



Recommendations of Working Group on Responsible International Cooperation in Higher Education and Research

Why responsible international cooperation in higher education and research?

Responsible international cooperation in higher education and research aims for openness, reciprocity, understanding and risk management.

Open international cooperation in higher education and research is vital, particularly when responding to shared global challenges. At the same time, managing risks and understanding interdependencies and different ways of doing things in a changing world are increasingly important in higher education and research. Risks faced in cooperation may include undesirable actions and pursuits relating to ethicality, sustainability or economic activity. The administrative branch must identify the obligations under law relating to export controls and sanctions.

Taking risks is often necessary in international cooperation. The above-mentioned risk management and the measures required in case a risk materialises must, however, be taken into account. Responsible international cooperation supports academic freedom and, consequently, upholds democracy in all cooperation. International cooperation in higher education and research must be as open as possible and only as closed as necessary. Openness also means the ability to openly express the themes on which cooperation will not take place or that fall within the scope of national security.

The conceptual content in international cooperation have changed: the benefits of international cooperation are significant, but at the same time the risks are also increasing. It is important for the higher education and research sector to collaboratively consider a conscious approach to promote responsible international cooperation. Risks may relate to education, training and research environments, including research infrastructures, agreements, partners and individuals, both unintentionally or intentionally, but also to funding. Commonly recognised at-risk subject matter areas include those involving dual-use items and export controls, potential for significant economic benefits, sensitive personal data or large datasets, critical infrastructure, or areas aligned with national economic or strategic interests.¹²³

¹ [Council Recommendation of 23 May 2024 on enhancing research security.](#)

² [G7 Best Practices for Secure and Open Research.](#)

³ See also [Shih, T. Gaunt, A. & Östlund, S. \(2020\). Responsible internationalisation: Guidelines for reflection on international academic collaboration. Stockholm: STINT, 2020.](#)

The changed geopolitical situation, Finland's accession to the North Atlantic Treaty Organization (NATO) and the threat of erosion of liberal democracy and the rules-based world order are also reflected in aims relating to international cooperation in higher education and research. At the same time, the crisis resilience of societies is being tested by interdependent challenges, such as Russia's brutal war of aggression in Ukraine and the wars in the Middle East as well as migration, pandemics, habitat change and natural disasters. Uncertainties and surprises call for new ways of doing things.

The significance of the various policy areas, such as migration, foreign and security policy, must be recognised in the activities of higher education institutions, too. At the same time, concerns of students and staff regarding changes in the operating environment and related challenges must be taken into consideration. There are crises near and far.

The Programme of Prime Minister Petteri Orpo's Government⁴ sets out aims such as functioning relations with China and African countries and more strategic cooperation with priority countries (the EU, the Nordic countries, Africa, the Baltic States, Australia, South Korea, Japan, the United Kingdom, Canada, the USA). In line with the Government Programme, workforce recruitment efforts based on the target country model focus particularly on India, the Philippines, Brazil and Vietnam.

We must also be able to cooperate with countries that do not share our values and principles and whose conception of the world order we must understand. Understanding does not, however, always mean approval. This is why the higher education and research sector needs understanding and knowledge of at-risk areas, with each measure needing to be considered case-specifically. A national dialogue and information sharing help higher education institutions to assess risks.

We need international competence, as competition for talent and competence is accelerating due to issues including the technology race and ageing populations. Responsible international cooperation involves responsible recruitment of students and staff that is ethically and socially sustainable and at the same time safe and secure.

The changes in the operating environment also include national challenges, such as security of supply regarding competence, taking account of aspects such as our own technology competence, ageing population and the national education level and its regional differences. The role of competence is emphasised both in technological development and in foreseeable and unforeseeable changes as well as in safeguarding the rule of law and democracy.

Due to different traditions or societal starting points, different countries and academic communities use different terms when talking about responsible international cooperation. For example, the United Kingdom uses the term 'Trusted Research', the Netherlands and Denmark use

⁴ [A strong and committed Finland: Programme of Prime Minister Petteri Orpo's Government 20 June 2023.](#)

‘Knowledge Security’⁵, EU recommendations talk about ‘research security’, while Sweden refers to the concept as⁶ ‘responsible internationalisation’⁷.

In these Finnish recommendations, ‘responsible international cooperation’ means that our entire higher education and research sector is international and responsible. Each actor assumes responsibility for its international cooperation and activities without prejudice to the principle of academic freedom, in accordance with the autonomy of higher education institutions.

Recommendations of the working group on responsible international cooperation for measures by the higher education and research sector

1. Actors in the administrative branch of the Ministry of Education and Culture will strengthen their awareness and understanding of responsible international cooperation and take measures to manage risks:
 - a. A mutual dialogue, shared messages, cooperation between sectors and regular sharing of best practices and information will enable to identify threats and risks and to address them by common means.
 - b. Each organisation in the administrative branch (higher education institutions, government agencies and other actors) will appoint a contact person for responsible international cooperation to enable the above-mentioned measures.
2. The higher education institutions, the government agencies in the administrative branch and the Ministry will promote the EU recommendations on research security, including as part of the vision work of higher education and research
3. Formulating organisation-specific policies
 - a. Convened by the Ministry of Education and Culture, actors in the administrative branch will agree on a common minimum level for policies required to promote responsible international cooperation.
 - b. The higher education institutions and other actors in the sector will formulate their own policies and take care of the operational processes of responsible international cooperation.
 - c. Each actor will ensure its sufficient competence relating to the above-mentioned processes.
 - d. The Ministry will act as the facilitator of internal sharing of information and boosting of shared competence in the administrative branch, organising common events. The

⁵ [Knowledge Security | Danish Security and Intelligence Service](#).

⁶ E.g. [Nationell stödfunktion för ansvarsfull internationalisering föreslås - Universitets- och högskolerådet \(UHR\) \[National support function for responsible internationalisation proposed – Swedish Council for Higher Education\]](#).

⁷ See also [Stockholm Center for Research and Innovation Security Archives - Institute for Security and Development Policy](#).

Ministry will act as the cross-administrative cooperation coordinator supporting the activities of the sector.

4. Strengthening responsible international cooperation in international cooperation networks
 - a. Each actor (higher education institutions, funding providers, the Ministry) will strengthen its cooperation relating to responsible international cooperation with its partners and share information on this with other domestic actors to enable a common learning process (the Nordic countries, the EU, global level).
5. The Ministry of Education and Culture/Department of Higher Education and Science Policy will act as part of cross-administrative processes to coordinate roles, contents and responsibilities.
6. Responsible international cooperation will be monitored as part of the dialogue and steering process between the sector and the Ministry of Education and Culture

APPENDIX

National legislation and policies on responsibilities

Legislation

In Finland, the freedom of science, the arts and higher education is guaranteed under the Constitution of Finland (section 16) and the universities are self-governing (section 123), as provided in more detail by legislation. Detailed provisions are laid down in the Universities Act (section 3), which specifies that the autonomy entails the right of universities to make their own decisions on matters related to their internal administration. The Universities of Applied Sciences Act states that universities of applied sciences enjoy freedom of tuition and research when carrying out their statutory mission (section 9). Higher education institutions are responsible for the quality of their tuition, research and other activities. Universities and universities of applied sciences are responsible for their student admissions and staff recruitment.

The tasks of the Research Council of Finland include promoting scientific research and the conditions for research as well as their utilisation by funding these and taking part in international cooperation. The Finnish National Agency for Education (EDUFI) in turn operates as an expert agency under the Ministry of Education and Culture in tasks relating to education and training, lifelong learning and strengthening international cooperation in the field.

Under the law concerning the mandates of the ministries, international issues (treaties and other international obligations) fall within the responsibilities of the ministry whose mandate covers the treaty or obligation in terms of content (Government Act, 175/2003). The tasks of the Ministry of Education and Culture in the Government and in its own administrative branch include participating in preparation and decision-making in EU institutions and in activities of international

organisations, Nordic cooperation, cooperation with the neighbouring areas and bilateral cooperation. Under the Government Rules of Procedure (262/2003), each ministry considers matters including those concerning research, development and monitoring as well as international matters within its mandate. The Ministry of Education and Culture is responsible for matters involving research, education and training.

International policies, recommendations and action plans

On 24 January 2024, the European Commission published five initiatives to strengthen the EU's economic security: a proposal for a Council recommendation on enhancing research security, a White Paper on options for enhancing support for research and development involving technologies with dual-use potential, a White Paper on export controls, a White Paper on outbound investment and a proposal for a new regulation on the screening of foreign investments.

The recommendation of the Council of Europe on enhancing research security⁸ was published in May 2024. The main objective of the recommendation is to support the Commission and the Member States in addressing risks to research security relating to international cooperation. The recommendation provides examples of awareness raising relating to research security and of risks mainly relating to undesirable transfer of knowledge, foreign interference and ethical or integrity violations. This is to ensure that research, innovation and higher education activity is not misused in ways that are unethical or affect the security of the EU or its Member States.

In the Council recommendation, 'research security' refers to anticipating and managing risks related to: a) the undesirable transfer of critical knowledge and technology that may affect the security of the Union and its Member States, for instance if channelled to military or intelligence purposes in third countries; b) malign influence on research where research can be instrumentalised by or from third countries for instance in order to create disinformation or incite self-censorship among students and researchers infringing academic freedom and research integrity in the Union; c) ethical or integrity violations, where knowledge and technologies are used to suppress, infringe on or undermine Union values and fundamental rights, as defined in the Treaties.

The recommendation states that, as a general rule, the research and innovation sector operates openly and internationally. This is why a uniform approach to improving security in the research and innovation sector based on academic freedom and institutional autonomy is required throughout Europe. The recommendation deals with the roles of the various actors at the strategic level. The recommendation does not contain binding regulations. Instead, it provides guidelines concerning measures that the Commission, Member States and research community could implement.

⁸ <https://data.consilium.europa.eu/doc/document/ST-9097-2024-REV-1/en/pdf>.

Finland promotes activities in line with the Council recommendation on research security, taking account of the key principles of responsible international cooperation, when planning and implementing policy measures improving security in higher education and research.

The Council recommends that Member States engage in dialogue with the research and innovation sector with a view to defining responsibilities and roles and developing a national approach, if not already in place, for example through guidelines or a list of relevant measures and initiatives to boost research security with a clear process for implementation, while considering Commission guidance and available tools for support.

The Council also recommends that Member States, where relevant, create a new or reinforce an existing support structure or service, to help actors in the research and innovation sector to deal with risks related to international cooperation in research and innovation. It is also recommended that Member States strengthen the evidence base for research security policymaking, through analysis of the threat landscape, and facilitate information exchange between research performing organisations and research funding organisations on the one hand and intelligence agencies on the other hand, for example through classified and non-classified briefings or dedicated liaison officers.

The G7 countries (Italy, Japan, Canada, France, Germany, the United Kingdom and the United States) have determined their common values and principles for research security and good research practice⁹. The G7 countries commit to promoting international research cooperation and state that openness and security in research are not contradictory but complementary and mutually reinforcing. The G7 countries have prepared recommendations for best practices for research security that apply to ministries, research funders, research organisations and researchers, who must ensure research security collectively and individually.

Many of Finland's peer countries¹⁰ have produced recommendations and action plans on research security and responsible international cooperation in higher education and research. Active cooperation between the Nordic countries, in the EU context and with our partner countries is vital for Finland.

The UNESCO-OECD Guidelines on Quality Provision in Cross-Border Higher Education¹¹ were issued as early as 2005. They outline the practices for quality assurance in cross-border higher education provision. International student recruitment has been developed using ethical guidelines in many countries. Their purpose is to create common rules for ethical and responsible student recruitment.

Roles, processes and procedures of actors in the administrative branch

Roles and responsibilities

⁹ Such as [G7 Best Practices for Secure and Open Research - Gemeinsamer Ausschuss zum Umgang mit sicherheitsrelevanter Forschung](#).

¹⁰ Such as [Norway](#), [Sweden](#), [Denmark](#), [the Netherlands](#).

¹¹ [Guidelines for Quality Provision in Cross-border Higher Education | OECD](#).

Each organisation has, with reference to the above, its own responsibilities and obligations under its mandate with regard to promoting responsible international cooperation. In addition to the individual responsibility of each higher education institution and actor, all of the actors also have collective responsibility¹². The dialogue and cooperation between the actors ensure that risks are addressed in a proportionate manner and that there is appropriate understanding of responsibility at all levels of organisation.

It is the role of higher education institutions to ensure that their risk management mechanisms are in place throughout the organisation and that they have competence in identifying risks.

The Research Council of Finland plays a key role from the perspective of national research funding. The role of the Finnish National Agency for Education (EDUFI) in turn involves bringing more international scope to higher education as well as country image and marketing work aimed at international students.

The role of the Ministry of Education and Culture includes, in particular, supporting higher education institutions and other actors in the administrative branch through dialogue and international and cross-administrative cooperation in promoting responsible international cooperation.¹³

Themes and ongoing and noteworthy processes in responsible international cooperation in higher education and research

Processes relating to international cooperation in higher education and attracting students

The increasing numbers of applicants and students have also resulted in various undesirable phenomena relating to international students. Higher education institutions are actively developing international student admission procedures and processes.

To prevent risks, closer contacts between higher education institutions and the authorities have been launched. The Ministry of Education and Culture has organised several events on risks, abuse and solutions relating to the entry and stay of students in the country. Close contacts and a good knowledge base on the various phenomena are key to solving any problems that emerge.

¹² See [G7 Best Practices Annex B: G7 Principles on Research Security](#).

¹³ [The Ministry of Education and Culture Performance Plan](#) for 2025 (abstract in English) states that responsible international cooperation promotes the development of higher education and research as well as Finland's impact, and that the Ministry participates actively in the multinational dialogue to promote responsible international cooperation in research and higher education. The Ministry supports responsible international cooperation in the steering of higher education institutions and research institutes.

Higher education institutions have jointly prepared for their cooperation partners the Finnish International Education Agent Code of Conduct¹⁴, providing ethical guidelines for international student recruitment, and introduced a guide to ethical conduct in education exports to share best mutual practices in education exports. The purpose of compliance with the ethical code of conduct and best practices is to ensure ethically sustainable recruitment of students to Finnish higher education institutions.

In line with the Government Programme, the Ministry of Economic Affairs and Employment is preparing legislative amendments concerning students and researchers from third countries (restricting residence permits for students and researchers based on an assessment by the Finnish Security and Intelligence Service, and revoking the residence permit if a student resorts to Finnish social assistance). The process is currently underway.

Processes relating to international research cooperation

The Government is proposing an amendment to the Act on the Research Council of Finland whereby a provision would be added to the Act under which attendance to the Council's duties concerning the funding of research and research conditions and international cooperation may not be in conflict with Finland's national security or Finland's international obligations. In addition, other adjustments mainly of a technical nature are proposed for the Act. The process is currently underway.

Shared responsibilities and processes of higher education and research

Higher education institutions are responsible for ensuring a safe and secure operating environment for students and staff.

Each organisation is responsible for identifying the risks involved in responsible international cooperation, such as risk assessments and action plans in case risks materialise, and for information security and travel safety. Institutional and institute-level partnerships, including related agreements, projects, visitor practices, external funding and recruitments, must be examined through the principles of responsible international cooperation.

Each actor must take account of potential reputational harm to individuals, organisations and Finland as a whole.

The Ministry of Education and Culture supports higher education institutions in implementing responsible international cooperation. The Ministry has organised several events for rectors, presidents and strategic management of higher education institutions and for the entire sector on power politics and its impacts on higher education and research in cooperation with organisations including the Ministry for Foreign Affairs and the Finnish Security and Intelligence Service.

¹⁴ [The-Agent-Code-of-Conduct-Arene-Unifi.pdf](#).

Processes of other ministries relating to the higher education and science policy sector

The Finnish national competent authority referred to in sanctions regulations is the Ministry for Foreign Affairs¹⁵ unless the matter falls within the mandate of another authority. In individual cases, however, the Ministry for Foreign Affairs or the Ministry of Education and Culture does not have the powers to interpret in a legally binding manner the contents of EU regulations concerning sanctions or to take a stand on their application, except with regard to applications for exemptions under EU regulations. EU sanctions regulations constitute legislation applied directly in Member States, which means that everyone, both legal and natural persons, is obliged to know the legislation and act in accordance with it. The Ministry for Foreign Affairs is responsible for export controls. The Ministry for Foreign Affairs is also responsible for country-specific communication with the authorities.

The Ministry of Defence is responsible for export controls concerning military equipment¹⁶.

The Ministry of Justice in turn is responsible for matters including legislation relating to security clearances.

Working group on responsible international cooperation in higher education and research

On 8 April 2024, the Ministry of Education and Culture appointed a working group on responsible international cooperation in higher education and research for the period from 15 April to 31 December 2024. The group was chaired by Director General Sirkku Linna from the Ministry of Education and Culture and its members were Vice-Rector Anne Portaankorva from the University of Helsinki as the representative of the Council of Rectors of Finnish Universities (Unifi) and, as her deputy, Vice-Rector Marko Joas from Åbo Akademi University, and President Jari Multisilta from Satakunta University of Applied Sciences (SAMK) as the representative of the Rectors' Conference of Finnish Universities of Applied Sciences (Arene) and, as his deputy, Vice President Mari Vuolteenaho from Laurea University of Applied Sciences. Senior Ministerial Adviser Tiina Vihma-Purovaara from the Ministry of Education and Culture was invited to serve as the group's secretary.

This joint group of the Council of Rectors, the Rectors' Conference and the Ministry was tasked with producing a shared situational picture for the higher education and research sector concerning the threats and opportunities faced by higher education and research and to map out needs for theme-specific national discussion in, for example, situation rooms or seminars.

The group was to report on its work and draw up recommendations for further activity by the end of 2024.

¹⁵ [Sanctions - Ministry for Foreign Affairs.](#)

¹⁶ [Export and transfer permits - Ministry of Defence \[in Finnish and Swedish\].](#)

The group met four times, on 7 May 2024, 29 August 2024, 19 November 2024 and 31 January 2024. The group organised three workshops and one seminar, which took place on 3 December 2024:

- 1) 19 September 2024 *Sanctions and export controls*
- 2) 24 October 2024 *Best practices in higher education and research security – taking account of the changed operating environment in international cooperation*
- 3) 22 November 2024 *People*
- 4) 3 December 2024 closing seminar *Geopolitics and impacts on higher education and research – self-censorship, risk avoidance, blocking versus openness?*

In addition, the Ministry of Education and Culture organised a webinar on the Council recommendation on research security on 19 June 2024.

The working group on responsible international cooperation heard about best practices from the United Kingdom¹⁷, Norway¹⁸ and France at its events. During the process, France invited the Ministry of Education and Culture to the enlarged G7+ community on research security of the G7 countries.

¹⁷ E.g. <https://www.ukri.org/manage-your-award/good-research-resource-hub/trusted-research-and-innovation/>.

¹⁸ [Guidelines and tools for responsible international knowledge cooperation | HK-dir \(hkdir.no\)](#).