



Dearbhú Cáilíochta  
agus Cáilíochtaí Éireann  
Quality and  
Qualifications Ireland



# Higher Education Pathway Assessment Report: ICD Business School



## About this assessment

This report details the findings of the assessment conducted by an Assessment Panel on behalf of Quality and Qualifications Ireland (QQI) of ICD Business School's IEM Application Statement (IEMAS), which was submitted to QQI as part of the provider's application for authorisation to use the TrustEd Ireland mark. The desk assessment was conducted by the following Assessment Panel:

| Name                     | Role                           | Affiliation   |
|--------------------------|--------------------------------|---|
| Prof. Phil Cardew        | Chairperson                    | Deputy Vice Chancellor (Academic), Leeds Beckett University, United Kingdom |
| Rowena Pelik             | Report writer/Secretary        | International Higher Education Consultant, United Kingdom                   |
| Elizabeth Noonan         | International Education Expert | University College Cork, Ireland  |
| Chethaka Janendra Gamage | Learner                        | Atlantic Technological University, Ireland                                  |

## Outcome of the assessment

This assessment evaluates the provider's compliance with the criteria set out in the Code of Practice for Provision of Programmes of Higher Education to International Learners (HE Code). From the evidence provided by the provider in the self-assessment document, the IEM Application Statement (IEMAS), the Assessment Panel concludes that the provider should be:

| Outcome                                    | Please tick |
|--|-------------|
| Authorised to use TrustEd Ireland Mark     | ✓           |
| Not Authorised to use TrustEd Ireland Mark |             |

Please see below a summary of the outcome by HE Code principle (5.1-5.6)

## 5.1 Marketing and Recruitment:

**Principle: HE providers recruit international learners in a transparent and ethical manner. In their marketing and promotional materials, they ensure that clear, accurate, transparent, accessible, relevant and up to date information is provided.**

5.1.1 (a) HE providers shall endeavour proactively to understand the information needs of prospective international learners.

5.1.1 (b) HE providers shall ensure that information provided to potential international learners about the institution and its provision is clear, accurate, transparent, accessible, relevant and up to date. This shall include information about the intended purpose of the provision e.g., to prepare a learner for further study or specific employment. Where necessary, it should also include information on associated immigration requirements, including requirements for learners requiring entry visas and/or immigration permission.

5.1.1 (c) Where applicable, information should also be provided on the professional accreditation status of programmes.

5.1.1 (d) Where applicable, information on practice placement requirements, and how these may be fulfilled, should also be made be known to prospective international learners.

5.1.1 (e) HE providers shall be compliant with information for learner requirements, as set out in Section 67 of the 2012 Act as amended. They shall confirm:

- (i) whether or not the successful completion of the programme entitles the learner to an award;
- (ii) the awarding body making the award;
- (iii) the title of the award;
- (iv) whether the award is one that is included within the NFQ;
- (v) the level at which the award is included within the NFQ;
- (vi) whether the award is a major, minor, special purpose or supplemental award, as identified within the NFQ;
- (vii) the procedures for access, transfer and progression that are in place, including the pathways for international learners for further study, employment, and residency, where applicable (see also section 4.2 above);
- (viii) details, where appropriate, of the arrangements in place for the protection of enrolled learners under Section 65 of the 2012 Act as amended (see section 4.5.2 above and Appendix Two of this code).

5.1.1 (f) HE providers shall ensure that information is provided in a way that is accessible to international learners and assists them in making informed decisions. This information should support international learners in understanding all matters related to a programme prior to enrolment. If provided in a different language, it is the responsibility of the HE provider to ensure that the information is clear, accurate, transparent, accessible, relevant and up to date.

5.1.1 (g) HE providers shall accurately represent their organisation and facilities in all marketing and promotional materials and ensure that no false or misleading information is issued.

5.1.1 (h) HE providers shall provide appropriate contact details for an appropriate person or persons to provide assistance with queries from international learners prior to enrolment.

5.1.1 (i) HE providers shall state the commencement dates for all programmes.

5.1.2 (a) Prior to enrolment, HE providers shall ensure the availability and provision of relevant financial information pertaining to the study and average subsistence costs of their programme provision, from the period of enrolment through to graduation.

5.1.2 (b) Prior to enrolment, HE providers shall ensure that the learner is made aware of any insurance requirements, e.g., medical or travel insurance, and of the availability of accommodation, and any accommodation services provided.

5.1.2 (c) HE providers shall have a written agreement with each education agent, recruitment partner or consultant that formally represents their programme provision.

5.1.2 (d) HE providers shall ensure that any contractual arrangements entered with an education agent, recruitment partner or consultant incorporate the principles of the London Statement. Existing contracts that do not incorporate these principles shall be amended appropriately within two years of the date of the HE provider's application for authorisation to use the IEM.

5.1.2 (e) The contract between the HE provider and education agent, recruitment partner or consultant shall include a termination clause in instances where the agent does not comply with the principles of the London Statement or is found to have acted in an unethical fashion to the detriment of international learners.

5.1.2 (f) HE providers shall conduct due diligence e.g., three reference checks, to verify the track record of education agents, recruitment partners or consultants, in relation to learner protection issues, prior to entering into a contractual agreement.

5.1.2 (g) HE providers shall ensure that all education agents, recruitment partners or consultants contracted to them are in possession of accurate and up to date information regarding the provider and its provision.

5.1.2 (h) HE providers shall have in place a transparent process for monitoring and reviewing the activities of education agents, recruitment partners or consultants including, where appropriate, feedback from applicants, to ensure that the education agent, recruitment partner or consultant is operating within the spirit of the HE Code and the London Statement.

5.1.2 (i) HE providers required to put in place arrangements for the protection of enrolled learners under Section 65 of the 2012 Act as amended shall do so prior to the recruitment of learners (see also section 4.5 and Appendix Two of this HE code).

## Summary

The Panel agreed with ICD Business School that all criteria under Principle 5.1 were fully applicable. In its IEMAS, ICD identified itself as partially compliant with two criteria: 5.1.2 (f) and 5.1.2 (h), the Panel agreed with this assessment on the basis of the evidence presented, including in response to queries raised in the Outstanding Queries Report (OQR). However, the Panel did not concur with the view that ICD was fully compliant with 5.1.2 (d) nor 5.1.2 (e), assessing the evidence to indicate only partial compliance.

The response to the Panel's queries on 5.1.2 (f) and 5.1.2 (h) in the OQR outlined well considered and detailed plans, which ICD was about to begin the process of implementing, with dates starting in July 2025 and extending over the following two academic sessions; the planned actions include monitoring, auditing and review and were assessed by the Panel as covering the relevant criteria. The proposed augmentation of training provision for educational agents to ensure their understanding of NQF levels, admissions processes, ethical recruitment and obligations associated with the London Statement are welcome and reflect plans to proactively manage compliance with 5.1.2 (f) and 5.1.2 (h) in future.

### Condition 1

**5.1.2 (f) and 5.1.2 (h):** However, at this point, ICD is only partially compliant, and it is a **recommended condition of authorisation** for ICD to undertake the indicated monitoring and review the effectiveness of the implementation of the new planned processes for the monitoring and review of recruitment agents and partners, extended due diligence and for the briefing and

training of agents, and to have completed that review within one year from the date of TrustEd Ireland authorisation.

The Panel noted that two areas, 5.1.2 (d) and 5.1.2 (e), ICD had identified itself as fully compliant when the evidence made it clear that there was an intention to address criteria but that not all current practice was fully compliant (reflecting ICD's words that it was in an aspiration and not an implementation phase). This assessment of full compliance by ICD in its IEMAS before it was being achieved concerned the Panel. However, if the plans with regard to incorporation of the principles of the London Statement (5.1.2 (d)) and regarding termination clauses (5.1.2 (e)) are implemented the Panel anticipates that compliance will be achieved.

### **Condition 2**

**5.1.2 (d) and 5.1.2 (e):** The panel **recommends as a condition of authorisation** that the planned changes are implemented and monitored within one year from the date of TrustEd Ireland authorisation and are thereafter subject to regular review. Alongside routine monitoring during implementation, it is further **recommended** that a full analytical report on the effectiveness of the new processes should be made to, and considered by, ICD's Quality Assurance Committee and Governing Body within two years of TrustEd Ireland authorisation to ensure that the approaches outlined deliver against TrustEd Ireland criteria 5.1.2 (d), 5.1.2 (e), 5.1.2 (f) and 5.1.2 (h) are fit for purpose, support ICD's aspirations and have fully met its planned movement 'from aspiration to implementation' [OQR response]. Relevant actions can then be considered through QQI monitoring of TrustEd Ireland authorised providers.

Overall, having considered the evidence provided in the initial IEMAS and in responses to the OQR, the Panel was able to conclude that ICD Business School recruits international learners in a transparent and ethical manner and to confirm that its marketing and promotional materials provide clear, accurate, transparent, accessible, relevant and up to date information for prospective learners – while noting the areas of partial compliance in aspects of its approaches to working with educational agents.

### **Principle 5.2 Admissions and Qualifications' Recognition:**

**HE providers operate fair, transparent and consistent admission policies that support the successful participation of international learners in their chosen programmes**

5.2 (a) HE providers shall clearly specify entry requirements for international learners that support the successful participation of the learners in their chosen programmes.

5.2 (b) HE providers' entry requirements shall clearly specify English language proficiency requirements for applicants whose first language is not English. These should include references to the benchmarks used in assessing proficiency requirements and, like other entry requirements, support the successful participation of international learners in their chosen programmes.

5.2 (c) HE providers shall adopt the principles, and follow the guidance, contained in the Lisbon Recognition Convention (LRC) and subsidiary texts in assessing the qualifications presented by international learners for the purpose of admission to their programmes. Qualifications should be assessed in an accessible and fair manner and within a reasonable timeframe.

5.2 (d) HE providers should recognise qualifications that are recognised for the purpose of access to programmes in an international applicant's own higher education system, unless a substantial difference can be demonstrated between the requirements for admission in the applicant's own higher education system and those of the Irish HE provider.

5.2 (e) HE providers shall provide a timely written response to international applicants who are refused admission.

5.2 (f) Where a HE provider decides to withhold recognition of a qualification from an international learner for the purpose of admission, the reasons for the refusal to grant recognition shall be stated, and information provided concerning possible measures the applicant may take to obtain recognition at a later stage. If a HE provider decides to withhold recognition of a qualification for the purpose of admission, or if no decision is taken, the applicant shall be able to make an appeal within a reasonable time limit.

5.2 (g) HE providers shall support QQI, as appropriate, in implementing its statutory function to facilitate the recognition outside the state of awards made in the state, including the home countries of their international learners.

### Summary

ICD identified each of the criteria in 5.2 as fully applicable and assessed itself fully compliant. The Panel agreed that all criteria are fully applicable but not that ICD is compliant against 5.2 (c) to 5.2 (f).

The Panel noted a number of areas where ICD's practice was not fully reflective of the LRC, for example, published timeframes for relevant articles or practice with regard to refugees and displaced persons.

### Condition 3

**5.2 (c)-(f):** The Panel **recommends as a condition of authorisation** that ICD review its admissions policy, and any other relevant policies and processes, against the principles and guidance in the LRC (and any subsequent iterations or subsidiary texts) and criteria 5.2 (c) to (f) firstly to establish clearly where gaps exist in institutional policy and practice and, secondly to establish a timebound implementation plan to revise institutional policy and practice to incorporate the principles and guidance of the LRC and HE Code criteria 5.2 (c) to (f) and, finally, to make any revisions to ensure that all principles and guidance of the LRC and HE Code criteria 5.2 (c) to (f) are fully encompassed within the College's policy and practice. All elements should be completed within one year of TrustEd Ireland authorisation.

The IEMAS provided detailed information that confirmed in many respects that ICD Business School operates fair, transparent and consistent admission policies that support the successful

participation of international learners, ICD's target market, in their chosen programmes. However, ICD is not fully compliant across this Principle. The Panel makes no recommendations or commendations against 5.2.

### Principle 5.3 Fees, Refunds and Subsistence:

**HE providers provide all learners with clear, accurate, transparent, accessible, relevant and up to date information on all study costs, including subsistence and accommodation. HE providers shall inform learners about fees and other costs associated with undertaking a programme of study in Ireland**

5.3.1 (a) HE providers shall provide information on compulsory fees for the full duration of the programme from registration and admission to graduation or exit from the programme. Where fees may change, this shall be clear to applicants in the information provided.

5.3.1 (b) HE providers shall provide information on the collection or payment of fees, including sanctions for late payment and debt collection for moneys owed.

5.3.1 (c) HE providers shall establish a fees structure that supports the mission of the organization and reflects the costs associated with quality provision.

5.3.1 (d) HE providers shall ensure that there are no additional fees or unexpected charges that international learners have not been made aware of.

5.3.1 (e) HE providers shall issue a receipt to international learners upon receipt of payment of fees which will include a breakdown of fees paid.

5.3.1 (f) HE providers shall establish and publish a procedure on full and partial refunds. This procedure shall outline the conditions under which a refund will be granted e.g., a refused entry visa application, in the case of a non-EU/EEA Swiss learner.

5.3.1 (g) HE providers shall provide information on any financial supports or resources that exist within the organisation, or nationally, for international learners.

5.3.2 (a) HE providers shall provide information on the indicative costs of studying on their programmes e.g., the costs of textbooks, electronic resources, computer requirements, protective equipment.

5.3.2 (b) HE providers shall furnish prospective learners with general advice regarding the average cost of living e.g., accommodation, food, transport and medical care, for the programme duration.

5.3.2 (c) HE providers shall provide information on:

- (i) fees for accommodation services, if offered by the HE provider or other accommodation service providers;
- (ii) fees for complaints and appeals procedures as relevant e.g., rechecking of exam results.

5.3.2 (d) HE providers shall provide information on any other costs related to the provision of student services as considered relevant by the provider.

### Summary

ICD indicated in its IEMAS that all criteria under Principle 5.3 are fully applicable and assessed itself as fully compliant for each. In the view of the Panel, from the IEMAS it was evident ICD Business School provided all learners with clear, accurate, transparent, accessible, relevant and up-to-date information on study costs, including subsistence and accommodation across most, but not all, elements of the criteria detailed in Principle 5.3, with practice in the process of being extended in some.

The School informed learners about fees and other costs associated when undertaking a programme of study in Ireland and outlined its plans to extend its practice in this area; these plans cover the aspects where current practice, at the time the IEMAS was submitted, represented partial compliance. The response to the OQR indicated that ICD was now adding further elements to its approaches, and at pace. Following a meeting to discuss concerns that were, nevertheless, outstanding, ICD provided the necessary information for the Panel to be satisfied that this new information, and evidence of the progress being made, meant that it could change its assessments to fully compliant for 5.3.1 (e) and 5.3.2 (b). While the Panel welcomes this additional action and the responsiveness to its queries, it is concerned that all criteria were identified by the School as fully compliant in the IEMAS, although the evidence quoted demonstrated partial compliance with 5.3.1 (e) and 5.3.2 (b) – also 5.3.1 (f), and that the OQR also indicated gaps – with material only subsequently produced to ensure compliance. The Panel recognises the additional material provided on 5.3.1 (e) and 5.3.2 (b) is sufficient and ICD's plans are appropriate and timely.

#### **Condition 4**

**5.3.1 (f):** However, with respect to one detail within 5.3.1 (f), the Panel would **recommend as a condition of authorisation** that ICD revise the information for students as, in its Extenuating Circumstances Policy, illnesses that would enable a refund are described in vague terms, and there is no clear definition of what constitutes a “serious illness” or “certified illness”. This lack of specificity may create ambiguity for students expecting refunds under illnesses and could lead to inconsistent decision making. The panel recommends that ICD revises this information within 24 weeks of TrustEd Ireland authorisation.

Against principle 5.3 the Panel was especially concerned that ICD had recorded itself as fully compliant even though the evidence provided did not support this, and that the shortcomings in evidence were confirmed with the response to the OQR. This suggests that the School's self-assessment processes need to be re-examined and for that re-examination to embrace how effectively it analyses its own practice, challenges its own assumptions and tests the supporting evidence. It also indicates shortcomings in quality assurance and the quality of engagement with a strategically significant external process.

#### **Condition 5**

**Section 5.3:** Given this, the Panel **recommends as a condition of authorisation** that the monitoring and review of delivery is fully reported on to relevant committees internally within 24 weeks from the date of TrustEd Ireland authorisation and on an annual basis thereafter, as well as through QQI monitoring of TrustEd Ireland authorised providers. The Panel would strongly encourage ICD to undertake a wider critical review of the effectiveness of its approaches to quality

assurance, the sign-off of external submissions and of its monitoring and review processes, as well as of its capacity to ensure that these vital activities are routinely and consistently performed to an appropriate level.

There are no commendations. The actions taken to extend practice more comprehensively to address the detail of all criteria are appropriate and supported with plans that are clearly set out with appropriate timescales for implementation. The Panel noted that plans include monitoring and review of actions and sees the routine inclusion of this element as welcome practice, but emphasises the concern that the IEMAS suggests that monitoring and review itself requires critical consideration of effectiveness. The Panel welcomed planned enhancements in a number of areas, including the establishment of a formal Financial Hardship Policy.

#### Principle 5.4 Supports and Services for International Learners

**HE providers shall foster a supportive environment which supports the wellbeing and integration of all learners into the student body and ensures a positive learning experience for all learners**

5.4.1 (a) HE providers shall designate appropriate personnel to be responsible for inquiries about learner support issues from international learners e.g., course coordinator, counsellor, or international officer.

5.4.1 (b) HE providers shall offer information to international learners prior to their arrival to help them adjust to their new surroundings e.g., information on transport, banking, availability of accommodation and accommodation services.

5.4.1 (c) HE providers shall ensure that inductions offered to learners also meet the needs of international learners, including intercultural awareness. They should direct learners to services, supports and facilities relevant or appropriate to their programme of study. They should also remind international learners requiring entry visas and/or immigration permissions of their responsibilities under the Department of Justice's student immigration regime.

5.4.1 (d) The induction programme shall be provided to all cohorts of international learners who register or enrol at various times of the year, including learners who access programmes through advanced entry.

5.4.1 (e) HE providers shall provide information on appropriate learner supports and services to facilitate learner integration into the wider HE community.

5.4.1 (f) HE providers shall ensure that international learners are aware of opportunities to participate in, and be represented at, engagements between the provider and the learner body. Where possible, they should provide, in collaboration with learner representative bodies, information on national learner engagement initiatives and opportunities for international learners to avail of training opportunities.

5.4.1 (g) HE providers shall have mechanisms in place to support international learners financially in instances of personal or other emergency or hardship.

5.4.1 (h) HE providers shall facilitate and encourage feedback from international learners on the delivery of any supports and services. This includes informing learners about complaints processes for these services.

5.4.1 (i) Institutional approaches to quality assuring learner services and supports will include all learners, including international learners.

5.4.2 (a) HE providers shall offer induction that is accessible to all learners and, where appropriate, tailored to the needs of international learners. They shall provide full information and advice on all relevant institutional and academic policies.

5.4.2 (b) Induction shall be provided to learners and cohorts who enrol at different points during the year, including those accessing programmes through advanced entry.

5.4.2 (c) HE providers shall ensure the information provided at induction is easily accessible throughout the academic year and shall offer reminders of this information at key points during the year e.g., in the lead-up to examinations or submission of assignments.

5.4.2 (d) HE providers will include academic integrity as a core component of induction for all learners, including international learners. Recognition will be given in inductions to the different education cultures of international learners, and the content, advice and support they impart will be relevant and specific to the Irish higher education context. Formal and informal conversations about academic integrity should be held on an ongoing basis throughout the period of enrolment of all learners, including international learners.

5.4.2 (e) HE providers shall endeavour to integrate their international learners, through their inductions and through their policies, procedures, and services, into the wider learner community.

5.4.2 (f) HE providers shall continue to provide staff with training and support to facilitate an appropriate and effective delivery of programmes and services to international learners. This should include, where appropriate, training in intercultural competence and support for the development of English language education competence.

### Summary

The Panel concurred with ICD's assessment both that all the criteria under Principle 5.4 are fully applicable and that it is fully compliant with each. ICD Business School fosters a supportive environment which supports the wellbeing and integration of all learners into the student body and ensures a positive learning experience for the range of its international learners. The initial IEMAS did not provide sufficient detail, but the response to queries from the Panel in the OQR provided the required additional information, examples and reflection on effectiveness to provide the necessary assurance.

Against Principle 5.4 there are no recommended conditions for authorisation and no recommendations. Current practice is sound, compliant and effective and planned developments appropriate. Additional information, in response to a query by the Panel, provided examples on student feedback and closing the feedback loop with students and gave valuable insight into the operation of ICD's processes and their effectiveness in practice for students.

### Commendation 1

**5.4.2 (d):** ICD is **commended** for its proactive approach to some aspects of the enhancement of the quality of provision. A specific example being, in connection with criterion 5.4.2 (d), the review of AI and Assessment Strategy across three business programmes which showed a thorough and contemporary evaluation of potential vulnerabilities in light of current practice and research about AI and Assessment and plans to mitigate the connected risks.

## Principle 5.5 English Language Policy Statement and International Foundation Year Programmes

**The English language supports provided by HE providers to international learners, including through the provision of international foundation year programmes, are underpinned by a coherent and transparent institutional policy approach.**

5.5 (a) HE providers shall have an English language policy statement for international learners that shall:

- (i) document the policy approach and process to the assessment of English language proficiency entry requirements;
- (ii) document, as appropriate, the institution's policy approach to the provision, support, and development of English for Academic Purposes;
- (iii) set out the institution's policy approach to the provision of English language supports to non-native English speakers prior to commencement and throughout the duration of their higher education programmes;
- (iv) document the arrangements, including, as appropriate, the quality assurance, credit and/or awarding arrangements, for different types of EAP programmes, such as:
  - pre-sessional programmes/modules,
  - in-sessional programmes/modules

5.5 (b) HE providers offering international foundation year programmes shall set out in their English language policy statement for international learners

- (i) the quality assurance, credit and/or awarding arrangements for these programmes,
- (ii) the corporate and academic governance arrangements in place where such programmes are provided in partnership with other entities e.g., a private English language education provider, other independent/private education provider or campus company.

5.5 (c) For compliance with this HE Code, an international foundation programme shall lead to one of the following awards included within the NFQ:

- (i) QQI preparation for undergraduate programmes, leading to NFQ Level 5 Special Purpose Award (foundation qualification)
- (ii) QQI preparation for postgraduate programme, leading to NFQ Level 8 Special Purpose Award (foundation qualification)
- (iii) equivalent programmes leading to awards that are included within the NFQ and validated by an Irish awarding body.

5.5 (d) Where HE providers currently offer international foundation year programmes that do not lead to awards that are included within the NFQ, they must secure programme validation/course approval for such programmes through an Irish awarding body within two years of the date on which they are authorised to use the IEM.

### Summary

As identified by ICD, only 5.5(a) (i-iv) is fully applicable to it, with 5.5 (b) to 5.5 (d) not applicable. ICD assessed itself as fully compliant with 5.5 (a) (i-iv); against the evidence in the IEMAS, and in response to the OQR, the Panel did not concur with this assessment. The English language supports provided by ICD Business School to international learners were planned at the time of the submission of the IEMAS, to be underpinned by a coherent and transparent institutional policy approach. The Panel were informed, in response to the OQR, that this approach was currently being formalised as an English Language Policy which was planned to be finalised and approved by the end of 2025. However, following a subsequent meeting with ICD, an English Language Policy was produced enabling the Panel to move its assessment from one of partial compliance to fully compliant. There are, nevertheless, areas where action is recommended.

The Panel identified two recommendations. It recommends that the effectiveness and cohesiveness of the English Language Policy for students is fully reviewed, to include the gathering and evaluation of student views, within one year of TrustEd Ireland authorisation, and subsequently reported and evaluated through QQI monitoring of TrustEd Ireland authorised providers. The Panel further **recommends** that ICD consider developing further focused in-session English language supports to help ensure international learners progress on their programme of study.

The Panel would again highlight the gap between the institution's assessment of itself as fully compliant in the IEMAS and the evidence it provided for this, and reiterate that this illustrates an underdeveloped ability to assess evidence against requirements and to self-assess performance effectively. The fact that a meeting was needed following the OQR process and that only after that was appropriate additional evidence provided, supports the view that the level of engagement with the IEMAS, a strategically significant external process, suggests shortcomings in institutional prioritisation and quality assurance. QQI monitoring of TrustEd Ireland authorised providers will be able to assess progress in these areas.

#### Principle 5.6 International Learners outside the State

**HE providers ensure that learners outside the state who are enrolled on their programmes receive quality learning experiences, where these programmes lead to awards that are included within the NFQ, and whether they are offered in transnational education settings and/or through remote, fully online modes of learning.**

5.6.1 (a) HE providers, having regard to their statutory quality assurance obligations, shall ensure that the academic quality, standard and recognition of their transnational education programmes are equivalent to the academic quality, standard and recognition of the programmes they provide within the state.

5.6.1 (b) HE providers shall apply the principles and criteria set out in this HE Code in an equivalent manner in transnational education settings, including in relation to the provision of learner support services.

5.6.1 (c) HE providers shall support QQI, as appropriate, in implementing its statutory function to facilitate the recognition outside the state of awards made in the state. This facilitatory function extends to awards included within the NFQ, where the programmes leading to these awards are provided outside the state.

5.6.1 (d) Linked providers who intend to offer transnational education programmes that lead to awards within the NFQ shall only do so with the agreement of the designated awarding body or bodies making the awards.

5.6.2 (a) HE providers, having regard to their statutory quality assurance obligations, shall ensure that the academic quality, standard and recognition of their remote online programmes are equivalent to the academic quality, standard and recognition of the programmes they provide through other teaching and learning modes.

5.6.2 (b) HE providers shall apply the principles and criteria set out in this HE Code in an equivalent manner in relation to learners outside the state enrolled on remote online programmes that lead to awards included within the NFQ, including in relation to the provision of learner support services.

5.6.2 (c) HE providers shall support QQI, as appropriate, in implementing its statutory function to facilitate the recognition outside the state of awards made in the state. This facilitatory function extends to awards included within the NFQ, where the programmes leading to these awards are offered as remote online programmes.

5.6.2 (d) Linked providers who intend to offer remote online programmes to learners outside the state that lead to awards within the NFQ shall only do so with the agreement of the designated awarding body or bodies making the awards.

### Summary

Principle 5.6 is not applicable; ICD does not currently deliver programmes to learners outside the State.

## Summary of assessment outcomes

### This section provides for the Assessment Panel findings and outcomes by principle and criterion

#### Overview of the provider's international profile and activities

ICD Business School is a small provider of tertiary level with QQI-approved qualifications at levels 8 and 9 in accounting, finance business and management, a number involving professional body recognition or exemptions. It was established in 2001 and aims to attract both EU and non-EU students. Its offer is on-site and it stresses small group tuition and individualised support with 'quality', 'consistency' and 'caring' as its watchwords. It has indicated future expansion of blended and online learning to accommodate international students and lifelong learners.

The student profile is predominantly international learners, 81% are non-EU (with 32 different countries noted in the IEMAS) with 5.3% from the EU. ICD does not offer transnational or distance/online provision. However, it has indicated the intention to pursue partnerships for student pathways and collaborative programmes (thus aspects of 5.6 may come to apply in future). The IEMAS was considered, and this Assessment Report has been written, in the context of the centrality of international learners in ICD's business model. The fact that international is the main focus of its activity, and it aims to extend into blended and online learning, means that this is the primary focus of all its activity under each of the TrustEd Principles and the basis of its experience from recruitment, through learning delivery to all quality processes.

The IEMAS provided a wide range of information across most criteria, but the Panel had a number of significant queries arising from it as the application did not provide an evaluative account of the

effectiveness of the procedures in relation to the IEM criteria overall. Against 5.4, the response to those queries in the Outstanding Queries Report (OQR) and, especially the additional information and examples, provided the additional assurance sought on the effectiveness of ICD's processes and procedures in operation. For 5.1 and 5.3 it was evident that there is work underway, while additional plans, with timescales, provided some of the necessary assurance that ICD will become compliant in all areas. However, the fact that ICD did not appear to have identified where it did not fully comply remained a concern. That concern was especially acute with respect of 5.5 as, neither the IEMAS nor the response to the OQR, evidenced the existence of an English Language Policy (ELP). A subsequent meeting between the provider, the Panel Chair and QQI resulted in the submission of a further tranche of new material as evidence, including an ELP.

The Panel noted ICD's proactive approach to some aspects of the enhancement of the quality of provision. For example, in connection with criterion 5.4.2 (d), the review of AI and Assessment Strategy across three business programmes was seen as commendable practice, showing a thorough and contemporary evaluation of potential vulnerabilities in light of current practice and research about AI and Assessment and plans to mitigate the connected risks.

However, of far greater concern was the nature and quality of the IEMAS which did not provide the evidence necessary to support the assertions of full compliance and did not illustrate an ability to self-assess effectively. Given the strategic significance of international activity for ICD, and the vital importance of the IEM for it, these shortcomings are surprising and suggest that the IEMAS exercise was not given sufficient priority either in the production of the IEMAS or in its internal review and sign-off prior to submission. The Panel would, therefore, strongly encourage ICD to undertake a wider critical review of the effectiveness of its approaches to quality assurance, the sign-off of external submissions and of its monitoring and review processes, as well as of its capacity to ensure that these vital activities are routinely and consistently performed to an appropriate level.

#### Recommended condition(s) for authorisation:

##### Condition 1

**5.1.2 (f) and 5.1.2 (h):** The Panel **recommends as a condition of authorisation** that ICD undertake the monitoring and review the effectiveness of the implementation of the new planned processes (as noted in Recommendation 1 below) for the monitoring and review of recruitment agents and partners, extended due diligence and for the briefing and training of agents, and to have completed that review within one year from the date of TrustEd Ireland authorisation.

##### Condition 2

**5.1.2 (d) and 5.1.2 (e):** The Panel **recommends as a condition of authorisation** that that the planned changes (as noted in Recommendation 1 below) to incorporate the principles of the London Statement (5.1.2 (d)) and regarding termination clauses (5.1.2 (e)) are implemented, monitored within one year from the date of TrustEd Ireland authorisation and there after subject to regular review.

### Condition 3

**5.2 (c) to (f):** The Panel **recommends as a condition of authorisation** that ICD review its admissions policy, and any other relevant policies and processes, against the principles and guidance in the LRC (and any subsequent iterations or subsidiary texts) and criteria 5.2 (c) to (f) firstly to establish clearly where gaps exist in institutional policy and practice and, secondly to establish a timebound implementation plan to revise institutional policy and practice to incorporate the principles and guidance of the LRC and HE Code criteria 5.2 (c) to (f) and, finally, to make any revisions to ensure that all principles and guidance of the LRC and HE Code criteria 5.2 (c) to (f) are fully encompassed within the College's policy and practice. All elements should be completed within one year of TrustEd Ireland authorisation.

### Condition 4

**5.3.1 (f):** The Panel **recommends as a condition of authorisation** that ICD revises the information for students in its Extenuating Circumstances Policy within 24 weeks of TrustEd Ireland authorisation to provide a clear definition of what constitutes a "serious illness" or "certified illness".

### Condition 5

**Section 5.3:** Across HE Code 5.3, the Panel **recommends as a condition of authorisation** that the monitoring and review of delivery is fully reported on to relevant committees internally within 24 weeks from the date of TrustEd Ireland authorisation and on an annual basis thereafter, as well as through QQI monitoring of TrustEd Ireland authorised providers.

## Commendations:

### Commendation 1

**5.4.2 (d):** ICD is **commended** for its proactive approach to some aspects of the enhancement of the quality of provision. A specific example being, in connection with criterion 5.4.2 (d), the review of AI and Assessment Strategy across three business programmes which showed a thorough and contemporary evaluation of potential vulnerabilities in light of current practice and research about AI and Assessment and plans to mitigate the connected risks.

## Recommendations:

**Recommendation 1**

**5.1.2 (d), 5.1.2 (e), 5.1.2 (f) and 5.1.2 (h):** The Panel **recommends** that a full analytical report on the effectiveness of the new processes should be made to, and considered by, ICD's Quality Assurance Committee and Governing Body within two years of TrustEd Ireland authorisation to ensure that the approaches outlined deliver against TrustEd criteria 5.1.2(d), 5.1.2(e), 5.1.2(f) and 5.1.2(h) are fit for purpose, support ICD's aspirations and have fully met is planned movement 'from aspiration to implementation' [OQR response].

**Recommendation 2**

**5.5 (a) (i)-(iv):** The Panel **recommends** that the effectiveness and cohesiveness of the English Language Policy for students is fully reviewed, to include the gathering and evaluation of student views, within one year of TrustEd Ireland authorisation, and subsequently reported and evaluated through QQI monitoring of TrustEd Ireland authorised providers.

**Recommendation 3**

**5.5 (a) (iv):** The Panel **recommends** that ICD consider developing further focused in-sessional English language supports to help ensure international learners progress on their programme of study.

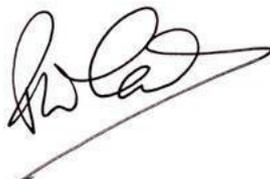
**Declarations of Assessment Panel**

This report has been agreed by the Assessment Panel and is signed on their behalf by the Chairperson.

Assessment Panel Chairperson: Professor Phil Cardew

Date: 5th October 2025

Signed:



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## ICD Business School – Formal Response to TrustEd Ireland HE Pathway Assessment Report

Date: November 3<sup>rd</sup> 2025

To: Approvals and Reviews Committee, TrustEd Ireland

From: ICD Business School

### 1. Introduction

ICD Business School welcomes the TrustEd Ireland Assessment Report and appreciates the professional and developmental tone adopted by the Assessment Panel. We are pleased that the Panel has recommended ICD Business School for authorisation to use the TrustEd Ireland Mark and acknowledged ICD's strong commitment to ethical recruitment, learner welfare, and robust quality assurance.

This response outlines ICD's actions and commitments in relation to the conditions and recommendations specified in the report, referencing the institution's supporting documentation, particularly the IEMAS Application (May 2025) and ICD Response to Outstanding Queries (information conveyed to the TrustEd panel, since ICD's initial application, in response to panel queries), which detail ICD's recruitment, admissions, and monitoring frameworks.

### 2. Response to Conditions of Authorisation

#### **Condition 1 – Recruitment Agent Monitoring (5.1.2(f), 5.1.2(h))**

ICD is establishing a structured Agent Monitoring Framework embedded in the institutional QA cycle and overseen by the Registrar's Office. Implementation commenced in November 2025, with milestones including a revised Agent Management Policy and Agreement (v2.0) by January 2026, and the first Annual Performance Review in January 2027.

#### **Condition 2 – Incorporation of London Statement and Termination Clauses (5.1.2(d)-(e))**

All new and renewed agent contracts from January 2026 will embed London Statement principles and structured termination protocols. ICD has adopted a three-stage escalation model (informal warning, probation, termination with applicant protection), ensuring both accountability and student welfare continuity.



**Condition 3 – Admissions and Lisbon Recognition Convention (5.2(c)-(f))**

A cross-functional working group led by the Registrar is revising the admissions policy to align with the Lisbon Recognition Convention (LRC). Revisions include transparent documentation of evaluation procedures and staff training. Completion is scheduled for October 2026.

**Condition 4 – Refund and Illness Policy (5.3.1(f))**

ICD agrees with the recommendation to refine definitions of 'serious illness' and 'certified illness.' Updated policy publication is planned for March 2026.

**Condition 5 – Monitoring of Fee-Related Provisions (5.3)**

ICD has integrated financial monitoring into its QA cycle, with outcomes to be reported by the Registrar to the ICD Governing Body annually.

**3. Response to Recommendations**

**Recommendation 1 – Analytical Report on Agent Management (5.1.2(d)-(h))**

A comprehensive report analysing the effectiveness of new processes, related to criteria 5.1.2(d), 5.1.2(e), and 5.1.2(h), will be made to ICD Governing Body by the ICD Registrar by December 2027.

**Recommendation 2 – English Language Policy Implementation (5.2(a)-(b))**

In Oct 2025, ICD amended its semesterly student feedback surveys to include gathering of student views on the effectiveness and cohesiveness of the ICD English Language Policy and related supports. Responses will be evaluated for potential beneficial enhancements.

**Recommendation 3 – In-Sessional English Support**

ICD has increased its in-sessional English language supports offering as of the Autumn 2025 semester.

*Vincent Barry*

Vincent Barry  
Managing Director

