

AYY statement for the Ministry of Culture and Education

General remarks on the draft proposal

Aalto University Student Union opposes proposed amendments that undermine Finland's appeal as a study destination and hinder the possibility for higher education institutions to implement internationalisation in alignment with their strategies. However, in terms of commissioned education and certain details on tuition fees, the proposal also includes elements that can be supported.

AYY hopes that the schedules for the implementation of the amendments are prepared carefully and with sufficient transition time to ensure that students have adequate information on changes. The Finnish National Agency for Education and universities must be able to implement the amendments carefully.

Views on the reintroduction of application processing fees

AYY opposes the reintroduction of application processing fees. If the fee is reintroduced, AYY supports the SYL's and SAMOK's working group proposal of the smallest possible fee (EUR 50 fee, for example). In addition, the fee should be refunded to students who receive a place of study.

In the impact assessment of the bill, it is stated that the number of applicants decreased by 35 per cent in 2016. Based on the experiences in Sweden, the impact is estimated specifically on the number of applicants. However, the impact on the number and standard of those accepting a place of study has not been assessed. The justifications also refer to the reduction of queues when applicants who 'have no intention of accepting a place of study' would be removed from the queues. However, we are aware that the common reason for not accepting a place of study is usually linked to whether a student receives a scholarship either from Finland or elsewhere – not because they have no intention to study. Thus, application processing fees could not only reduce the number of unfounded applications but also lower the standard of those who accept a place of study.

Views on amendments to commissioned education

AYY supports amendments aimed at implementing commissioned education responsibly and ensuring the legal protection of students.

Views on the increase in tuition fees

AYY opposes the proposed increases and considers the impact assessment in the proposal to be of very poor quality. The plan contradicts internationalisation goals agreed in a parliamentary manner and reduces the power of universities to act in alignment with their own strategies. Based on the report of the monitoring working group on the introduction of tuition fees, most universities have had a clear internationalisation strategy based on tuition waivers and scholarships, which the government proposal will demolish.

Since the beginning of the preparation, it has been clear that the concept of full costing cannot be unambiguously defined. It is positive that, in the proposal, the definition of the concept remains within university autonomy and discussions between universities. It is also beneficial that the proposed amendment allows for the reduction or even elimination of fees at the end of studies, for example. As a whole, we still view the amendment as harmful to universities and the Finnish society built on expertise.

The impact of increasing tuition fees on the number of students has been assessed very poorly in the proposal. The estimate suggesting that the number of applicants would decrease by a third appears to be based on the assumption that the reduction in the number of students would be directly proportional to the increase in euros. Although the justifications of the proposal acknowledge the uncertainty of the estimate, we would like to draw attention to the very poor research foundation of the presented assessment.

It is not realistic to transition scholarship systems to operate with donated funds in the short or medium term. If a national scholarship system is set up in the future, it must not affect the core funding of higher education institutions.

The exemption of beneficiaries of temporary protection from the obligation to pay tuition fees is a positive change. The exemption should be extended to students who have started their studies with a residence permit granted on the basis of temporary protection.

Views on the amendment to prevent the circumvention of tuition fees

AYY does not perceive the circumvention of tuition fees as a genuine problem at universities. The employment of international students during their studies and changing their residence permit to a work-based one is beneficial for the student, the higher education institution, and the state. A change in the residence permit cannot be proven to be motivated by a desire to circumvent tuition fees. Raising suspicions about all students who change the type of residence permit is highly questionable. The issue could also be regulated differently in the Universities Act and the Universities of Applied Sciences Act, as the issue apparently mainly concerns the

universities of applied sciences. Those pursuing higher university degrees do not typically change their residence permit type.

Views on expanding the right to access information

Expanding the right to access information imposes a questionable obligation on higher education institutions, particularly in terms of privacy protection, to address the residence permit history of a student's family members. Due to the proposed amendments to tuition fees, this may become necessary. However, the implementation of the right to access information must be as equal as possible and clearly defined in terms of information disclosure to establish consistent practices for higher education institutions.