

Tilburg University endorses and has actively contributed to UNL's response to the government's Balanced Internationalization bill. **In our own response, we as an institution address a number of specific points we would like to explicitly draw attention to in the context of this legislative procedure.**

With its Balanced Internationalization bill, the government aims to strike a balance between advantages and disadvantages of internationalization in higher education. Tilburg University recognizes that the rapid growth of the number of international students in the Netherlands poses some challenges, including housing issues, and it therefore supports the proposed measures in the bill for a track-level capacity quota and an emergency quota. Tilburg University itself also takes responsibility in this matter by following a road map for expanding student housing until 2025, by which time the capacity problem in the region should have been adequately resolved, and it will continue to do so.

As a university, we issue this response as a warning **that in seeking short-term solutions we do not take wrong decisions together that will in the long term adversely affect Dutch society as a whole.** We must do now what needs to be done to tackle a number of clear problems, but we must always do so with the long-term agenda for the Netherlands in mind. The bill as it now stands causes collateral damage whose long-term consequences will be detrimental to the country as a whole. Such consequences can be observed in Denmark, where similar policies were experimented with and whose government is now backtracking because the labor market can no longer draw on the talent it needs.¹

Tilburg University has a balanced student body, with fewer international students than the average in the Netherlands. In many of our programs, Dutch language proficiency is a key skill, and we encourage our international students to learn Dutch (for free) or to become more proficient. Only one of our Bachelor's programs sets capacity restrictions, but in practice we admit all applicants and it is therefore fallacious to say that we put up barriers for Dutch students.

For us as a university, but certainly also for the Netherlands as Land of Knowledge, it is vitally important that we maintain and where possible strengthen our international position in the field of scientific education and research. This is emphatically endorsed in the bill. Much has already been written about the importance of international students, both for the quality of education and for our innovation capacity and labor market, not to mention the centrality of the notion of European unity. However, our immediate concerns stem **primarily from the connectedness of education and research within the university.** The strength of universities and university education lies precisely in this interconnectedness. The fact that research does not stop at national borders, is internationally and even globally oriented, means that a substantial number of scientists working at Dutch universities are non-native speakers of Dutch. And where in past times the common language of scientists was Latin, today it is English – a fact that makes it an important language at universities. This, added to the high degree of mobility within academia, means that the working climate for international scientists in the Netherlands will deteriorate as soon as stricter requirements regarding teaching and working language are introduced. Adequate attention should therefore be paid to preventing the effects of strict language requirements on the appeal Dutch universities currently still hold for scientific talent, particularly as this will lead to a decline in the quality of education and research. All students, including the Dutch ones, will suffer, as will, ultimately, the Netherlands as Land of Knowledge. It is imperative to preserve the international context of research and education, and not throw the baby out with the bathwater. Rebuilding the current strong position of Dutch higher education and scientific research within our universities will take many years. After all, trust and reputation are slowly won and quickly lost. The bill not only seems to ignore the inextricable

¹ <https://www.thelocal.dk/20230302/denmark-could-offer-places-to-thousands-of-additional-international-students>

connectedness of education and research; it disconnects both. **Given that our academic staff is largely English-speaking, the proposed legislation does not provide enough room to offer English-taught education.** The temporariness associated with this aspect of efficiency implies that we should require our academic staff to learn academic-level Dutch to be able to teach at that level. Even now, international scholars made to feel unwelcome by this debate are considering leaving. The bill makes it much harder to attract fresh international talent, and in view of the above that is the biggest threat it poses.

The other concerns Tilburg University has over the proposed legislation are as follows:

- Students' Dutch language proficiency is a legitimate concern in the bill and one that we as a university take to heart. However, the manner in which the bill **explicitly intervenes in the curriculum in higher education is not the right solution. It shifts the responsibility for the content and form of education from the institution to the government.** What is more, never in the history of Dutch education, primary and secondary education included, have minimum numbers of hours of instruction been prescribed by law for a specific component of the curriculum. This is an unprecedented intervention that greatly harms the autonomy of universities with respect to setting their curricula. It is the responsibility of educational institutions to shape the educational program appropriate to the level of the program, the content of the relevant discipline, and social demand. Educational institutions are accountable to their students and society through accreditation of the programs they offer. As an institution, we call on the government to give us the room to take on this responsibility our own way.
- **The escalation ladder must become a real ladder and provide sufficient time.** The ladder as outlined in the memorandum starts, in principle, with sector self-direction, to be followed only at a later stage by legal measures. The requirement for all Bachelor's degree programs to pass the effectiveness test on linguistic diversity within six months of the proposed legislation taking effect is not consistent with this ladder: it leaves insufficient time and scope for self-direction. We propose that **the focus be more explicitly on sector self-direction** and to only activate the escalation ladder **when that becomes necessary. A general assessment of the effectiveness of linguistic diversity would then no longer be relevant.** The effectiveness test would then only be used following signals that self-direction for a specific program has been insufficiently effective.
- **We believe it is important that clarity on frameworks be offered in primary legislation (Acts of Parliament), not in subsequent ministerial decrees or orders in council.** On the one hand, the use of such secondary regulatory instruments creates ambiguity and uncertainty which prevents institutions from acting, while on the other hand this construction also ensures that interpretation of these essential components can take place in a number of cases without scrutiny by the House of Representatives. For example, the following questions have yet to be answered. How exactly is the percentage of non-Dutch speakers in any given program or track to be determined? As to criterion (d), what does the Minister understand by the international positioning of a top program? And who is to determine that status? Is this about excellence in teaching or research, or both? What makes a program unique? Is that a matter of historical record or will other parameters apply, too?
- **Both the regional socio-economic agenda and the regional educational needs should play a greater role in the considerations regarding linguistic diversity.** Societal and economic issues are not only about shortage sectors, but also about regional sectors with shortages or future needs. Demographic developments are important here. Moreover, universities do not educate people for the professions of today, but for the needs of the future. If we had allowed shortage sectors to be leading, a discipline such as linguistics, now essential in the development of artificial intelligence, would no longer exist in the Netherlands. With regard to educational needs, the range of educational programs on offer is at risk, generically, of becoming impoverished as a result of the proposed legislation (limited utilization of top international scientists, difficulty in maintaining small programs). The immediate effects are a restricted

educational offer and an uneven spread of educational offers for Dutch students. It is essential that not only young people in the *Randstad*, where the concentration of universities is high, have access to a wide range of high-quality educational programs; a full range is also essential in other regions, such as North Brabant. The importance of a broad and distributed supply applies to both initial education and Lifelong Development.

- Finally, as a university, we would like to call attention to the fact that the proposed legislation does not address a major cause of the increase in the number of international students: **the funding model**. Due to the market share funding the current funding model is based on, institutions for higher education are financially penalized when their student intake grows less than that of other institutions. Without a more stable funding model, such as, for example, capacity funding, self-regulation of the intake of international students will remain difficult and will directly affect accessibility for Dutch students in several regions. One effect could be that students will no longer be able to attend a university in their region – not because too large an influx of international students reduces their chances of being admitted, but because offering the program is no longer financially viable.

To conclude, far from being blind to the challenges posed by the rapid growth of the number of international students, Tilburg University aims for a balanced composition of the student body, one that allows us to grow in meaning and to further prioritize the Dutch language proficiency of our students. Moreover, it is our constant task to review our program portfolio against our mission and to critically examine whether it continues to align with scientific developments and society's needs. **In the coming years, and provided the time and room given suffice, Tilburg University will be seeking to implement well-considered, careful changes in its program portfolio and its curriculum, including the English-taught components.** We call on politicians to give us the trust, room, and time to do this carefully and with sufficient consideration for the long-term agenda of the Netherlands.