**Reference to the White Book on the actions necessary to eliminate irregularities in the Polish visa system.**

**In the official document of the Ministry of Foreign Affairs of the Republic of Poland entitled The "White Paper on actions necessary to eliminate irregularities in the Polish visa system" contains a significant number of simplifications of reality and statements that are not confirmed by statistics. In many places, the document incorrectly refers en bloc to the issue of the labor market and the internationalization of Polish universities.**

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Moreover, the document ignores the relevant conditions and contexts, ignores international statistics and documents of international organizations, including the European Commission, regarding the issue of internationalization of higher education.

The Polish legal system has some imperfections, but it is difficult to agree with the statement that "legislative and systemic solutions are completely lacking." One may get the impression that the authors of the document, having become acquainted with certain pathologies and individual cases for which a small number of Polish universities are responsible, suggest the introduction of new regulations that will somehow "expose" the entire environment and real, honest candidates for studies for pathologies detected in a small percentage. Polish universities. Legal imperfections are a permanent feature of legal systems in a rapidly changing reality and there should be no objections because of this, but constructive actions based on evidence-based information should be taken, and this is missing in the said document.

The document mentions "pressure" from employers and the scientific community. The existence of "pressure" resulting from objective needs should not be treated as an accusation against any social group. "Pressure" should simply be understood as the submission of new ideas for the development of internationalization in Poland by both groups of stakeholders (i.e. employers and universities). Importantly, ideas usually originating from the environment of Polish universities themselves have a strong basis in documents and reports of international organizations, higher-level regulations and directives (including EC, UNESCO, OECD and should not be considered controversial or anti-systemic, as could be deduced from the content of the White Paper) . The role of the Legislator and the government is to create a system of solutions that will meet these needs. Universities should not be "punished" and stigmatized for publicizing their needs and for providing the public with facts about the challenges faced by Polish employers and Polish universities.

The statement included at the very beginning of the document regarding the "misunderstood idea of internationalization of Polish universities" is unfair to the efforts of the authorities of Polish universities to fit in with global trends, as well as trends set by the European Commission. The European Union strongly supports the internationalization of higher education, considering it a key element of the strategy for the development of education and research. The EU's position on this issue focuses on several key objectives. According to the European Commission, internationalization activities aim to strengthen the position of European universities on the international arena, which includes developing cooperation with institutions outside Europe and promoting the mobility of students and researchers . All these activities aim to develop a more integrated and competitive European higher education sector that is better equipped to meet global challenges.

The authors of the White Paper did not specify what the difference would be between a "badly understood idea of internationalization" and a "well-understood idea of internationalization". If such criteria exist, it would be worth defining this idea so that all stakeholders understand the intentions of the Ministry of Foreign Affairs. Therefore, it would be worth developing a document that could basically be called the position of the Ministry of Foreign Affairs on the well-understood idea of internationalization of Polish universities. This document should be based on the rich knowledge derived from scientific research on internationalization. Conferences are organized on this topic and researchers have the opportunity to publish their research on the internationalization of higher education in high-ranking international journals. It is therefore worth using specific facts and results of scientific research to possibly authenticate the theses contained in the White Book. Scientific literature on the internationalization of universities includes, among others, proposals for methods and measures of internationalization. They cover a very wide spectrum of university activities. Renowned scientific publishers such as: SAGE Publications, Springer, Elsevier and Taylor & Francis have in their portfolio high-scoring (Impact Factor) titles devoted to the internationalization of higher education (including Journal of Studies in International Education (JSIE), International Journal of Educational Development, A Journal of Comparative and International Education, Higher Education Policy, Studies in Higher Education, Journal of Higher Education Policy and Management, International Journal of Educational Research, International Higher Education (IHE)). These types of information sources should be the foundation for managing the process of internationalization of Polish higher education.

The authors of the White Paper are probably not aware that the internationalization of universities does not only concern students, but also curricula, lecturers, involvement in international research, international accreditations and many other aspects. Moreover, these aspects are interrelated and the field of analysis should not be limited to such a narrow issue as visas for foreign students. The results of scientific research in the area of internationalization prove many positive, long-term benefits and synergies resulting from opening the higher education system to foreign students, such as the prospect of continuing an academic career for the most talented students or supplying the labor market with highly qualified specialists. There are spectacular cases of students starting businesses, the most striking case of which is Elon Musk, who studied in the United States when he came there from South Africa. According to a report by the National Foundation for American Policy (NFAP), a quarter of American "billion-dollar companies" were founded by entrepreneurs who studied at American universities as foreign students. These entrepreneurs significantly contributed to economic development and the creation of new jobs.

The claim that issuing work permits "on request", regardless of the priorities of Polish foreign and security policy, is an abuse. It is in the interest of the Polish economy that Polish entrepreneurs have the opportunity to develop their enterprises based on labor resources, which are missing on the Polish labor market. Every legally employed employee benefits the economy. Of course, the presence of some of these people carries certain security risks, but the problem of economic emigration should not be treated in binary terms.

The authors of the White Paper use the argument: "Abuse of too easy recruitment for studies " - however, it is not stated what the "abuse" is according to the authors - if recruitment is "easy", there is probably no need to "abuse" it. This is a serious accusation against Polish universities - although formulated in an insufficiently precise manner. The authors of the White Book did not specify which universities have "too easy recruitment", what are the parameters of "easy recruitment", and what constitutes, in the authors' opinion, correct or "not easy" (?) recruitment. We certainly cannot agree with the alleged cause and effect relationship pushed in the document, which claims that "easy recruitment" is evidenced by a high percentage of foreign students in the general student population of a given university (first table in the White Book (no title).

The second table of the White Book presents a list of 10 universities with the largest number of foreigners in 2022. This information is presented right after the argument about the abuse of too easy recruitment to universities. Such a compilation of information can be considered manipulation, because there is no evidence that the large share of foreign students is the result of too easy recruitment, and as one can assume, according to the authors of the White Paper, the low percentage of foreign students among students would be evidence of difficult recruitment criteria. It is worth noting that the number of students given in the table does not exceed 6,000. while the world's leading universities have five-digit student populations. The given absolute numbers are surprisingly low and cannot prove any reliably substantiated hypothesis about the abuse of "too easy recruitment to studies." Moreover, the numerical data presented in the first table of the White Paper take on a completely different meaning when compared to the data in table 1. Referring to the above statements it would be necessary compile data regarding numbers issued permits on working with the number of foreign students from a given country. With small exceptions for countries where the absolute number of students is several hundred people (e.g. Kenya), the percentage of foreigners studying in the first year of studies in relation to the number of work permits from the same country in many cases does not exceed 1% (e.g. Nepal , Turkmenistan, Philippines). For India, this value is 3%, which means that 97% of this country's citizens who had a work permit in 2018-2023 did not study in Poland. For Bangladesh, this value is 99.2%, etc. It can be seen that foreign students constitute only a small part of the population of citizens of a given country staying in Poland.

**Table 1. Number of work permits issued compared to the number of students from a given country**

**country .**

**Source: APUI study based on Central Statistical Office data: https://stat.gov.pl/obszary-tematyczne/edukacja/edukacja/szkolnictwo-wyzsze-i-jego-finanse-w-2022-roku,2,19.html**

Table 1 clearly shows, without the need to carry out complex analyses, that the ratio of the number of students from a given country compared to the number of work permits is marginal. The exception is a country with a small absolute number of students, e.g. Tanzania (153 students vs. 306 work permits). To sum up , number students foreign countries in Poland in 2018-2023 only 4.36% spent work permits . Contrary to the narrative pushed in the White Paper, there is a connection problems visas employees in Poland with student visas is unjustified and the percentage of students among the number of work permits (700,000) is marginal (Table 2.) As clearly show the data in table 2. the percentage of residence permits issued for education purposes is still very low in Poland compared to other European/EU countries - Poland was in 3rd place among the countries with the lowest percentage of visas issued for this purpose.

**Table 2. Percentage of residence permits issued for education purposes .**

**Source: Eurostat**

It is also worth making comparisons (benchmarking) with other countries and universities, especially in the "Old Union". According to the authors of the White Paper, is recruitment (sufficiently) "difficult" in those countries? Therefore, instead of using journalistic arguments, it is worth the Ministry issuing specific recommendations for Polish universities regarding how, in the Ministry's opinion, recruitment should be carried out in such a way that the Ministry's accusation becomes obsolete. The arguments presented at the end of the White Paper seem unconvincing and burdened with many question marks.

The percentage of international students can and should be considered in a much broader sense than as evidence of supposedly low recruitment criteria. Attracting a foreign student requires high marketing competences from universities, knowledge of educational markets, preparation of staff for marketing activities outside Poland, etc. Not all Polish universities have such competences, so the low rate of internationalization of the student population in other Polish universities may as well be used as evidence of low competences in the field of internationalization. Polish universities compete on international markets with dozens of other universities in the region and beyond. To ensure a reliable picture of the situation, it would be necessary to present analogous statistics for the most internationalized universities in Europe, for example in Germany, France, the Netherlands or Italy, and then make such comparisons. It is worth noting that the list also includes 4 public universities with great traditions, i.e. universities from Warsaw, Krakow and Poznań. How to interpret their position in this ranking compared to other universities? To sum up, the statistical data presented in the first two tables of the White Paper do not contribute much to an objective understanding of the undoubtedly needed debate in Poland on the internationalization of Polish higher education. These data are completely independent of international statistics - the recipient of this document does not know how to interpret the data - the only interpretation is the one imposed in the document by the Ministry - this interpretation is not reliable. Table 3 shows the numbers of students studying in other EU countries and these numbers are much higher than for Poland.

**Table 3. Number of foreign students in selected European countries**

**Source: own study**

The White Paper later states that the Polish visa is "easily available and relatively cheap." Since detailed statistics on the number of students at Polish universities are presented, it would be worth presenting this thesis in the form of a table/ranking of the "cheapest visas" and showing the position (price) of the Polish visa compared to other countries in order to prove the thesis that one of the reasons why Poland is an attractive country for emigrants due to the low visa price compared to other countries.

The existence of alleged "rogue intermediaries" is abusive because:

l The functioning of visa intermediation is a practice common in many countries around the world and is justified by the economics of the diplomatic service;

l Having the status of an intermediary should not automatically stigmatize any intermediary as a dishonest person. The concept of "intermediary" should be separated from "dishonest intermediary". These honest intermediaries work to the benefit of our country because they contribute to reducing transaction costs between the applicant and the Polish state. An alternative would be to maintain additional highly paid officials delegated from Poland in Polish foreign missions , subsidizing their stay with their families and business trips, and even this would not guarantee the complete elimination of corruption.

The White Paper includes a statement about "selective satisfaction of requests for accelerating the visa procedure." However, it is not indicated what type of visas these corruption phenomena concerned. Did they concern the issuance of visas *for students* or *work visas* ? The issuance of a student visa takes place at the consulate level and the university is not involved in this process in any way. All decisions to grant or not to grant a student visa are made by the Polish diplomatic service without consulting the host university. It is therefore an abuse to suggest that universities are involved in the visa issuance process, and even more so to suggest that universities may be involved in corruption processes when issuing student visas. Because this polemic concerns primarily aspects related to the internationalization of universities, and the Ministry's document concerns both the labor market and the internationalization of universities. It would be necessary to separate the analysis of possible corruption-generating phenomena and indicate whether they also concerned the issuance of student visas - it can be assumed that this phenomenon did *not apply to* students, especially since the earlier statements of the White Paper mention "too easy recruitment for studies in Poland". If recruitment was "too easy" (as can be assumed at the level of specific universities), there was probably no need for applicants to use corrupt methods (at the level of the diplomatic service). This in turn leads to suggestions for the Ministry to clearly indicate that visa corruption did not concern student visas or, if the Ministry has evidence of this, to indicate specifically which universities admitted students who used corrupt methods to obtaining a student visa in Poland.

At the end of the White Book, there are 9 recommendations for actions - remedial measures. The first 4 relate strictly to the labor market, the remaining 5 concern higher education:

l Carrying out mandatory pre-selection of foreign students - such a requirement violates the autonomy of universities, which is one of the foundations of the education system in Poland. There are several hundred universities in Poland with extremely diverse profiles, local conditions and histories. These universities have different development strategies and conduct research in various scientific disciplines. This, in turn, implies the need to adapt the operating conditions of these universities to local requirements. Recruitment criteria are customarily established by the Senate of a given university, and depriving senators of these rights may be treated as a violation of the autonomy of universities in Poland.

l Failure to apply minimum recruitment criteria - the probable source of this recommendation is the detection of pathologies in the recruitment of students to study in Poland by a few universities . Collective responsibility should not be used , but consequences should be drawn against specific universities and people responsible for the occurrence of pathological phenomena. The vast majority of universities in Poland apply reliable recruitment criteria. If the Ministry's recommendations are implemented, many new problems will arise as to what exactly these criteria should be implemented, taking into account the diversity of profiles of different universities. Should a medical university apply the same criteria as a small university in a former provincial city teaching sociology or physiotherapy? Centralization of solutions regarding education always entails many new problems, because education is an area of the economy that requires a particularly large dose of autonomy.

l Increased administrative costs of universities should be reflected in increased study fees - in Poland there is a belief that studies in our country are significantly cheaper than in the countries of the so-called "Old Union", which is not true. In countries with a much higher income per capita (including the Netherlands), which is also reflected in the personnel costs of universities, tuition fees for one year of studies are approximately €3,000-4,000, which is slightly lower than for similar studies at good Polish universities. . The ongoing economic growth in our country also leads to the equalization of wage differences between the "Old" and "New Union". To sum up, the argument that Polish studies are significantly cheaper than in other countries becomes less valid every year. **Reproducing the myth of cheap studies in Poland does not serve to build the reputation of our country as a place to study, because we should emphasize the quality of our education system and not only use the criterion of the tuition fee in the debate on the internationalization of higher education.** Table 4 shows examples of tuition fees from European universities.

**Table 4. Examples of tuition fees from European universities.**

**Source: own study**

l Centralized system of pre-selection of foreign candidates - it is not true that in Germany (DAAB) is the operator of a centralized system of pre-selection of foreign candidates for studies. The German academic exchange agency DAAB only performs certain specific verification activities, for example checking the authenticity of diplomas, but does not check students' language competences. This is what German universities do. There is a centralized system in the UK, but ultimately it is each university's responsibility to set its admissions criteria.

l Considering limiting the access of foreign students to the Polish labor market - this is a justified recommendation, and the current legal system addresses this need. It should be noted that students' activity at the university and their student status are checked by the Provincial Office during the procedure for issuing a residence card. A student who withdraws from studies loses the right to work. In many European countries, foreign students can legally work up to 20 hours a week and this is a form of compromise between the demand to regulate access to the labor market and the demand of employers and the interest of students. In the case of Poland, a possible compromise in this area could apply primarily to students studying at the first cycle of studies ( Bachelor 's degree) and should be developed after consultations with employers. However, introducing a deposit system, where the student is obliged to have an account with the minimum amount of funds blocked, is an idea with many negative consequences. First, this amount would have to be related in some way to the level of income in the country of origin. If this amount were uniform for all students, it would be a form of discrimination, because students, especially from the countries of the former Soviet Union, could encounter an insurmountable financial barrier. The European Commission's plans to expand to new countries would be in clear contradiction with this deposit system, as it would financially discriminate against students from countries applying for accession.

To sum up, this document contains a comprehensive reference to the theses and suggestions contained in the White Book of the Ministry of Foreign Affairs. Many of these theses are based on journalistic arguments that are not confirmed by facts and figures. Taking care of state security and the rule of law in the area of higher education is also in the interest of the overwhelming majority of Polish universities and it is not justified to present them as agents of negative processes. On the contrary: Polish scholars express concern for maintaining the highest standards in the internationalization of higher education in Poland. The development of new solutions and innovations should take place as part of a substantive debate based on facts and evidence.

**About the author:**

Prof. Ph.D. Jan Fazlagić from the Poznań University of Economics specializes in issues of intellectual capital, knowledge management, internationalization of education and local government management. Member of the Steering Committee that developed the assumptions of the new Act on Higher Education (Act 2.0) at the Allerhand Institute .

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**About APUI:**

APUI is an abbreviation of the Association of Polish Universities for Internationalization ( Association of Polish Universities for Internationalization ). It is a non-profit organization that was founded in 2017 to support the internationalization process of Polish universities. APUI acts as a representative body bringing together Polish universities and helping them establish international cooperation and attract foreign students. The key goals of APUI are to promote Polish universities internationally, increase the mobility of students and academic staff, and develop teaching programs in foreign languages, especially English.