



**Statement to the  
Committee on Education,  
Further and Higher  
Education, Research,  
Innovation and Science:  
Higher and Further  
Education Access for  
Refugees**

**June 2022**

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## Introduction

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The Irish Refugee Council has extensive experience working to remove barriers to education for people seeking asylum and with refugee status. Each year we administer an Education Fund derived from public and corporate donations, which ensures that people with refugee status and all protection applicants who are ineligible for state support have the possibility to continue in further and higher education if successful. As part of this work, we directly assist students struggling to access education in Ireland and have used this frontline experience to influence much-needed policy change. We have supported almost 500 new student enquiries in the past twelve months and are continually responding to ongoing requests for support.

In addressing the needs of people from Ukraine in accessing education, the State has a unique opportunity to remove barriers facing all refugees and international protection applicants. Maintaining a focus on equality of access will be crucial to ensuring we do not, either intentionally or unintentionally, create a tiered system of education access.

## Recommendations

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The Irish Refugee Council recommends that the Irish government provides 'Equal Education for All' and suggests the following:

### 1. Education for All

Should the three-year rule be waived for one nationality, it should be waived for all nationalities to be equitable, specifically in relation to SUSI, the Free Fees Initiative, and the Student Support Scheme for people in the International Protection System.

### 2. Enrolment as EU Students

Higher Education Institutes (HEI) should quote and register all refugees, protection applicants and temporary protection holders as EU students without the three-year requirement. HEIs would not lose revenue from this change, as these students cannot attend at the international fee level at present.

### 3. Free Fees Initiative (FFI)

If the government provides access to the FFI to people fleeing Ukraine, we recommend that all refugees, protection applications, and people with temporary protection be deemed eligible for the FFI without the three-year residency or nationality requirement.

### 4. Student Support Scheme for International Protection Applicants 2022-23 (to include Ukraine)

We strongly recommend that the Student Support Scheme be opened for applications in the coming weeks. As a comparison, SUSI has been open since April. Opening the scheme in August 2021 led to some students receiving approval/refusal in the middle of the academic year, which

is hugely problematic for students and HEIs.

We believe this scheme could be quickly adapted to include all newly arrived students who fled Ukraine regardless of their nationality by changing clause (3) of the 'Student Support Scheme for those in the International Protection System' [policy document](#) from: *'to whom the scheme applies'* to read, for example:

- a) Individuals who meet the definition of a protection applicant or a person with temporary protection.
- b) All international protection applicants resident in the state, or persons with temporary protection without the requirement for three years in the State.
- c) Individuals who have been accepted onto an approved PLC or undergraduate course via direct entry or the CAO.

## **5. English Language Assessment and Provision**

Provide for a language assessment on arrival with a progression plan in place. Each person is different and while some will need to reach an everyday conversational level, some people will need a higher level for employment and undergraduate and graduate study. This applies to Ukrainians and all other people in need of our protection.

## **6. Third Country Nationals Previously Residing in Ukraine**

Where non-Ukrainian nationals were studying on student visas in Ukraine in February 2022 and fled to Ireland for protection having been unable to safely return to their country of origin, we recommend they are given the same access to continue and complete their studies in Ireland as per Ukrainian nationals.

## **7. Back to Education Allowance (BTEA)**

Where temporary protection holders obtain a place in further or higher education starting in September 2022, they should be eligible for BTEA without the requirement of three or nine months on an eligible social welfare payment.

## **8. Voluntary Training Opportunity Scheme (VTOS)**

Enable temporary protection holders to access VTOS without requiring six months on an eligible social welfare payment for courses commencing September 2022.

## **9. Central Applications Office (CAO)**

If the government provides a direct entry route for temporary protection holders to apply to attend university in September 2022 having missed the CAO closing date, we recommend providing this same entry route for other nationalities who also missed the closing date.

## **10. Recognition of Prior Learning**

We are aware of and promote the work done by Naric in providing comparability statements for those who have completed a degree in another country. Many people who have fled their home country do so 'mid-degree' (i.e. in the middle of their studies) and find it very difficult to

progress their education due to the difficulties involved in matching modules and standards of Education. We would therefore welcome any progress in the area of partially completed degrees on a national level.

## Underpinning Principles

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The Irish Refugee Council believes that the following principles should apply to policy measures introduced to ensure access to education for all. These principles should guide the analysis of need and the appropriate responses adopted by the State.

- Education as a social good and equaliser.
- Importance of equality of access for all people.
- Flexibility and willingness to adapt to circumstance.

Education is a fundamental **social good**, but it is also a powerful **equaliser**. It allows people who have recently arrived in Ireland to integrate, form new communities, improve their career prospects, and progress in their new lives. Additionally, access to education for people with a refugee experience enriches Irish society through a diversity of perspectives and cultures. We very much welcome the Government's recognition of the importance of education for new arrivals from Ukraine.

However, it is also vital that we use the opportunity presented by the current crisis to provide **equal access to all people seeking international protection** from persecution. The experience of war and conflict is the same regardless of origin and the barriers affecting access to education arise regardless of nationality. The Government now has a unique opportunity to ensure access to education for people fleeing the war in Ukraine. We also open this opportunity to all people seeking international protection from conflict.

In our experience, the education system can sometimes be slow to adapt to change where it's needed. This is sometimes unavoidable due to the complexity of the administrative system, the underlying legal framework, and the size of the education sector in Ireland. The Irish Refugee Council believes that **flexibility of approach and a willingness to adapt existing frameworks** quickly to meet needs will be vital to ensuring access to education for the coming academic year.

## Equality of Treatment for All People Seeking Protection

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Many of the barriers and difficulties accessing education will be the same for Ukrainian people as other international protection applicants. There are approximately 33,000 refugees from Ukraine (which could grow to 50,000+ in the coming months) compared to the approximately 6,000 people who will apply for protection in 2022. There is an opportunity to treat all people fleeing war and conflict in an equitable manner. If it is possible to help a large group it is possible to help a smaller group of people to access education, particularly as it will be a small percentage of these numbers.

Significant work has been underway for the past few years to improve access to education for international protection applicants. In addressing the needs of Ukrainian people accessing education, we can build on existing work, rather than starting from scratch.

As a general point, it should be noted that policy change is often slow to occur, but in the current emergency situation, speed of response will be enormously important. There will also likely be a variety of different situations applying (for example, different language abilities) and one solution will not suit all situations. Flexibility and a willingness to adapt existing frameworks and processes quickly to meet new need will be key to ensuring access to education for Ukrainians.