

Til: Jonny Roar Sundnes
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Innspill til Intern Høring - “Forslag til endringer i egenbetalingsforskriften: Mer fleksible regler om egenbetaling for statlige universiteter og høyskoler”

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 - an increasingly large group that is responsible for much of the academic knowledge production at Norwegian higher education institutions.

We would like reply to two points in the proposal related to the development and offering of courses tailored for self-funded students, which we foresee could impact temporary research staff in their non-research duties.

According to the UiO guidelines for academic employees point 13 “working duties (compulsory work)” both postdoctoral research fellows as well as research fellows can be required to carry out compulsory work in form of teaching or corresponding tasks. For postdoctoral research fellows with a contract up to three years this compulsory work is limited to 10% of the position while for postdoctoral research fellows with a contract exceeding three years the work is set to be 25% of the position. For research fellows with a fixed-term period of four years the compulsory work duties are also set to 25%.

The regulations state that these compulsory work duties comprise assisting in teaching, laboratory and practicum supervision, counselling and exam work and assisting in collecting and adapting materials for teaching.

In **point 4.1** the ministry suggests to integrate courses aimed at self-funded full-time students with a full-time job into the normal teaching activities at the institutions using the same resources as well as teaching staff. The ministry calls for an adaptation of the program to fit the needs of full-time employees but also to protect the principles of basic and free education.

«4.1 Et mer fleksibelt og tydelig regelverk

Forslagene som er omtalt i høringsnotatet punkt 5, åpner for en videre adgang til å tilby studiepoenggivende utdanning mot betaling, tilpasset personer med arbeidserfaring. Departementet foreslår ikke endringer i adgangen til å tilby kurs. Etter departementets vurdering bør tilbudene som er rettet mot arbeidslivet, kunne være integrert i den vanlige virksomheten ved institusjonen, og bygge på det samme personalet. Det at utdanningstilbudene ofte er kostbare å utvikle, kan begrense utviklingen av tilbud som er etterspurt av yrkesaktive og arbeidsgivere. En mer kostnadseffektiv utvikling av studiepoenggivende utdanningstilbud tilpasset yrkesaktive kan derfor gi bedre muligheter både for å utvikle tilbudene og begrense kostnadene forbundet ved å benytte seg av dem. Departementet mener derfor at egenbetalingsforskriften bør åpne for at universiteter og høyskoler kan bruke innhold fra det ordinære utdanningstilbudet når de utvikler studiepoenggivende utdanningstilbud som er rettet mot personer med arbeidserfaring. Institusjonene bør kunne gjenbruke innhold, læringsutbyttebeskrivelser og pensum fra gradsutdanningene, men tilby og tilpasse det på en måte som skjermer grunnutdanningene og gratisprinsippet.»

In **point 4.1.3** the ministry seizes on the idea to develop a course offering specifically adapted to full-time employees who wish to broaden their education. The ministry asks for a programme that which is adapted not only in terms of content but also time-wise to make it available to full-time employed students after working hours.

«4.1.3 Krav til innretning på studiepoenggivende utdanningstilbud

Formålet er ikke å åpne for at mer av dagens tilbud skal kreve egenbetaling. Formålet er å legge til rette for at det utvikles et større tilbud av utdanninger som er tilpasset en målgruppe i arbeidslivet som ønsker kompetanseutvikling»

UiODoc fears that the proposed changes would lead to intensified compulsory work duties on the expense of the temporary staff conducting these tasks. We are unclear about who the ministry thinks should develop the course offering aimed at full-time employees and who is in charge of conducting the teaching duties for these newly developed courses.

In terms of PhD research fellows, only those with a 4-year contract are required to carry out non-research duties. The percentage of research fellows with these extra duties varies a lot from faculty to faculty, and do not necessarily consist of teaching. While at the Faculty of Mathematics and Natural Sciences it is nearly 50%, at other faculties (e.g. the Faculty of Humanities) it is only 10%. Considering this, we are unsure how the proposed changes will affect PhDs and postdocs at the different faculties given the different resources, and we would like to ensure that the extra workload does not disproportionately fall on the shoulders of early career researchers, who are in a vulnerable position and might be easily persuaded to take on extra duties that exceed the agreed contractual percentage.

We think it is important that the anticipated increase in teaching load does not crowd out the opportunities to engage in other non-research duties. With a distinct focus on research in their own jobs, we also worry that courses targeting full-time employees will require a more practice-based orientation than aspiring academics can and want to provide. We would further like to make sure that all teaching duties for PhDs and postdocs remain voluntary and are relevant for the competence development and career goals of the fellows.

UiODoc wants to ensure that the proposed changes do not come to the detriment of the temporary staff we represent. The ministry should therefore clarify in their proposal who they think should set up the increased course offerings for self-funded full-time employees, with due consideration for the workload and professional interests of temporary research staff.

We thank the university for the opportunity to give input on this proposal through an internal consultation and hope the interests and concerns of temporary employees will receive appropriate attention in the final consultation statement.

On behalf of UiODoc,

Margret Veltman

President

Michael Goul Larsen

Secretary