



CODE OF CONDUCT
INTERNATIONAL STUDENT HE

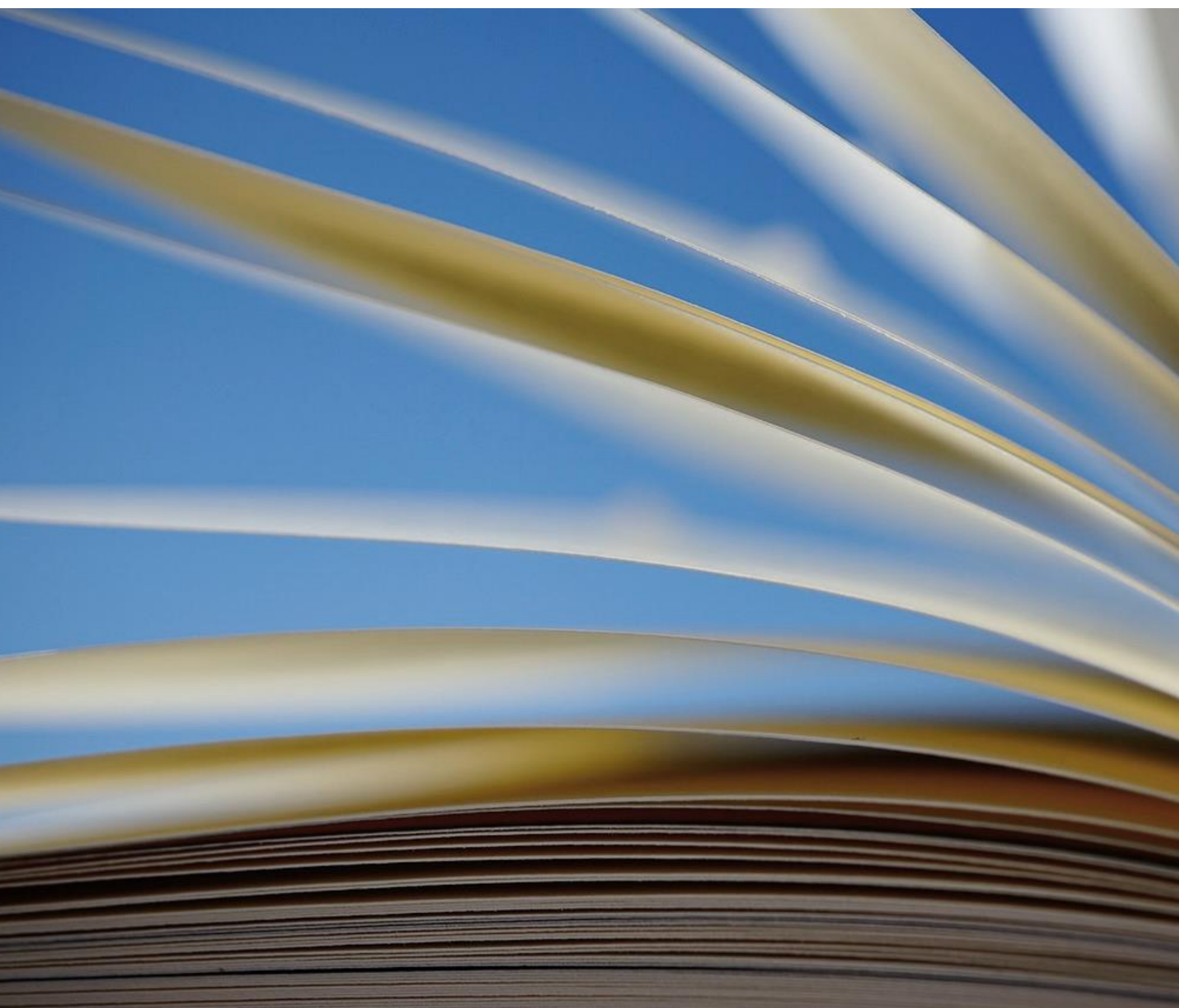


Annual Report

2024

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Introduction

In recent years, the internationalisation of higher education in the Netherlands has been subject to close scrutiny, especially with regard to incoming student mobility. Discussions about the influx of international students form part of a wider debate on migration. For some time, the Ministry of Education, Culture and Science has been working on an Internationalisation in Equilibrium bill, containing measures to establish more effective controls on the number of international students entering the higher education system. It also includes an assessment of tuition in languages other than Dutch with the aim of ensuring that students are only taught in another language when it serves a clear purpose.

The current Dutch government took office on 1 July 2024 under the leadership of Prime Minister Dick Schoof. Its education minister Eddo Bruins has stated his intention to pursue a stricter policy than his predecessor, as reflected in a tightening of the aforementioned bill on matters such as the assessment of foreign-language tuition. In addition to its commitment to a restrictive migration policy, the government has announced plans for significant cuts to higher education. The education sector is critical of both the bill and the proposed cuts. The National Code of Conduct Commission (hereafter referred to as 'the Commission') has also raised concerns. The bill contains measures that could have a far-reaching impact on the position of international students now and in the future.

The developments outlined above generate a high degree of uncertainty among higher education institutions, students and prospective students. It has emerged from the Commission's discussions with the International Student Advisory Board that international students do not always feel welcome in the Netherlands. The current debate has an impact on them and creates uncertainties, something the Commission views as regrettable. Young people should be able to enjoy their time as a student without having to worry about the rules being changed along the way.

The Commission issues an annual report on its activities during the previous year. In this document, it describes the developments in relation to the Code of Conduct and the register for which the executive agency for education in the Netherlands, Dienst Uitvoering Onderwijs (DUO), is responsible. The Commission met regularly over the course of the last year and held administrative consultations with external parties. It also conducted a number of reviews and received an official complaint. In the final section, the Commission will look ahead to the coming year.

National Code of Conduct Commission

The text of the Code of Conduct was drafted by higher education institutions in the Netherlands represented by their umbrella organisations: Dutch Council for Training and Education (NRTO), Universities of the Netherlands (UNL) and the Netherlands Association of Universities of Applied Sciences (VH). The educational institutions which have signed up to the document have established a Commission to monitor compliance with the Code of Conduct. The Commission fulfils this assignment by, among other things, conducting reviews and handling complaints from international students or stakeholders in relation to the Code of Conduct. In addition, the Commission identifies relevant developments with regard to the Code of Conduct, organises consultations with Code of Conduct stakeholders and informs educational institutions and stakeholders about these matters in a newsletter.

You can read more about the work of the Commission below.

Reviews

By conducting reviews, the Commission monitors compliance with the provisions of the Code of Conduct. The outcomes of these reviews can also help ensure that educational institutions implement the Code of Conduct's provisions more effectively. Examples include suggestions for providing information to students based on best practices. The Commission completed two reviews in the past year.

Register review

Since 2022, the Code of Conduct has required the Commission to review all the institutions on the register once every six years in the light of the following articles: Article 1 (the definition of an educational institution); Article 2.1(h) (information provision about the Code of Conduct); Article 5.2 (determination and application of minimum language requirements); and Article 6.2 (accreditation requirements for the study programmes offered). The main purpose of the review is to determine whether the educational institutions on the register continue to comply with the present Code of Conduct as regards the aspects under review.

The review was set up in line with the requirements of various relevant parties, such as the umbrella organisations, the Inspectorate of Education and the Accreditation Organisation of the Netherlands and Flanders (NVAO). The results of the review enable the Commission to determine whether further action is needed. Its findings are not included in a published report but will be used to inform institutions where improvements are needed in relation to certain aspects of the Code of Conduct.

Ten educational institutions were selected for the initial review, all of which had been on the register since its early years (2006-2008). The review was completed in 2024 and did not reveal any findings that cast doubt on the institutions' proper compliance with the Code of Conduct. Another register review will be initiated next year.

Institutional review

In response to media reports about international students taking the Bachelor of Nursing International programme at Avans+, the Commission launched an institutional review. These reports prompted concerns among the Commission and led it to ask the educational institution to provide information on how it was ensuring compliance with the Code of Conduct's provisions. Avans+ provided the Commission with relevant information in writing. The Commission then invited the board of Avans+ to a meeting to clarify a number of issues.

After carefully considering and evaluating all of the information provided, the Commission decided to strike Avans+ from the register for a period of at least two years. The Commission concluded that the educational institution had shown serious failings in its compliance with the Code of Conduct. The above measure is deemed proportionate given the seriousness of the situation.

Official complaints

Any party with a direct interest in the Code of Conduct is entitled to lodge a complaint with the Commission. The complaint must be related to one or more provisions of the Code of Conduct. In addition, the complainant must have already gone through the entire complaints handling procedure at the relevant educational institution.

In 2024, the Commission received a complaint from a former international student. The Commission declared the complaint inadmissible on the grounds that they were a part-time student; part-time education falls outside the scope of the Code of Conduct. Even so, the Commission believed that the complaint gave sufficient cause to initiate a discussion with the relevant educational institution. The complaint went to the heart of the Code of Conduct, in that it concerned the need to inform and offer guidance to international students. The discussion turned out to be constructive, after which the Commission decided to close the file.

2024 Code of Conduct

During the previous evaluation of the wording of the Code of Conduct in 2021-2022, it was recommended that the Code's overview of language tests should be thoroughly revised. This ultimately resulted in a new version of the Code of Conduct. The 2024 Code of Conduct for Higher Education contains three major changes and a number of modifications to the wording:

- 1) In section 5, the *Standard for Language Tests in the language overview of the Code of Conduct for Higher Education* was introduced. With the introduction of this standard, the table containing language tests was removed from the body of the text of the Code of Conduct and included as an appendix instead. In addition, a procedure was established to enable language test providers to gain admission to the language overview pertaining to the Code of Conduct. The introduction of this procedure was prompted by the multiple requests that the umbrella organisations and the Commission have received in recent years from language test providers seeking admission to the language overview. The Commission and the umbrella organisations consider it important that this be done in an objective and, above all, a conscientious manner. After all, English language proficiency is an indisputably relevant component of the admissibility of prospective students (and in the assessment of their admissibility). For this reason, it is important that educational institutions and students (and in particular, prospective students) can rely on the results of language tests. Every year from 1 October until 1 April, language test providers can submit requests to have their language tests included in the language overview.
- 2) Article 6.2 of the 2022 Code of Conduct for Higher Education already contained the provision that educational institutions may provide education to international students, whereby the relevant degrees are issued on the basis of foreign statutory provisions. This provision follows from Article 15.7(1)(c) of the Higher Education and Research Act. Until 1 January 2024, this provision was implemented on the basis of a list of foreign accreditation organisations. The Code of Conduct has since been revised in line with the explanation provided by the Inspectorate of Education. The Inspectorate assesses whether applicable foreign statutory provisions exist. In addition, educational institutions are obliged to clearly inform students (and prospective students in particular) about any such foreign statutory provisions, as well as the degree to which the programme leads and the consequences of the absence of NVAO accreditation. In practical terms, this means that the list of organisations with foreign accreditation has no longer been used since 1 January 2024.
- 3) Article 6.6 was amended so that educational institutions can exempt students who are in preparatory education or taking the pre-Master's programme. This amendment follows from Directive (EU) 2016/801 of the European Parliament and of the Council of 11 May 2016 on the conditions of entry and residence of third-country nationals for purposes including studying (i.e. non-EEA students). This Directive states that "any decision to withdraw or refuse to renew [a residence permit] shall take account of the specific circumstances of the case and respect the principle of proportionality" – Article 21, paragraph 7. The foregoing means that a student may not be deregistered with the IND solely because that student did not complete their preparatory education within one year. The Directive stipulates that account should be taken of the student's specific situation. Section B3.4 of the Aliens Act Implementation Guidelines has also been amended to align with Directive (EU) 2016/801.

The new Code of Conduct and the documents underpinning it have been shared, via a variety of channels, with both the boards and the employees of institutions of higher education and the Code of Conduct stakeholders. It is also worth noting that our newsletter highlights the new version of the Code of Conduct and all documents are published on the Code of Conduct website.

Request for inclusion in Code of Conduct's Language Test Appendix

From 1 January to 1 April 2024, in line with the new version of the Code of Conduct described above, language test providers were for the first time able to apply for admission to the Code of Conduct's Language Test Appendix. Five providers took this opportunity and submitted an application to the Code of Conduct office. The language test providers had validating body Hobéon assess whether their language tests meet the Standard for Language Tests for inclusion in the language overview of the 2024 Code of Conduct for Higher Education and had Hobéon prepare an advisory report to this effect. The Language Test Assessment Committee, which includes representatives of the umbrella organisations, assesses whether this advice can be followed and whether the language test can be added to the language overview as included in the Language Test Appendix to the Code of Conduct for Higher Education.

Three of the five applications from language test providers received by the Code of Conduct office were granted. The other two applications were rejected because the validating body concluded that either the provider or the language test did not meet the required standard. A new version of the Language Test Appendix to the Code of Conduct was adopted as of 1 October 2024, to which the three new providers have been added.

More information about the procedure and the advisory reports can be found on the following website: [Information package language tests providers – international study](#)

Newsletters

To inform educational institutions and other Code of Conduct stakeholders about its work and to keep them informed of relevant developments with regard to the Code of Conduct, the Commission publishes two digital newsletters each year. This information can be accessed on [the website](#). The newsletter currently has 304 subscribers.

The newsletter is published twice a year. If you wish to receive the newsletter automatically, you can subscribe by contacting us at: info@internationalstudy.nl.

Composition

National Code of Conduct Commission

The members of the Commission are appointed by the umbrella organisations. The members unanimously appointed Paul Rullmann as chair of the Commission in 2022. Under the Code of Conduct regulations, a maximum of two four-year terms may be served.

Ed Brinksma, a member representing UNL, and Erik van den Berg, deputy member representing VH, stepped down from the Commission last year. Anton Pijpers, President of the Executive Board of Utrecht University, took over from Mr Brinksma from 1 September 2024. Anneke Luijten-Lub, member of the Executive Board of Van Hall Larenstein University of Applied Sciences, became a deputy member on behalf of VH from 1 December 2024.

Frans Snijders, a member representing UNL, will step down from the Commission on 1 January 2025.

Composition of the National Commission as of 31 December 2024

POSITION	NAME	UMBRELLA ORGANISATION
chairperson	Paul Rullmann	
member	Anton Pijpers	UNL ¹
member	Frans Snijders	UNL ²
member/acting chairperson	Elisabeth Minnemann	VH
member	Rob Verhofstad	VH
member	Karen Penninga	NRTO
deputy member	Tom van Veen	UNL
deputy member	Guido van Leerzem	UNL
deputy member	Janco Bonnink	VH
deputy member	Anneke Luijten-Lub	VH ³
deputy member	Jan van der Heijden	NRTO

Code of Conduct office

In carrying out its appointed tasks, the Commission is supported by the Code of Conduct office. This office consists of a secretary and two auditors and is responsible for day-to-day matters concerning the Code of Conduct. DUO is responsible for staffing the office and the independent position of its staff is guaranteed by a covenant that has been agreed between DUO and the Commission.

International Student Advisory Board

In 2022, an International Student Advisory Board (ISAB) was established in relation to the Code of Conduct. This Board may provide the Commission with solicited and unsolicited advice on matters concerning the Code of Conduct. The Commission is confident that this will enable it to take note of the perspective of international students in its activities.

In 2024, a number of members stepped down: Aysun Hasan, Michelle Muchuchuti, Liliana Almeida, Patryk Jarmakowicz, Sumneet Kaur, Miklós Papp and Fernando Teruel. These members left either because they reached the end of their term or because they completed their studies. The Commission thanks them for their commitment and for the valuable and inspiring discussions in which they participated.

The Code of Conduct office brought the ISAB membership vacancies to the attention of the various participation and other councils at universities and universities of applied sciences and asked them to further publicise these vacancies among international students who were already actively participating in one of these councils. With effect from 1 September 2024, the following new members were appointed: Arvin Gharib, Marjorie Miranda, Isaq Tuna and Parker Winkel. These members were appointed for a two-year term of office. Members whose study programme means that they will be studying in the Netherlands for a shorter period were appointed for one year.

ISAB met twice in the past year, in addition to a number of online consultations. Please refer to ISAB's annual report for information regarding its activities in 2024.

¹ Anton Pijpers took office with effect from 1 September 2024. He succeeds Ed Brinksma in this position.

² Frans Snijders will step down on 1 January 2025.

³ Anneke Luijten-Lub took office on 1 December 2024. She succeeds Erik van den Berg in this position.

Composition of the International Student Advisory Board as of 31 December 2024

POSITION	NAME	EDUCATIONAL INSTITUTION
Member	Arvin Gharib	Wittenborg University of Applied Sciences
Member	Ato Essuman Mensah	HAN University of Applied Sciences
Member	Marjorie Miranda	The Hague University of Applied Sciences
Member	Isaq Tuna	IHE Delft Institute of Water Education
Member	Parker Winkel	Radboud University
Member	Rauf Mahmudzada	HAN University of Applied Sciences
Member	Sarah Kuipers	The Hague University of Applied Sciences

Finances

The chairperson, members and deputy members receive attendance fees at the end of each quarter for activities relating to the Code of Conduct. To this end, and in consultation with the Ministry of Education, Culture and Science, attendance fee regulations have been drawn up, which can be found on the Code of Conduct website. The amount paid out per quarter is stated in the table below.

It proved to be a relatively busy year: the Commission met eight times in 2024. The deputy members and ISAB members were also invited to attend the meetings in June and December 2024. The Commission attaches great value to these combined consultations, which give ISAB the opportunity to provide input and ensure that all members are aware of developments in relation to the Code of Conduct. Several administrative consultations also took place with organisations including the Ministry of Justice and Security, the Immigration and Naturalisation Service (IND), and the Ministry of Education, Culture and Science.

Attendance fees (including travel expenses) for 2024 compared to 2023

Term	2023	2024
1st quarter	€6,932.64	€4,594.15
2nd quarter	€3,912.36	€6,515.27
3rd quarter	€2,188.35	€4,594.15
4th quarter	€4,794.07	€5,326.12
Total	€17,827.42	€21,029.69

Code of Conduct Register

DUO has been designated administrator of the register listing the institutions which have signed up to the Code of Conduct; this Code of Conduct register can be consulted at www.internationalstudy.nl.

Changes to the register in 2024

In 2024, DUO received three applications from educational institutions asking to be included in the Code of Conduct register. One of these applications was granted. The other two applications were rejected on the grounds that the institutions did not comply with the provisions of the Code of Conduct. The Commission also asked DUO to strike one educational institution from the register for a minimum of two years.

In addition to a number of administrative adjustments, DUO made the following changes to the register:

Registrations

- Haarlem Institute for Higher Education: registered with effect from 22 January 2024

Deregistrations

- Avans+: deregistered with effect from 15 June 2024

On 31 December 2024, the register included 78 institutions.



Outlook for 2025

In this section, the Commission provides an insight into its plans for the coming year. In 2025, the Commission will continue to fulfil its monitoring role with full conviction. It will do so by handling complaints and conducting reviews of educational institutions' compliance with the provisions of the Code of Conduct. Its agenda for the coming year includes a register review. In line with the review conducted last year, it will select another ten educational institutions and examine their compliance with the definition of the term educational institution, the information they provide about the Code of Conduct, their application of minimum language proficiency requirements and the provision with regard to accredited education. Article 8.9 of the Code of Conduct stipulates that every six years the Commission must assess whether an educational institution included on the register continues to comply with these provisions.

In addition, the Commission attaches great importance to communicating clearly about its activities and developments pertaining to the Code of Conduct. It publishes a newsletter twice a year and pays visits to educational institutions that have signed up to the Code. The Commission has already scheduled two visits in the first half of 2025. It also plans to hold discussions with Code of Conduct stakeholders in order to exchange views on current issues relating to the Code. This may include consultations with umbrella organisations and relevant government departments.

Collaboration with the International Student Advisory Board is key in enabling the Commission to obtain an accurate impression of the views and experiences among the international student population. In the coming year, as in previous years, two meetings will be organised to give the Commission and ISAB the opportunity to exchange ideas. A meeting will also be organised with ISAB and representatives of other student unions.

The Commission's office has already received two applications from language test providers, both concerning language tests that are already included in the Language Test Appendix to the Code of Conduct. The Commission expects to round off these applications in the first half of 2025. An updated appendix will take effect from 1 October 2025 and will be published on the Code of Conduct website and shared (via the umbrella organisations) with educational institutions in a timely manner.



Publication details

National Code of Conduct Commission for Higher Education

Secretarial office contact information:

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This annual report can be downloaded at www.internationalstudy.nl