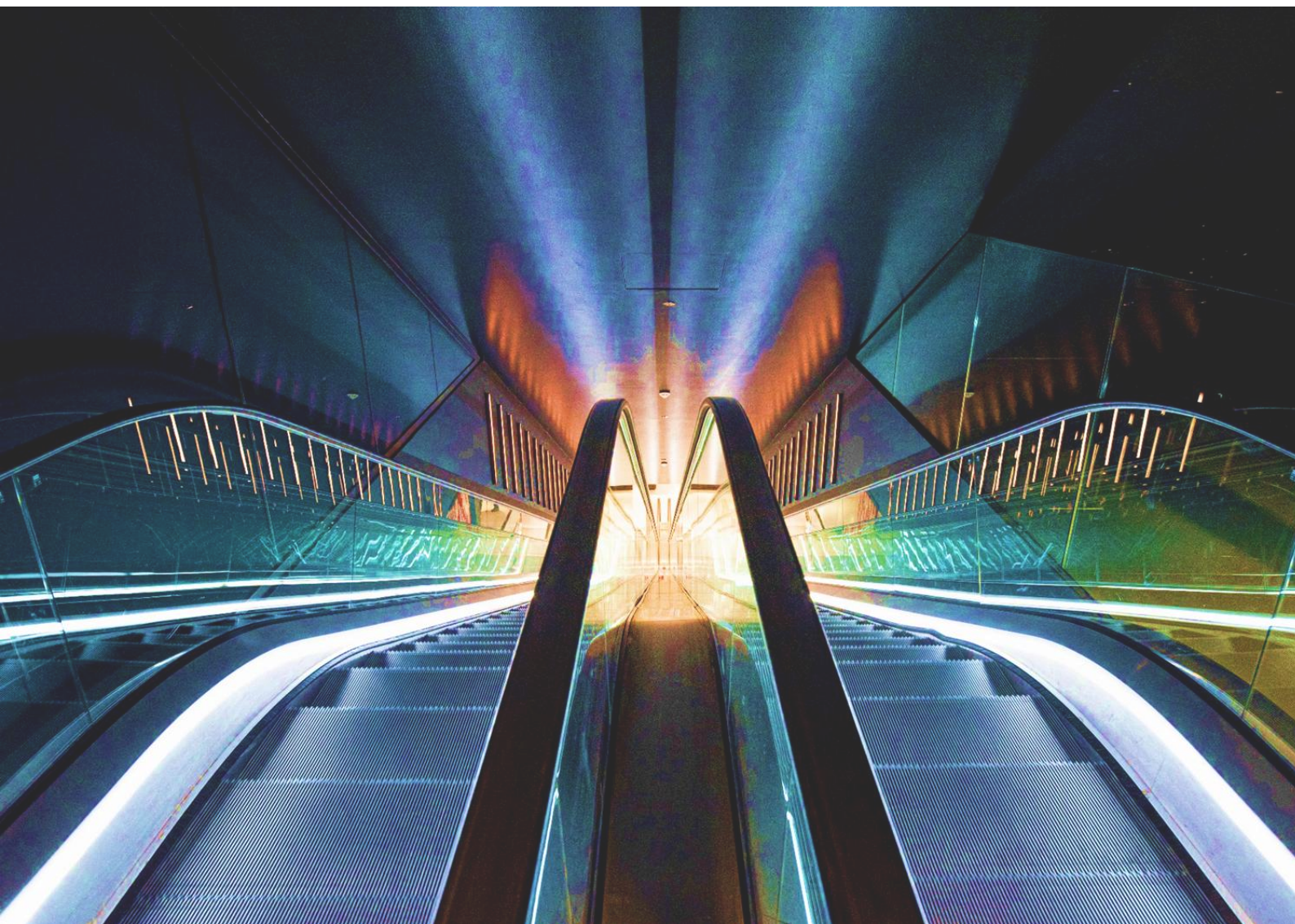




CODE OF CONDUCT
INTERNATIONAL STUDENT HE



Annual Report

2025

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Introduction

2025 will go down in history as a year of unrest. Dutch Prime Minister Dick Schoof's administration collapsed, triggering a new round of elections. Education, especially the internationalisation of higher education, featured prominently in the various election campaigns and was a topic of debate in society. Additionally, the Balanced Internationalisation bill was to be redesigned yet again. The universities countered with a proposal of their own. They wanted to be given the autonomy to rebalance internationalisation themselves. As a strict prerequisite for this autonomy, the Foreign-Language Tuition Assessment would apply only to new study programmes. And so it was done. What the actual legislation looks like should be revealed in the year to come.

The past year was one of global unrest as well. It was marked by both new and continuing conflicts and wars. During a meeting between the National Commission and the International Student Advisory Board, the students emphasised the far-reaching effects on international students of conflicts and tensions in their home country. They worry about their friends and family, of course, but finances are also a concern. Accounts can become inaccessible and funding may be cut. The meeting made it clear how important it is for educational institutions to pay attention to these students' needs. The Commission suggests regularly checking in on such students to ask how they are doing and determine whether they require assistance.

Every year, the Commission issues a report on its activities in the previous year. This document describes developments relating to the Code of Conduct and the register maintained by the Netherlands' Education Executive Agency (DUO). Over the course of the year, the Commission held regular meetings and administrative consultations with external parties. It also conducted various reviews. The final section looks ahead to the coming year.

National Code of Conduct Commission

In 2006, umbrella organisations representing the Netherlands' institutions of higher education drafted a Code of Conduct for International Students in Higher Education. This Code of Conduct aims to define relations between institutions of higher education and international students. A Commission was also established to monitor signatory educational institutions' compliance with the Code of Conduct. It fulfils this duty by conducting reviews and addressing complaints by international students or stakeholders relating to the Code of Conduct, among other things. The Commission also identifies developments relevant to the Code of Conduct, sets up consultations with Code of Conduct stakeholders and publishes newsletters to inform educational institutions and stakeholders about these matters.

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

Reviews

The Commission can decide to conduct a review on its own initiative or in response to certain signals. The Commission uses such reviews to monitor compliance with the provisions of the Code of Conduct. The findings also help support an effective application of the Code's provisions by educational institutions. Examples include setting up the right complaints handling procedures or providing complete and accurate information. The Commission concluded two reviews in the past year.

Register review

The Commission once again reviewed a selection of ten educational institutions on the register this past year. According to the Code of Conduct, the Commission must review all registered educational institutions once every six years based on the following: the definition of an educational institution, the obligation to provide information about the Code of Conduct, the application of English language requirements and the accreditation requirements for the study programmes offered. These key provisions are used to assess educational institutions' continued compliance with the present Code of Conduct.

No irregularities or violations of the Code of Conduct were detected for the ten educational institutions reviewed. The Commission shares its findings with the educational institutions so they can adapt their policies if needed. Another register review will take place next year.

Internal review of Commission instruments

The Commission also conducted a review of the instruments at its disposal in 2025. Which measures can it implement if an institution fails to comply with the Code of Conduct? The review summarises all the measures available to the Commission and how it did or did not make use of these instruments in the past. The Commission's final conclusion is that it has sufficient measures at its disposal. The review served as preparation for the evaluation of the Code of Conduct scheduled to take place in 2026–2027. This review is for internal use and has not been published.

Official complaints

According to the Code of Conduct, any party with a direct interest in the Code of Conduct is entitled to lodge a complaint with the Commission. Complaints must relate to behaviour by an educational institution that has signed the Code of Conduct. Furthermore, the complaint must concern one or more provisions of the Code of Conduct. Before the Commission can begin investigating a complaint, the complainant must have gone through the full complaints handling procedure at the relevant educational institution. This gives the educational institution a chance to attempt to resolve the complaint itself first.

The Committee received two complaints in December 2025. It will study these complaints in 2026, after the winter break.

Other developments

Call for policy changes

In mid-2025, the [Administrative Jurisdiction Division of the Council of State](#) issued an opinion on the application of the study progress requirement as laid down in Articles 6.5 and 6.6 of the Code of Conduct. The Council of State has found that, when taking a decision to notify IND regarding deregistration of students required to hold residence permits due to insufficient study progress, all relevant circumstances must be taken into consideration. The proportionality principle should preclude the omission from decision-making of a student's ongoing personal circumstances extending into the next academic year. This opinion is at odds with the current formulation of Article 6.6 of the Code of Conduct, which states that identical personal circumstances may only be used once in each reference period for exemption from notification of IND.

The Commission, following consultation with the umbrella organisations and the Ministry of Asylum and Migration, has issued an urgent request to the institutions that policies regarding decisions on mitigating circumstance be brought into line with the opinion of the Council of State as quickly as possible. In concrete terms, this means that if a student does not meet the study progress requirement, it must be assessed each time whether personal circumstances, as referred to in the Code of Conduct, apply. The limitation laid down in the Code of Conduct regarding the number of times identical personal circumstances may be invoked must be set aside.

The text of the Code of Conduct will be re-evaluated in 2026–2027. Article 6.6 of the Code of Conduct will be modified in line with the opinion of the Council of State at this time.

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

Language test providers could submit a request for inclusion in the Code of Conduct's Language Test Appendix between 1 October 2024 and 1 March 2025. The Commission received requests from two previously registered language test providers to extend their tests' inclusion. The language test providers had validating body Hobéon assess whether their language tests met the Standard for Language Tests for inclusion in the language overview of the 2024 Code of Conduct for Higher Education. The Language Test Assessment Committee determined that the validating body's positive assessment could be followed. These tests will continue to be included in the language overview. The above was laid down in an updated version of the Code of Conduct's Language Test Appendix which took effect on 1 October 2025. All language tests currently included in the language overview have now been assessed against the standard.

Relatedly, the Commission has received multiple alerts from educational institutions and the IND in the past year regarding false online TOEFL iBT language test certificates. The Commission urgently appeals to institutions to increase their vigilance and to verify certificates online.

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

Newsletters

The Committee considers it important for employees at educational institutions to remain informed of developments affecting the Code of Conduct. It therefore publishes two digital newsletters each year in which it writes about its activities and informs readers of developments pertaining to the Code of Conduct and international students. This information can be accessed on [the website](#). A total of 304 people are now subscribed to these newsletters.

Newsletters are published twice a year. If you wish to receive these newsletters automatically, you can subscribe by contacting us at: info@internationalstudy.nl.

Composition

National Code of Conduct Commission

Members of the Commission are appointed by the umbrella organisations. The members appointed Paul Rullmann as chair of the Commission in 2021. Under Code of Conduct regulations, a maximum of two four-year terms may be served.

Anton Pijpers, a member representing the Universities of the Netherlands, and Jan van der Heijden, representing the Dutch Council for Training and Education (NRTO), stepped down from the Commission last year.

The Universities of the Netherlands appointed Pamela Habibović (Rector Magnificus of Maastricht University) and Sjoukje Heimovaara (chair of the Board of Directors of Wageningen University and Research) as members. The NRTO appointed Marijn Leijten as a deputy member.

Composition of the National Commission as of 31 December 2025

POSITION	NAME	UMBRELLA ORGANISATION
Chair	Paul Rullmann	
Member	Pamela Habibović	Universities of the Netherlands (UNL) ¹
Member	Sjoukje Heimovaara	Universities of the Netherlands (UNL) ²
Member/acting chair	Elisabeth Minnemann	Netherlands Association of Universities of Applied Sciences (VH)
Member	Rob Verhofstad	Netherlands Association of Universities of Applied Sciences (VH)
Member	Karen Penninga	Dutch Council for Training and Education (NRTO)
Deputy member	Guido van Leerzem	Universities of the Netherlands (UNL)
Deputy member	Tom van Veen	Universities of the Netherlands (UNL)
Deputy member	Janco Bonnink	Netherlands Association of Universities of Applied Sciences (VH)
Deputy member	Anneke Luijten-Lub	Netherlands Association of Universities of Applied Sciences (VH)
Deputy member	Marijn Leijten	Dutch Council for Training and Education (NRTO) ³

¹ Pamela Habibović took office on 1 November 2025. She succeeds Frans Snijders.

² Sjoukje Heimovaara took office on 1 November 2025. She succeeds Anton Pijpers.

³ Marijn Leijten took office on 1 November. He succeeds Jan van der Heijden.

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 an auditor and is responsible for day-to-day matters relating to 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

The International Student Advisory Board (ISAB) may provide the Commission with solicited and unsolicited advice on topics included in the Code of Conduct. New members are appointed nearly every year as students step down once they have completed their education or because their term has come to an end. The latest recruitment round proved very effective. ISAB gained nine new members. The Code of Conduct office brought the ISAB's need for new members 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 any of these councils.

With effect from 1 September 2025, the following new members were appointed: Oksana Smalii, Miguel Pérez Hernández, Marko Darabos, Nikita Golovanov, Bianca Tudorache, Anna van der Spek, Reihaneh Salehi Mourkani, Jess Jia and Eoghan McCarty. These members were appointed for a two-year term of office. If the duration of their study programme meant they would not be studying in the Netherlands for the full two years, they were appointed for a term of one year.

The following members stepped down in 2025: Ato Essuman Mensa, Arvin Gharib, Sarah Kuipers, Marjorie Miranda and Isaq Tuna. The Commission thanks them for their commitment and for the valuable and inspiring discussions in which they participated.

The International Student Advisory Board met in person twice and once online in the past year. Joint meetings were held and attended by all members of the Commission and ISAB in June and December. These were constructive meetings, resulting in valuable input for the Code of Conduct evaluation.

Please refer to ISAB's annual report for information regarding its activities in 2025.

Composition of the International Student Advisory Board as of 31 December 2025

POSITION	NAME	EDUCATIONAL INSTITUTION
Member	Anna van der Spek	Leiden University
Member	Bianca Tudorache	The Hague University of Applied Sciences
Member	Eoghan McCarty	University of Groningen
Member	Jess Jia	Wageningen University and Research
Member	Marko Darabos	VU Amsterdam
Member	Miguel Pérez Hernández	Saxion University of Applied Sciences
Member	Nikita Golovanov	NHL Stenden University of Applied Sciences
Member	Oksana Smalii	University of Twente
Member	Parker Winkel	Maastricht University
Member	Rauf Mahmud-Zada	HAN University of Applied Sciences
Member	Reihaneh Salehi Mourkani	Saxion University of Applied Sciences

Finances

The chair, members and deputy members receive attendance fees at the end of each quarter for their 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.

The Commission met seven times in the past year. For the meetings in June and December, deputy members and ISAB members were also invited to attend. The Commission attaches great value to these joint meetings. There were various administrative consultations with parties such as the directors of the umbrella organisations.

A so-called 'future-focused, agenda-setting' meeting took place in November. Every year, the Commission meets with the umbrella organisations' policy advisors and the directors of the Ministry of Education, Culture and Science, the Ministry of Asylum and Migration and the Immigration and Naturalisation Service (IND). This meeting is used to explore future risks and bottlenecks, exchange views on internationalisation and bring them into alignment if needed. Participants assess the Code of Conduct's effectiveness in relation to departmental policies and objectives. There is also room for discussion of incidents and concerns.

Attendance fees including travel expenses 2025

Term	2025
1st quarter	€2,959.17
2nd quarter	€4,844.45
3rd quarter	€3,319.80
4th quarter	€7,991.94
Total	€19,115.36

Code of Conduct Register

The Education Executive Agency (DUO) maintains a public register to show which educational institutions have signed the Code of Conduct for Higher Education. DUO is responsible for managing the register and the processing of requests for inclusion. A list of registered signatories is available on the Code of Conduct website, see: www.internationalstudy.nl.

In 2025, DUO received one application from an educational institution asking to be registered as a Code of Conduct signatory. After questioning, the institution's application was accepted. DUO also removed two educational institutions from the register, as these signatories no longer exist.

In addition to various administrative adjustments, DUO made the following changes to the register:

Registrations

- Business School Notenboom

Deregistrations:

- Maastricht School of Management
- Nyenrode New Business School

On 31 December 2025, the register included 77 institutions.

It is noteworthy that over the past year, DUO received multiple requests for information from Dutch branches of foreign educational institutions regarding the conditions for inclusion in the register. International branch campuses are not currently eligible for inclusion, as they do not meet the definition of an educational institution as laid down in the Code of Conduct. This topic has been marked for discussion as part of the Code of Conduct's evaluation in 2026–2027.

Outlook for 2026

This section sets out the Commission's expectations for the coming year. It goes without saying that the Commission will continue to fulfil its monitoring duties by addressing complaints and reviewing institutions' compliance with the provisions of the Code of Conduct. Plans for 2026 include another register review. According to Article 8.9 of the Code of Conduct, the Commission must assess whether the educational institutions on the register remain in compliance with the Code's provisions once every six years. The Commission will review ten educational institutions.

Additionally, an evaluation of the text and impact of the Code of Conduct is scheduled to take place in 2026–2027. According to Article 10.4 of the Code of Conduct, such an evaluation is required once every five years. The Commission is responsible for initiating the evaluation and proposing an approach. This is done in close collaboration with the umbrella organisations and their policy advisors. In the first quarter of 2026, an approach will be decided upon and the institutions will be notified in writing and asked for their input. The evaluation process will include the organisation of a large-scale meeting. Educational institutions and Code of Conduct stakeholders will be invited to attend. This meeting is an opportunity for employees of institutions of higher education to provide input directly. Concrete text proposals can also be submitted for review.

The Commission attaches great importance to communicating clearly about its activities and developments pertaining to the Code of Conduct. To that end, the Commission aims to publish two newsletters in 2026 and will also be paying visits to signatory educational institutions and possibly meeting with the umbrella organisations and departments involved.

The advisory role of the International Student Advisory Board has continued to develop. ISAB's advice is key in enabling the Commission to obtain an accurate impression of 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. ISAB will also be involved in the evaluation of the Code of Conduct.

The Commission's office has received an application from a language test supplier. The Commission expects to round off this application in the first half of 2026. An updated appendix will take effect from 1 October 2026. This will be published on the Code of Conduct website and shared with educational institutions in a timely manner via their umbrella organisations.

Publication details

National Code of Conduct Commission for Higher Education

Secretarial office contact information:

Email: info@internationalstudy.nl

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