

Ministerie van Onderwijs, Cultuur en Wetenschap

Minister of Onderwijs, Cultuur en Wetenschap

Mrs. Dr. M. Bussemaker

Postbus 16375

2500 BJ Den Haag

Apeldoorn, 18 may 2015

Regarding: The use of the English noun “University” by a “University of Applied Sciences”.

Dear Mrs. Bussemaker,

Introduction

Wittenborg University is a University of Applied Sciences and it describes itself as such in all publications. We are confident that we are perceived correctly in the market and we do not attract students who are expecting a pure research degree. We also use the English term 'University' both in our legal entities and in describing the institute in a secondary manner, after first having clearly defined ourselves as a (small) University of Applied Sciences, for instance through introductory texts, and our logo or our letterhead. *We firmly believe that we use the correct English terminology with regard to term 'University' and we are opposed to what may seem as Dutch government interference with our freedom of speech and our correct use of the English language.* The Oxford dictionary states 'University - A high level educational institution in which students study for degrees and academic research is done' The Oxford dictionary does not have an entry for “University of Applied Sciences”.

Explanation

Firstly let me confirm Wittenborg's support for your proposed law to protect the use of the words 'Universiteit' and 'Hogeschool'. We also fully support the protection of titles and degrees as proposed. We believe that this will bring more transparency to the internal Dutch market. For instance, help to stop councils being 'conned' into supporting unfounded initiatives such as the 'Business Universiteit' that managed to convince the councils in Apeldoorn and later Zutphen that they would bring students to the region, only to fold a short while later, having been given some kind of support. We also support the idea that Dutch Research Universities and Universities of Applied Sciences should clearly promote themselves as Universities in such a way that are distinct from each other.



However they should be able to fairly compete in Europe, especially with the UK where Research and Applied Science are mainly in combined institutes. The majority of University undergraduate degree programmes in the UK cater for the Applied Sciences student. As a partially British owned institute, operating fully and solely in the English language, we are firmly opposed to your proposed regulation of the English term 'University' if this means that Universities of Applied Science are not 'permitted' use the term in their correct use of the English language. We believe that the correct use of the English language cannot be regulated by law (in any country). It is regulated by society, and supported by scholarly research.

We are convinced in regard what the rest of the world will consider as a correct and commonly use of the term 'University. We're convinced that the Dutch government will perhaps bring some clearance to the national situation, but certainly not in the international situation. Disregarding the international interpretation will bring in our opinion new and unnecessary consequences. It also interferes with the freedom of speech and last but not least it will make solving the situation more complicated.

We do agree that it is probably possible to regulate the use of the general term University to be only used by officially recognised Research Universities and Universities of Applied Sciences in the Netherlands, according to their status, however it will not be able to stop Universities of Applied Sciences being called 'University' as this is precisely what they are, and people inside and outside of the institute will use the term. As a linguistic example, a 'bird of prey' remains a 'bird'. A semi-detached house, remains a house.

If making the Dutch binary higher education system internationally transparent is an important goal, then this can probably be best ensured through correct implementation of the code of conduct for international students.

Another suggestion is to bring in compulsory institutional accreditation for all Dutch government recognised institutes and ensure that as part of that process they are correctly promoting themselves. Of course Wittenborg would expect a fair period of preparation to be given to those institutes who do not yet have an institutional quality 'accreditation' and that institutional accreditation is made to measure for small institutes such as ourselves.

About Wittenborg

The term 'Wittenborg University' is a protected and registered European trademark, and there are three trusts and two Dutch Limited Companies (BV's) bearing the term Wittenborg University in their names:

- Wittenborg University BV is the company that operates accredited programmes under Wittenborg University of Applied Sciences.
- Stichting Wittenborg University Executive is the owner of Wittenborg University BV and has no commercial activities. It forms the Board of the University of Applied Sciences.
- Stichting Wittenborg University Advisory Board is a completely independent trust that forms the Supervisory Board of Wittenborg University of Applied Sciences.



- Wittenborg University Network BV is owned by Wittenborg University BV and carries out all the “commercial” non-accredited (VAT subjected) activities of Wittenborg University of Applied Sciences.
- Stichting Wittenborg University Accommodation is an independent trust that manages the school accommodation and student housing of Wittenborg University of Applied Sciences

These entities were created and named in good faith, without restrictions and completely in line with the correct usage of the English language in respect to Wittenborg's status as a University of Applied Sciences. The European trademark 'Wittenborg University' was also correctly registered and uncontested.

Request

We strongly advise you to adapt the correct usage of the English term “University” in your proposal. So that usage of the English term 'University' is permitted by recognised Dutch higher education institutes whilst requiring that they ensure that they clearly promote themselves as either a Research University or a University of Applied Sciences. In the end it will contribute to a better positioning and profiling to international competitors.

Finally, from media news around your proposal, we learned that Tias (formally Nimbas) has achieved the status of a Dutch Research University. Tias originates from programmes jointly offered with the University of Bradford, a former UK polytechnic (University of Applied Sciences).

You may remember that during your HBO tour last year, at your visit to IVA in Driebergen we asked you if there was a formal procedure through which a private institute could gain research university status. Not that Wittenborg would have the capacity to achieve this in the near future, the possibility to provide research degrees in the long term is an ambition and we kindly ask you to provide us with the details of the requirements and procedures to achieve this status.

As an attachment, we enclose a Dutch translation of this letter.

Yours sincerely

Peter Birdsall

Maggie Feng

Stichting Wittenborg University Executive

Wittenborg University of Applied Sciences