



To: Seksjon for studiekvalitet
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Input for Consultation – Forslag til UiOs høringsuttalelse om endringer i uh-loven

UiODoc is the interest organisation for PhDs and postdocs at UiO. In this capacity it is our role to promote the academic, professional and social well-being of temporary research staff. We have focused our commentary on the question how the draft for UiO's consultation statement on the proposed changes in the UH law may be interpreted in light of the rights for PhD students, in connection with their special status as both students and employees and how they may lead to a double standard. We have separated our input into one general comment and specific comments related to each subsection.

General input

We urge UiO to ask the government to clarify which provisions apply for PhD students and which apply only to Bachelor and Master students, since there seems to be little clarity in the matter. The position of PhDs in this document is problematic because they are both employees and students. Thus, the cases where the law pertaining to workers and students are contradictory need to be clarified. The uncertainty of the applicability of these changes towards PhD students is evident through the comments by UiO, and this uncertainty needs to be eliminated for the safety and benefit of the PhD students employed at UiO. This is especially important regarding leave and whether that is leave from studies or leave from work, be that paid or unpaid.

National body for quality in higher education

We agree with UiO's opinion in this section. However, we need to stress the importance of a comprehensive and well-balanced system for translating foreign credentials into the Norwegian system. Generally, foreign credentials appear to be undervalued in the Norwegian system, the admission requirements for PhD students seem somewhat arbitrary and foreign credentials often compare unfavourably to credentials from the Norwegian system. We agree on one body taking care of this, since this can reduce variation across universities for foreign students applying to Norwegian education.

Academic follow-up of students

We agree that there is no need for central regulations for education plans. However, we believe that publishing data and statistics regarding drop-out rates and throughput is still very valuable, since it will be a public indicator of how good the academic follow-up for

students at individual institutions is. Furthermore, publishing statistics on PhD student success and failure is an important aid in raising awareness on the struggles that PhD students face whilst earning their degree. We already know that the majority of PhD students don't finish in time and the drop-rate is high. As an added note we believe that the current metric for success in PhDs (completion within 6 years of starting) is far too generous since at that point most funding for PhD students has already ended.

Facilitation during pregnancy and after birth

We mostly agree with UiO's comments on the suggested changes to the law. Nonetheless, we need to stress that due to the mixed position that PhD students find themselves in, we encourage a more explicit determination regarding which changes would apply for PhD's and which ones would not. Since PhD students are employees, we are aware that the protection regarding pregnancy and birth comes from the Working Environment Act. However, a pregnancy can also affect the study component of a PhD's planned curriculum. Thus, clarity on the options that PhD's students can rely on for successfully finishing their study aspect needs to be improved. Furthermore, the time constraints for finishing a PhD and obtaining the degree, puts PhD students in a similar position as Master and Bachelor students. PhD students may also need to finish as many exams as possible during a short period of time, which can be heavily impacted through pregnancy. However, we do not want to erode worker's protection by providing a loophole by appealing to the student status of PhDs, especially for work that can be physically dangerous (e.g. in the field or lab). So, a deeper analysis or a separation of PhD's and the rest of students regarding facilitation of studies during and after pregnancy is needed.

Leave

We agree with UiO that the need for follow-up applications in case of long-term leave would be unnecessarily bureaucratic and not in the benefit of the student. However, we do not see any problems with extending the right to study and apply for exams to all students who are on leave, including PhD students. Fitting the education component into the PhD is already a complicated process due to data collection, experimental work, international visits and conferences. Therefore, extending the right to register for exams during leave to PhD students on leave would be greatly beneficial. Furthermore, we disagree that certain provisions for leave do not apply for PhD students, such as leave due to being in an elected position or body. PhD students should retain the same rights as Master and Bachelor students.

We thank the University for taking these points into consideration and wish you the best of luck in finishing the consultation, despite the short notice.

On behalf of UiODoc,

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