



RESPONSE OF THE IRISH COUNCIL FOR INTERNATIONAL STUDENTS (ICOS) ON OUTLINE PROPOSAL OF THE DEPARTMENT OF JUSTICE, EQUALITY AND LAW REFORM (D/JELR) ON INTERNSHIPS/PLACEMENTS

Thank you for your earlier correspondence (10/12/08) outlining the D/JELR's proposals for the future treatment of internships and work placements which are part of academic programmes.

ICOS has circulated the information to its members and we hope you will find it useful to have some feedback from the institutions as you move towards further elaboration of the measures.

The comments of ICOS' members can be summarised as follows:

1. ICOS members have generally welcomed D/JELR's initiative to bring much needed clarity to the question of internships which has been problematic for non-EEA students, HEIs and employers for some time in the absence of any written guidelines on the matter;
2. The proposals as released would seem to largely satisfy HEIs when it comes to the treatment of internships at undergraduate level with some possible exceptions which are discussed at 4 and 5 below. HEIs have also asked if there will be restrictions on the timing of 12 month placements which are attached to a 4-year undergraduate programme. Typically, the 12 month placement might be in year 3 of such a programme eg BA(Hons) Business Studies (DBS);
3. HEIs, however, have some serious concerns about the impact of the proposals on some post-graduate programmes and specifically with the proposal to limit the placement period to three months where the academic programme is of 12 months duration. The main argument is that very few employers will entertain placements of less than 6 months and in some cases the internship component of a particular programme is influenced by criteria set down by the HEA;

ICOS' members have provided some specific examples of courses that would be affected (more examples available). I am aware that some institutions will have already been in touch with you directly on this:

- a) MBS E-Commerce (NUI Galway)The academic programme is of 2 years duration but the placement can be anything from 6-12 months allowing students time to complete both practical and thesis requirements. A number of employers take students from courses, such as this, that operate a nine or twelve month placement – this will discriminate against the non EU/EEA students;
- b) MSc Software Engineering (NUI Maynooth). The work placement on this programme is a minimum of 6 months and the course can be completed on a 1-year full time basis;
- c) Erasmus Mundus MSc in Food, Science, Technology & Nutrition (DIT)
This is an EU supported programme involving a 1.5 year academic course plus a 6 month work placement. There are currently 12 non-EEA students registered on this programme;

4. It is not clear from the proposals how summer (unpaid) internship programmes might be treated. These usually have a internship component of 6 weeks eg Summer Internship Programme (UCD) – geared to the US market. Also the general issue of the status of students undertaking voluntary work to complement their studies has not been addressed;

5. The proposals specify that placements will only be allowed at Level 7 and above. Will courses which otherwise meet the criteria be excluded from accepting non-EEA students by default eg Higher Certificate in Pharmacy Technician Studies (DIT) which is a level 6 programme? This is a 2-yr course with a 6 month placement;

We appreciate that immigration officers cannot be expected to calculate the allowable placement period for every programme and that some general guidelines should apply. However, some flexibility will be required to accommodate legitimate students on recognised programmes offered by reputable HEIs. The environment has become more challenging for everyone, both at home and abroad, but there is widespread recognition that international education will be a key element in Ireland's future policy as we try to rebuild the economy. The Taoiseach has recently reaffirmed the Government's commitment to position Ireland as a location of choice for international education and to underpin this policy with "new regulatory and marketing co-ordination arrangements that will enhance the promotion of Irish education overseas"¹. We particularly welcome the move towards a co-ordinated approach and ICOS is happy to support in any way it can and would be happy to engage with the Department(s) on outstanding questions such as the proposed process for registering courses which have placement components. There is some concern about having two registers for courses, the existing DES register of approved courses and the proposed new register in the D/JELR.

Bulgarian and Romanian Students

In the meantime and on a separate issue, we would also be grateful for your advice regarding how Bulgarian or Romanian graduates can avail of the Graduate Employment Scheme. At the moment they are unable to provide evidence of their eligibility to work to employers because, as EU citizens, they are not required to register with the GNIB and have no Stamp 2? This issue has also come up in the past in relation to how Bulgarian and Romanian students can present to employers during their studies in order to avail of their right to undertake casual employment for up to 20 hours per week.

Sheila Power
Director

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¹ "Building Ireland's Smart Economy – A Framework for Sustainable Economic Renewal", Govt of Ireland, December, 2008