

SUBMISSION TO  
THE DEPARTMENT OF  
FURTHER AND HIGHER EDUCATION, RESEARCH,  
INNOVATION AND SCIENCE ON  
IRELAND'S INTERNATIONAL EDUCATION, RESEARCH AND  
INNOVATION STRATEGY

19 APRIL 2022



**QQI**

Quality and Qualifications Ireland  
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

## Contents

Introduction .....	2
QQI's legislative remit and international engagement: 2019 Amendment Act	4
Other QQI functions/roles relevant to international engagement and the IERIS	9
General Observations .....	13



## Introduction

Quality and Qualifications Ireland (QQI) welcomes the recent publication by the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) of the Indecon Review of Ireland's 2016-2020 international education strategy, *Irish Educated Globally Connected*, together with the consultation paper on the development of a new international education, research and innovation strategy (IERIS). QQI also welcomes the opportunity afforded by DFHERIS to make a submission to the consultation.

The primary focus of this submission is to consider QQI's own statutory role and current strategic engagements in the international education sphere, and to identify and highlight where they align with and can support key elements of the new IERIS. The essential synergies between the prospective international education objectives of DFHERIS and the work of QQI were anticipated in QQI's recently published *Statement of Strategy 2022-2024*. In setting out its vision for the upcoming period, QQI emphasised its commitment

‘... to a vision of Ireland that offers diverse high-quality further and higher education opportunities, enabling learners to reach their full potential through achieving qualifications that are widely valued nationally and *internationally*’.<sup>1</sup>

QQI's *Statement of Strategy* also reflected on the significant adverse impact of the pandemic on international students due to the restrictions on international travel, noting especially the difficulties that these restrictions have posed for the English language education (ELE) sector. In this connection, QQI also anticipated that DFHERIS's impending IERIS would seek ‘to chart a path to a robust sustainable and quality-led recovery for Ireland's international education sector’, in which QQI would play an enhanced role.

That role is rooted in the Qualifications and Quality Assurance (Education and Training) (Amendment Act) 2019<sup>2</sup>, which strengthens and expands QQI's existing legislative remit in the areas of learner protection and the assurance of the quality and consistency of the learning experience. As far as international education students are concerned, the primary focus will be on the underpinning of standards for international students in the

---

<sup>1</sup> [QQI Statement of Strategy 2022-24](#) p. 3.

<sup>2</sup> [Qualifications and Quality Assurance \(Education and Training\) \(Amendment\) Act 2019 \(irishstatutebook.ie\)](#).



higher education (HE) and ELE sectors through the introduction of the international education mark (IEM).<sup>3</sup>

Finally, QQI's submission also seeks to contribute to the broader discussion on international education policy in Ireland, as prompted by the series of questions posed in the IERIS consultation paper. In addressing this broader policy discussion, QQI has elected to respond only to those questions where it has the requisite knowledge and experience to provide an informed response, acknowledging that other key stakeholders are better placed to answer the remaining questions.

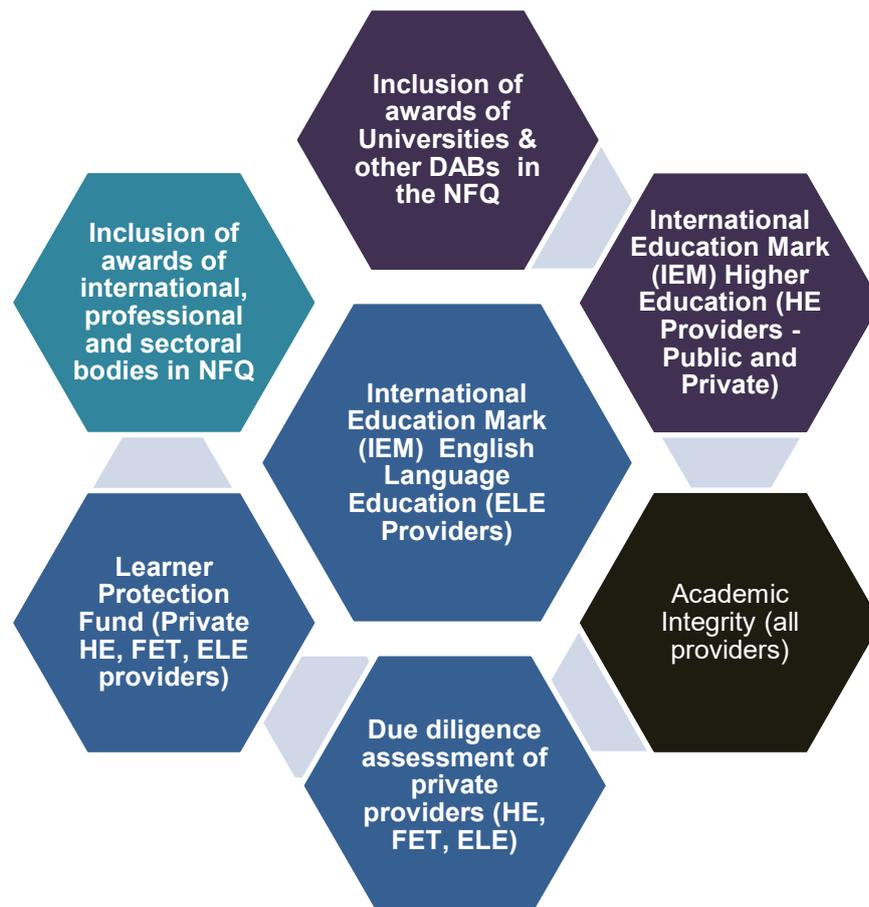
---

<sup>3</sup> [QQI Statement of Strategy 2022-24](#) p. 8

## QQI's legislative remit and international engagement: 2019 Amendment Act

As noted in the introduction above, QQI's legislative remit has been expanded and strengthened by the Qualifications and Quality Assurance (Education and Training) (Amendment Act) 2019. The Act provides for a suite of measures encompassing qualifications, quality assurance and regulatory matters, which are designed to protect the interests of learners engaged with the Irish education and training system, whether these interests relate to their general welfare, the quality of their learning experiences or the recognition of their learning achievements.

Figure 1 Qualifications and Quality Assurance Act 2019: Key Measures



All these measures will to a greater or lesser degree protect the interests of international learners in Ireland, but several of them are intended to do so more directly. Section 4.4 (pp 26-7) of the DFHERIS Consultation Paper on the IERIS emphasises the need to



support learning for all (drawing on the lessons learned about the international student experience in Ireland during the pandemic), and the need for good governance to enhance quality. Both themes are addressed in QQI's 2020 evaluation, entitled *The Impact of Covid-19. Modifications to Teaching, Learning and Assessment in Irish Further Education and Training and Higher Education*, which provide useful pointers on how support for international learners can be addressed in the context of the IERIS.<sup>4</sup> In terms of the broader impact of Covid-19 on international education, it is also worth noting that the pivot to online learning that occurred during the pandemic has also generated some new developments in some providers' engagement on the international stage. Specifically, QQI is aware of a growing number of private providers who wish to offer QQI awards globally on a remote basis to large corporate clients. It is unlikely that such provision would be in scope for the IEM and there may be some value in giving consideration to this aspect of international education in the context of the new IERIS.

In this connection, the DFHERIS Consultation Paper rightly contends that the success of the new IERIS will be dependent on the reputation of Ireland's education providers, noting the citation in the Indecon review about stakeholder concerns regarding the closure of private providers. The IEM specifically is identified in the Consultation Paper as a key component of the Government's policy for the ELE sector, both in terms of providing a regulatory framework for ELE provision and ensuring that quality will be its hallmark. It is also envisaged in the Consultation Paper that the IEM will be linked to the student immigration system and that, in due course, only providers authorised to use the IEM will be eligible to recruit international students who require immigration permission.

These priorities and objectives are fully aligned with QQI's strategic priorities and objectives as set out in its *Statement of Strategy 2022-24*. Under its *Strategic Priority # Protection*, QQI will

contribute to ensuring a high-quality learning experience for international students through issuing the International Education Mark for higher education and English language education providers.<sup>5</sup>

---

<sup>4</sup> [The Impact of COVID-19 Modifications to Teaching, Learning and Assessment in Irish Further Education.pdf \(qqi.ie\)](#). The evaluation specifically examines the impact of Covid-19 on international students, especially at pp. 18-19, 80, 87, 118, 134-5, 159-60, 172-3.

<sup>5</sup> [QQI Statement of Strategy 2022-24](#) p. 13.



This core priority and objective will be delivered through an ambitious and integrated programme of measures (see also *Figure 1*) relating to:

- ***The due diligence of private providers***

Private providers, including ELE providers who intend to seek authorisation to use the IEM, will be required to meet certain criteria concerning governance, finance, and compliance with the law, to give QQI reasonable assurance that they have the capacity and capability to implement robust quality assurance procedures, and to provide coherent programmes of education and training. The aim is to ensure that only providers with sufficient financial resources, sound business practices, and a genuine commitment and capacity to meet learner needs will secure State recognition for the education and training provision they offer. It is of note that parallel arrangements are in place for publicly funded providers, who are subject to a range of corporate governance requirements, including requirements under their own legislation, and the Department of Public Expenditure and Reform's *Code of Practice for the Governance of State Bodies*.<sup>6</sup> Together, these measures will ensure that a high standard of governance will be in place across the education and training system generally and, in tandem with the Learner Protection Fund (see below), mitigate substantially the risk of closure amongst providers permitted to recruit international learners, and ensure that Ireland's reputation as a destination for international study will be enhanced (*Consultation Paper Question 18*).

- ***IEM for ELE Providers***

The IEM ELE, including the associated code of practice, will provide a voluntary national quality assurance system for ELE provision, taking an approach to the student experience which is appropriate to ELE and guided by current international and national best practice. It will also have regard to the issues and challenges experienced by international students during the pandemic. The IEM ELE will assure that all ELE learners studying with providers who have been authorised to use the Mark will receive a quality educational experience. In effect, it will support the sector in establishing quality as its hallmark. It is also intended that the IEM ELE will strengthen Ireland's reputation as a preferred destination for international learners seeking to learn the English language and, where appropriate, to progress into higher education. As such, it will assist the

---

<sup>6</sup> [gov.ie](http://www.gov.ie) - Code of Practice for the Governance of State Bodies ([www.gov.ie](http://www.gov.ie))



State and ELE providers in developing new marketing and promotion approaches for the sector (*Consultation Paper Question 1*).

- ***IEM for HE Providers***

The overarching purpose of the IEM HE is to make a substantial contribution towards ensuring that international learners studying in Irish higher education institutions are provided with a quality learning experience. Building upon the strengths of the existing quality assurance system, the IEM HE, and the associated code of practice, will focus *inter alia* on learner protection, including in relation to the ethical marketing of programmes and the transparent provision of information to learners, and in relation to the pastoral and other non-academic supports those providers offer to protect the well-being and integration of their international learners while studying in their institutions. Overall, the aim is that the IEM brand will confirm the quality of the providers and their programmes/awards, and the consistency of the learner experience. In doing so, it will assist the State and the providers themselves in the marketing and promotion of Irish higher education globally (*Consultation Paper Question 1*). Ultimately, it will enhance the international standing of Irish higher education, marking Ireland out as a preferred destination for international learners wishing to undertake their higher education study abroad.

- ***Learner Protection Fund***

The concept of the protection of enrolled learners (PEL) is intended to ensure that learners who commence a programme, or enrol on a programme, that leads to a QQI award, or that is delivered by an ELE provider authorised to use the IEM ELE, will be able to complete their programme, where their chosen provider ceases to trade or ceases to provide the programme. In circumstances where it is not possible to facilitate programme completion for affected learners, they will receive a refund of the fees most recently paid in respect of the programme. The 2019 Act provides for the establishment of a national PEL scheme, underpinned by a Learner Protection Fund under the stewardship of QQI, to provide the necessary security for learners. The establishment of this new scheme and the Learner Protection Fund will contribute to the protection and enhancement of the reputation of the Irish education and training system as a whole and its attractiveness to potential international students.



- ***Inclusion of Awards in the National Framework of Qualifications (NFQ): Universities and other Designated Awarding Bodies (DABs)***<sup>7</sup>

The 2019 Act has strengthened the legal standing of the NFQ and will make it more transparent and useful to learners and other stakeholders. A new process has been created to allow for the formal inclusion of the qualifications of public universities, technological universities, and institutes of technology (designated awarding bodies). The DABs, as statutory national awarding bodies, are key partners of QQI in maintaining the integrity of the NFQ. The new legislative basis for the QQI/DABs relationship clarifies the respective obligations and mutual expectations in this shared undertaking. It will also be a key piece of the architecture to enable the linkage of the student immigration system to the IEM in due course (*Consultation Paper*, p. 26).

- ***Inclusion of Awards in the NFQ made by International, professional, and sectoral bodies***

Many learners in Ireland, including some international learners, undertake programmes that lead to the awards of education and training bodies that are not currently included in the NFQ. These include qualifications made by professional bodies in areas such as law and accountancy, vocational and technical qualifications issued by UK awarding bodies, and qualifications made by international organisations or sectoral bodies often linked to specific industries, technologies, or occupations. The 2019 Act enables QQI to establish a new category of awarding body, called 'listed awarding bodies', who, on a voluntary basis, may obtain regulated access to the NFQ for their awards. This can expand and strengthen the international dimension of the qualifications market in Ireland.

These and the other functions assigned to QQI under the 2019 Act are intended to align with and support the new IERIS. The suite of measures will be implemented during the period 2022-24, and a new organisational structure, including the appointment of new staff, has been put in place in QQI to ensure they are delivered.

---

<sup>7</sup> The Designated Awarding bodies (DABs) are those bodies with the authority in law to make awards. Apart from the Universities and Technological Universities, they also include Institutes of Technology and the Royal College of Surgeons in Ireland.



## Other QQI functions/roles relevant to international engagement and the IERIS

QQI's statutory functions also include the requirement to co-operate with international bodies on qualifications and quality assurance policies and their implementation. This function includes liaising with

- awarding bodies outside the state for the purposes of facilitating the recognition in the State of awards of those bodies
- and the recognition outside the State of awards made in the State.

In addition, in the performance of these and its other statutory functions, QQI is obliged to inform itself of practices outside the State in respect of matters relevant to them.

On foot of these functions, QQI has a long and well-established network of connections in Europe and further afield and a strong expertise in policy related to its core functions, which are valued by national and international stakeholders. They are also germane to different aspects of Ireland's international education strategy. They are discussed briefly below in tandem with issues raised in the IERIS Consultation Paper.

### **INTERNATIONAL PARTNERSHIPS/LINKS AND THE DEVELOPMENT OF INWARD STUDENT MOBILITY IN EXISTING OR EXPANDING MARKETS**

QQI has extensive links with international quality assurance and regulatory bodies both on a bilateral basis and through its membership of network organisations, such as the European Association for Quality Assurance in Higher Education (ENQA); the International Network for Quality Assurance Agencies in Higher Education (INQAAHE), and the Cross-Border Quality Assurance Network (CBQAN). It is also a registered agency in the European Quality Assurance Register (EQAR).

With regard to the recognition of qualifications, Ireland is a signatory to the Lisbon Recognition Convention. In direct fulfilment of its statutory qualifications' recognition function, and at the behest of DFHERIS, QQI operates the National Academic Recognition Information Centre (NARIC), which facilitates the recognition of international qualifications in Ireland and Irish qualifications abroad. By virtue of this role, QQI is also a member of the ENIC and NARIC networks and takes part in the governance of the



networks as well as various recognition projects. In addition, QQI hosts the national Europass centre. Europass is a suite of tools to improve mobility of learners and workers in Europe and the centre is responsible for promoting the tools in Ireland and to contribute to the network of European Centres.

These relationships are important in terms of building trust and increasing understanding between the Irish education system and other national systems, including in core target countries for international student recruitment. There may be some scope for developing new relationships or deepening existing ones in line with the emerging IERIS priorities on global engagement, particularly in relation to target countries that lie beyond Europe and/or in relation to ELE provision (*Consultation Paper*, p. 23). For example, QQI currently has memoranda of understanding with the Hong Kong Council for Academic and Vocational Qualifications, the Hong Kong Bureau of Education, and the Malaysian Qualifications Agency, and has engaged in discussions with the Chinese authorities

The same links also contribute significantly to Ireland's overall engagement with the EU and the broader European Higher education Area on education matters, whether these relate to developments in quality assurance (e.g., the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG)), or qualifications frameworks (e.g. the European Qualifications Framework (EQF) and the Qualifications Framework for the EHEA). Where relevant, these relationships can be leveraged to support emerging IERIS priorities on EU engagement, including in areas such as the European Universities Initiative (*Consultation Paper Question 11*).

## **EAST-WEST AND NORTH SOUTH RELATIONSHIPS**

On foot of the longstanding and close links between the Irish and United Kingdom labour markets and educational systems, QQI cooperates with a range of UK bodies. These include the UK Quality Assurance Agency for Higher education, with which QQI has a Memorandum of Understanding that is underpinned by bi-annual meetings of senior staff of both agencies. In addition, QQI takes part in a standing group with its counterpart agencies from England, Wales, Northern Ireland and Scotland on qualifications and quality assurance. These engagements can be aligned with emerging IERIS priorities, including supporting institutional relationships across the two islands, through increasing mutual understanding of the regulatory and quality assurance environments in which the institutions operate in their respective jurisdictions, and through collaborating with QQI



counterpart agencies to lessen any regulatory/quality assurance impediments to institutional cooperation, if and where they exist.

## ENGLISH LANGUAGE EDUCATION

English language education is inherently international. QQI's role here will be exercised primarily through the implementation of the IEM, which is a key priority for the organisation under its current *Statement of Strategy* (see above). In addition, QQI has also developed standards for pre-higher education foundation awards for international students and English language teacher training awards. QQI agrees with the point in the Consultation Paper that there is potential for growth in the area of International Foundation Year (IFY) and related programmes, including teacher training, and that such programmes can potentially support the retention of students. The IFY standards have been developed for both undergraduate and post-graduate students and these can help attract more international students. The teacher training award standards are developed for new and experienced teachers and they could help contribute to the growth of the ELE sector in Ireland. In developing this area further, there would be some merit in undertaking more analysis of international practice and encouraging the sharing of information amongst stakeholders about their experiences. In this regard, QQI also maintains connections with international quality assurance groups operating in the ELE space and is an associate member of EAQUALS, a quality assurance network for language learning. As the IEM is rolled out, it is anticipated that QQI's engagement with such bodies will increase and support the enhancement of quality in the sector through increased knowledge of developing practice (*Consultation Paper*, pp. 19, 25-6).

## THE NATIONAL FRAMEWORK FOR DOCTORAL EDUCATION (THE NFDE)

The aim of the NFDE is to support excellence in all forms of doctoral education in Ireland. It provides a set of principles for doctoral education, while recognising the diversity in the Irish higher education system. The NFDE Advisory Forum was established to support the implementation of the Framework. Co-chaired by QQI in partnership with the Higher Education Authority (HEA), it provides all stakeholders, particularly providers, the opportunity to discuss issues of strategic importance and national interest concerning the provision of doctoral education. Overall, the NFDE is an important, but under exploited, piece of infrastructure in publicising the quality and broader profile of Irish research to



national and international audiences and would merit a reference in the new IERIS, given the anticipated prominence of international research and innovation in the strategy. (Consultation Paper, p, 6; section 3; Questions 1, 9).



## General Observations

### THE BALANCE BETWEEN OPENNESS AND PROTECTING SHARED VALUES AND PRINCIPLES IN GLOBAL PARTNERSHIPS

QQI notes *Consultation Paper Question 14*, which asks how Ireland can ensure an appropriate balance between maintaining an open approach to international cooperation in education and research and innovation, while protecting shared values and principles in global partnerships. This, of course, is a delicate matter and not easy to manage. QQI, in its initial consultations on the IEM, has noted that some providers feel there is a tension between the avowed ambition of the IEM to protect learner interests, and the reality of conditions in other countries where the values and principles in relation to, for example, human rights, are not shared. This tension is particularly acute in contexts where the Irish educational provision is delivered to students on a transnational basis in their home countries, and where the operation of Irish values and principles cannot be guaranteed in all circumstances. It is noteworthy that the current crisis of the war in Ukraine has increased provider reflection on such matters. There are, of course, no easy solutions to such dilemmas, but there may be merit in addressing this matter in some way in the new IERIS, perhaps through developing agreed principles and guidelines on how providers should proceed when faced with such situations.

### POLICY DELIVERY STRUCTURES

QQI would agree with the point made in the Consultation Paper that the High Level Group on International Education was successful in implementing some key and beneficial policy changes in relation to the international agenda. However, with the inclusion of research and innovation more overtly in the new IERIS, there may be some risk that a wider agenda may crowd out other areas of the internationalisation agenda, especially ELE. In this connection, QQI considers that there will be a need to establish a strong and focussed sub-committee structure so that HE, ELE and R & I issues, which are often quite distinct, are adequately catered for in the implementation of the new strategy (*Consultation Paper Question 20*).



## TARGETS AND DATA

As noted in the Indecon report, the quality of the data available to the State on international education is variable. In particular, the quantity and the quality of data available on ELE is much less than that available for HE. To some degree, the gap will be narrowed through the implementation of the IEM and the associated measures on due diligence and the Learner Protection Fund. As implementation of the IEM progresses during the lifetime of the new IERIS, it would be worth keeping the emerging data under review, in order to estimate its value in terms of identifying the strengths and weaknesses of the sector and where efforts and supports should be targeted. At some point during the life of the strategy, there may be some merit in examining the need for and feasibility of developing a data strategy for ELE specifically or as part of a wider international education data strategy (*Consultation Paper Question 24*).