

## **TREY's Statement on the Draft Proposal for a Government Bill to the Parliament on Amending the Universities Act and the Universities of Applied Sciences Act**

The Student Union of Tampere University is grateful for the opportunity to comment on the draft proposal from the Ministry of Education and Culture, intended to become a government bill for amendments to the Universities Act and the Universities of Applied Sciences Act. TREY is concerned about the potential impacts of the proposed measures on the international competitiveness of Finnish higher education. The increase in tuition fees, changes to the scholarship system, and the measures planned to prevent the so-called evasion of tuition fees may negatively affect Finland's attractiveness as a study destination. The government program sets the goal of increasing the number of international university students and attracting international talent to Finland. However, the measures proposed in the draft do not align with this objective.

However, the draft also includes positive proposals, and we particularly appreciate the changes in the regulations concerning commissioned education, which strengthen the legal protection of students. TREY will provide more detailed comments on each proposal in the following sections.

## **Views on the restoration of the application processing fee**

TREY does not support the restoration of the application processing fee but considers it crucial that applying for studies remains free of charge.

We understand the challenges faced by universities due to the increased number of applications, and therefore, it is essential to ensure adequate resources for the processing of applications. The application processing fee itself does not guarantee high-quality applications or the inclusion of all necessary attachments. Thus, relying too much on the introduction of the application processing fee may not address these issues effectively.

However, if the decision is made to implement the application processing fee, the amount should be kept as low as possible.

## **Views on changes to commissioned education**

TREY supports the aim of the proposal to improve the legal protection of students participating in commissioned education and to clarify the collaboration between higher education institutions and clients. It is crucial that commissioned education is carried out with the student's best interests in mind and that responsibility is ensured in the operations. The obligation of

higher education institutions to inform students about their rights and obligations is also an important addition to strengthen the position of students.

## **Views on the increase of tuition fees**

TREY strongly opposes implementing full costing of tuition fees and the resulting increases in tuition fees. The rise in tuition fees could pose a significant barrier to many talented students and future professionals who, due to financial reasons, would be unable to participate in higher education. Full costing of tuition fees would also lead to significant changes in scholarships, and scholarships would likely be offered less frequently if the proposed changes in the presentation are implemented. This would further increase the financial burden on many international students.

The cost of studies and scholarships are also crucial attractiveness factors. In the 2022 International Student Barometer, international students were asked about important factors in choosing a study destination. Both for the University of Tampere and nationally, the cost of studies and scholarships were highlighted as important or very important factors. With the increase in tuition fees and the decrease in scholarships, there is a significant risk that

Finland may no longer be perceived as an equally attractive study destination.

It is positive that the autonomy of universities in defining tuition fees has been respected in the proposal. It is also positive that universities may not necessarily have to charge students tuition fees for each academic year in the future if the costs have already been covered. This would help in situations where a student has completed all other studies, but the official graduation is delayed to the next academic year. In these cases, the student has had to pay the entire tuition fee solely to graduate, but according to the proposal, the university could in the future consider that the costs have already been covered earlier. Despite these positive aspects, TREY sees that in the proposed full cost tuition fee model, there are more drawbacks than benefits.

## **Views on the proposed change to prevent the evasion of tuition fees**

TREY views the proposed measures to prevent the so-called evasion of tuition fees as problematic. The extent of the activities identified as evasion of tuition fees appears to be quite minimal based on the presented figures. It is not possible, even with these figures, to determine whether intentional evasion of tuition fees is taking place or if students are simply seeking employment and,

consequently, changing the grounds for their residence permit. Even if the proposal does not restrict an individual's ability to apply for a work-based residence permit or the right to work, there is a concern about how attractive employment in Finland would be perceived in the future.

TREY also does not consider it commendable to increase the workload for universities in investigating students' residence permit histories.

While it is important to address any misconduct, there is no reason to cast suspicion on the entire international student population. Instead, it might be advisable to enhance the resources and oversight of immigration authorities to better address individual cases of abuse.

More information:

Specialist in Educational Affairs and International Affairs

Jenna Rantanen

[jenna.rantanen@trey.fi](mailto:jenna.rantanen@trey.fi)

+358503612849