



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

QQI COMPREHENSIVE POLICY DEVELOPMENT PROGRAMME

SUBMISSIONS

WHITE PAPERS

WHITE PAPER

Code of Practice for Providers of Programmes of Education and Training to International Students

WHITE PAPER

Quality Assurance Guidelines and Criteria for Providers of English Language Teaching Programmes

Consultation closed on
14th November 2014.

SUBMISSIONS

QQI received submissions for each of the White Papers from each of the following stakeholders:*

CODE OF PRACTICE FOR PROVIDERS OF PROGRAMMES OF EDUCATION AND TRAINING TO INTERNATIONAL STUDENTS

- » Trinity College Dublin
- » Irish Universities Association
- » Dublin City University
- » Griffith College Dublin
- » MIC, UL
- » National College of Ireland
- » Higher Education Colleges Association
- » University College Dublin
- » IT, Sligo
- » Castel Education
- » MEI
- » ELA Ireland
- » SEDA
- » Centre of English Studies

QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES

- » Griffith College Dublin
- » DCU Language Services
- » MIC, UL
- » Higher Education Colleges Association
- » Arena School of English
- » Atlantic Language, Galway & Dublin
- » Castel Education and Training
- » Frances King School of English
- » A2Z School of English
- » Language in Dublin
- » Dublin School of English
- » Horner School of English
- » Divine Word School of English
- » Waterford English Language Centre
- » Atlas Language School
- » Everest Ireland
- » EFL Ireland
- » MEI
- » ELA Ireland
- » Killarney School for English
- » Emerald Cultural Institute
- » Centre of English Studies

**The submissions have not been altered, except to divide feedback between the specific consultation documents to which they apply.*

**CODE OF PRACTICE FOR PROVIDERS OF PROGRAMMES OF
EDUCATION AND TRAINING TO INTERNATIONAL STUDENTS**

SUBMISSION BY:

Trinity College Dublin

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between the specific consultation documents to which they apply.*

Submission by: Trinity College Dublin

This response to the Code of Practice is provided in the context of previous discussions with QQI at which TCD has provided feedback on its concerns in relation to the Code and the IEM. In addition, TCD, and representatives of the IUA Registrars Group, are awaiting a planned meeting with representatives of the Department of Immigration to clarify the application of the Regulatory Reform of the International Education Sector and the Student Immigration Regime, which relate to aspects of the Draft Code of Practice for Public Consultation.

TCD is a Global University and has a strategic objective to grow and diversify our student population to 18% by 2019. We wish to reiterate our strong preference for differentiation within the IEM itself and in the method of assessment for the IEM that reflects institutional/provider type, context and history.

TCD preference is for an IEM specific to the University sector that mitigates the risk to our strategic objectives of adverse publicity associated with the performance of other sectors that are currently i) unregulated ii) not subject to public funding accountabilities, and iii) have not participated in cycles of external quality assurance reviews. Response to QQI Consultation Papers –due 14 November 2014

Specific to the Draft Code of Practice for public consultation, we note:

1. Language of the Code –the use of ‘shall’ in the criteria implies compliance and does not reflect the statement on page 4 that the criteria will ‘not to be so specific as to be constraining or overly prescriptive’. Clarity is required as to what is the minimum acceptable provision. It should be noted that expectations in respect of this code will not be met unless there is earmarked funding and the availability of the expert resources required to roll out, for example, a full programme of staff training on intercultural competence.

2. Concerns over profiling of international students over Irish domicile students arise under 1.1e and 3.1. As referenced above, a representative group of IUA Registrars plans to meet with Department of Immigration to agree key requirements with respect to the University sector?

3. Recruitment Agents 1.2: TCD support the position of the IUA with respect to Recruitment Agents i.e. that the HEA with Enterprise Ireland (EI) work towards a ‘preferred list’ of Agents and publish this list after having conducted a preliminary due diligence on Agents against National Standards. It is thought that a centralised role for the HEA and EI would offer a better incentive of continued good practice from an Agent rather than individual negotiations at an institution level. This would also allow an escalation process on complaints around Agents to a centralised authority and subsequent deregistration.

4. Volume capacity concerns: 1.3c TCD recommends a reframing of this criterion to say that ‘Providers will communicate a decision on the outcome of an international learners application for a place on a programme’. The specification of ‘in writing’ is deemed too onerous in the context of large numbers of international

students and again would serve to differentiate the level of service provided to international and Irish domiciled students.

5. Tuition and tuition-related fees, 2.1 and 2.2: TCD endeavours to provide comprehensive information to international students but is concerned with the directive in respect of publication of full costs. We recommend that the code provide some classification of compulsory as 'tuition-related', 'Sports Levy' and 'USI' levy. Specific courses may have additional costs e.g. Laboratory coats for STEM subjects, Seminars, Plays or Exhibitions for Arts & Humanities students, which are not always known upfront.

Under the University Act 1997, Academic Councils have authority to set fees; Trinity College reserves the right to change fees and we publish fees annually, and do not forecast fees beyond that.

TCD does not support 2.1d that students are provided with written assurance to students on fees.

Explanatory Notes: remove reference to Emergency Fund and Hardship and Emergency which were outlined in Draft 1 of the Code of Practice.

**CODE OF PRACTICE FOR PROVIDERS OF PROGRAMMES OF
EDUCATION AND TRAINING TO INTERNATIONAL STUDENTS**

SUBMISSION BY:

Irish Universities Association

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: Irish Universities Association

General comments:

The Code of Practice needs to allow for the QQI to differentiate between diverse categories of provider, based on profiles of students, institutional QA history, and existing range of institutional services provided by those categories of provider. In the opinion of the IUA, the lack of this differentiation has led to compromises in the White Paper in terms of clarity and terminology.

The unknown cost associated with the IEM represents a very significant issue for the universities, on top of the proposed “relationship fee” issues.

There are open questions regarding how QQI is planning to market the mark globally, and whether it has the competence for this. The difficulties linked to the diversity of providers within the IEM are inherent in these marketing challenges.

QQI needs to be able assess alignment of institutional practice with the Code. This is best achieved as part and parcel of the institutional review process, not a separate stand-alone review.

There are significant timing and sequencing issues associated with the roll-out of this Code of Practice and awarding of the IEM. It is important for the universities to know precisely what is planned in this area, given ongoing marketing and recruitment activities aimed at international students in a wide variety of contexts and geographical markets.

The universities would like to understand better what is QQI’s effective capacity to administer this Code of Practice and the IEM.

Detailed comments:

P5: the universities note that this is now clearly a compliance document.

P6: 1.1 e) “attendance requirements, as appropriate”. It will be crucial that the Dept of Justice also takes the same approach in this respect.

P7: 1.3 c) it is not realistic for the universities to provide a written explanation to all international applicants, detailing why that learner has not been offered a place. The universities agree that applicants need to receive clear communication regarding the provider’s decision to admit or otherwise (ie a reply), but that providing an explanation for this decision is not feasible. Large numbers of students from multiple countries are applying to the universities, some on a speculative basis, with increasing numbers using systems-based online application platforms designed by the universities and other agencies for these purposes. It would be helpful for QQI to clarify what “as appropriate” means in this context.

P8-9: 2.1 and 2.2

The language used in these sections is complicated, sometimes repetitive (e.g. 2.1. f and 2.2 a, b) and in cases potentially problematic, particularly when providers endeavour to provide learners on degree programmes (ie not short-term or exchange) with correct and complete information. The universities would suggest revisiting some of the wording in this section to cater for these aspects. For example:

- refer to “tuition related fees” and “other categories of costs”

- add a reference such as “students should be informed if fees are subject to annual review”

More specifically,

2.1. d) The language used here implies that providers are currently hiding costs. The universities would prefer to see a rewording of this, with incorporation of the intention currently contained under d) into a), for example:

2.1. a) Providers shall provide information on all compulsory fees (and anticipated other costs) for the full duration of the programme from entry and registration to graduation or exit from the programme.

The universities would like QQI to acknowledge that it will be prove difficult if not unrealistic to provide 100% exhaustive information in all cases, particularly for longer programmes (4-5-6 years), given the nature of such programmes and the relevant and desirable co-curricular activities undertaken within them at the initiative of individual academic staff and student groups.

P10-11:

Section 3. There is a danger in this section that the proposed Code of Practice will lead - for the purpose of demonstrating compliance with the Code - to the unintentional isolation of international students from other learners in terms of how pastoral care and academic services are organised and provided. While it is recognised that certain groups of international students may have more specific needs for aspects of this pastoral care and these academic services, international students need to be encouraged to participate in and engage with mainstream provision in this areas, including normal module, course and other feedback mechanisms.

For example, the draft proposal that “Providers shall facilitate and encourage feedback from international learners and seek to identify themes arising from feedback from international learners” could be understood as requiring providers to run separate parallel feedback mechanisms for international learners, not linked to the rest of the student body.

In the proposal that “Providers shall offer in-sessional supports”, it is not clear what “in-sessional” is intended to mean.

3.3 The universities note and acknowledge the importance of staff training in this area. However, it is not clear what is expected under this proposal, from a compliance perspective.

Explanatory notes:

P13: The explanatory note re “hardship and emergency” should be removed. There is no other reference in the document to “hardship”, and the issue of “emergency” is covered earlier in the explanatory notes under “emergency fund”.

**CODE OF PRACTICE FOR PROVIDERS OF PROGRAMMES OF
EDUCATION AND TRAINING TO INTERNATIONAL STUDENTS**

SUBMISSION BY:

Dublin City University

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: Dublin City University

General comments:

(1) The overall cost of applying for and obtaining the IEM should not be prohibitive given that realistically it is not an optional award.

(2) It would be helpful if QQI / HEA could be involved in providing information on and marketing the IEM internationally.

(3) Care should be taken throughout that the guidelines for international students are not excessive in relation to the provision of pastoral supports and services, particularly in comparison with those provided to domestic students.

Page 5:

(a) Regarding the provision of 'clear, unambiguous' information, although this will be a key objective, due to cultural perspectives perceptions of clarity can vary considerably.

(b) It is very difficult to ensure that 'all matters' pertaining to a programme is available before enrolment.

(d) There may be other ways for a provider to assist with queries from international students rather than solely providing individual staff member contact details.

Page 6: 1.2.a It is unclear what is meant by 'all relevant financial' information.

Page 7: 1.3.c It is suggested that this statement be rewritten in order to address (i) not treating domestic students differently and (ii) restate to remove 'explanation in writing', change to 'inform applicants of outcome' or 'communicate decision'. An explanation in writing to all unsuccessful students would be time-consuming and difficult.

Page 8: 2.1.a Fees are generally set from year to year, so providing information on fees for the duration of the programme (for up to 4 years) may be problematic. The fact is that they don't change very fast, but over 4 years may well increase. Suggest change this to '...provide information on all compulsory fees and related expenses for the full..'. It is also suggested that a definition of the term 'compulsory fees' is included in the Explanatory Notes at the end of the code.

2.1.c This may be too specific a requirement as fees and other costs are determined in many different ways, using differing criteria from year to year.

2.1.d The term 'hidden costs' might imply an attempt to conceal costs. However, for research degrees for example, a student might claim that doing fieldwork or attending specific training is necessary for the programme. Currently DCU publishes 'indicative costs' of engaging with the research for each school. Actual costs might be higher or lower, which may only emerge years into the programme, but there is no intention to hide anything.

Page 9: 2.2 There appears to be some repetition of principles here from 2.1.

Page 10: (d) An induction programme can be offered, but may not be availed of by students.

Page 11:

3.2.b Academic induction can be 'offered' but may not be taken up by students. There may be repetition here of requirement in 3.1.d.

3.2.e DCU does currently provide an English language module for post-graduate researchers which may result in an additional cost.

3.3.a It is not clear what is meant by 'intercultural competence'. If this requirement includes both lecturing staff as well as admin, technical, security, catering and others, this will be a new demand requiring considerable financial and human resources.

Page 12: Accommodation: 'Student' used here, not learner. Also suggest changing to '... in which students reside for the duration of their studies', to keep the non-gender specific pronoun while matching up the plural with plural.

Agent: Suggest change to 'A person or organisation contracted to act on behalf.....'. Also an agent does not recruit students, however it can suggest them to a provider for enrolment / recruitment.

Alumni: Regarding 'former students' should this be 'former learners'? Also, if students drop out of a programme, or transfer without completing, are they still regarded as alumni?

Due Diligence: The following part of the second sentence is unclear – '., and enhances the following decision-making by identifying risks'.

Emergency Fund: This should only apply in hardship cases.

Page 13: Fees/Tuition Fees: Such a fixed sum is not currently provided to 'local' students.

International Education Mark (IEM): Regarding '... in Ireland' – Does this mean that if the provision is based outside of Ireland that the IEM does not apply? E.g. DCU provides programmes in Princess Nora University (PNU) in Saudi Arabia. When the IEM is awarded to DCU, will it also apply to PNU?

Recruitment: Refer to comment re Agent above. An agent cannot select or enrol new students.

**CODE OF PRACTICE FOR PROVIDERS OF PROGRAMMES OF
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SUBMISSION BY:

Griffith College Dublin

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Submission by: Griffith College Dublin

Query: There has been a move to use the term learner rather than student to reflect the diversity of candidates taking training and education programmes.

Is there a similar case for referring to International Learners?

Introduction: Page 2 Relationship with Quality Assurance

Reference to the collaborative, trust and partnership relationship is welcomed as is the collective responsibility for quality provision for international learners.

“.....In respect of each programme of education and training of the provider which leads to an award, that award is recognised within the National Framework of Qualifications.”

Question: What does “recognised” mean? Would it include awards from other jurisdictions “recognised” within the Irish NFQ by alignment of the Irish framework and the relevant foreign framework (of the award).

Suggestion: The code draws upon and informs good practice ...

Page 11

3.2 Academic Supports and Services

“d. Providers shall ensure, where possible and appropriate, that there is a balance of international and domestic learners in different learning settings (classrooms, tutorials, project-work etc.).”

Suggestion: This might refer to a balanced representation of learners with English as a mother tongue and other learners and a balance between nationalities to avoid the undue presence of one nationality in a class.

Page 11

3.3 Staff Training

“a. Providers shall ensure that staff are provided with training and support regarding.....”

Suggestion: a. Providers shall ensure that staff and students are provided with training and support regarding.....

Page 18

Learner Resources

“Department of Justice and Skills...”

Suggestion: Department of Justice and Equality

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SUBMISSION BY:

MIC, UL

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Submission by: MIC, UL

Introduction Section

- **P. 3** *“These requirements specifically relate to the pastoral care, including support services and information provision, of international learners by the provider.”*

Feedback: Are there going to be QQI guidelines for the pastoral care, support services and information provision of international learners, particularly in emergency situations where an international student is very ill (physically or mentally) or has a serious accident?

This issue arises again on **P. 10 (3.1, f)**: *“Providers shall have mechanisms in place to support international learners in instances of personal difficulty or other emergency.”* Does the QQI have guidelines/expectations in relation to these mechanisms?

Section 1: Marketing, Recruitment and Admissions

- **P. 6 (1.1, e)** *“Providers shall state any attendance requirements and make sanctions for those who do not fulfil requirements clear”*

Feedback: This requirement makes sense but monitoring attendance of international students is problematic in larger, fully integrated classes in HEIs (e.g. students sign/swipe in for their friends or sign/swipe in and leave). Do we just take attendance for international students only? How does the QQI propose to monitor this?

Section 2: Finance, Fees and Living Costs

- **P. 9 (2.1, h)** *“Providers shall provide information on any supports or resources that exist at a national level for international learners.”*

Feedback: Who is this referring to? Does this mean ICOS or the Learner Resources listed on page 18 of the White Paper, or are there other suggested supports that relate more closely to Finance, Fees and Living Costs? This needs clarification.

Section 3: Supports and Services for International Learners

- **P. 10 (3.1, f)** see **P. 3** above

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SUBMISSION BY:

National College of Ireland

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Submission by: National College of Ireland

More specifically we welcome the Code's three components that provide clear guidelines for providers and their agents with respect to:

1. Institute and Programme Information Provision
2. Finance
3. Support Services

Within Component 1, we specifically welcome the adoption of the spirit of the "London Statement" on behalf of the Provider's Agents.

While it may be outside the scope of the white paper, we are keen to see the proposed process and timelines for authorisation and approval to use the International Education Mark.

**CODE OF PRACTICE FOR PROVIDERS OF PROGRAMMES OF
EDUCATION AND TRAINING TO INTERNATIONAL STUDENTS**

SUBMISSION BY:

Higher Education Colleges Association

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Submission by: Higher Education Colleges Association

Page 2: Relationship with Quality Assurance: Under this heading it states “in respect of each programme of education and training of the provider which leads to an award, that award is recognised within the National Framework of Qualifications”. HECA would like clarification as to what “recognised” means? Would it include awards from other jurisdictions “recognised” within the Irish NQF by alignment of the Irish framework and the relevant foreign framework (of the award)?

Page 11: 3.2: Academic Supports and Services: Under this paragraph (d) it states “Providers shall ensure, where possible and appropriate, that there is a balance of international and domestic learners in different learning settings (classrooms, tutorials, project-work etc.)”. HECA does not agree with this statement and believes that this should refer to a balanced representation of learners with English as a mother tongue and other learners and a balance between nationalities to avoid the undue presence of one nationality in a class.

Page 11: 3.3: Staff Training: It is stated under Paragraph (a) “Providers shall ensure that staff are provided with training and support regarding intercultural competence to facilitate an appropriate and effective delivery of services to international students”. HECA believes that this statement should include “staff **and students**”

Page 18: Learner Resources: Department of Justice and Skills should read ***Department of Justice and Equality***.

**CODE OF PRACTICE FOR PROVIDERS OF PROGRAMMES OF
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SUBMISSION BY:

University College Dublin

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Submission by: University College Dublin

UCD will continue to support the need for a robust quality assurance framework and well regulated higher education sector, not least, for the protection of learners - home and international. UCD will also continue to comply with national and international developments/requirements in these domains.

The quality of university programmes and the student experience, is assured, *inter alia*, through regular internal and external quality review. The White Paper: Code of Practice - International Education Mark, however, considers Designated Awarding Bodies, such as UCD, in the same light as a largely unregulated sector currently providing education services to international learners. This lack of differentiation is unhelpful.

General Points:

- Given the diversity and number of institutions potentially involved (and also reflecting a considerable range of risk) - eg large public institutions; English Language providers; and everything else in between - we are concerned that there is no apparent differentiation between these institutions - neither in the 'standard' or 'grade' of the Mark (eg silver/gold), nor in the potential assessment mechanisms. Is it appropriate that a 'one size fits all' model' is applied given the diversity of institutions providing education services to international learners in Ireland? UCD would support some differentiation, perhaps based upon a categorization of risk.
- The uncertainty of the fees to be applied and how this will be calculated is unhelpful. This is compounded for the university sector as a significant sum is already levied from institutions under the annual 'relationship fee'.
- We are unclear as to how the Mark will be promulgated as a 'national brand.' Who has this responsibility?
- It is unclear who will evaluate applications from institutions.

Specific Points:

1. Page 3 - there is a reference to 'threshold standards' - but this phrase does not occur anywhere else in the document
2. Page 5 - there is a reference to *recruitment being undertaken.....in'ethical manner'*. No definition is provided - how will this be evaluated? We would also anticipate issues around consistency of interpretation- again, compounded by the diversity and number of institutions
3. Page 6, 1.2 a - there is reference to the '*.....provision of all relevant financial information'* - what does '*relevant'*' mean? Who decides what is '*relevant'*'? Is it the same standard for all institutions?
4. Page 7, 1.3 c - *the requirement to provide written feedback to an international learner who did not obtain a place.....as appropriate*. Who decides when it is or is not appropriate? How will this be evaluated? The requirement does not appear to factor in scale - again this reflects the range of institutional types eg one institution may deal with 50 such communications per year, while another

institution may have to handle 5,000 plus such 'individual' communications - there is a significant resource implication here. It be more helpful to state that *'feedback will be provided to learners upon request'*. Related to this, is the issue of consistency/equity of treatment in relation to 'home' students who apply through the CAO system -these applicants do not receive individual written communications if they do not obtain a place.

5. Page 8 - Principle - there is reference to the provision of *'.....clear, unambiguous and up-to-date information.....'*. The Code should perhaps also require that this information is provided in an integrated and coherent manner - as stated, it does not guarantee the utility of the information provided.
6. Page 8, 2.1 b and c - relating to tuition and tuition-related fees: reference to providing information (b) *'as relevant ..on debt collection processes.....'* this is too prescriptive - further, there may be a variety of mechanisms used to recover monies owed - to indicate all these may be problematic. And again, who decides 'what is relevant'? (c) who decides and/or how will it be evaluated that *'.....a fee structure supports the mission of the institution.....'*?
7. Page9, 2.2 - this section appears to duplicate/overlap with 2.1
8. Page 11, 3.3 - *'Providers shall ensure that staff are provided with training and support regarding intercultural competence.....'* Would training of staff be mandatory before staff have contact with international learners? Who/how will the appropriateness of the training curriculum be evaluated? Again, the scale of operations impacts here - one institution may only have 5 staff, whereas another could have 3,000 plus.

**CODE OF PRACTICE FOR PROVIDERS OF PROGRAMMES OF
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SUBMISSION BY:

IT, Sligo

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Submission by: IT, Sligo

General comments

1.2e – Due Diligence on Agents:

This is something that would require further clarification as to the exact nature of proposed due diligence.

Example: If we are dealing with a former student who is just setting up an agency then how is he or she supposed to provide references etc.

1.2g – relating to the London Statement and its periodic implementation:

I think this is an important point. The London Statement principles are outlined as follows...

Principle 1 - Agents and consultants practice responsible business ethics.

Principle 2 - Agents and consultants provide current, accurate and honest information in an ethical manner.

Principle 3 - Agents and consultants develop transparent business relationships with students and providers through the use of written agreements.

Principle 4 - Agents and consultants protect the interests of minors.

Principle 5 - Agents and consultants provide current and up-to-date information that enables international students to make informed choices when selecting which agent or consultant to employ.

Principle 6 - Agents and consultants act professionally.

Principle 7 - Agents and consultants work with destination countries and providers to raise ethical standards and best practice.

The question is the ability of smaller institutions (such as IT Sligo) to ensure all Agents comply with the principles laid out above. This goes beyond a simple code of practice when the implications are that participating institutions may lose the IEM if they (or their agents) are found to be in breach.

Therefore there is a need to establish what is “reasonably” expected of Institutions in relation to monitoring of the above.

1.3c – Relating to written explanations to the learner of refusals:

Is our practice to provide written reasons for any application declination to student applicants? Oftentimes we do not have a direct relationship with the student applicant (e.g. scholarship agencies; bilateral partners or agents).

2.1f – relating to provision of accurate cost of living estimates:

This is difficult to accurately assess. An average cost breakdown guesstimate of €6,000 per annum is probably appropriate. However students from different backgrounds will spend less or more than this figure.

2.1h – Providing Information on national supports or resources to students:

Please define! Can we have some examples of this please?

3.1b – Relating to prior information on transport and accommodation services:

It is our practise to organise orientation upon arrival. Students are expected to notify the International Office of their arrival and within reason are picked up from the airport (first time arrivals only).

IT Sligo does not have an accommodation office which is certainly an issue for us in relation to formally engaging on this subject.

International Office staff do work to secure accommodation upon arrival but it is not possible for us to engage with students on the matter prior to arrival other than direct them to third party websites or providers such as DAFT.ie or Clarion Village / The Grove Student Accommodation.

3.1d – Induction at various times of the year:

The Institute currently provides a formal induction and orientation program to International students at the beginning of the September term.

It is not possible to provide the same level of induction for students arriving late or indeed for later intakes such as that provided to the January ESME SUDRIA students from France.

3.3a – Staff Training:

We agree with this and there are mechanisms to enable this however it would need to have staff engagement.

Explanatory Notes – Page 12

Emergency Fund – I cannot find it mentioned in the main document so why is the explanatory note required?

Explanatory Notes – Page 13

Fees / Tuition fees – They say that this is a “fixed sum” but then mention photocopying as an example...this should just refer to the tuition fee/ medical insurance. All other costs are variable.

Summary

In summary, I think the White Paper is an improvement in general terms on previous iterations but it still shows a lack of understanding on the resource implications that full compliance will entail. It also fails to fully appreciate the relationship between institutions, agents and applicants. There are also some areas, as highlighted above that require clarification and a lot questions arise as to the implications for “policing” of the code and the procedures and or sanctions for dealing with elements of non-compliance.

**CODE OF PRACTICE FOR PROVIDERS OF PROGRAMMES OF
EDUCATION AND TRAINING TO INTERNATIONAL STUDENTS**

SUBMISSION BY:

Castel Education

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Submission by: Castel Education

1.1 Marketing

ELP

· Castel Education is contracted by the Kuwait Cultural Office to provide an English Language Programme for Kuwaiti students wishing to study specific programmes in Ireland but whose English Language level is not sufficient for entry to Commencement/Undergraduate Programmes.

IMCP

· All students on the IMCP are recruited by RCSI and NUI Galway following agreement with the relevant Cultural Office on the number of places available each year.

· All students are on each country's scholarship list.

· Students are provided with full details of the IMCP.

1.2 Recruitment

ELP

· The Kuwait Cultural Office provides Castel Education with a list of students who have obtained Kuwaiti Government scholarships to prepare them for their appropriate Commencement/Undergraduate Programme.

2. Finance: Fees and Living Costs

ELP

· All students coming on the ELP are funded by the Kuwaiti Ministry of Higher Education through the Kuwait Cultural Office for both tuition and accommodation and subsistence.

IMCP

· All students coming on the IMCP are funded by their relevant Ministry of Higher Education through their Cultural Office for both tuition and accommodation and subsistence.

· Castel Education has no involvement in setting/collecting fees or scholarship rates.

3. Supports and Services for international Learners

ELP and IMCP

· Castel Education provides a range of pastoral and academic supports and services in addition to the menu of services available to students of IT Tralee.

**CODE OF PRACTICE FOR PROVIDERS OF PROGRAMMES OF
EDUCATION AND TRAINING TO INTERNATIONAL STUDENTS**

SUBMISSION BY:

MEI

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Submission by: MEI

There has been very strong reaction to the Draft 2 Code of Practice as published. We do not see it as in any way addressing the ELT sector and seems designed for third level providers.

MEI submitted a proposed Code of Practice for ELTOs to QQI and nothing from that has appeared in this Draft.

It is our view that Draft 2 is not context specific and treats only international students in third level colleges.

Our proposal is that the Code of Practice that we submitted to QQI should be included as Appendix 1 in Draft 2. It should be integrated into Draft 2.

In Draft 2 there are details which ELTOs would find totally unacceptable eg. **2.1.6** regarding hardship.

The defence that a lot of the content of the MEI Code of Practice submitted to QQI is now part of the QA does not stand up as Draft 2 CoP is contextualised by third level concerns. It is not generic.

The commercial model addressed in Draft 2 is a third level one.

Whilst we greatly appreciate the time and work devoted to producing this draft we remain of the view that it is not ELTO friendly.

**CODE OF PRACTICE FOR PROVIDERS OF PROGRAMMES OF
EDUCATION AND TRAINING TO INTERNATIONAL STUDENTS**

SUBMISSION BY:

ELA Ireland

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: ELA Ireland

As a member of the MEI Academic Committee, we produced a draft Code of Practice over a three month period in 2013, and submitted it to QQI in the hope that it would be considered when the Code of Practice for Providers of Programmes of Education and Training to International Students was being drafted. A lot of work went into the development of this document from many experienced practitioners in the ELT Sector.

I, and my colleagues are of the view that nothing of our submission was considered and that the draft document, as it currently stands, is not fit for purpose for the ELTO sector.

While I accept that there is a statutory requirement in that there can be only one Code of Practice for international students, this does not prevent there being an Appendix A, containing a specific Code of Practice for ELTOs.

At the very least, there should be an Appendix of the lists of types of providers and of which part of Code of Practice applies to which sector.

The current draft document should be coded in such a way that it is immediately clear which sector/provider is included/excluded in each line/section of the draft Code of Practice. However, we feel that for the draft document to be in any way meaningful, there should be separate sections for each sector perhaps encompassing an introduction and conclusion that would be relevant to all sectors.

It is my view that unless such arrangements are in place then the Code of Practice, as currently constituted in draft form, is not fit for purpose.

May I suggest that you consider including the MEI Code of Practice as an Appendix A to the current document which may go some way to redressing the shortfall in this draft document.

**CODE OF PRACTICE FOR PROVIDERS OF PROGRAMMES OF
EDUCATION AND TRAINING TO INTERNATIONAL STUDENTS**

SUBMISSION BY:

SEDA

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: SEDA

As part of the consultation process, we would like to make the following comments:

- That the purpose of the code to be a key part of the national strategy to strengthen Ireland's reputation for provision of Education and Training to international learners is to be welcomed.
- That the first principle that recruitment of international learners shall be conducted in a transparent and ethical manner is consistent with SEDA's vision for course provision
- That the associated criteria with the first principle, i.e. marketing, recruitment and enrolment information provision are appropriate. In particular we welcome the incorporation of the London statement, which helps regulate the use of agents for recruitment of students.
- That the second principle providing international learners with clear and up-to-date information on all study costs including subsistence and accommodation is appropriate.
- That the third principle concerning the integration and support of international learners is appropriate, in particular we welcome the areas highlighted by section 3.1 'Pastoral Supports and Services'

**CODE OF PRACTICE FOR PROVIDERS OF PROGRAMMES OF
EDUCATION AND TRAINING TO INTERNATIONAL STUDENTS**

SUBMISSION BY:

Centre of English Studies

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: Centre of English Studies

Does this require a separate section for junior learners? If so, it should include pastoral responsibilities, minimum academic standards, duty of care, support structures, vetting of staff and families, and child protection codes which are compliant with Irish and European law.

QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES

SUBMISSION BY:

Griffith College Dublin

The submissions have not been altered, except to divide feedback between the specific consultation documents to which they apply.

Submission by: Griffith College Dublin

This is a most helpful, comprehensive and positive document. It is likely to be of very considerable assistance in guiding and developing the sector.

Section 2.3.c: The commitment of QQI to contribute to the development of international best practice is to be applauded.

Similar explicit commitments to contribute to and inform developments in the international HE / FE sectors would be helpful in setting aspirations and expectations nationally.

Section 3.4.a: The 'enhancement' orientation and collaborative nature presented of QA is most encouraging and to be welcomed.

Page 36 Guidelines: This is a most positive presentation of the reflective nature of QA and its role in institutional development.

QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES

SUBMISSION BY:

DCU Language Services

The submissions have not been altered, except to divide feedback between the specific consultation documents to which they apply.

General Query	<p>Has the DCF been REPLACED by the QA policy or will DCF be a PART of QA policy?</p> <p>What is the relationship?</p>
General Query	<p>What is involved in the application procedure to have QA policy approved (Jan 2015)?</p> <p>What is the fee?</p> <p>What documentation is required for the application stage?</p>
General Query	<p>Several references throughout the document to exams and assessment. However, there is no specific mention of end – of programme exams/ exit exams which have been a feature of previous regulations</p> <p>Are all students on every type of programme required to take an internal end-of programme (different to weekly class/ progress tests)?</p> <p>What about students who only enrol for very short periods? (1/2/3 weeks?)</p> <p>What about students on specialist courses/ professional development course where the aim is for example to explore pedagogic strategies rather than achieve a certain improvement in language ability?</p>
General Query	<p>Not specifically mentioned in THIS document but related to various criteria about programmes and hours of study.</p> <p>There has been slight discrepancy in documentation from between ACELS and INIS in relation to regulations about the timetabling of programmes. For full time day-time study programmes, what is the latest approved finish time? 5pm or 6 pm?</p>
General Query	<p>A lot of the criteria related to “programmes”, are clearly very relevant, desirable and feasible for standard, scheduled courses. However, they would be more challenging to fulfil or apply to bespoke programmes where the client requests specific tuition hours, delivery, content etc. This is particularly the case when there is little lead time for such bespoke programmes and where classes are made up of mixed ability.</p>

Page	Section & Subsection	Comment / Query/ Suggestion
2	1.1	What is the situation for providers of ELT to young learners (ten years or younger)? What organization governs this? What are the criteria and regulations for this sector?
2	1.1	What is the situation if provider delivers programmes outside Ireland? ELT programmes Teacher Development programmes
11	i	Is there a template for the SER that providers can access from QQI?
14	5.1 Guidelines	Section on <i>separation of responsibilities</i> between those who develop programmes and those who approve them. In small/ medium schools this might have to be same person/ group. Can this situation be accommodated in the criteria?
14	5.1 Guidelines	There is mention of " <i>submission for certification</i> " Are there any guidelines from QQI on what features should/ must be included in provider-issued certification to students?
16	ii	Do providers have to provide intercultural awareness for all staff (including non-academic staff)?
16	5.3.a.iv	Do the criteria for <i>minimum qualifications</i> apply to all existing staff (for example, long-term staff who have been established in their position for a significant number of years)?
19	5.3.c.i	Request that the expression " <i>documented outcomes</i> " be clarified and defined. Does this entail keeping minutes of all forms of staff meetings (teacher meetings/ academic team meetings/ programme-team meetings/ management meetings)? OR Does it mean providers must document action taken as a result of decisions taken at meetings
19	Guidelines	Will email correspondence to host families suffice in terms of the criterion " <i>effective channels of communication</i> "?
21	5.4 i-iv	There are issues defining a programme (in a personalized format) in a continuous enrolment context for both long-term and short-term

		<p>students.</p> <p>Also, there may be challenges defining <i>programme end-of component learning outcomes</i> in mixed ability groups. Client organizations may send one group of students, where there is a wide spread of levels, for a CLOSED programme</p>
21	5.4 ii	<p>Request clarification regarding “<i>resources total</i>”.</p> <p>Does this refer to or include <i>numbers of staff / hours of input /equipment /facilities /core materials /supplementary materials /assessment tools/ other resources?</i></p>
21	5.4 iv d	<p>“<i>Guided learning hours</i>”</p> <p>Request clarity regarding this section. Does it refer to set homework or additional self-study or both?</p> <p>What are the industry guidelines on number of hours students should spend on self-directed learning and how will this concept account for variety of factors such as the L1 and degree of cultural difference etc. that impact on rates of progress</p>
21	5.4 iv e	<p>Request clarification on the term “<i>facilitate learners...</i>”</p>
22	5.4 a	<p>Request clarification on the criterion “<i>Holidays and breaks... should only normally ... after the first eight weeks</i>”</p> <p>What degree of obligation/prohibition does this impose?</p> <p>Is it a guideline, a suggestion or a rule?</p>
22	5.4 vi b	<p>“<i>Junior programmes must address Irish life and culture</i>”</p> <p>Why is this a “MUST” criterion?</p>
22	5.4 v c	<p>Request clarification of the issue that “<i>programme design must address entry to end-of-programme Public Proficiency exams and recording learners’ results</i>”</p> <p>What does “address” mean in real terms? - Encourage students to enrol/ Provide all the required information about exams and exam dates/ Enforce exam enrolment?</p> <p>If providers are to be responsible for these two requirements, tell providers exactly how they can ENFORCE / INSIST? Please provide realistic, workable, practical method of doing this.</p>
		<p>What are the guidelines for “<i>remedial</i>” routes</p>

22	5.4 v d)	Does this refer to additional hours outside the fixed programme hours or to students repeating part or all of the programme?
24	5.5 a i c	Are the terms “ <i>common room</i> ” and “ <i>recreational areas</i> ” interchangeable
24	5.5 a ii	“ <i>Emergency</i> ” situations. Request more clarification on the types of policies and procedures to be established. Is the criterion limited to normal hours of business? What locations are included in this? On site and / or locations which are included in social programme
25	5.5 a x a)	“ <i>Maintaining secure learner records for current and historical use</i> ” Please clarify “ historical ” . Are records required to be kept AFTER students leave the school? If so, for how long If so, WHICH types of records relating to students have to be kept once student has departed?
27	5.5 b v c)	See point 5.4 i-iv above How detailed must the <i>Programme and Syllabus</i> for STUDENTS be? Are providers expected to produce a personalized student programme for each student? How can providers practically provide personalized programme and yet still take into account normal variations that might occur during a period of tuition: students improve and move levels, core texts may change / classes may merge when shrinkage in enrolment occurs etc.
27	vii	Clarification on “ <i>remedial support</i> ” . Does this mean extra tuition time with a designated teacher or access to self-study materials?
27	Guidelines	Does the guideline suggest that every programme has to be delivered by a minimum of two teachers? Has individual context been taken into account? e.g. Specialist nature of some programmes, requires teachers with very specific skill set/ knowledge Short intense nature of some programmes Location of different classrooms (in different buildings/ premises/ spread out) may make sharing of delivery very difficult i practical

		terms (timing to relocate, movement of equipment and materials).
28	5.5c Guidelines	<p>View of Learners: Feedback should be sought on issues such as “Health and Safety”</p> <p>What exactly does this refer to?</p> <p>-Asking students about specific criteria regarding provider premises? Information on H&S made available by provider? Health and Safety in accommodation / associated with social activities?</p>
33	5.8	<p>How is the PEL going to work in reality? What are the implications regarding school closures...will remaining providers have to take a % of these students in for “free” programmes?</p> <p>And is so, for how long?</p> <p>Will the remaining providers have to commit to “adopting” the affected students for a percentage period/ the remainder of students’ programme/ a pre-determined fixed “MINIMUM” period?</p> <p>How will be the affected students be “distributed” amongst remaining providers?</p> <p>If providers “adopt” remaining students, will there be a formal obligation (T&Cs issued by QQI) on these students to comply with the timetable, procedures and code of conduct etc. of the adopting provider. These maybe quite different to those of the previous provider</p>
33		<p>Is a draft available from QQI of a document to be sent to students at booking stage to explain the Provider’s Student Protection Policy</p>

QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES

SUBMISSION BY:

MIC, UL

The submissions have not been altered, except to divide feedback between the specific consultation documents to which they apply.

Submission by: MIC, UL

Section 5.5 Teaching and Learning

- **P. 24 5.5a ii)** *“The provider must establish policies and procedures and appoint responsible staff in relation to emergency situations.”*

Feedback: Are there going to be QQI guidelines for these policies and procedures?

Section 5.6 Assessment

- **P. 30 5.6, xi)** *“Providers must have policies and procedures in place for the selection and appointment of external authenticators with sufficient independence and subject matter expertise.”*

Feedback: Can our existing HE external examiner structure be used, whereby we appoint our own external authenticators from another academic institution with sufficient independence and subject matter expertise, or does it have to be an authenticator from a QQI-approved ELT school?

**QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR
PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES**

SUBMISSION BY:

Higher Education Colleges Association

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: HECA

HECA would welcome clarification on the implementation date. The Guidelines are due to be enforced from January 1st 2015. It is presumed that the Guidelines as they relate to ELT in HE are for enforcement on the same date, notwithstanding HE's IEM process which is due to begin in mid-2015.

Scope of Guidelines: Previously, ACELS regulations stated that regulations applied to a section of an organisation. These new Guidelines refer to the provider and not a specific centre or section, "regarding education providers with an English Language Teaching section, all promotional materials must ensure that it is clear that recognition is for the ELT department not the whole organisation". This implies that all English Language teaching modules, programmes and courses would adhere to these Guidelines. This directive expands the Guidelines from a dedicated English Language section to the whole institution as it relates to ELT provision.

HECA would welcome clarification on which sections of an organisation apply to HE? An earlier note received from QQI stated that "It is important to note that the following parts of the draft guidelines, which relate specifically to ELT provision, are applicable to all providers who offer ELT as part of their provision:

Staff Recruitment & Staff Management, Section 5.3a, 5.3b

Programme Design, Section 5.4

Resources, Facilities and the Learning Environment, Section 5.5a

Delivery and Learning Opportunities, Section 5.5b

By implication it infers that Staff Communication, Staff Development and Feedback are not applicable to all providers who offer ELT as part of their provision. HECA believes that guidelines should be all-inclusive of systems and processes in the effective management of ELT provision. It is difficult to separate what is a relevant guideline and what is not. Should there be separate guidelines for HE institutions? This allowed under the Act (Section 27 (6) (a).

Why is it not explicitly stated which sections apply to which sector?

On Page 2, the White Paper refers to two types of awards for programmes:

ELT programmes leading to awards made by QQI and

ELT programmes leading to awards recognised within the NFQ.

What is the difference between a QQI award and awards recognised within the NFQ? Are they not the same?

Is it envisaged that currently ACELS accredited Schools offering ELT courses would have these courses designated as QQI awards? Does a QQI award refer to FETAC courses of English?

The HE Context: Some HECA members operate within the Higher Education context where ELT is also provided. Within that context, a high degree of autonomy is afforded by QQI to teachers and lecturers in the areas of teaching, learning and assessment. Learning is organised with appropriate teach methodologies and assessment carefully and rigorously applied. Will these new Guidelines recognise that the HE context is substantially different from that of sole ELT providers?

Assessment – Proficiency Exams:

On Page 22 reference is made to “Public Proficiency exams”. This terminology is unclear. Does it refer to IELTS, Pearson, Cambridge, TIE, ETAPP, TOEFL, TOEIC, etc.? Does it also refer to any proficiency exam advertised to the public such as the NCI Test? Some providers design their own proficiency tests as an integral part of their delivery. It is presumed that this practice can continue as normal.

Will new courses developed by HE providers require external examinership of their proficiency tests?

Does QQI foresee a role for the State Examination commission in the devising of national Public Proficiency Exams?

On October 7th 2014, the then Minister gave the following answer to a question in the Dáil in relation to Cambridge qualifications in English which may now be disallowed.

Deputy Charlie McConalogue asked the Minister for Education & Skills “if the following current qualifications for English, Cambridge, ICM, CTH, EDI Pearson, ABE will be recognised under the 2015 arrangements and if she will make a statement on the matter. The answer to which was “The regulatory reform of the international education which I recently announced with the Minister for Justice and Equality, requires that the programmes concerned lead to awards made by Irish awarding bodies, such as the universities or QQI. Therefore, providers will not be permitted to recruit non-EEA students to programmes leading to the awards referred to by the Deputy”.

HECA would welcome clarification on this point.

Cost and Practicality of Public Proficiency Assessment:

Should QQI consider permitting higher education providers that offer ELT to design their own “Public Proficiency Examinations” and apply their approved QA procedures with regard to External Examiners etc. in order to fulfil the requirement? The cost of assessment using IELTS is €193 per candidate which adds up to 10% to the cost of running a 12 week English Language programme. Previously, the requirement for external examinations was restricted to 25 week courses.

The practicality of booking external examinations on suitable dates can be limited by the availability of places and the need to ensure progress of the learner from one level to another

Often examination date availability does not coincide with 12 week terms or semesters. Thus, students often have to take the examination in week 7 or 13 due to lack of availability. This inflexibility often hinders timely learner progression.

IELTS/TOEFL/Cambridge scores have a 2-3 week score reporting timeline. Thus a 12 week learner taking a test in Week 13 may not receive an external result until Week 16 and may, therefore, miss a progression date.

This requirement operates against HE institutions that operate an externally assured and examined proficiency examination and can create problems in ensuring efficient learner access, transfer and progression.

QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES

SUBMISSION BY:

Arena School of English

The submissions have not been altered, except to divide feedback between the specific consultation documents to which they apply.

Submission by: Arena School of English

3.2 c QA Procedures

Does this section propose that tasks are assigned to individuals within the organisation or is it acceptable for tasks be assigned to a particular role? Assigning tasks to roles may be more practical to allow for changes in personnel.

5.3.a Staff Recruitment

(iv)

We have some concern regarding the proposed minimum qualification requirements for Academic Managers. We advocate that there be legacy period for academic managers who are already in place and who have demonstrated the required experience in the field in order to allow them time to up-skill and meet the new criteria.

5.5.a Resources, Facilities and Learning Environment

(vi)

It is unclear what is considered to be 'appropriate educational technology'. More detail could be provided here to avoid ambiguity.

(x) a

An exact time period for learner records to be maintained could be specified.

5.8 Protection of Enrolled Learners

(i)

It is unclear whether there are further categories of information which are required to be made available to learners prior to enrolment. Are these categories confined to the examples given in 5.8 (i) or are there further categories.

What are considered acceptable ways to make this information available to learners?

(ii)

Do PEL agreements apply to part-time courses e.g. part-time evening courses?

(iii)

It is unclear as to what form the assistance in this section entails.

QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES

SUBMISSION BY:

Atlantic Language, Galway & Dublin

The submissions have not been altered, except to divide feedback between the specific consultation documents to which they apply.

Submission by: Atlantic Language Galway & Dublin

1 Introduction

Who they apply to

It is listed that these guidelines do *not* apply to ELT programmes to young learners (ten years old or younger). Many programmes for young learners include those aged up to 11/12 (primary school age). If a programme is aimed at primary-school-aged learners up to 11/12, is it subject to the guidelines?

Guidelines also do not apply to au pair placement services of fewer than 15 hours per week. Is this also the case for non-EU students?

Providers' Quality Assurance Policies and Procedures

QA Procedures

Are the duties of *responsibility* and *monitoring* to be assigned to different departments/roles/people?

What form of indicative evidence is to be produced? Should this be assessed separately; by an individual not involved in the monitoring?

Internal Monitoring

Paragraph 3: Remedial action contingencies to be in place, or cases of procedures being ineffective to be reviews on a case-by-case basis?

Self-evaluation and Enhancement

Paragraph 3: 'Self-evaluation will have a *broad focus* and it will be *relatively infrequent*'. [emphases mine]. The language here is vague; can it be elaborated on?

3.4.a Outputs

Self-evaluation Report: Clarification on the duration of the review cycle. Does this refer to the initial review next year, or every year?

5.1 Governance

Separation of responsibilities between those who develop and approve programmes. How does this apply to small organisations?

5.2 Quality Management

Criteria (iii) – Data management systems. For learner attendance, absenteeism and enrolment, will paper records be required, or are soft copies suffice?

5.3 Staff Recruitment

Academic managers experience and qualifications. Is a higher ELT qualification required for those who have years of experience, and have been promoted from within? Are existing academic managers required to undertake a course to obtain a higher level ELT qualification?

In seasonal centres for juniors, academic staff *may* also hold a recognised Irish teaching qualification or a Preparatory ELT Certificate. Does this mean that staff are required to have one of these two qualifications?

5.3.b Staff Management

Are staff appraisals to be carried out for all staff, including temporary staff who may only be in, for example, a summer school for two or three weeks at peak season?

5.4 Programme Design

Where programmes are 12 weeks of longer, learners should only normally have a scheduled break after the first 8 weeks of the course. Are there new guidelines in place to how much of a break a learner is entitled to, depending on the length of their programme?

5.5.a Resources, Facilities and the Learning Environment

Are full academic staff room, recreation area and common room facilities required for off-site centres (e.g. external summer schools)?

Learner record system: for how long are records for individual students to be retained?

5.8 Protection of Enrolled Learners

Criteria: What certain categories of information are to be made available to learner prior to enrolment?

Are all school obliged to have PEL arrangements in place?

Can the essential points of the PEL Protocols be included in the consultation documentation?

How is the information communicated to insurance providers?

QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES

SUBMISSION BY:

Castel Education and Training

The submissions have not been altered, except to divide feedback between the specific consultation documents to which they apply.

Submissions by: Castel Education and Training

3.1 QA Policies and 5.2 (i) Quality Management

It might be helpful to providers if QQI listed separately the legal obligations of each provider.

5.1 Governance

The governance of the English Language component of the IMCP is enhanced through Castel's engagement in the Executive Committee comprising representatives from RCSI, IT Tralee and Castel Education.

5.4 Programme Design (iv) (d)

Guided learning hours obviously vary with particular circumstances e.g. current level of English of the student, class contact hours in English and overall Programme class contact hours.

5.4 Programme Design (iv) (h) and (i)

The English Language Programme addresses the cultural awareness etc. in the Programme.

IMCP students study approved QQI modules in Intercultural Communications and Learning at Third Level as part of their overall Programme. This experience is therefore not repeated within Castel's English Language teaching.

5.5 (a) (i) Resources, Facilities and the Learning Environment

Castel Education has access to IT Tralee classrooms, laboratories and all student facilities for their Programmes under contractual agreements between RCSI, IT Tralee and Castel Education.

5.5 (a) (ii) Resources, Facilities and the Learning Environment

Castel Education shares in IT Tralee's policies and procedures.

5.6 Assessment (vi) (f)

QQI might provide clarity in relation to comparing the CEFRL scale with other grading systems, e.g. IELTS.

5.8 Protection of Enrolled Learners

ELP

- In relation to the English Language Programme, Castel Education is contracted to the Kuwait Cultural Office.
- All students are funded by the Kuwaiti Ministry of Higher Education Scholarship Programme.

**QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR
PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES**

SUBMISSION BY:

Frances King School of English

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: Frances King School of English

Section 2a on page 18 of the Quality Assurance Guidelines White paper states there must be the development of weekly lesson plans. Can this be reviewed? Schools that have a weekly syllabus which teachers use may not have the need for teachers to also create additional weekly lesson plans and therefore will not have it in place. Different modes of operation for each school need to be taken into account.

Section 6d on page 30 of the same paper. Can there be more clarification as to whether this applies to external examinations (e.g. Cambridge exams) or internal, in house tests.

QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES

SUBMISSION BY:

A2Z School of English

The submissions have not been altered, except to divide feedback between the specific consultation documents to which they apply.

Submission by: A2Z School of English

Could you please clarify the role of the DCF in conjunction with the new assurance policy.

In relation to 5.1 Guidelines on Governance, can separation of responsibilities take place within an organisation, by people not in the country i.e. managers in London & Manchester.

Can you clarify the roles of the Academic groups as this seems to contradict what has been started earlier re. different people drafting and monitoring programmes and / or policies.

5.3 – We think Academic Managers should be accepted into the role without higher degrees, providing, they have provable CPD and considerable experience should be taken into account as the recommendation set out herein would prove difficult to fulfil.

Furthermore we believe Academic Managers should hold a threshold recognised ELT certificate as standard. Assistant Academic managers should not necessarily be required to have the same qualifications as the Academic manager. Possibly, experience as a Senior Teacher should be taken into account.

5.4 iv. a) We would recommend a list of educationally sound methodologies and approaches be included in this point.

5.4 v a) Could you please clarify what happens if a non EUA student arrives a month or so before the scheduled obligatory holidays. Can you clarify the discrepancy between what is stated here and Dept of Ed. & Skills Policy Statement Regulatory Reform of the International Education Sector and the Student Immigration Regime point 4.17; published September 2014.

5.5.a i. b) This point requests a room solely for the use of Academic Staff. Could this be broadened to include ancillary/support staff.

5.5.a v1. What are appropriate educational technologies? If this is something we must do, to what degree/extent should these be supplied?

5.8 point 3. We would like to request clarification of liability for payment of said students and judgement of a school's capacity to accept same.

QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES

SUBMISSION BY:

Language in Dublin

The submissions have not been altered, except to divide feedback between the specific consultation documents to which they apply.

Submission by: Language in Dublin

5.4 PROGRAMME DESIGN

- v. a - Please clarify how many weeks students can take as holidays if their course is between 8 and 24 weeks.
- v.c - Please clarify if it is the responsibility of the ELT provider to make sure that long-term students and VISA students doing the Academic Programme sit an exam like FCE, CAE, IELTS or TOEFL; recording learners' results can be very problematic since schools do not have access to their results and it depends on whether students want to share their results or not

5.6 ASSESSMENT

- How long do ELT organisations have to keep records of the students (booking forms, level tests, etc.)?

5.8 PROTECTION OF ENROLLED LEARNERS

- 5.8.i - syllabus or course outline?

5.9 INTERNAL MONITORING, SELF-EVALUATION AND ENHANCEMENT OF PROGRAMMES AND SERVICES

5.9.a

ii. b -

Who do we report to in QQI?

General observations:

- We have the criteria and the guidelines in the White Paper which constitute the minimum required of an ELT organisation to get the IEM, but it would be useful if there was more information on how each ELT organisation can measure if what they have for each criteria is enough or good enough to pass the QA assessment process. Maybe something similar to the British Council guidelines would be useful (see this http://www.britishcouncil.org/sites/britishcouncil.uk2/files/accreditation_uk_handbook_2014-15.pdf, pages 22-33)
- A timeframe and structure of the IEM application process would be useful to have and what happens in each stage of the process
- When ACELS ceases to exist, will there be any workshops for the academic staff?

**QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR
PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES**

SUBMISSION BY:

Dublin School of English

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: Dublin School of English

5.3.h "academic conventions and norms in an Irish educational context".

We would question the relevancy of this in a ELT context.

5.5.b 'Academic staff should share delivery of classes' - Assuming that this refers to shared delivery of classes in the one school day, there are arguments both for and against this. For example a course with 3 hours per day is managed perfectly well with one teacher and provides more continuity to the students. At the DSE more intensive courses (22 1/2 hours per week for example) are delivered by 2 teachers. We would also rotate classes each term (12 weeks) and sometimes more often to accommodate teachers holidays, etc, so longer term students will always experience more than one teacher.

**QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR
PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES**

SUBMISSION BY:

Horner School of English

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: Horner School of English

Point One I don't feel that the overall document understands the scale or size of the average ELTO.

The Draft Document 5.1 Governance (page 14) speaks of Academic Management Groups – small Schools, with small number of learners, cannot afford to employ lots of staff.

Furthermore please do not confuse a small Management Team with poor quality assurance or poor delivery of the programmes, this is certainly not the case.

5.2 Quality Management

Criteria ii: "The provider must clearly delineate management responsibility for policy and procedures" – this is not possible or practical in small ELTOs – in our case we the Administration Management Team all multi-task. Multi-tasking is an essential requirement and to be honest it fits with the seasonality of our business and it is the best use of staff and their considerable knowledge.

Point Two - Nature of a Traditional ELTO and consequently Learner International mix & duration of stay.

I am making the point perhaps for what can be best described as a "Traditional ELTO". Traditional ELTO's have a good mix of nationalities (perhaps) as a result of starting to work with the more traditional European markets first. "Traditional ELTO" perhaps is a new term and one QQI and other ELTO's may not want to use....

I can only speak for our School but we have at least 65% learners coming from within the EU area.

Approximately 35% coming from non-EU countries.

Note many of the non –EU students are studying English on short courses, they are not all academic year students of duration 25 weeks +.

EU students study for short periods – anything from one week for the Business and Professional learners to twelve weeks for those University Graduates preparing for a Cambridge University Exam, IELTS, TOEFL, TOEIC. Many EU learners will repeat with the same School, we have a number of Professional Learners that come every year for a short refresher course.

By the nature of the shorter course the draft guidelines referring to Transfer and Progression, and even to a certain extent "Learner Outcomes" don't apply. A learner coming for one or two weeks does not expect the outcome to be a jump from A2 level to B2 level – learner outcomes of course must be based on realistic expectations.

5.3 Staff Recruitment, Management, Communication and Development.

I highlight Criteria Point iii a) Intercultural Awareness

What exactly do you QQI mean and what do you expect ?

When we are marketing our courses abroad we are always striving to develop new markets, many of the ELTO's are at the cutting edge leading the way into New Markets. It takes time to develop our understanding of the people, their cultures and traditions and of course we use many resources to educate ourselves – we use our experiences to educate our staff.

If QQI expects an expert outside consultant to provide training to all staff members then again we are into the prohibitive costs involved etc.

Academic Staff (page 16-17).

I understand that QQI is proposing minimum Academic Managers qualifications based on current practice by the British Council ?

I would like to highlight and make some comparisons.

The English Language Industry in the United Kingdom is a much larger industry and a much older industry. Many of the ELTO's in the UK were established more than 50 years ago, The London School of English celebrated their centenary in 2012.

The UK currently holds approximately 50% of the Global Market for EFL. (2011 data).

I refer you to HM Government report July 2013 entitled: "International Education – Global Growth and Prosperity".

The report states UK has 50% of the Global student numbers (EFL), relating to approx. 35% of the total spend worldwide, the lower spend percentage reflecting the average stay of 4.9 weeks in the UK – referring to the year 2011.

The population of the UK is 64.1 Million people.

The population of Ireland is 4.595 Million people.

My point is this: The UK has access to more ELT Teachers – larger Industry.

Teaching English as a Foreign Language has been recognised for a long time in the UK as a career.

Therefore the British Council can set the Academic Manager and Assistant Academic Manager minimum qualifications as:

1. NFQ at level 7 or equivalent
2. A recognised ELT Certificate
3. Diploma in ELT, ESOL OR Master Degree in ELT,ESOL
4. Min. 5 years consecutive experience in the field, immediately prior to appointment.

In my opinion these minimum standards will not be workable in Ireland. Perhaps in the future this could be reviewed but now in 2014/2015 there are simply not sufficient numbers of suitable candidates in the workplace.

I would suggest a review of the number of University Post Graduate students graduating with the Master Degree in ELT/ESOL from Irish Universities in last 3 years ? How many remain in the EFL sector ?

The current ACELS minimum for the Academic Manager is NFQ level 7, plus a recognised ELT Certificate and three years relevant experience. I would not deviate from this minimum standard at this time.

Finally I refer to page 27 – Delivery and Learning Opportunities

See under Guidelines

‘Normally, academic staff should share delivery of classes in order to facilitate joint planning and sharing of effective practice’

We believe that this should be a choice and not a requirement.

Again I refer to the nature of short courses and the potential loss of effective teaching time due to team teaching/hand over of classes.

Team teaching and joint planning and sharing of effective practice does take place but in a different way to team teaching on a 15-20 hour weekly short course.

**QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR
PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES**

SUBMISSION BY:

Divine Word School of English

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: Divine Word School of English

Further to discussions at a few of the tables during Tuesday's session, I thought I should contact you and QQI to point out the difficulty that small schools such as ours may have in meeting the particular requirement that academic managers in year-round centres must hold a higher qualification in ELT. It is regularly pointed out in the White Paper that the procedures which are in place should be appropriate to the size of a school, the nature of its clients and the services which it offers. However, the requirement as to qualifications for academic managers in year-round centres seems to apply to all providers, regardless of size. I feel that there must be a number of schools of a size similar to ours which may have a considerable difficulty in meeting this requirement. We rarely have more than 20 students during the period October to June but we are anxious to continue to provide courses throughout the year as we have students, mainly of a religious background, who require an extended stay in Ireland.

**QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR
PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES**

SUBMISSION BY:

Waterford English Language Centre

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: Waterford English Language Centre

Documented Procedures (previously contained in DCF)-Clarity as to nature of required documented QA procedures e.g. are what we do + how we intend to improve the quality of what we do two separate categories? (i.e. a 'DCF' describing current practice + an improvement plan timetabling quality improvements along with monitoring strategies)?

2. In a small school, the course developer is often solely responsible for approving the course (often in consultation with teachers) so will it be necessary to source and pay external 'academic management groups' to perform the functions described in 5.1 Guidelines.

3. Section 5.3-

What happens if the the current Academic Manager did not have 5 years' consecutive experience in the field before commencing the role?

4. In a small school, where the DOS/Management is in direct contact with all teaching staff on a daily basis and teachers are coming and going at varying hours of the day, what regularity of scheduled staff meetings will fulfil the criteria (monthly/weekly ?)

5. To what extent is the provider responsible for adult learner attendance and what explicit procedures would fulfill the criteria for dealing with absenteeism (specifically for visa students)-e.g. after what period should immigration authorities be informed/what is a legitimate period after which to suspend a student from a course/ what are the responsibilities of the provider should a student simply stop attending or refuse to take/apply for an end of course external exam.

6. Some clearer idea of 'appropriate educational technology'- especially min requirements would be useful.

7 In 5.6x, what is the role of the 'external authenticators', what qualifications would render them suitable and with what regularity would they need to authenticate an assessment framework predominantly catering to rolling admissions.

8. With regard to courses to which the guidelines do not apply (specifically Academic Year Placement)- do/should these courses be made to fit the criteria and can they then be marketed as IEM approved or must a distinction be made on marketing literature.

**QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR
PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES**

SUBMISSION BY:

Atlas Language School

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: Atlas Language School

There appears to be no clear, unequivocal statement on the requirements in relation to child protection and the care of juniors. Child safety must be a core concern. I think Garda Vetting is required for all adults working with Irish children, why not adults working with ELT juniors?

2. The elements of regulatory requirements could be stated in a separate section. At the consultation meeting there was mention of 3 areas: a refund policy, tax clearance and PEL. Could you also set out the need for legal and regulatory compliance in other areas: Premises, Employment, Health and safety, Data Protection, Copyright and INIS / Justice regulations.

3. There is also no mention of Environmental issues. 'E' issues are increasingly rolled up with Health and Safety in other sectors. Should minimum requirements also start to take into account EHS issues.

4. In Section 5.3 i) a) there is a requirement for the provider to have a process to address intercultural awareness training at the point of teacher induction. Shouldn't this just be desirable rather than an essential minimum requirement at induction?

5. Also in Section 5.3, on page 17, it appears that the required qualifications for Academic Managers in seasonal multi-centres and seasonal single centres are the wrong way round. If the purpose of the criteria are to ensure minimum standards then surely a DELTA-qualified DOS at a year-round supporting experienced CELT(A)-qualified DOSes at the seasonal multi-centres is more likely to guarantee standards than the model you propose of allowing just CELT(A)-qualified DOSes at seasonal single centres but not at seasonal multi-centres.

6. On page 5, the following statement is a debatable point. I'd say for many providers it's more about the bottom line a consequent rush to the bottom in terms of quality. The statement as it stands is therefore aspirational.

[While QQI's QA role is external and regulatory, its objectives are broadly the same as providers': maintaining and enhancing quality of English language teaching.](#)

7. Again, more specifically, on page 12 - the following sentence needs to be reviewed / proofed / micro-edited. It doesn't quite make sense as it stands.

[The provider must be able to demonstrate that relevant policies and procedures are in place, are appropriate to the provider's context and are effective.](#)

8. Finally, could we know more about the resources that QQI will have in 2015 to review and monitor all QA submissions and conduct follow up inspections? We would also like inspection reports to be publicly available.

We would like to see the resources and systems in place to ensure that if we take on all the business costs to meet the required standards then we can be sure that all other schools with the IEM also really do meet the required standards. The publication of inspection reports (perhaps minus the recommendation sections) would make the whole process more transparent and QOI more accountable.

QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES

SUBMISSION BY:

Everest Ireland

The submissions have not been altered, except to divide feedback between the specific consultation documents to which they apply.

Submission by: Everest Ireland

Would it be possible to take one Policy>Procedure>Evaluation and give an example. One that wouldn't necessarily be used by all or any schools, but that could provide a model.

Is it possible for schools to offer course of less than 15 hours (if a course of 15 hours is also offered)?

What constitute "reasonable accommodation" for learners with difficulties/disabilities?

I am responding on behalf of EFL Ireland – a summer school for juniors based in Waterford - to the Quality Assurance Guidelines and Criteria for Providers of English Language Teaching outlined in the QQI White Paper.

QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES

SUBMISSION BY:

EFL Ireland

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Submission by: EFL Ireland

The paper is quite good as it carries on and expands the accreditation process we have maintained with ACELS and NQAI since 2006. I would like to note that I appreciate there are some aspects which recognize the differences between full time year round educational providers and junior summer centres.

I have always thought the ACELS accreditation procedure was essential to maintaining, expanding and developing sound quality in the industry and I look forward to continuing guidance from QQI.

I would like to recommend we maintain the close relationship many schools enjoyed with representatives from ACELS (e.i. Deborah O'Brian and Sue Hackett). It is important to have good communication which can help guide our strength and help to keep Ireland as a special ELT destination.

QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES

SUBMISSION BY:

MEI

The submissions have not been altered, except to divide feedback between the specific consultation documents to which they apply.

Submission by: MEI

Introduction. Page 2.

Who they apply to.

'Providers offering ELT programmes leading to awards made by QQI'. **In our view this wording needs to be changed.**

Page 8: Providers' Quality Assurance Policies and Procedures:

No reference made to protecting the IEM.

What happens when ownership of a school with IEM is transferred? What is QQI protocol in terms of governance ?

Page 9: 3.2.c

3.2.d should the responsibility and monitoring rest with a person/or a role/or a department?

Page 14: Governance.

Guidelines: 'Included in the governance structure should be *academic management groups* which approve.....**who are these academic management groups? Do they not apply to universities only? Such groups do not exist in ELTOs. In ELTOs there are teams.**

Page 15.

5.2 Quality Management.

Criteria ii: 'The provider must clearly delineate management responsibility for policy and procedures' **Is this an Organisation Chart? Concern that there is not appreciation that in some small providers the same person may be multi tasking and doing different/all roles.**

5.2 iii. 'The provider must have data management systems in place. **We need clarification on what is meant by 'data management systems'.**

Page 16.

5.3.a.

iii. a 'Intercultural awareness' this needs to be analysed and specified.

Page 17:

Academic managers: ...'post holder having minimum of 5 years' consecutive experience...' **There is really strong feeling about this. DELTA and then minimum of 5 years' consecutive experience. Ireland is too small to have a pool of such suitably qualified academic managers. Feeling is that everybody in situ should be left there . 3 years' consecutive experience seen as more realistic. And the DELTA should be aspirational.**

'Assistant academic managers must ...hold same qualifications...as an academic manager' **also impractical.**

There isn't a pool of such people in Ireland.

'One of the following ELT certificates is required for ELT teaching (or as a self-employed person contracted to an ELT provider)' **All teachers must be on the books. Self-employed may not be tax compliant.**

Page 18.

5.3.b

a & b . Meaning of 'intercultural awareness' is never clear. But Teachers' Handbook will cover these two points anyway.

Page 19.

Guidelines: paragraph two: 'there should be a system for the appraisal of all staff.....' This may be difficult for small providers.

Page 21.

Criteria: iii. a. Can this be the placement test?

iii.c) and iv.d). These are not appropriate for short courses.

Page 22.

v.d) N/A for ELTOs.

Page 23.

viii. Not always practical for medium/small ELTOs.

Page 24.

5.5.a

i.b) 'An adequate staff room' is sufficient.

iii.operational hours should be 08.00 to 18.00.

vi.'.....including multi media options'. Can this be specified, please?

Page 25:

Class sizes:

ix. 18:1 or 16:1 would be better and would also facilitate pair-work.

Learner record system

x. c) N/A for ELTOs.

xi. Data access controls should be appropriate to scale of the organisation.

Page 26.

5.5.b

Criteria: iii. g) 'aware of intercultural differences' needs to be clarified.

Page 27.

Learner Opportunities:

viii. N/A for ELTOs.

Guidelines. 'Normally, academic staff.....' Team teaching is choice of the school. Not appropriate for all schools.

Page 28.

'Assessment'. Clarification needed.

'Sponsors, employers.....' N/A for ELTOs.

Page 29.

5.6 s

Criteria

a)....'through internal verification' should be deleted.

b) N/A for ELTOs.

b) ...'.or additional help' should be deleted.

c)....'provided through learning with academic staff' is how we think it should read.

Page 30.

d) and g) n/a.

vii, viii, ix, x, xi, xii are all Fetac and N/A for ELTOs.

Page 31.

Entire page n/a for ELTOs.

Page 32.

Entire page n/a for ELTOs.

Page 33.

PEL: Is current MEI arrangement sufficient?

Page 34.

5.9.a Where schools identify poor attendance whom should they report it to?

QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES

SUBMISSION BY:

ELA Ireland

The submissions have not been altered, except to divide feedback between the specific consultation documents to which they apply.

Submission by: ELA Ireland

The main issue that we think needs to be addressed urgently is the restrictive nature applied to private ELT providers around the specific hours that we can offer classes. The timing of classes we can offer is not mentioned in the White Paper, and this needs to be addressed urgently. After 1st January 2015, the ELT sector will be considerably reduced and only quality accredited schools will remain. There will be more students to cater for also, so we need to have more flexibility around timetabling. According to current ACELS regulations, classes can be offered between 9am and 5pm only, while the Department of Justice guidelines state differently. This is confusing to say the least!

No such restrictions seem to exist in other jurisdictions.

We did a quick survey of what ELT schools offer in terms of class timetables in some competitor countries and this is what we uncovered:-

Kaplan Sydney : Timetable from 8.30am-6.00pm

English Language Training (ELT) London: Timetable from 8.30am-8.30pm

Academies Australia Asia with schools in Sydney, Melbourne, Singapore and Brisbane: Timetable from 8.30am-10.00pm.

IES Malta: 8.45am- 7.30pm

It must be remembered that up to 2011, all ELT providers servicing the international student market, could offer evening classes. While we understand that the restrictions needed to be applied back then because of abuses, (mainly facilitated by non-ACELS accredited schools), now that the purging of the sector is underway we feel that this needs to be revisited.

The current ACELS regulation of 9am -5pm classes for ELTO's is clearly too restrictive. We are educational institutions and the least we would expect is that we could run classes from 8am-6pm. Anything else is clearly anti-competitive and puts ELTO's at a distinct disadvantage vis-a-vis other education sectors in the State. ACELS/MEI member Schools will also need to cater for more student booking places from international students because there will be more demand as other non-accredited schools close. We need co-operation and flexibility from QQI/Dept of Justice to cater for students who are currently displaced and for those students currently enrolled in schools which will not meet the new criteria after 1st January, who will also find themselves displaced. We predict that there will be an absolute avalanche of displaced students from 1st January next so we need forward thinking from QQI, the Department of Education, and the Department of Justice on this issue.

Here are our other opinions on the QA document:-

Section 5.1 Governance

In terms of governance, it clearly states that " providers' governance structures should have a separation of responsibilities between those who develop programmes and those who approve them". While most MEI schools employ Academic/QA Managers, this may prove to be a problem for smaller ACELS schools in rural

areas where owners 'wear many hats', and may not have the resources to employ additional staff. In our opinion, there should be a delineation of responsibilities as opposed to a separation of responsibilities and should be size appropriate.

Section 5.3a Staff Recruitment, Management, Communication and Development

With regard to the qualifications required for Academic Managers/ Assistant Academic Managers, it will be extremely difficult to source such members of staff who would have at least 5 years experience in the required position and who also have a DELTA qualification/Masters in ELT etc. We suggest that legacy arrangements remain in place from existing ACELS schools, going forward. We also suggest that the same criteria that ACELS currently sets down regarding Academic Managers should be adopted, instead of those set out in the draft QA document.

5.5 Teaching and Learning

We are of the opinion that a maximum of 15 students in an ELT class is an odd number through which to address pair work, can that be changed to 16? It is worth noting that in other jurisdictions, a class size of 18 students maximum is the norm.

5.6 Assessment

Much of the criteria around Assessment does not relate to an ELTO. It needs to be adapted, so that it is fit for purpose for the ELT model.

5.7 Access, Transfer and Progression

Much of the criteria around the above is not applicable to an ELTO.

5.8 Protection of Enrolled Learners

Regarding Protection of Enrolled Learners, MEI Members have a learner protection arrangement in place for all members.

There is no formal mention of acceptance of such arrangements in the QA document. This needs to be formally clarified by QQI.

**QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR
PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES**

SUBMISSION BY:

Killarney School for English

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: Killarney School for English

3.2e QA Procedures

What constitutes evidence as for some procedures evidence may not be in the form of documentation?

5.1 Governance

An Academic Management group might consist of only one person. It may not be possible to separate those who develop the programmes and those who approve them due to the limited number of management staff.

5.2 Quality Management

1a) what does various legal obligations mean?

5.3b Staff Management

iii. Appraisal of temporary academic staff is very difficult in the summer months for a small seasonal school with one academic manager for up to 20 members of staff.

5.4 Programme Design

v.a) Some students may enrol a month before the Christmas holidays and will therefore not have completed 8 weeks of course prior to the holidays.

Vi. a) Not all our junior programmes have a social/cultural programme. It depends on whether they pay for this as some travel with their parents and spend the afternoons with them.

5.5 Teaching and Learning

5.5a vi. What is the minimum technology required to support teaching. Small schools are restricted by budget and by space.

5.5a vii What self-access facilities are required in a small all-year round school which has small numbers for most of the year and then expands greatly in the summer? In addition most of the summer clientele are not interested in self-study as they are here for a short period and spend most of their afternoons doing activities.

5.5a xi We don't understand what data access controls and data backup systems mean in this context?

Guidelines

It is not always practical or effective to have two teachers sharing the delivery of classes, particularly in the summer months.

On another note, we would also like to state that we are concerned that there is no chance to amend our QA documentation prior to the initial site visit. If there were some areas that needed improvement it would be preferential to know that in advance so that we could make adjustments.

**QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR
PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES**

SUBMISSION BY:

Emerald Cultural Institute

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: Emerald Cultural Institute

Questions we have relating to sections of the draft QA are listed below by section. Statements taken from the QQI document are in bold and our input is in italics.

5.1 GOVERNANCE

“Providers’ governance structures should have a separation of responsibilities between those who develop programmes and those who approve them”. *In our organisation the senior academic team has the responsibility for both developing and approving the programmes. Feedback from teachers and learners is also used to evaluate and modify programmes. Will this system meet proposed criteria?*

Included in the governance structure should be academic management groups which approve learner results prior to progression (to another programme or level) or submission for certification.

While ongoing monitoring and assessment of learners is a key part of programme provision, there are sometimes issues when it comes to deciding what constitutes a satisfactory level of competence in order to allow a learner progress to another level. We believe there needs to be some discretion allowed, where the learner is an adult client, whose own criteria may differ from that of the school when it comes to deciding whether or not s/he is ready to progress to the next level. Attendance and teacher feedback are considerations here as well as the overall percentage obtained in progress tests or other formal assessment.

5.2

The provider must clearly delineate management responsibility for policies and procedures

Our current QA system has people from different departments within the organisation responsible for different areas of QA rather than having one person responsible overall. The senior management team meet regularly and QA matters are discussed at these meetings. Will the new guidelines allow for this team approach to QA?

5.3 STAFF RECRUITMENT

Academic Managers in year-round centres, seasonal multi-centres and home tuition services must meet the threshold requirements for academic staff. In addition they must hold a higher qualification in ELT (such as a Diploma in ELT, ESOL or equivalent or a Master’s Degree in ELT or ESOL . . .

In the case of a senior member of the academic team, who has held a post of responsibility for a number of years but who does not hold a higher qualification as listed above, will relevant experience compensate for this? While there is reference to “assistant academic managers being in the process of gaining higher qualifications . . .” there could be qualifications more relevant to the position than those listed (a Master’s in e-learning is one example or an MBsc where some of the modules are relevant to the management position in question. There are also modular courses available leading to certification but not at Master’s level). Apart from the above considerations there are significant HR implications where a staff member who has successfully held a position for a period of time is not considered qualified for the position under new regulations. The issue wouldn’t arise for new appointees.

5.5 TEACHING AND LEARNING

Provider centres (including temporary premises) must have . . . an adequate staffroom exclusively for the use of academic staff

In summer centres, while there is a dedicated seating and preparation area for academic staff including shelves of resources, syllabus records and syllabus documents, the room may also be used by administrative staff and has both the photocopier as well as facilities for preparing tea/coffee etc

5.6 THE ASSESSMENT FRAMEWORK

Records of learner assessment maintained by the provider

Our question here refers to the period of time for which such records should be kept.

**QUALITY ASSURANCE GUIDELINES AND CRITERIA FOR
PROVIDERS OF ENGLISH LANGUAGE TEACHING PROGRAMMES**

SUBMISSION BY:

Centre of English Studies

*The submissions have not been altered, except to divide feedback
between the specific consultation documents to which they apply.*

Submission by: Centre of English Studies

P.17 5.3 a

Academic Managers should also hold: the Cambridge DELTA qualification (or equivalent). I think it needs adding that a teacher will also require a primary degree alongside the teaching qualification in order to teach in Ireland (bottom of page)

P.22 5.4 v. c)

This section should be reworded. The recording of learners' results by providers will be impossible to guarantee in all cases. This is something that the INIS will have to review. Providers will not be able to force anyone to take an actual exam, so I do not know how this can be enforced. Our school is an exam centre and will happily provide results (where possible).

P.27 5.5 b v. c)

Syllabus cannot be included in an induction – this is not practicable in large intake schools because each level comes with a different syllabus. Teachers will provide this in class through can-do statements linked to CEFR and CES Curriculum, through weekly schemes of work and through guided e-learning facility

P.32 5.7

The prior learning section is problematic. Our school insists that all new arrivals must do a placement test. We will take their prior learning / external ratings into consideration, but our key indicator is on what they can do (via placement test/in class week one diagnostics) and not on what they have previously studied.

Possible Omissions from White Paper

Inspection Regime (if any)

Penalties for non-adherence to policy

Ongoing provider input to QQI – at board level to represent the sector / for appeals processes

Comments from the Department of Justice on the QA guidelines and criteria for providers of English language teaching.

QA guidelines

With regard to the QA element it would appear to us that an integral part of the governance regime of a college is clarity on the ownership of the institution and the relationship between the owners and the senior management.

The criteria for staff recruitment to seasonal recruitment for junior learners should also make reference to the requirement for appropriate Garda vetting of academic staff.

The criteria for programme design do not clearly specify that programmes should have published commencement and intake dates for students. There have been significant problems with colleges that have operated "rolling" intakes which have created significant confusion for both learners and the authorities. We would suspect that colleges that operate on this basis would have issues with the quality of the delivery of

their programmes. Consideration should be given to limiting the number of intakes per year (2 or 4?). The intakes should be communicated to QQI.

The criteria for teaching and learning should specify that Provider Centres must have adequate capacity for their student body that are compatible with the provisions on class size. Consideration should also be given to requiring providers to notify QQI of their maximum learner capacity. Where providers increase that capacity they must provide QQI with a comprehensive reasons and evidence that this increase is justified and can be supported.

Comments from the Department of Ed and Skills on the QA guidelines and criteria for providers of English language teaching

important to ensure that the Designated Awarding Bodies are required to be as rigorous in their agreement of QA with their linked providers as QQI is with those providers with which it directly engages. If QA agreement is where many requirements on IEM providers are to be imposed, it will be important to ensure consistency btw QQI and the DABs in this regard

QAGs – clarity on ownership of a college is particularly important

QAGs – the capacity to physically accommodate denrolled student numbers

Comments from the Nov 11th meetings:

Sections 5.1 and 5.2: Governance and Quality Mgt

Q Regarding separations of responsibilities btw those who develop programmes and those who approve the, how will this work for general English programmes? In smaller organisations the person responsible for planning and for collecting fbk is the same (Academic Mgt Groups)

Q Approval of learner progress prior to progression to another level (can be complicated in certain cases and time frames) even with remedial work.

Q What constitutes as acceptable data management and reporting system within the guidelines?

Section 5: 3 and 4

5.3b: Staff recruitment, management, communication and development

Staff Management: legacy arrangements should be in place to recognise prior experience in the field, i.e. academic managers who don't have a formal qualification like a DELTA or Masters in the TESOL (lead-in period)

5.3d: Smaller scale or seasonal schools – may have difficulties in complying with regulations/ approaches particularly in summer season. Also if cover teachers are brought in to cover specialist subjects, or people employed for shorter periods, i.e. less than 6 weeks, appraisal will be difficult to operate.

5.4d: Guided learning – what are we being asked to do?

5.4e: We need clarity around the guidelines or programme design, i.e. British Council give measurable scales.

Please give examples for each criteria. For smaller / seasonal centres. Clarity around learning outcomes.

Will every students have to be presented with a personalised programme or learning outcomes ...?

5.4v how much responsibility is on the provider to ensure students undergo the exams at the end of the programmes?

Clarity needed on holiday period for students under 25 weeks.

Assessment

Providers of some international exams, e.g., Cambridge exams – will they continue to be approved under the IEM?

Will it continue to be OK to have mixed level classes for smaller schools?

Does the 'internal verifier' need specific qualifications? Who is the role assigned to?

For staff that may need upskilling – is there a time line allowed for this training?

Clarify time period to hold records for students.

5.8 Criteria ii

Guidelines make reference to PEL protocols?? 14 page document?

What about offerings of insurance providers? Adherence to protocols? Who monitors these? Whose responsibility is it to ensure PEL is adequate?

How must information or PEL be made available? What is acceptable? Terms and conditions?

What about part time courses? 3 months or longer?

1 Re off-site premises ---- minimum requirements

Staff room exclusively for the use of academic staff?

Staffed office for off-site premises?

What is 'appropriate educational technology' = again with respect to seasonal centres

If you could/ triple in number – do you still have to offer self –access facilities for say a two week period?