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Short bio:

Jim Murray is Director of Development at QQI since October 2021. He has previously held senior executive roles in Institutes of Technology Ireland (IOTI)/Technological Higher Education Association (THEA), 2011-2021; and the National Qualifications Authority of Ireland (NQAI), 2003-2011. A historian by training, Jim began his career as an archivist in the UK's National Archives in 1990, and moved into education policy and administration in the mid-1990s in Dublin City University, where he served successively in the roles of Senior Faculty Administrator (Science Faculty) and Assistant Registrar (Policy and Planning) until 2003.

Proposal

Title: The International Education Mark – an innovative approach to the quality assurance of the international student experience in Irish Higher Education

Abstract:

Arising from a recently expanded legislative remit, QQI is currently developing a new quality mark that will be awarded to higher education providers (both public and independent/private), and providers of English language education, who demonstrate their compliance with statutory codes of practice for the provision of their programmes to international learners. In the case of higher education, the code of practice will build upon the existing, statutory quality assurance infrastructure, and will focus on principles and criteria relating to the ethical recruitment of international students by providers; their use of fair and transparent admission processes and equitable qualifications' recognition procedures; the transparency and propriety of their financial dealings with international students; the supports and services they offer international students to protect their well-being and integration on campus, including English language supports for non-native speakers; and the appropriate application of these principles and criteria in the contexts of

transnational education and fully online provision. The IEM, when fully implemented, will make an impact at a variety of levels in the Irish education and training system.

This paper will consider the potential uses and benefits of the IEM for key stakeholders including prospective international learners; education providers; the national qualifications and quality assurance systems; and state bodies involved in the promotion of Ireland's international education offering. The aim is that the International Education Mark (IEM) brand – TrustEd Ireland – will attest to the quality of the programmes and awards of the providers authorised to use it, and to the quality and consistency of the 'student experience' of their international learners.

Introduction

Quality and Qualifications Ireland (QQI) – the national agency responsible for promoting the quality, integrity and reputation of Ireland's further and higher education system – is currently advancing its preparations to introduce a new quality initiative in Ireland in early 2024. This initiative will enable providers based in Ireland who offer programmes of education to international learners residing in the state, or who enrol learners outside the state on programmes that they offer in transnational education settings or through fully online modes of learning, to apply to QQI to obtain authorisation to use a state-endorsed quality mark, known formally as the International Education Mark (IEM). The ultimate aim is that the IEM brand – TrustEd Ireland (*Figure 1*) – will attest to the quality of the programmes and qualifications of the providers authorised to use it, and also to the quality and consistency of the 'student experience' that international learners should expect to find when enrolled on programmes with these providers. This paper will briefly examine the thinking behind the development of the IEM; the different types of providers that may apply to use it; the IEM's relationship with existing quality assurance arrangements in Ireland; and the potential uses and benefits of the IEM for key stakeholders including international learners and their providers, the national qualifications and quality assurance systems, and the state bodies involved in the promotion of Ireland's international education offering.

Figure 1: The International Education Mark brand



Policy context

The idea of establishing a quality mark for providers of education to international learners in Ireland has been under consideration for some time, having been referenced in public policy statements on international education prior and subsequent to QQI's establishment in 2012. In broad terms, these policy statements set out two ambitious objectives. The first of these is a commitment to place educational quality at the heart of the internationalisation of Ireland's education and training system, and to ensure that the quality of the learning experience is maintained and enhanced for all learners through a holistic approach to internationalisation. The second objective is regulatory in nature and recognises an 'imperative' to maintain a 'robust regulatory environment' to protect and enhance the overall quality of the international learner experience in Ireland. This regulatory imperative encompasses, in particular, a desire to put in place a strong regime for the protection of all learners, including international learners, that is based upon a joined-up approach across Ireland's quality assurance and qualifications systems, on the one hand, and the national student immigration system, on the other, so that the recruitment of international learners in Ireland is underpinned by strong ethical and educational values. Overall, the quality and regulatory imperatives identified in public policy statements seek to protect the interests of international learners, and to ensure the sustainability of Ireland's international education offering and the safeguarding of Ireland's reputation internationally.¹

¹ For the public policy statements and their relevance to the IEM initiative see *Investing in Global Relationships. Ireland's International education Strategy 2010-15* (Department of Education and Skills 2010), pp. 14-16, 18, 35-36, 40, 44-49, 53-54, 57, 59-60, 69, 79; available at: [GLOBALUTEX \(assets.gov.ie\)](https://assets.gov.ie/6794897b14064e08bae9a9068a849075.pdf); Government Policy Statement (May 2015) on the 'Reform of the International education Sector and Student Immigration System', available at: [6794897b14064e08bae9a9068a849075.pdf \(assets.gov.ie\)](https://assets.gov.ie/6794897b14064e08bae9a9068a849075.pdf); *Irish Educated. Globally Connected. An International Education Strategy for Ireland, 2016-2020* (Department of Education and Skills), pp. 23-

Legislative context

To achieve these ambitious policy objectives, it has been necessary to establish the IEM not as a stand-alone function, but as one of a suite of measures that have greatly expanded QQI's legislative remit (2019), and yet also remain grounded in and integrated with QQI's core functions in the quality assurance and qualifications arenas.² In combination, these new legislative measures have been designed to protect the broader interests of all learners enrolled on programmes with Irish providers, including at different points the specific needs of international learners. In the round, they cover the quality and consistency of the learning experiences, the recognition of learning achievements and the general welfare of learners. They thus involve a mix of quality assurance, qualifications, and regulatory matters, and encompass, besides the IEM, provisions concerning the academic integrity of the Irish education and training system, specifically in relation to combatting the facilitation of learner cheating. They also include provisions relating to the inclusion within the National Framework of Qualifications (NFQ) of qualifications made by universities and other types of awarding bodies. They are completed by the regulatory arrangements for learner protection that will oblige independent/private providers to undergo due diligence assessments when they engage statutorily with QQI, and to subscribe to a new scheme for the protection of enrolled learners (PEL), which will be underpinned by a statutory learner protection fund. Specifically, private/independent providers engaging with QQI for the first time in relation to the IEM will be required undergo a due diligence assessment as part of their IEM application, in which they must demonstrate their capacity and capability to implement robust quality assurance procedures and to provide coherent programmes of education and training. In addition, all private/independent providers will also be obliged to join the new PEL scheme at the appropriate time, and to subscribe to the learner protection fund, which will serve as a safety net for international and other learners in circumstances where their chosen provider ceases to trade or ceases to provide their programme.³

Initial IEM Authorisation: HE and ELE providers

The legislation underpinning the IEM enables QQI to authorise its use by different groups of providers. QQI has determined that, initially, it will specify and authorise the use of the IEM for higher education (HE) providers (both public and private/independent providers); and English language education (ELE) providers (a largely independent/private education sector in Ireland).⁴ All of these providers will be required to demonstrate their compliance with distinct codes of practice

25, 28-9, 42, 47 (quotations at p. 29), available at: [21dc9268d98043328fb8aea25f3dabc3.pdf \(assets.gov.ie\)](https://assets.gov.ie/21dc9268d98043328fb8aea25f3dabc3.pdf).

² The relevant legislation is available at: [Qualifications and Quality Assurance \(Education and Training\) Act 2012 \(irishstatutebook.ie\)](https://www.irishstatutebook.ie/eli/2012/act/12/section/1); [Qualifications and Quality Assurance \(Education and Training\) \(Amendment\) Act 2019 \(irishstatutebook.ie\)](https://www.irishstatutebook.ie/eli/2019/act/12/section/1). QQI's original legislation from 2012 and the amending Act of 2019 are conveniently consolidated at: [Revised Acts \(lawreform.ie\)](https://www.lawreform.ie/acts-revised).

³ A graphical representation of the measures is presented in Appendix 1, and their legal underpinning can be consulted in [Revised Acts \(lawreform.ie\)](https://www.lawreform.ie/acts-revised): s. 43A (learner cheating services); ss. 55A-55I (inclusion of awards within the NFQ); ss. 60-63 (IEM); sections 29A-29C (due diligence); ss. 64-67 (PEL and learner protection fund). The formal inclusion of the awards of universities in the NFQ is now provided for in a joint-sectoral protocol: [Joint-sectoral protocol DABs.pdf \(qqi.ie\)](https://www.qqi.ie/joint-sectoral-protocol-dabs.pdf).

⁴ QQI, *Policy on Authorisation to Use the International Education Mark* (2023): available at: [iem-04-policy-on-authorisation-to-use-the-iem-october-2023.pdf \(qqi.ie\)](https://www.qqi.ie/policy-on-authorisation-to-use-the-iem-october-2023.pdf).

developed for each group: one for higher education, the HE Code;⁵ and one for English language education, the ELE Code.⁶ In coming to this decision, QQI has taken its lead from the public policy statements referenced above, which have identified higher education and English language education as the key areas for strategic development in establishing the Irish education system as a fully internationalised system that attracts international student talent.⁷ This same strategic focus on higher education and English language education is otherwise reflected in the established student immigration criteria.⁸

Yet while QQI has decided to authorise the use of the IEM by HE and ELE providers initially, the legislation also gives the agency discretionary authority to revoke or amend an existing code of practice, or to issue different codes of practice. Through the mechanisms of amending an existing code of practice, or issuing different codes of practice, QQI could, if there was a sufficient policy imperative to proceed in this direction, extend the authorisation to use the IEM to other categories of providers at a future date, e.g. further education providers; or to specific types of programmes, e.g. transnational education programmes or international foundation year programmes.

The IEM and its relationship with the existing quality assurance system

As previously mentioned, the IEM scheme has been designed to complement and build upon the existing quality infrastructure in Ireland. In this connection, it is noteworthy that the HE and ELE sectors have evolved in distinct ways historically, one consequence of which is that there has been significant variation between the two sectors in the way they have engaged with the state's quality assurance and qualifications' systems. As a result, the codes of practice for the respective sectors, while sharing some common features, will also have distinct characteristics. These relate to the way quality assurance features in the two codes of practice, and how it will underpin the authorisation by QQI to use the IEM.

In higher education, statutory quality assurance arrangements have been in place since the late 1990s. These statutory quality assurance arrangements are reflected in a comprehensive set of policy documents developed by QQI since its establishment in 2012, including the *Core Statutory Quality Assurance Guidelines developed by QQI for use by all providers*.⁹ Any higher education provider seeking authorisation to use the IEM must comply with these arrangements. The IEM scheme provides for the enhancement of the existing procedures through the HE code, which establishes clear expectations in relation to the quality of service and supports available to international learners in Ireland, and to learners outside the state enrolled on higher education programmes leading to qualifications included within the NFAQ. These expectations are enshrined in 6 principles and 63 associated criteria, which cover such topics as the ethical recruitment of international learners by HE providers; their provision of accurate and transparent information about their programmes and

⁵ QQI, *Code of Practice of Practice for Provision of Programmes of Higher Education to International Learners* (2023), hereafter QQI, *HE Code*: available at iem-01-he-code-of-practice-october-2023.pdf (qqi.ie).

⁶ QQI, *Code of Practice of Practice for Provision of Programmes of English Language Education to International Learners* (2023), available at: iem-02-ele-code-of-practice-october-2023.pdf (qqi.ie).

⁷ See note 1 above.

⁸ These criteria are published at: [Interim List of Eligible Programmes \(ILEP\) - Immigration Service Delivery](http://www.irishimmigration.ie/interim-list-of-eligible-programmes-ilep-immigration-service-delivery) (irishimmigration.ie).

⁹ [gg-1-core-statutory-quality-assurance-guidelines.pdf](http://www.qqi.ie/gg-1-core-statutory-quality-assurance-guidelines.pdf) (qqi.ie). The full suite of QQI's quality assurance guidelines are available at: [Quality assurance guidelines | Quality and Qualifications Ireland](http://www.qqi.ie/quality-assurance-guidelines-quality-and-qualifications-ireland) (qqi.ie). <http://ehea.info/page-standards-and-guidelines-for-quality-assurance>

qualifications, and the related requirement that they be included within the NFQ; their use of fair and transparent admission processes and equitable qualifications' recognition procedures; the transparency and propriety of their financial dealings with international learners; the supports and services they offer international learners to protect their well-being and integration on campus, including English language supports for non-native speakers; and the appropriate application of these principles and criteria in the contexts of transnational education and fully online provision.¹⁰

In general, the ELE sector has not been subject to statutory regulation by the state to this point, and consequently has not yet had cause to formally engage with the statutory quality assurance arrangements that underpin the provision and resultant qualifications within the Irish education and training system. This will now change with the introduction of the IEM. QQI's expanded legislative remit makes provision for ELE providers to become a class of providers incorporated into the formal quality assurance system for the purpose of authorisation to use the IEM. Thus, any ELE provider wishing to obtain authorisation to use the IEM will be required to establish procedures for quality assurance under the existing national legislation. The establishment of quality assurance procedures by ELE providers will be a key component of IEM implementation in the ELE sector. The IEM implementation process will embed compliance with a formal quality assurance system for ELE providers that is grounded in new statutory quality assurance guidelines for ELE providers.¹¹ The new guidelines, which are compatible with QQI's core statutory quality assurance guidelines, will also support the alignment of ELE programmes to the Common European Framework of Reference for Languages (CEFR).¹² In effect, the IEM authorisation process will extend the national quality assurance infrastructure to the ELE sector in a formal manner.

While the IEM scheme provides for two distinct pathways to IEM authorisation (HE pathway and ELE pathway), it is the case that some providers in the Irish system are engaged to varying degrees in both higher education and English language education provision.¹³ In such cases, and for the purposes of initial authorisation to use the IEM, a provider whose business is primarily in English language education provision will apply through the ELE pathway and a provider whose business is primarily in higher education will apply through the HE pathway. In both instances, however, providers will be expected to comply with the other relevant code of practice, and QQI will initiate supplementary assessments after the initial IEM authorisation process to ensure that providers that operate in both areas of provision will be compliant with both codes of practice and the related quality assurance arrangements.

Intended/potential impacts of the IEM

The IEM, when fully implemented, will take effect and make an impact at a variety of levels in the Irish education and training system. The following are the anticipated uses and benefits of the IEM for key stakeholders.

For prospective **international learners** contemplating undertaking their studies in Ireland, the IEM will provide a dependable guide to trustworthy and quality assured providers of higher education

¹⁰ QQI, *HE Code*, pp. 14-26. Not all of the 63 criteria will apply to any single HE provider. HE providers will be required to identify applicable criteria and demonstrate how they comply with them.

¹¹ QQI, *Statutory Quality Assurance Guidelines for English Language Education Providers* (2023), available at: [iem-04-qa-guidelines-for-ele-october-2023.pdf](#).

¹² [Common European Framework of Reference for Languages: Learning, Teaching, Assessment \(CEFR\) - Common European Framework of Reference for Languages \(CEFR\) \(coe.int\)](#).

¹³ For an overview of the statutory requirements associated with the two pathways to IEM authorisation see the table in Appendix 2.

and English language education programmes in Ireland. Providers authorised to use the IEM will be listed publicly. The IEM will also ensure that international learners are recruited by Irish HE and ELE providers in an ethical manner; and that, when they commence their studies, they can be confident that the learning experience will be a positive one in terms of consistency and quality throughout the duration of those studies, because they will be sustained by good quality academic and other services. For those who elect to study with independent/private providers, whether in the ELE or HE sectors, there will be a state-backed guarantee to protect their interests in circumstances where their chosen provider ceases to trade or ceases to deliver their chosen programme.

For **HE and ELE providers**, the IEM will provide state attestation that they are higher education institutions or English language schools of quality, who deliver quality assured programmes. Such attestation will support their own marketing and promotional activities. The IEM will also establish clear, nationally agreed threshold standards for the care of international learners, which will support providers in evaluating the quality of the academic and other supports they offer to international learners and the student body as a whole. The establishment of distinct HE and ELE pathways towards IEM authorisation will also present HE providers and ELE providers alike with an opportunity to regularise areas of their provision that are not currently covered by their existing quality assurance infrastructure. It will also provide a solid basis for engagement between the sectors, opening up the possibility for wider collaboration in areas such as the development of international foundation year programmes, the development of direct pathways between ELE and HE, and the pedagogy of English language teaching and learning.

For the **national qualifications and quality assurance systems**, the IEM will establish a new statutory basis for engagement between QQI and the ELE sector and thus help to connect ELE providers and ELE provision with the national systems. This will strengthen the sector and raise the level of quality overall. The IEM will also complement, strengthen, and enhance the existing suite of QQI's quality assurance and qualifications' tools and policies, and deliver new learnings that may be applied more widely, particularly when QQI is establishing new, or amending existing quality assurance policies and guidelines, in areas such as English for academic purposes (EAP) or transnational education. It is of note that the IEM is very much grounded in the national arrangements for quality assurance in Ireland, and certainly in terms of its jurisdictional competence. However, it is also the case that Irish quality assurance, in itself, is very much a part of the European tradition of quality assurance, especially with regard to higher education and the Irish HE system's subscription to the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG).¹⁴ It remains to be seen how and in what ways, if at all, the IEM will interact with quality assurance arrangements at the supranational level, including in such initiatives as the emerging European Universities, and the European Approach for Quality Assurance of Joint Programmes.¹⁵

For the **Irish education and training system**, the IEM will further enhance the reputation of Ireland's educational offering internationally, through the support it provides to Ireland's international education and student immigration strategies. In particular, it will also act as a useful tool for any communications specialists, whether they be based in government departments and state agencies, business and enterprise, or education providers and their representative bodies, when they are tasked with explaining the complexities and dependability of the national quality assurance system to international peers, who do not possess the technical expertise on quality assurance matters. The

¹⁴ [ESG 2015 616002.pdf \(ehea.info\)](#).

¹⁵ [European Universities initiative | European Education Area \(europa.eu\)](#);
https://www.eqar.eu/assets/uploads/2018/04/02_European_Approach_QA_of_Joint_Programmes_v1_0.pdf.

IEM, when fully implemented and fully promoted, may present a clearer, more convenient and, perhaps, more attractive way to explain the intricacies of quality assurance to non-specialists.

Conclusion: Progress on implementation and next steps

The advent of the IEM is a significant development for the Irish education and training system. Over the past two years substantial progress has been made by QQI, in active consultation and partnership with HE and ELE providers and stakeholders, and key Government departments and state agencies, to put in place the necessary infrastructure to enable providers to apply for authorisation to use the IEM, in a manner that will realise the ambitious objectives enunciated in public policy statements over the past decade or so. Amongst the highlights are:

- the finalisation by QQI of the texts of the core suite of policy documents: the HE and ELE Codes of Practice; the Policy on Authorisation to use the IEM; and new quality assurance guidelines for ELE providers;
- the development of the IEM brand – TrustEd Ireland: further work is underway on developing supporting communications’ material, and protocols for the use of the brand, which will be rolled out in the first six months of 2024;
- the development of the ministerial regulations that will underpin the learner protection measures associated with the IEM and other QQI quality assurance functions – it is anticipated that these documents will be published before the end of 2023;
- the development of application and assessment processes for HE and ELE providers – advanced drafts of the processes are currently under discussion with providers and will be finalised before the end of 2024.¹⁶

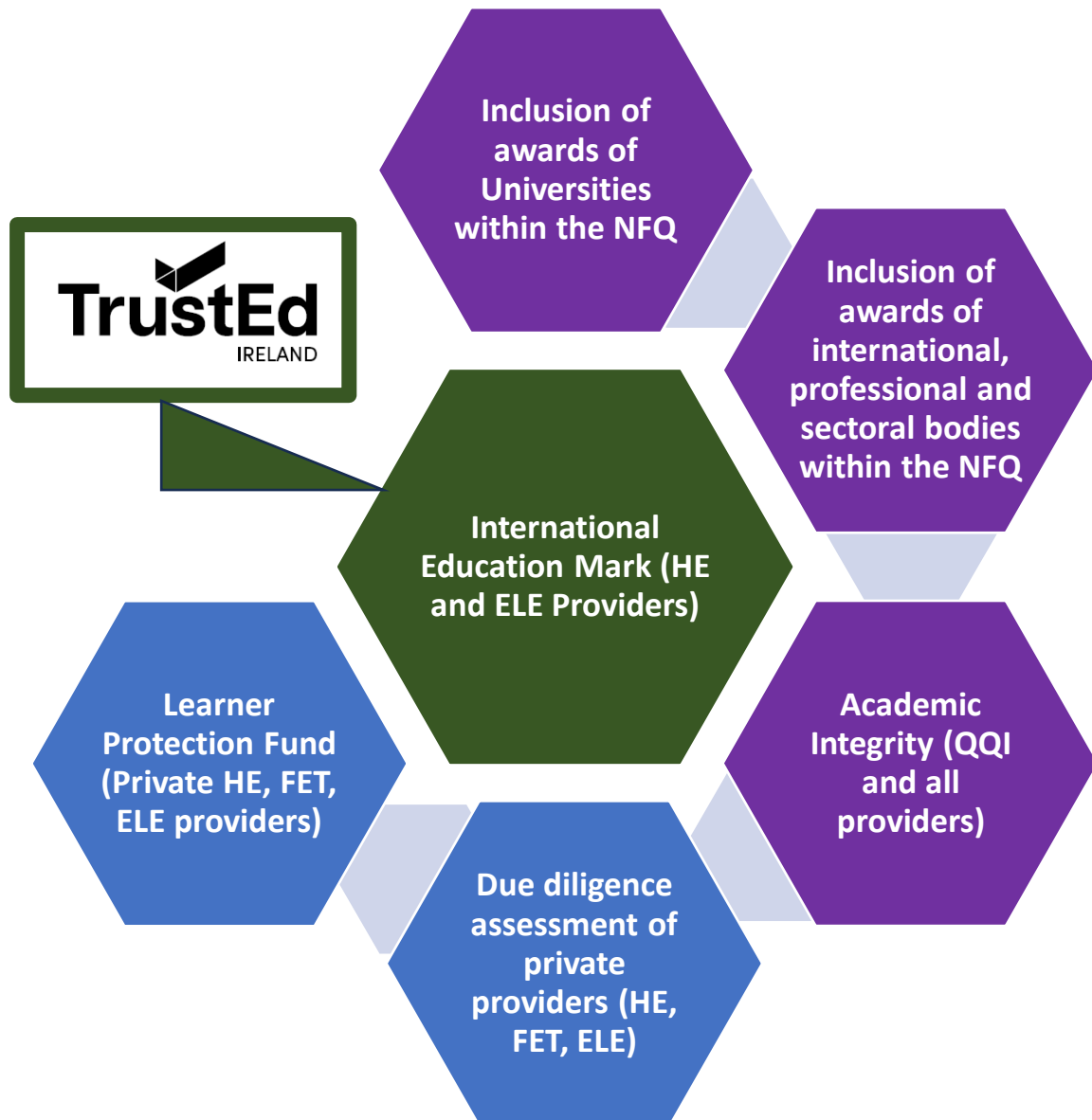
It is planned that, for the purposes of the initial authorisation of providers to use the IEM, there will be two application windows, one commencing in early 2024 and one commencing in early 2025. It is anticipated that the first authorisations (from the cycle 1 application and assessment process) will issue in early 2025, and the second set of authorisations (from cycle 2) in early 2026. The IEM scheme is voluntary, though all providers will be required to confirm their intention to apply ahead of the opening of each of the two application windows. More importantly, it is of note that, while the scheme is voluntary, it is also the policy intention that, following the initial IEM authorisation period, providers who wish to recruit international learners from outside the EU and EEA thereafter will be required to have authorisation from QQI to use the IEM. In this context, it is likely that there will be significant uptake from ELE and HE providers over the next two years.

In conclusion, QQI is looking forward to commencing work with the higher education and English language sectors in reaffirming our collective commitment to establishing clear national standards that will ensure a quality experience for international learners in Ireland from enrolment through to the completion of their programmes of education and training. While there will undoubtedly be challenges in introducing the IEM scheme across two diverse sectors simultaneously, the prize of representing and promoting public confidence in Irish HE and ELE providers, both nationally and internationally, will be worth the effort.

¹⁶ A graphical overview of the application and assessment processes are included in Appendix 3 (HE Pathway) and Appendix 4 (ELE Pathway).

Appendix 1

New learner protection measures (2019) and their relationship with the IEM



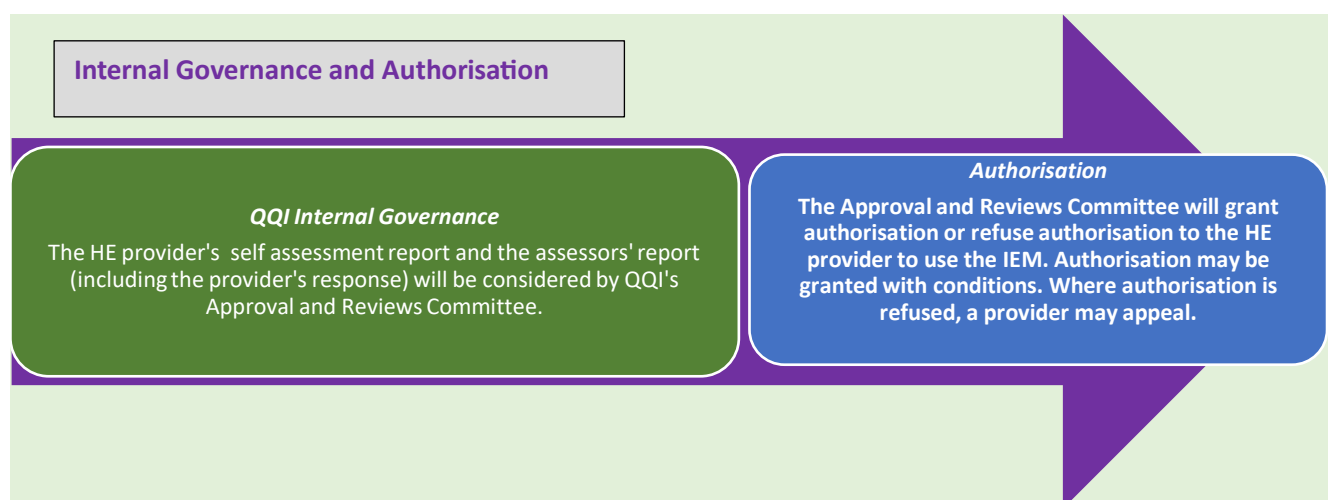
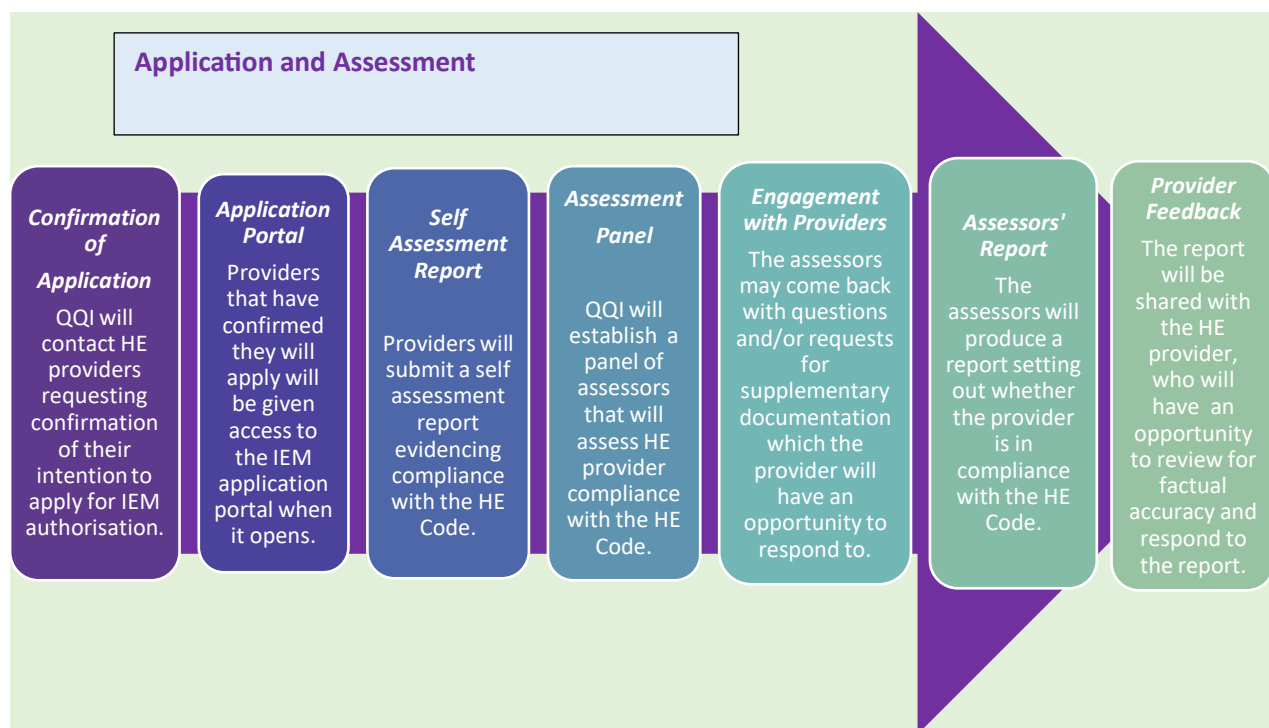
Appendix 2

Overview of statutory requirements for providers seeking authorisation to use the IEM

HE PATHWAY		ELE PATHWAY
<p><u>Statutory Awarding Bodies and other HE Providers exempt from due diligence and PEL Requirements</u></p> <ul style="list-style-type: none"> Established QA procedures Established access, transfer and progression (ATP) arrangements Programmes/awards included within the NFQ under the Joint Sectoral Protocol Compliance with HE Code of Practice Annual upload of programmes/awards to Irish Register of Qualifications (<u>Irish Register of Qualification (irq.ie)</u>) 	<p><u>HE Providers (Independent/Private)</u></p> <ul style="list-style-type: none"> Established QA procedures Established access, transfer and progression (ATP) arrangements Programmes/awards included within the NFQ under arrangements for: QQI validated programmes; providers with delegated authority from QQI to make awards; and the inclusion of the awards of international, professional and sectoral awarding bodies. Compliance with HE Code of Practice Due diligence requirements satisfied Participation in national Protection of Enrolled Learners (PEL) Scheme at the appointed time Annual upload of programmes/awards to Irish Register of Qualifications (<u>Irish Register of Qualification (irq.ie)</u>) 	<p><u>ELE Providers</u></p> <ul style="list-style-type: none"> Compliance with new Quality Assurance Guidelines for ELE Providers, and access, transfer and progression arrangements Compliance with ELE Code of Practice Due diligence requirements satisfied Participation in national Protection of Enrolled Learners (PEL) Scheme at the appointed time Annual upload of programmes to Irish Register of Qualifications (<u>Irish Register of Qualification (irq.ie)</u>)

Appendix 3

Overview of Application and Assessment Process: HE Pathway



Appendix 4

Overview of Application and Assessment Process: ELE Pathway

