Student Advisory Board Council Advice and Opinion Bill On Internationalization

To Whom It May Concern,

The Student Advisory Board (SAB), consisting of international students currently studying at various Dutch research universities and universities of applied science, being the advisory board of the auspice of the National Commission Code of Conduct in Higher Education, would like to contribute to the ongoing consultation on the internationalization bill. Having scrutinized the necessary, publicly available documents, we discovered certain pressing challenges, as outlined below. We believe that by engaging in further consultations, we can assure smooth implementation. Nevertheless, we are optimistic that through sustained and collaborative consultations, we can facilitate a seamless implementation of the legislation in question.

1. Discrimination

- 1.1. Understanding the objective behind incorporating the Dutch language into English-stream academic programs. We contend that this initiative may not substantially improve the employability of international students, particularly in roles that explicitly specify "native Dutch speakers only" as a prerequisite in job descriptions. Consequently, we propose a reevaluation of this approach to more effectively address the career prospects of international students.
- 1.2. Stressing the potential discriminatory implications inherent in establishing a quota for the admission of international students. Such a cap could engender disparate conditions in the application processes, thereby exacerbating inequalities between EEA and Non-EEA applicants.

2. Labour Market

- 2.1. Regional Variability: It remains ambiguous how distinct regional requirements for Dutch language proficiency would be determined and standardized, posing the question of how such variability aligns with educational objectives.
- 2.2. Impact of the English-Language Labor Market: The burgeoning prevalence of the English-speaking labor market could diminish the relevance of localized Dutch language requirements, potentially undermining the policy's effectiveness.

3. Education Institutions

3.1. Differentiated language requirements across regions may result in an inconsistent educational experience, thereby compromising the uniform quality of education for students.

- 3.2. International students exhibit diverse long-term objectives, including differing plans for geographic relocation post-graduation. Mandating Dutch proficiency for those who do not intend to reside in the Netherlands post-study imposes an extraneous academic burden without commensurate benefits.
- 3.3. Mandating full language proficiency within the timeframe of a 3-4 year degree program is impractical given the academic rigour of full-time coursework.
- 3.4. Access restrictions may disrupt the diversity within academic settings, a quality often cited as an attraction by international students. Such policies could disproportionately affect the socio-cultural composition of classrooms and detract from the educational experience.
- 3.5. The proposed changes could substantially deter prospective international students from considering Dutch educational institutions, thereby affecting both the quality and quantity of the international student body.
- 3.6. Implementing Dutch language to courses could potentially change the outline/scope of the courses which could lead to an accreditation issue. Seeing how implementing more Dutch language courses would create a "dual" program and not a full English stream.
- 3.7. Given the far-reaching implications on student diversity, academic freedom, and international competitiveness, we strongly advocate for a holistic review of these proposed changes prior to their implementation.
- 3.8. We suggest a more flexible approach, such as offering complimentary Dutch language courses.
 This could incentivize intrinsically motivated students to acquire the language without feeling coerced, thus striking a balance between integration and academic freedom.
- 3.9. With English as the main academic language worldwide, setting Dutch as the language of instruction will jeopardise students' possibilities of joining the global discussion through publications by reducing their familiarity with academic English writing.

4. Conclusion

In summary, the proposed policy raises significant concerns with respect to its disproportionate effects on non-EU students, without meaningfully addressing systemic issues such as housing and labor market challenges. The approach, as currently conceived, bears the risk of being construed as a parochial measure rather than a strategic solution.

Additionally, we note with concern that the open consultation process is available exclusively in Dutch. While ostensibly aligned with national priorities, this decision paradoxically marginalizes the input of international students—the primary stakeholders most affected by this initiative—thereby undermining the legitimacy of the consultation process.

In light of these critical factors, we vehemently recommend a postponement of the proposed legislation. During such, we advocate for a targeted engagement strategy to more effectively consult international students, thereby allowing for their experiences, insights, and suggestions to be incorporated into a more equitable and strategic policy framework.

Signed:

Student Advisory Board