



**Submission to the Department of Further
and Higher Education, Research,
Innovation and Science on the Reform of
the Higher Education Authority Act**

March 2021

About the Irish Council for International Students (ICOS)

This submission is made on behalf of the Irish Council for International Students (ICOS). ICOS' is an independent advocacy organisation whose mission is to protect the rights of international students, and to contribute to a healthy and vibrant international education sector in Ireland which has the quality of the student experience at its centre.

ICOS has more than thirty institutional members, including all ten universities in the Republic of Ireland, many of the Institutes of Technology and all the major independent third level colleges. Our membership also includes the Union of Students in Ireland (USI).

ICOS' values include consultation, professionalism, collaboration and learning. Our goals are to influence policy and standards in international education; build the capacity of our members; empower international students to pursue their rights; and support and showcase the important contribution of international education to international development.

Introduction

ICOS welcomes the opportunity to make a submission in relation to the reform of the Higher Education Act 1971. The Act has been in place for almost 50 years and the reforms envisaged in the legislation are welcome and overdue as the function of the Higher Education Authority are not limited to those envisaged 5 decades ago. The reforms proposed are important as they seek to balance the accountability and the autonomy of higher education institutions. ICOS offers some observations below as well as some key recommendations.

Reform of Governing Authorities

The student voice needs to be central to decision-making processes in all HEIs. The composition of Governing Authorities needs to include the relevant expertise and must be conducive to good governance. ICOS supports the call from the Union of Students in Ireland to have four students on each Governing Authority, nominated by the student representative body/s within the institution. These students should be diverse and include a postgraduate student as well as a student that is knowledgeable on the needs of international students. Training should be provided for all members of Governing Authorities.

Stakeholder Involvement in Higher Education Institutions

Engagement with students and ensuring student representation in all areas that affect them should be paramount in all HEIs. In relation to Academic Councils, it is not sufficient to state that 'an appropriate number of students' should be on the councils. This leads to inconsistent practice across the sector. It needs to be specified that students should be represented in the

same way as staff. ICOS recommends that international students need to be represented on Academic Councils. This is particularly important in HEIs where international student numbers make up a significant part of the student body.

Governance Framework between Higher Education Institutions and the HEA

ICOS welcomes the co-regulation model and the respect for institutional autonomy. It is important that the role of HEIs, the HEA and the Minister are clear.

The Board of the HEA

ICOS recommends that at least one member of the Board of the HEA has extensive expertise on international education policy and that this should be specified when the role is advertised.

Performance Framework

ICOS advocates that compliance with the International Education Mark, when introduced, needs to be a performance indicator for all HEIs.

Engagement with International Students

ICOS welcomes provision for the Higher Education Authority to engage formally with student representatives. We propose that ICOS be consulted in relation to any student panels that are being developed so as to ensure that the voice of international students is heard.

Research

ICOS would recommend that consideration is given to the importance of researchers within HEIs. PhD students in Ireland often do not receive fair remuneration and many end up teaching hours for free. There needs to be more regulation and data collection in relation to the experiences of these students and researchers.

ICOS would welcome the opportunity to engage in further discussion regarding this submission.

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