



QQI

Quality and Qualifications Ireland  
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

# WHITE PAPER

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

FOR CONSULTATION

INTERNATIONAL EDUCATION MARK

This White Paper is the proposed QQI Code of Practice for Providers of Programmes of Education and Training to International Students.

Following publication and consideration of the outcomes of consultation, this paper will lead to a Draft QQI Code of Practice which is proposed for adoption by the Board of QQI. Once adopted, the code will supplement QQI Policy on Authorisation to Use the International Education Mark.

QQI is seeking feedback from stakeholders on the Code of Practice contained in this White Paper.

Submissions may be emailed to  
**[consultation@QQI.ie](mailto:consultation@QQI.ie)**

The closing date for submissions  
is **Friday 14 November 2014**.

In your submission please clearly indicate:

1. *Your contact details.*
2. *Whether you are responding as an individual or on behalf of an organisation.*
3. *If you do not wish your submission to be published.*

## INTRODUCTION

The Code of Practice for Provision of Education and Training to International Learners (the Code) supplements the Policy on Authorisation to use the International Education Mark (IEM) and has been developed in line with the requirement of the Qualifications and Quality Assurance (Education and Training) Act 2012 (the 2012 Act).

### RELATIONSHIP WITH QUALITY ASSURANCE

The Code forms part of a suite of quality assurance engagements between QQI and the provider, and it specifically relates to provision of services for international learners. The Code is designed to further reflect and build on a spirit of trust, partnership, and on-going collaboration between the provider and QQI. There is an understanding that all providers shall act with integrity, openness and within the law, with a commitment to improvement.

Eligibility criteria, as specified in the 2012 Act, need to be met to allow the provider access to application for the IEM.

These require that:

- » The provider has established procedures for quality assurance in relation to the quality assurance guidelines for that sector
- » The provider has established procedures for access, transfer and progression (ATP)
- » 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.

The Code draws upon good practice nationally and internationally.

## PURPOSE OF THE CODE

The Code is designed be a key part of the national strategy to foster and strengthen Ireland’s reputation for provision of education and training to international learners<sup>1</sup>. It also supports the relationship with national marketing and immigration strategies.

It provides a comprehensive set of threshold requirements particular to the provision of education and training across all sectors to international learners in Ireland. These requirements specifically relate to the pastoral care, including support services and information provision, of international learners by the provider.

It recognises that:

- » The needs and expectations of international learners may evolve from pre-enrolment to graduation or exit.
- » There is significant diversity in institutional missions and in practice across providers, including sectoral differences and providers with mixed provision.

The Code recognises the role of an internationalised campus in positively valuing and promoting inter-cultural diversity, multi-cultural understanding, plurilingualism and social integration. It is envisaged as enabling an enriched international education experience for all members of the institution, as well as for those people and organisations associated with the institution.

## STRUCTURE OF THE CODE

The Code comprises three components as follows:

1. *Institute and Programme Information Provision: Marketing, Recruitment and Admissions*
2. *Finance: Fees, Refunds, and Subsistence*
3. *Supports and Services for International Learners.*

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<sup>1</sup> [Investing in Global Relationships 2010 – 2015 \(Department for Education and Skills, 2012\)](#)

Each component is described and illuminated by a principle and a series of criteria which are designed to provide sufficient detail to enable the provider and others to understand what is required from the provider, but not to be so specific as to be constraining or overly prescriptive.

Enabling themes intertwined throughout the criteria in each of the three components are:

- » Student integration, and its importance in fostering a sense of community
- » Comprehensive information provision which is clear, unambiguous and up-to-date
- » Feedback mechanisms which enable the provider to identify issues and respond proactively, and on a continual basis
- » Opportunities for building relationships and forming academic and social networks.

## *Explanatory notes*

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These notes list key terms and associated explanations, as used throughout the Code. This is intended to enable the user to have clarity as to what is meant in the Code when using what may be generic or over-arching terminology, and to provide supporting information.

## *Provider Resources*

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This provides a list of references for the information of providers. These resources may also be of interest to other stakeholders.

## *Student Resources*

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This provides a list of references for the information of students. These resources may also be of interest to other stakeholders.

## CODE OF PRACTICE: PRINCIPLES AND CRITERIA

### 1 INSTITUTION AND PROGRAMME INFORMATION PROVISION: MARKETING, RECRUITMENT AND ADMISSIONS

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#### PRINCIPLE

Recruitment of international learners shall be conducted in a transparent and ethical manner.

Providers shall ensure that clear, unambiguous and up-to-date information is provided in marketing and promotional materials regarding their institution and programmes.

International learners can expect all provider information to be clear, unambiguous and up-to-date.

Providers will be asked to demonstrate compliance with the following criteria in the areas of:

- » Marketing
- » Recruitment
- » Admissions and Enrolment Information Provision.

#### 1.1 *Marketing*

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- a. Providers shall ensure that clear, unambiguous and up-to-date information regarding the provider and their provision is provided to potential international learners.
- b. Providers shall ensure that that clear and accessible marketing and promotional material designed to support international learners in understanding all matters pertaining to a programme prior to enrolment, is available. This should include the type and status of the award as appropriate.
- c. Providers shall ensure that their institution and facilities are accurately represented in all marketing and promotional materials.
- d. Providers shall provide contact details for a staff member who can assist with queries from international learners prior to recruitment, e.g. programme co-ordinator or international officer

- e. Providers shall state any attendance requirements as appropriate. Sanctions for international learners who do not fulfil these requirements should be clear<sup>2</sup>.
- f. Providers shall provide information on 'foundation' programmes designed to enable international learners to enter academic programmes, in particular higher education programmes, or transition to new academic cultures or disciplines where appropriate.

## 1.2 *Recruitment*

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- a. Prior to enrolment, providers shall ensure the availability and provision of all relevant financial information.
- b. Providers shall ensure that the student is made aware of any insurances required or advised, e.g., medical or travel insurance.
- c. Providers shall ensure that any contractual arrangement with a recruitment agent incorporates the principles of the London Statement<sup>3</sup>.
- d. The contract between the provider and agent shall include a terminations clause, including: instances where the agent is in breach of the principles of the London Statement; does not comply with the Code of Practice or is found to have acted in an unethical fashion to the detriment of international learners.
- e. Providers shall conduct due diligence on the agent prior to entering into a contractual agreement.
- f. Providers shall ensure that agents are in possession of accurate and up-to-date information regarding the provider and its provision.
- g. Providers shall have a process of review of agents consistent with the spirit of the Code and the London Statement in place and ensure its periodic implementation. The provider should have available a description of the process of review and documented outcomes of this process.

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<sup>2</sup> Visa required students may be subject to greater scrutiny of attendance to ensure compliance with the immigration regime of the State.

<sup>3</sup> All agents are expected to comply with the "London Statement"; a high-level Statement of Principles which promotes best practice among agents dealing with international students. For further information on this Statement, please click [here](#).

## 1.3 *Admissions and Enrolment Information Provision*

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- a. Providers shall ensure that clear specifications are in place and available regarding entry requirements for international students.
- b. Providers shall specify English language (EL) proficiency requirements for applicants whose first language is not English.
- c. Providers shall provide an explanation in writing to an international learner where the applicant has not obtained a place on a programme as appropriate.

## 2 FINANCE: FEES AND LIVING COSTS

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### PRINCIPLE

Providers shall provide all international learners with clear, unambiguous and up-to-date information on all study costs, including subsistence and accommodation.

International learners can expect clear, unambiguous and up-to-date information on all study costs, including subsistence and accommodation, and costs associated with undertaking a programme of study in Ireland.

Providers will be assessed against and asked to demonstrate compliance with the following criteria in the areas of:

- » Tuition and Tuition-related Fees
- » Additional Costs

### 2.1 *Tuition and tuition-related fees*

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- a. Providers shall provide information on all compulsory fees for the full duration of the programme from entry and registration to graduation or exit from the programme.
- b. Providers shall provide information on collection or payment of fees, including sanctions for late payment as applicable, and, as relevant, on debt collection processes for any outstanding monies owed to the provider.
- c. Providers shall establish a fees structure that supports the mission of the institute and reflects the costs associated with quality education provision.
- d. Providers shall provide a written assurance in fees documentation that there are no hidden costs or unexpected charges in relation to any programme.
- e. Providers shall issue a receipt to international learners upon receipt of payment, which may include a breakdown of the fees paid as relevant.
- f. Providers shall furnish prospective international learners with information regarding the average cost of living, e.g. accommodation, food, transport, medical care for the programme duration.

- g. Providers shall publish a refund policy in respect of full or partial refunds and it should outline the conditions under which a refund will be granted, e.g. a refused visa application in the case of a non-EEA student.
- h. Providers shall provide information on any supports or resources that exist at a national level for international learners.

## 2.2 *Additional Costs*

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- a. Providers shall provide information on the full cost of studying in Ireland where possible.
- b. Providers shall provide information on:
  - i. Fees for accommodation services, as offered by the provider or for placement with a host family if relevant
  - ii. Fees for complaints and appeals procedures as relevant; e.g. rechecking of exam results
  - iii. Any other costs related to provision of student services as considered relevant by the provider.

## 3 SUPPORTS AND SERVICES FOR INTERNATIONAL LEARNERS

### PRINCIPLE

A supportive environment promoting well-being and integration of international learners shall be fostered by providers to ensure a positive learning experience for all learners.

Providers will be assessed against and asked to demonstrate compliance with the following criteria in the areas of:

- » Pastoral Supports and Services
- » Academic Supports and Services
- » Staff Training

### 3.1 *Pastoral Supports and Services*

- a. Providers shall designate appropriate personnel to be responsible for inquiries about pastoral care issues from international learners, e.g. programme co-ordinator, counsellor, international officer.
- b. Providers shall provide orientation information prior to the learner's arrival. For example, this could include inter alia information relating to transport and accommodation services. Information on any services or options available to the learner should be provided if applicable.
- c. Providers shall ensure that the induction offered to students also meet the particular needs of international learners.
- d. The induction programme should be provided to all cohorts of international learners that register or enrol at various times of the year, including those that access the programme through advanced entry.
- e. Providers shall provide information (either directly or through a student's union) on all integration opportunities available for international learners and encourage them to avail of those opportunities.
- f. Providers shall have mechanisms in place to support international learners in instances of personal difficulty or other emergency.

- g. Providers shall strive to ensure that international learners are aware of opportunities to participate or be represented in any student engagement for a to provide a comprehensive representation of the student body.
- h. Providers shall facilitate and encourage feedback from international learners and seek to identify themes arising from feedback from international learners. .

### *3.2 Academic Supports and Services*

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- a. Providers shall offer academic induction that is tailored to the needs of international learners.
- b. Academic induction shall be provided to all cohorts of international learners that enrol at different intervals during the academic year or period of enrolment (including those accessing programmes through advanced entry).
- c. Providers shall ensure the information provided at academic induction is easily accessible throughout the academic year and should consider offering reminders of this information at key points during the year (e.g. in the lead-up to examinations or submission of assignments).
- 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.).
- e. Providers shall offer in-sessional supports to international learners with English as a second language if necessary or appropriate.

### *3.3 Staff Training*

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- 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.

## EXPLANATORY NOTES

The following list of terms, phrases and words are defined and explained with reference to their use in the Code:

*Accommodation:* Accommodation refers to the lodgings in which a student resides for the duration of their studies.

*Agent:* A person or organisation acting on behalf of a provider to recruit international students. The agent may be based in Ireland or in the home jurisdiction of the student.

*Alumni:* Graduates or former students of a specific school, college, or university.

*Code:* Code refers to this Code of Practice to which providers must demonstrate compliance in order to be authorised to use the International Education Mark.

*Complaint:* A complaint is an expression of discontent or a formal allegation against a provider. Examples of grounds for complaint include the premises, the standard of teaching, misrepresentation of marketing facilities, etc.

*Due diligence:* This term refers to the process of checking a person or organisation prior to engagement with them. This is to ensure that the person or organisation is of good standing and enhances the following decision-making by identifying risks.

*Emergency fund:* An emergency fund is money which is set aside by a provider to support international students in an emergency situation. Examples of situations where access to an emergency fund may be required include a family bereavement where the student wishes to return to their home jurisdiction or an outbreak of war or conflict in the student's home jurisdiction which results in course funding being withdrawn.

*Fees/Tuition Fees:* A fixed sum charged, as by an institution for the delivery of a programme of education and training. The fee schedule shall incorporate all charges incurred for the duration of the programme, e.g. *tuition fees*, exam fees, photocopying, etc.

*Hardship and Emergency:* This refers to positions of difficulty or urgent need which students may unexpectedly find themselves in due to external factors beyond their control.

*Induction/Orientation:* A short, introductory programme provided (often obligatory) at the beginning of the semester or course to introduce new students to the target community, campus or learning environment. A primary aim is to enable students to have appropriate expectations, and an understanding of what their upcoming educational experience will involve, and require from them.

*International Education Mark (IEM):* A nationally and internationally recognised international education quality mark, represented by a brand name and logo, available to providers of Irish education and training programmes in Ireland.

*International Learner:* A learner, who is not an Irish citizen, enrolled on an Irish programme or qualification, in Ireland.

*Monitoring:* Monitoring has a twofold purpose: it relates to regular checking of all aspects of provision to both ensure that provision reflects what is intended, and to identify areas for improvement.

*Pastoral care:* This refers to the institutional structures and services in place to ensure an acceptable level of student well-being, providing the supports and infrastructure to enable the student to thrive and prosper.

*Provider:* A person who, or a body which, provides, organises or procures a programme of education and training.

*Recruitment:* Attracting, selecting, and enrolling new learners by an education and training provider, or agent acting on behalf of the provider.

*Refund policy:* This is defined as a document containing the following information: a description of the grounds process and conditions for claiming a refund.

*Review:* Review refers to the regular, scheduled checking of a provider in respect of the agreed processes and standards.

*Subsistence:* The advised reasonable amount of income and resources needed to support oneself as an international student.

## PROVIDER RESOURCES

Australian Government, Department of Education, Employment, and Work Place Relations (2007) National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007, retrieved 2 April 2014:

<https://aei.gov.au/Regulatory-Information/Pages/Information-for-Students.aspx>

Australian Government, Department of Education, Employment, and Work Place Relations (2007), Information for International Students, retrieved 2 April 2014:

<https://aei.gov.au/Regulatory-Information/Pages/Information-for-Students.aspx>

Australian Government, Department of Education, Employment, and Work Place Relations (2007). Examples of good practice in assisting international students to integrate with Australian students and the wider community.

Council of International Schools (2014), CIS Code of Ethics for Higher Education, retrieved 2 April 2014: <http://www.cois.org/page.cfm?p=1085>

Dutch Code of Conduct with respect to international students in Dutch higher education (2013), retrieved 2 April:

<http://www.nuffic.nl/en/about-nuffic/code-of-conduct>

European Association for International Education (EAIE), International Student Mobility Charter, retrieved 2 April:

<http://www.eaie.org/home/in-the-field/policy-advocacy/international-student-mobility-charter>

Eurobarometer:

[http://ec.europa.eu/public\\_opinion/index\\_en.htm](http://ec.europa.eu/public_opinion/index_en.htm)

## Education in Ireland

The Education in Ireland brand is managed by Enterprise Ireland the government organisation responsible for the development and growth of Irish enterprises in world markets. It promotes Ireland as a quality destination for students.

Higher Education Authority:

[www.heai.ie](http://www.heai.ie)

Higher Education Liaison Officer Association (HELOA) (2011), retrieved 2 April 2014:

<http://www.heloa.ac.uk/>

International Association of Language Centres, Code of Ethics, retrieved 2 April 2014:

<http://www.ialc.org/code-of-ethics/>

International Education Association of South Africa, Code of Ethical Practice in the Provision of Education to International Students by South African Higher Education Institutions, retrieved 2 April 2014:

<http://www.unisa.ac.za/Default.asp?Cmd=ViewContent&ContentID=19146>

Irish Higher Education Quality Network (IHEQN) (2009), Provision of Education to International Students: Code of Practice and Guidelines for Irish Higher Education Institutions, retrieved 2 April 2014: <http://www.iheqn.ie/publications/default.asp?NCID=154>

Languages Canada (2008), Code of Ethics, retrieved 2 April 2014:

<http://www.languagescanada.ca/en/languages-canada-code-ethics-o>

Marketing English in Ireland (MEI), Code of Practice and Guidelines for English Language Schools.

**National Student Survey:**

<http://www.studentsurvey.ie/>

**New Zealand Qualifications Authority (NZQA) (2013), Caring for international students:  
the Code of Practice for Pastoral Care, retrieved 2 April 2014:**

<http://www.nzqa.govt.nz/providers-partners/caring-for-international-students/>

**Quality Assurance Agency for Higher Education (QAA) 2012, International students  
studying in the UK - Guidance for UK higher education providers, retrieved 2 April 2014:**

<http://www.qaa.ac.uk/Publications/InformationAndGuidance/Pages/International-students-studying-in-the-UK.aspx>

**Statement of Principles for the Ethical Recruitment of International Students by  
Education Agents and Consultants (The London statement) (2012)**

**UK Council for International Student Affairs:**

<http://www.ukcisa.org.uk/>

## LEARNER RESOURCES

Accreditation and Co-ordination of English Language Services (ACELS):

([www.acels.ie](http://www.acels.ie))

Citizens Information: national agency responsible for supporting the provision of information, advice and advocacy to the public on the broad range of social and civil services.

([www.citizensinformation.ie](http://www.citizensinformation.ie))

Department of Education and Skills:

<http://www.education.ie/en/>

Department of Justice and Skills:

(<http://www.justice.ie/>)

Education in Ireland: information on studying in Ireland.

(<http://www.educationinireland.com/en/>)

Euraxess Ireland: helps researchers and their family to plan and organise their move to a foreign country, providing help in all matters related to mobility.

([www.euraxess.ie](http://www.euraxess.ie))

Euroguidance: promotes mobility, helping guidance counsellors and individuals to better understand the opportunities available to European citizens throughout Europe.

(<http://www.euroguidance.ie>)

Europass: an initiative which aims to help learners ensure their skills and qualifications are clearly and easily understood in Europe.

([www.europass.ie](http://www.europass.ie))

European Qualifications Framework: a common reference framework which assists in comparing the national qualifications systems, frameworks and their levels.

([http://ec.europa.eu/ploteus/search/site?f\[0\]=im\\_field\\_entity\\_type%3A97](http://ec.europa.eu/ploteus/search/site?f[0]=im_field_entity_type%3A97))

Irish Council for International Students: independent organisation advocating for the rights of all international learners in Ireland.

([http://www.icosirl.ie/student\\_information](http://www.icosirl.ie/student_information))

Irish Naturalisation and Immigration Service:

<http://www.inis.gov.ie/>

National Framework of Qualifications: a system of ten levels and is used to describe the Irish qualifications system.

([www.nfq.ie](http://www.nfq.ie))

Qualifications Recognition: information on the academic recognition of foreign qualifications in Ireland. ([www.qualrec.ie](http://www.qualrec.ie))

Qualifax, the National Learner's Database: Information on further and higher education and training courses.

([www.Qualifax.ie](http://www.Qualifax.ie))

SOLAS: the Further Education and Training Authority in Ireland, responsible for funding, planning and co-ordinating training and further education programmes.

([www.solas.ie](http://www.solas.ie))

Student Finance: source of information on financial support for further and higher education.

([www.studentfinance.ie](http://www.studentfinance.ie))

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