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1 The assignment and the drafting process

In April 2014 the Minister of Education and Research decided to appoint a commissioner to assist the Ministry in drawing up a proposal on how a quality assurance system for higher education should be designed. In March 2015 the Ministry for Education and Research referred a memorandum dealing with a proposed quality assurance system for higher education (U2015/01626/UH) for consideration. In this memorandum it is also proposed that resources for programmes at first and second-cycle level should no longer be allocated on the basis of their outcomes. A summary of this memorandum can be found in Annex 1 and a list of the agencies to which it was referred in Annex 2. An overview of the responses submitted is available at the Ministry of Education and Research (U2015/01626/UH).

In the Budget Bill for 2016 (Govt. Bill 2015/16:1) the Government proposes that the Riksdag's previous decision that resources for courses and programmes at first and second-cycle level partly should be allocated on the basis of quality evaluations of their outcomes shall no longer apply.

1 All higher education must maintain high quality standards

Sweden should be a leading knowledge nation. High quality standards in higher education are decisive in assuring future employment and in enhancing Sweden's competitiveness as well as for providing women and men with greater freedom to determine their own lives. Higher education plays a central role in providing the society with expertise and for the enhancement of knowledge in general. Higher education also sustains cultural values, contributes to personal development and endows people with greater capacity to face the major challenges of our age such as rapid changes in the circumstances in which they live. It also plays a decisive role for the development of democracy. The Government also considers that it is of central importance to prepare students, during their studies, for how to function in a global and ever changing labour market. Sweden is a small country which is dependent on exports and has to compete through knowledge.

Historically, the return on the investments in higher education has been positive and it is clear that the need of higher education has also risen over time. The Government is therefore expanding higher education by increasing the number of places during its period of office. At the same time, one of the Government's highest priorities is to enhance the quality of higher education. The aim is to ensure that all students, women and men, know that they are completing programmes that maintain high quality standards.

The quality assurance system provides a central tool for enhancing the quality of higher education. In this document the Government presents its conclusions on the framework for a new national quality assurance system based on principles which will enjoy widespread support in the higher education sector.

2 Assuring the quality of higher education

2.1 Quality assurance in Sweden

2.1.1 The current quality assurance system

Since the beginning of the 1990s there have been several national quality assurance systems in place for higher education in Sweden. The main features have been that each HEI bears the responsibility for the organisation of its own internal quality assurance system and that a governmental agency is responsible for the national, external quality assurance system. The structure of the quality assurance system has varied over the years. While assessments of applications for entitlement to award qualifications have been undertaken in the same way the focus of other evaluations has shifted between reviewing the HEIs' quality assurance procedures and the assessing of individual programmes. The focus of programme evaluation has in its turn varied. What all the evaluations have had in common is that the method used is based on the HEIs' own self-evaluations and their subsequent appraisal by panels of assessors that include external, independent experts (peer-review). These experts have also interviewed those involved at the HEIs after which they have submitted written reports on which the agency responsible has based its judgements.

The enactment by the Riksdag of the Government Bill *Fokus på kunskap – kvaliteten i högre utbildning* [*Focus on knowledge – quality in higher education*] (Govt. Bill 2009/10:139, bet. 2009/10:UbU20, rskr. 2009/10:320) led to the establishment of the current quality assurance system. The Government presented the following conclusions in its Bill. The national quality assurance system should comprise quality evaluations of first, second and third-cycle courses and programmes as well as appraisal of the entitlement to award qualifications. Courses and programmes leading to the award of first, second and third-cycle qualifications were to be evaluated by the National Agency for Higher Education (Högskoleverket) in four-year cycles and the main focus should be on their outcomes. The evaluations should be made by external independent experts and coordinated by the National Agency. The appraisal of outcomes should be based on review of the students' independent projects and the HEIs' self-evaluations of the outcomes of their programmes combined with site visits by the experts. In addition the results of questionnaires sent to alumni should be included in the evaluation. The Government also concluded that the evaluations should result in an overall appraisal of the outcomes of courses and programmes using a three-point scale.

One important reason given by the Government in its Bill for the introduction of a quality assurance system that focused on reviewing outcomes was that the HEIs are accountable to the state and had therefore been given a greater degree of autonomy for the organisation and operations of their activities. Appraisal of input and processes was considered to exert undesirable control. The responsibility that lay with the HEIs for organising their own quality assurance system was also stressed. The Government also concluded that the reduction of political control of higher education should be matched by a corresponding

increase in the responsibility of the HEIs themselves. This applied not least to monitoring the quality of the outcomes of their courses and programmes. In addition the system had to provide information about quality to students, the commercial sector, public agencies and other stakeholders.

The Government's conclusions resulted in a marked shift of focus on results compared with previous quality assurance systems in which evaluation of courses and programmes had concentrated mainly on input and processes. In addition, this new system implied that quality enhancement and developmental aspects were subordinated to an emphasis on quality control. Between 2011 and 2014, therefore, the quality assurance system consisted of two components, appraisal of applications for entitlement to award qualifications and programme evaluation. The courses and programmes evaluated were those that could lead to the award of a first or second-cycle qualification. Lack of resources meant that no third-cycle courses or programmes were evaluated during the most recent four-year period. Development work is, however, in progress at the Swedish Higher Education Authority on how to evaluate third-cycle courses and programmes. The intention is to integrate third-cycle evaluations into the new system. Initially, questionnaires were circulated to alumni within the framework of the programme evaluations but problems involving, for instance, inadequate response rates meant that after a while this method had to be abandoned.

If the assessment of the independent projects made by the experts gave a clear picture of how well courses and programmes attained certain qualitative targets laid down in the qualification descriptors, this assessment, together with the learning outcomes, accounted for in the self-evaluations, was given the greatest weight in their overall evaluations. When the qualification descriptors either completely or in part could not be assessed on the basis of the independent projects and the self-evaluations, information provided by the interviews assumed particular significance.

The task of each panel of assessors concluded with its proposal for an overall evaluation for each programme using a three-point scale: very high quality, high quality and inadequate quality. The Swedish Higher Education Authority subsequently decided on the overall judgement to be made for each programme on the basis of these proposals. Programmes that were evaluated as attaining very high quality or high quality fulfilled the quality requirements for higher education. HEIs with programmes that were given the highest rating were also allocated a quality premium in the funding system. Evaluation of a programme that led to inadequate quality meant that the right of that HEI to award the qualification was questioned. In such a case the HEI was given one year to present remedial measures to the Authority. After having assessed those measures the Authority took a decision on whether the measures were sufficient enough for the HEI to keep its right to continue to award the qualification. If not the Authority would revoke that right. Up until June 2015 no entitlement to award a qualification had been revoked as the follow-up reviews revealed that the specific programmes could demonstrate that they maintained high quality or they had been discontinued by the HEIs. Some follow-up reviews remain to be carried out during the academic year of 2015/2016.

2.1.2 The legislation and ordinances relating to quality assurance

There are a number of provisions that play a central role for the HEIs in their work with quality assurance and on which the operations of the Swedish Higher Education Authority are based. A fundamental requirement is that the HEIs are responsible for ensuring that courses and programmes maintain high quality standards. Section 4 of Chapter 1 of the Higher Education Act (1992:1434), which applies to all HEIs that are accountable to the Government, stipulates that “the operations of higher education institutions shall be arranged to ensure that high standards are attained in courses and study programmes and in research. The resources available shall be used effectively to sustain a high standard of operation. Quality assurance procedures are a shared concern of staff and students at higher education institutions”.

Chapter 1 of the Higher Education Act also contains provisions stipulating for instance, close links between research and teaching, student influence, gender equality, international links as well as widened recruitment to higher education. In addition the Higher Education Act stipulates the overall demands and goals for first, second and third-cycle courses and programmes (Chapter 1, Sections 7–9a). The Qualifications Ordinance, which is Annex 2 to the Higher Education Ordinance (1993:100), the annex to the Ordinance for the Swedish University of Agricultural Sciences (1993:221) and the annex to the Ordinance for the Swedish Defence University (2007:1164) lay down the requirements for the award of specific qualifications, i.e. intended learning outcomes.

Regulations on the HEIs’ legal entitlement to award qualifications can be found in the Higher Education Act (Chapter 1, Sections 11–16). The Higher Education Ordinance contains additional regulations about qualifications and authority to award them (Chapter 6, Section 4–5f). The Government prescribes which qualifications may be awarded by the Swedish University of Agricultural Sciences and the Swedish Defence University.

The Act Concerning Authority to Award Certain Qualifications (1993:792) contains provisions stipulating that independent higher education providers may be granted entitlement to award qualifications that the Government has, by virtue of the Higher Education Act, issued regulations for and the revocation of such entitlement. One requirement for such entitlement is, for instance, that a programme complies with the demands laid down in Chapter 1 of the Higher Education Act. The Act Concerning Authority to Award Certain Qualifications also stipulates that an independent higher education provider granted entitlement to award a qualification is required to take part in follow-up reviews and evaluations of programmes. The independent higher education provider is also required to draw up an annual quality report. In consequence, the evaluations referred to in this document also apply to those independent higher education providers that have been entitled by the Government to award qualifications. The term HEI in this document therefore refers, unless otherwise stated, both to HEIs that are accountable to the Government and independent higher education providers with entitlement to award qualifications.

The Ordinance which contains Instructions for the Swedish Higher Education Authority (2012:810) states that the Authority is responsible for the quality assurance of higher education by exercising programme evaluations and by awarding HEIs entitlements to award qualifications. The regulations in the

Higher Education Act relating to the right to award qualifications make it clear that the Authority can decide that a HEI is no longer entitled to award a qualification if there are shortcomings in the quality of a programme. It is the Government that takes decisions on an independent higher education provider's right to award a qualification, or its withdrawal. The Government normally takes such decisions after an opinion has been requested from the Swedish Higher Education Authority. The Authority reports to the Government on the number of evaluations made and their overall results in its annual report. The Authority's website also provides a continually updated database with information about the results of each evaluation.

2.2 Quality assurance in an international perspective

2.2.1 European principles for quality assurance

Sweden participates in the European cooperation called the Bologna Process which is intended, among other things, to promote the mobility of students and employees between the member states. In order to do so, the Bologna process has focused on the development of mutual recognition of educational systems in different countries by, for instance, increasing the transparency of each national educational system and by recognising programmes offered in other countries as well as the institutions that offer them. Quality assurance therefore plays a central role in the Bologna Process. One element of this cooperation has been the development of joint principles for quality assurance. These principles are entitled Standards and Guidelines for Quality Assurance in the European Higher Education Area, ESG. The principles have been adopted by the Ministers of Higher Education in the member countries but are not legally binding. The principles were adopted for the first time in 2005 and revised by the ministers in May 2015.

These principles have been drawn up so that they can be applied in each country irrespective of individual legal frameworks, educational systems and other circumstances. This means that the guide-lines can be implemented in different ways by different countries, by different HEIs and by different quality assurance agencies. The principles are divided into three sections. The first part deals with the way in which HEIs should assure the quality of higher education. The second part presents guide-lines on how quality assurance agencies should undertake external evaluations. The third section shows how quality assurance agencies should assure the quality of their own operations.

In 2000 the European Association for Quality Assurance in Higher Education (ENQA) was founded with the aim to foster cooperation and the exchange of experiences relating to quality assurance in higher education among the countries involved in the Bologna Process. ENQA is an organisation whose members are quality assurance agencies such as the Swedish Higher Education Authority. One requirement for membership is adherence to the principles for quality assurance. The Swedish Higher Education Authority (previously the National Agency for Higher Education) is no longer a member. After an evaluation by ENQA in 2012, the Authority was no longer considered to comply with these principles and was therefore

not allowed to retain its membership. The shortcomings identified by ENQA included, for instance, the failure of the national evaluation system to take the HEIs' own internal quality assurance systems into account and to contribute to the quality development of HEIs to a sufficient degree. ENQA plays an active role in the Bologna Process and played a part involved in the recently completed work on revising the principles for quality assurance.

The principles described above also form the basis for membership of the European Quality Assurance Register for Higher Education (EQAR). EQAR is an organisation that provides a list of quality assurance organisations whose work adheres to the principles. The intention is to enable quality assurance organisations listed in the EQAR to be commissioned for evaluation assignments in other countries.

2.2.2 Quality assurance systems in other countries

Usually, some kind of assessments of entitlements to award qualifications, is part of quality assurance systems also in other countries. In addition, in many countries a combination of assessments of the HEIs' own internal quality assurance systems and programme evaluations are used. Thematic evaluations in which certain specific aspects of quality are appraised are also undertaken. The quality assurance systems in different countries usually consist of a combination of all, or of some of these components, although with different emphases.

In Denmark the quality assurance system is based on the assessment of the HEIs' own quality assurance procedures. When the quality assurance system of a HEI has been approved, the HEI is given the responsibility for assuring the quality of its own courses and programmes and for establishing new programmes. The HEIs whose quality assurance systems are not approved have to submit their programmes for evaluation by the national quality assurance agency. For HEIs in the Netherlands external appraisal of their own quality assurance procedures is voluntary. However, if a HEI's internal quality assurance programme has been approved by an external quality assurance agency, the programmes that are offered by that HEI will be subject to a less exhaustive evaluation compared to those programmes offered by a HEI whose quality assurance system has not been assessed or that was not approved. The meaning of less exhaustive is that fewer aspects will be assessed. In Norway failure to gain approval of its quality assurance procedures means that a HEI is not allowed to establish any new programmes or apply for entitlements to award new qualifications. Also in Finland the HEIs' internal quality assurance procedures are evaluated. HEIs that are not approved have to undergo renewed evaluation within two to three years but are not otherwise subject to sanctions. In many countries the internal quality assurance systems of HEIs are evaluated regularly, usually every sixth year.

Programme evaluations are often made on the basis of risk assessment. In England education providers that have demonstrated, over a long period, that they are able to assure the quality of their programmes are not evaluated as frequently as those that are unable to do so. Another example of risk assessment can be found in Norway, where the national quality assurance agency can select programmes for evaluation on, for instance, the basis of problems and quality shortcomings in programmes of which the agency has become aware.

National thematic evaluations are undertaken in Finland, Denmark and Scotland, for instance. In these three countries thematic evaluations are intended to develop the quality of programmes. In Scotland these evaluations focus particularly on the development of the preconditions for student learning. In England thematic evaluations take place within the framework of the national programme evaluations and focus on a particularly relevant theme. In the Netherlands evaluations are focused on specific quality aspects that the HEIs involved want to emphasize in the context of their profiles. This can involve, for instance, aspects of internationalisation or of entrepreneurship in the programmes.

The method universally used is to arrange evaluations by external assessors, so called peer-reviews, in which the HEIs' self-evaluations and site visits provide the bulk of the material to be appraised.

2.3 A new national system for quality assurance of higher education

The Government's conclusions:

The Swedish Higher Education Authority should be responsible for a national quality assurance system that focuses on both the appraisal of outcomes and the quality development of higher education. The national quality assurance system should consist of four components:

- appraisal of applications for entitlement to award qualifications,
- review of the HEIs' own quality assurance procedures,
- evaluation of courses and programmes, and
- thematic evaluations.

The Swedish Higher Education Authority should be given the responsibility for further development of the system and its implementation on the basis of the Government's conclusions, the applicable legislation and ordinances as well as the principles for quality assurance developed within the framework of the Bologna Process. This work should be undertaken in consultation with both the HEIs and representatives of students and the labour market.

The memorandum's proposal: agrees with the Government's conclusions.

Responses after circulation: the majority of the bodies to which the memorandum was circulated for comments view the proposal positively on the whole. Several of them, for instance *the Royal Institute of Technology, Linnaeus University, Örebro University, The Swedish School of Sport and Health Sciences, Mälardalen University, The University College of Arts, Crafts and Design, The Association of Swedish Higher Education* and *The Swedish National Union of Students*, highlight the positive aspects of the proposed division of roles and responsibilities between the HEIs and the Swedish Higher Education Authority. The majority also welcome the fact that the proposal lays down a framework and that the Authority will be given the task of developing and implementing the system in consultation with the HEIs and with representatives of the students and the labour market.

The importance of basing the development work on international principles for quality assurance is emphasised by *Lund University, Umeå University, Linnaeus University, Örebro University, Kristianstad University, Mälardalen University, the Association of Swedish Higher Education and the Swedish National Union of Students* among others. Several HEIs, including *Lund University, the Royal Institute of Technology, Örebro University, Dalarna University, Mälardalen University and the University College of Arts, Crafts and Design* react positively to the proposed focus of the Authority's evaluations on both outcomes and the development of quality in higher education. *Uppsala University, Lund University and the University of Gothenburg* consider, for instance, that the four components proposed will together provide a broad view of the quality of programmes.

Critical points of view were, however, expressed by *Linnaeus University, Mälardalen University and the Swedish Defence University*, among others, on the question of how the four components will relate to each other if shortcomings are identified. *Örebro University, Dalarna University, Kristianstad University, Mälardalen University, the University College of Arts, Crafts and Design and the Swedish National Union of Students* point out the risk of the development of parallel systems for evaluating courses and programmes, if both the HEIs and the Swedish Higher Education Authority are to be responsible for the quality assurance of higher education and that this can lead to increased costs.

The proposals in the memorandum are rejected in their entirety by *the Swedish National Financial Management Authority [Ekonomistyrningsverket] and the Confederation of Swedish Enterprise [Svenskt Näringsliv]*. The National Financial Management Authority is of the opinion that the material on which the proposal has been based is inadequate and that a problem assessment and evaluation of the former and current quality assurance system is required. In the opinion of the Confederation, the employer's perspective has been omitted and the focus on process will have a negative impact on quality assurance procedures at the HEIs.

The grounds for the Government's conclusions

A new focus on the division of responsibilities and roles between the HEIs and the Swedish Higher Education Authority

Today the HEIs and the Swedish Higher Education Authority already bear the responsibility for assuring the quality of higher education. The Higher Education Act, to which the Act Concerning Authority to Award Certain Qualifications refers, makes it clear that the HEIs are responsible for ensuring that their courses and programmes maintain high quality standards. The Ordinance containing Instructions for the Swedish Higher Education Authority makes the Authority responsible for the quality assurance of higher education.

The Swedish Higher Education Authority which was established on 1st of January 2013 took over the tasks from the previous agency, the National Agency for Higher Education, concerning quality assurance, supervision and the monitoring of the effective use of resources in higher education. The

purpose of the review of the HEIs that took place prior to January 2013 was to establish a clear division of roles between those parties that had responsibilities in this area. In the Government Bill *Nya myndigheter inom utbildningsområdet m.m. [New agencies in the field of education etc.]* (Govt. Bill 2011/12:133, bet. 2011/12:UbU22, rskr. 2011/12:278) the Government states that it is important to separate inspection activities from those that offer support and service in the field of education. At the same time, therefore, the Swedish Council for Higher Education [Universitets- och högskolerådet] was also established and given responsibility for activities that explicitly involved providing service and coordination.

During the most recent evaluation cycle (2011–2014) the focus of the Swedish Higher Education Authority's evaluations has been on monitoring the outcomes of courses and programmes, while issues relating to internal quality assurance and development have been left for the HEIs to deal with themselves. Strengthening the link between the HEIs' own quality assurance procedures and the Swedish Higher Education Authority's evaluations will enable further enhancement of the quality of higher education. One of the premises of the international principles for quality assurance is that external appraisal should take internal quality assurance procedures at the HEIs into account and contribute to the development of quality.

The HEIs are responsible for the organisation of their operations and for ensuring that the content and implementation of courses and programmes will enable attainment of the targets laid down for higher education. This presupposes that each HEI has an internal quality assurance system. For many years the HEIs have been working with internal quality assurance procedures. Their systems have been evaluated by the National Agency for Higher Education in a number of rounds. Since 2001 the HEIs' courses and programmes have also been evaluated by the National Agency, today the Swedish Higher Education Authority.

In view of the knowledge and experience of quality assurance possessed by the HEIs, it is considered that sound conditions prevail for a change in the focus of the division of responsibility and roles between them and the Swedish Higher Education Authority. The Government concludes that the national system for quality assurance should have greater coherence than it does today. This means that the Authority should be responsible for a national quality assurance system that focuses on both monitoring outcomes and enhancement of the quality of higher education. An important starting point for the Government's conclusions is the experience that above all the Authority and the HEIs have gained from the current quality assurance system and its predecessors.

This document contains conclusions relating to the fundamental principles for quality assurance in higher education. These conclusions are intended to provide a framework for a national quality assurance system that the Swedish Higher Education Authority should be responsible for. The Government intends to give the Authority the task of further development and implementation of the system on the basis of the Government's conclusions, the applicable legislation and ordinances as well as the principles for quality assurance developed within the framework of the Bologna Process. This work should be undertaken in

consultation with both the HEIs and representatives of students and the labour market. The Government should issue the required regulations.

The new national quality assurance system should focus on both monitoring outcomes and quality development

The operations of the HEIs are funded to a very large extent from the public purse and it is the Swedish Riksdag and the Government that lay down the requirements and targets for higher education through legislation and ordinances. The state therefore has a legitimate right to ensure that courses and programmes maintain high quality standards and that public funds are used efficiently. A central starting point for the quality assurance system should therefore be that the HEIs and the Swedish Higher Education Authority are responsible for monitoring attainment of the requirements and targets laid down in the national regulations that apply to higher education.

Questions relating to internal quality assurance procedures and development are, as has been pointed out, matters on which the HEIs decide themselves, as they do about the organisation and implementation of their activities. The Government sees a need, however, for the HEIs to benefit from the expertise and the reflections of the panels of assessors who carry out evaluations for the benefit of their own internal development work, but it has not been possible to use the reports submitted in recent years for this purpose. The assessors' reports should therefore, as emphasised by *Mid Sweden University*, also contribute to quality development and not merely focus on shortcomings. Follow-up reviews that are carried out some time after the evaluations also offer a way to quality development. The Authority should therefore develop methods enabling evaluations to contribute to the quality development undertaken by the HEIs.

Four components in the national quality assurance system

As has been pointed out above, the aims of the Swedish Higher Education Authority's evaluations should be both to monitor the outcomes of courses and programmes and also to contribute to the work of the HEIs on quality development. The Government concludes that the current quality assurance system with the components of appraisal of entitlement to award qualifications and evaluations of courses and programmes should therefore be supplemented with reviews of the HEIs' own quality assurance procedures and thematic evaluations. It is considered that these four components will together contribute to the attainment of both these aims as well as high quality standards in higher education in Sweden. The components will also support the Authority's evaluations and the HEIs' own quality assurance procedures to complement each other and to make the quality assurance system coherent, with which for instance *Uppsala University* and *the University of Gothenburg* agree. The Government also concludes, and *Lund University* concurs, that the four components together provide a broad and more comprehensive image of the quality of higher education.

The weight that should be ascribed to each component in the proposed system should mainly be determined by the Authority. There should be some flexibility in the number of appraisals undertaken within the framework of each component

from one year to another, to enable them to be planned on the basis of relevance and the efficient use of resources. One point of departure should, however, be that the quality assurance procedures of all the HEIs are to be reviewed within a six-year period and that the Authority's programme evaluations constitute an important supplement to its reviews of the HEIs' quality assurance procedures.

Lund University and *Mid Sweden University* stress the importance of notifying the HEIs in good time of when evaluations are planned to take place. The Government agrees that the HEIs should be enabled to plan appropriately. At the same time the different components play different roles in the system and this affects how much notice can be given. For instance evaluation of a programme may have to be launched without delay because of complaints about shortcomings. Another important factor for the Authority's planning is the number of applications for entitlement to award qualifications received and the number of other assignments from the Government.

The method for external appraisal of higher education that is recognised internationally and that has been used in both the previous and current Swedish quality assurance system should also form the basic form of appraisal in the future and apply to all four components. This method means that for each evaluation the Authority should appoint a panel of assessors comprising external experts as well as student and labour market representatives. The material on which these panels base their appraisals should consist of self-evaluations from the HEIs in which they account for the way aspects of quality are attained and, if necessary, present additional information. More specific directives on which quality aspects are to be reviewed and what information the self-evaluations should contain should be drawn up by the Authority. In addition the panels of assessors should interview representatives of the relevant HEIs, who should include teachers and students, women and men. The evaluation should conclude with a report from the panel of assessors. The report will provide the basis for the decision made by the Authority. Different forms of follow-up reviews some time after the completion of the evaluation can also enhance quality development, for instance in enabling the HEIs to learn from each other and from the observations of the assessors. It may also be appropriate to follow up any recommendations that may have been made.

The different components are each presented in more detail below.

Appraisal of applications for entitlement to award qualifications

One component of the quality assurance system that should continue to be important is the Swedish Higher Education Authority's task of appraising issues relating to entitlement to award qualifications and the statutory entitlement of universities to award qualifications pursuant to Sections 11–15 of Chapter 1 of the Higher Education Act and to Section 7 of the Act Concerning Authority to Award Certain Qualifications. These regulations lay down the conditions that pertain to entitlement to award qualifications and what applies when a qualification may no longer be awarded because the requirements for doing so are no longer fulfilled.

Assessments are made both after applications have been submitted by a HEI and in connection with programme evaluations. The point of departure for appraisals of applications to award qualifications is assessment of whether the

programme in question attains, or has the possibility of attaining, the targets laid down by the Riksdag and the Government for award of the qualification to which it leads. If in the course of an evaluation the Authority finds that the requirements for the award of a specific qualification are no longer attained, the HEI is to be given a specified period in which to remedy the shortcomings. If these shortcomings persist, it may be ruled, pursuant to the regulations, that the qualification may no longer be awarded. The Authority is responsible for the way in which these reviews are conducted and for further development and quality assurance of the methods adopted.

Review of the HEIs' own quality assurance procedures

The HEIs are responsible for ensuring that higher education attains high quality standards, which presupposes that they have a quality assurance system. The Swedish Higher Education Authority should, therefore, as a second component, undertake reviews of the quality assurance procedures at all HEIs. The aim of these reviews should be both to monitor that a HEI's quality assurance procedures result in high quality and also to contribute to its quality development. The focus should be placed on assessing whether the HEIs assure the educational outcomes of first, second and third-cycle courses and programmes. Educational outcomes means here whether courses and programmes comply with the requirements in the Higher Education Act, Higher Education Ordinance and the qualification descriptors. *Lund University, Mälardalen University* and *the Association of Swedish Higher Education* endorse the reasoning in the memorandum about reviewing the HEIs' quality assurance procedures. They emphasise in their responses the Authority's important role when it comes to focus on ensuring that quality assurance procedures produce results. The Authority should not rest content with just evaluating a HEI's overall documentation and guidelines.

The point of departure for these reviews should be general aspects of quality drawn up by the Swedish Higher Education Authority in collaboration with the HEIs after consultation with representatives of students and the labour market. These aspects should be developed on the basis of the requirements in the Higher Education Act, Higher Education Ordinance and the qualification descriptors in the annexes to the ordinances based on the legislation. The principles for quality assurance within the Bologna Process should also be taken into account. Consideration should be given to the individual characteristics and profiles of the different HEIs. The possibilities of adapting and supplementing reviews with quality aspects that are particularly relevant for the HEI concerned should be borne in mind. Some of the principles that have been adopted within the framework of the Bologna Process relate to the HEIs' quality assurance procedures. These state, for instance, that a HEI should have a quality assurance policy and that there should be procedures on how a programme is established and on following it up to monitor that it attains its targets. There are no demands, however, relating to the way in which internal quality assurance procedures are to be organised but this is a decision that is left to each HEI to make itself. Neither the Swedish regulations nor the international principles lay down how quality assurance should be implemented.

A few HEIs, such as *the Swedish School of Sport and Health Sciences*, *Kristianstad University* and *the University College of Arts, Crafts and Design* point out that considerable expenditure may be incurred if they are to develop, administer and implement a new local evaluation system. It is therefore important to emphasise that the demand for internal quality assurance is not a new one in either the Swedish regulations or the international principles and that the HEIs themselves are at liberty to decide on the structure of their quality assurance system. Even though some development work on internal quality assurance may be required at a number of HEIs, this task is one that has already been assigned to them and is to be undertaken within the parameters of the resources available.

How much progress the HEIs have made in building internal quality systems to ensure that programmes meet the demands laid down in the Higher Education Act, Higher Education Ordinance and the qualification descriptors, varies however. Some of the HEIs that will be reviewed early in the first six-year cycle will, therefore, not find it possible to demonstrate that they have assured the quality of all of their programmes. The Government therefore considers it reasonable that in such cases require that the HEIs can show that they have a system for assuring the quality of the outcomes of programmes and that they, a few years later, can show quality assurance for all their programmes.

In the current programme evaluation system the Swedish Higher Education Authority issues its judgement using a three-point scale: inadequate quality, high quality and very high quality. In the memorandum circulated for comments it was proposed that every review of a HEI should conclude with a judgement using a corresponding three-point scale in which the highest assessment should be given to the HEIs that have made a great deal of progress in assuring the quality of their courses and programmes which can serve as good examples for other HEIs. Alternatively the Authority could merely judge whether a HEI's quality assurance procedures are approved or not, i.e. using a two-point scale. Some of the respondents, such as *Kristianstad University* and *the Swedish Confederation for Professional Employees [TCO]* support the use of a three-point scale, while several, among them *Lund University*, *Umeå University* and *Örebro University* have reservations about a three-point scale and consider that good examples can instead be indicated in the body of the reports. *Dalarna University* sees the risk of a three-point scale leading to standardisation and the establishment of norms. The Government concludes that the Authority should, in accordance with its response to the circulated memorandum, be responsible for investigating the advantages and drawbacks of a two-point or three-point scale and finally decide which of them is to be used.

The Government's conclusion is that if the quality assurance procedures of a HEI are judged to be inadequate, the Authority should be responsible for continued external review of these procedures until the shortcomings have been remedied. The Authority should assume responsibility for developing, in more detail, how continued review is to be undertaken, for example how much time the HEI will be given to deal with shortcomings in its quality assurance procedures, the composition of the review panel and what methods it should use. The Government considers, like *Örebro University*, that continued review

should be structured flexibly so that it can be adapted to the extent of the shortcomings at a HEI.

Some of the respondents, such as *the Confederation of Swedish Enterprise*, point to the importance of linking sanctions to shortcomings in quality assurance procedures. The Government considers that it is important for inadequate quality assurance procedures to lead to consequences for a HEI. The Government is therefore of the opinion that the quality of a HEI's quality assurance procedures should have a bearing on the Authority's selection of which programmes to evaluate within the framework of the programme evaluation component. *Uppsala University* and *the student council of the Swedish Confederation of Professional Associations [Saco studentråd]* share this opinion. In the section below on programme evaluation the Government concludes that a judgement implying that the quality assurance procedures of a HEI are inadequate should result in the evaluation of a larger number of its courses and programme. The implication of such a judgement is that the HEI is regarded as not capable of taking responsibility for the quality of its programmes. It also means that the HEI risks notification of withdrawal of its entitlement to award qualifications, or even withdrawal, in the same way as for other evaluations. The Government's conclusion is that an increase in the number of programme evaluations together with continued review of its quality assurance system because of its inadequacy are sufficient to make a HEI adopt the measures required. To ensure that reviews are effective the Government intends, however, to give the Authority the task of studying whether the possibility of invoking additional sanctions is necessary.

Programme evaluations

A third component that the Government considers should be included in the quality assurance system is evaluation by the Swedish Higher Education Authority of a selection of first, second and third-cycle courses and programmes. The aim of these evaluations should primarily be to monitor their outcomes, i.e. that they meet the demands laid down in the legislation and ordinances, but they should also contribute to the HEIs' own quality development. The Authority should attach high priority to these evaluations.

It should be possible to undertake programme evaluations either at specific HEIs or at all of them in order to acquire an overall view of quality in a certain field. The selection of the courses and programmes to be evaluated should be based on several different criteria. The section above on review of the HEIs' internal quality assurance procedures makes it clear that the HEIs are responsible for ensuring that their courses and programmes attain high quality standards and that the Authority should review their quality assurance procedures in order to check that this is complied with. If a HEI fails to meet the demands and its quality assurance procedures are not approved, the Authority should assume responsibility for evaluating a selection of its courses and programmes until it is considered that this can be undertaken by the HEI itself. The Authority should also be able to initiate a programme evaluation if, for instance, information has been received about specific courses and programmes implying a risk that the standards required are not attained.

Programme evaluations should therefore mainly be initiated by the Authority, but it should also be possible for the Authority to carry out evaluations initiated by the Government. The Government may, for instance, see the need for a national evaluation of a specific programme on which to base a decision or the need to monitor a specific qualification or programme. In addition, the Government considers that there is a continued need to acquire a national view of the standard of certain professional qualifications. It is therefore important to go on evaluating some programmes regularly. This applies mainly to certain regulated professional qualifications, for instance teaching qualifications, where it is of special interest that the programmes maintain high quality standards and that they are comparable from a national perspective. They should therefore be evaluated within a six-year period.

In the system implemented by the Swedish Higher Education Authority between 2011 and 2014, about half of all first and second-cycle courses and programmes leading to the award of a qualification were evaluated. As has previously been pointed out, third-cycle courses and programmes were not included because of lack of resources. One reason why many first and second-cycle courses and programmes were not evaluated was that there were too few students who had written independent projects and therefore not enough material on which to base an appraisal. Another reason why many first and second-cycle courses and programmes were not evaluated is that the quality assurance system did not include courses and programmes that do not lead to the award of a qualification. For this reason the Authority has also been assigned the task of evaluating a selection of the courses and programmes that were not included in the recent four-year cycle of programme evaluations. In spite of this assignment, many courses and programmes were not included in the national quality assurance system.

The Government's point of departure is that all courses and programmes should be subject to quality assurance, at both first and second-cycle as well as at third-cycle level. This should be achieved both through the HEIs' own quality assurance procedures for programmes, which the Authority should evaluate, as well as through the selection of the programme evaluations that the Authority should make. The Authority should have sound communications with the HEIs on which programme evaluations are to be undertaken in order to avoid, as far as possible, reduplication of the work and to create synergies instead.

A number of responses to the memorandum, for instance from *Linnaeus University*, *Mälardalen University*, *the Swedish Defence University* and *the Swedish Association of Graduate Engineers [Sveriges ingenjörer]*, raise questions about the relationship between the reviews of the HEIs' quality assurance procedures and the programme evaluations. The Government is of the opinion that it should be possible for the Authority not to approve a programme even if the programme has previously been accepted by the HEI's own quality assurance system. Even if the review of a HEI's own quality assurance procedures leads to the assessment that all its programmes are assured, in most cases this assessment will be based on an overall, general view of the HEI's own quality assurance procedures, augmented possibly by a sample of specific programmes. This leaves the possibility of a margin of error that may become apparent when a programme is evaluated as having inadequate quality and

entitlement to award a qualification is withdrawn. A specific programme may also reveal shortcomings even though the HEI has previously been approved but some time has elapsed between the different appraisals during which circumstances have changed. In cases where shortcomings are identified in a programme at a HEI whose quality assurance procedures have previously been approved the Authority should also consider a follow-up review of these procedures to remedy any deficiencies. Priority should therefore always be given to shortcomings in specific courses and programmes. In the same way, entitlement to award a qualification can today be called into question and withdrawn in a specific main field of study even if a HEI enjoys general entitlement to award the qualification in question, for instance a 60-credit Master's degree.

Experiences from the programme evaluations conducted in the last few years are mixed. Among the positive opinions is the feeling that they have contributed to the development of quality, as stated by *Kristianstad University*, for instance, in its response, mainly as a result of the focus placed on the qualifications descriptors. At the same time a number of problems have been noted concerning the recent evaluations of courses and programmes. One important point of view is that full advantage has not been taken of the expertise of the panels of assessors and their potential to contribute to quality development, as the intention has been primarily to monitor the outcomes of programmes. Many of the respondents to the memorandum, among them *Örebro University*, *Kristianstad University* and *the Swedish Confederation of Professional Associations [Saco]* do, however, express a very positive attitude to the existence of a national quality assurance system in which outcomes are evaluated. At the same time several HEIs, such as *Halmstad University*, *the Royal Institute of Technology* and *the Swedish University of Agricultural Sciences*, state that there should be a possibility of basing evaluations on a broader sample of material than was the case between 2011 and 2014. They consider that the independent projects have been given too much weight in the assessment of programme outcomes.

The Government's opinion is that the independent projects should continue to serve as an important basis for the appraisals made during evaluations of programme outcomes. But in order to provide as comprehensive a view as possible there should be a possibility to include other kinds of outcomes, as well as the prerequisites and processes that influence them. The programme evaluations should be based on the general quality aspects drawn up by the Authority in collaboration with the HEIs after consultation with students and labour market representatives. These aspects should be based on the requirements laid down in the Higher Education Act, Higher Education Ordinance, qualification descriptors in the annexes to the ordinances pertaining to the legislation as well as on the principles for quality assurance adopted within the Bologna Process.

As has previously been described, in the current programme evaluation system the Swedish Higher Education Authority issues a judgement on each programme on the basis of a three-point scale: inadequate quality, high quality and very high quality. Programmes judged as attaining very high quality qualify a HEI for the allocation of quality-based funding. The Budget Bill for 2016 (Govt. Bill 2015/16:1) proposes that the allocation of quality-based funding on

the basis of the programme evaluations will come to an end, which means that a three-point scale is no longer needed for this purpose. The memorandum circulated includes the conclusion that each programme evaluation should conclude with a judgement by the Authority using a two-point scale, corresponding to acceptable and unacceptable, as the aim of the programme evaluations is mainly to monitor whether they fulfil the requirements, i.e. whether they pass or fail. A three-point scale had been considered by the Government in order to highlight programmes with very high quality, which can also have a quality enhancing effect. With a two-point scale however, the wording of the panels' reports and the judgements issued by the Authority can be used to focus on programmes with very high quality, for instance by reporting good examples, clarifying the differences between programmes, developments that are needed, etc. Descriptions of this kind can help to provide more nuanced and equitable information about the quality of a programme than ranking them on a scale. As in the responses about the scale used for reviews of quality assurance procedures, the HEIs do not agree on this issue. Some of the respondents, such *Karolinska Institute, Borås University* and *Malmö University* agree with the conclusion in the memorandum that a two-point scale should be used, while others, among them *the Swedish Council for Higher Education, Kristianstad University* and *Chalmers Technological University* advocate a three-point scale to enable a greater degree of comparison between programmes. For this component too, the Government concludes that the Swedish Higher Education Authority should, in accordance with its response to the memorandum, be responsible for a study of the drawbacks and advantages of a two-point or three-point scale and finally decide which of them is to be used.

If a programme is considered to have inadequate quality, the same routine as today should apply. This means that the HEI will be given one year to remedy the shortcomings. The Authority will then undertake a follow-up review of whether this has been done. If this review concerns a programme offered by an independent higher education provider, after an opportunity has been given to resolve the problems, the Government will be notified and the Government will decide on the withdrawal of entitlement to award a qualification. The inclusion of appraisal of entitlement to award qualifications has functioned well in previous quality assurance systems and should therefore be retained.

One criticism of the current system that is frequently expressed is that it is adapted mainly for programmes that lead to the award of a general qualification and is less effective for evaluations of those that lead to the award of a professional qualification or to an award in the fine, applied and performing arts. The memorandum circulated contains the assessment that the general quality aspects should be adapted to different kinds of programmes so that they can be judged as fairly as possible. This is welcomed by a number of the respondents, for instance *the Swedish National Audit Office [Riksrevisionen], Mid Sweden University, Södertörn University* and *the Royal Institute of Art [Kungl. Konsthögskolan]*. The Government shares this opinion.

One explicit aim of the quality assurance system used from 2011 until 2014 was to satisfy the needs of students and other stakeholders for information about the quality of programmes. The results of all the Swedish Higher Education Authority's programme evaluations have therefore been published on both the

Authority's website and on www.studera.nu, a website for which the Swedish Council for Higher Education is responsible. The conclusions presented by the Government in this document mean that it will not be possible to provide the same kind of information, with national comparisons of programmes, as programme evaluations will no longer be made to the same extent. Some of the respondents, among them *the Swedish Confederation of Professional Associations*, feel that being unable to make national comparisons to the same extent in the future is a deficiency. *Uppsala University*, however, considers that the advantages offered by the memorandum's proposal outweigh the drawback of being unable to make comparisons. The Government concurs with this point of view and would at the same time like to point out that national comparisons will be possible for the programmes evaluated at all of the HEIs or in thematic evaluations.

The Swedish Higher Education Authority should continue to provide information about the results of all of its appraisals and publish them on its website. The HEIs should also be responsible for the publication of the results of quality appraisals.

Thematic evaluations

Thematic evaluations are based on the tasks assigned to the HEIs pursuant to the legislation and ordinances. They are considered important for the quality of higher education and can provide important knowledge and national comparisons of how the HEIs function and what results have been attained with regard to a specific factor. A fourth component of the quality assurance system should therefore consist of evaluations by the Swedish Higher Education Authority based on specific themes. The Government considers, as do for instance *Uppsala University*, *Skövde University* and *the Association of Swedish Higher Education*, that this component of the system can also have great significance for the HEIs' own development work. Themes that can provide the basis for evaluations may, for example, be widening participation, internationalisation and gender equality, which are important quality aspects in higher education. Just as *the Swedish Council for Higher Education* points out, these are themes with which also the Council works. The Council has, however, an explicitly supportive task and therefore a different kind of responsibility for these aspects than the Swedish Higher Education Authority has in its quality assurance role. The subjects of thematic evaluations should be determined by the Authority on the basis of relevance and the effective use of resources but it should also be possible for it to undertake them at the Government's behest.

Labour market usefulness and preparation for future careers should be taken into account in each component

It is important that a labour market perspective is included in all of the reviews and evaluations, mainly with regard to the stipulations relating to higher education in the Higher Education Act and Ordinance and through the participation of labour market representatives in the process.

The Higher Education Act lays down that one of the aims of first-cycle courses and programmes is to prepare "students to deal with changes in working

life” (Chapter 1, Section 8). In addition there are stipulations that second-cycle studies shall involve the acquisition of specialist knowledge, competence and skills in relation to first-cycle courses and study programmes. Second-cycle studies shall also develop the students’ potential for professional activities based on their independent thinking or their potential for research and development work (Chapter 1, Section 9). The Qualifications Ordinance, Annex 2 to the Higher Education Ordinance, contains the targets for general qualifications, qualifications in the fine, applied and performing arts and professional qualifications that refer to the labour market usefulness of these studies.

The requirements relating to labour market usefulness and preparation for future careers provide the basis for the aspects and criteria that should be used for assessment within all four components. Appraisal of an application for entitlement to award a qualification involves assessment of the usefulness of the programme for the labour market and its preparation for future careers as one requirement for granting entitlement. The reason for this is that the programme has to comply with the provisions referred to above in Chapter 1 of the Higher Education Act and the specific stipulations in the ordinance as prerequisites for an award. Compliance with these provisions is also assessed by the Authority’s in its programme evaluations and its reviews of whether the HEIs’ own quality assurance procedures ensure that programmes live up to the provisions. The thematic evaluations presented by the Government in this document should be based on tasks for which responsibility is assigned to the HEIs by legislation and ordinances. Labour market usefulness and preparation for future careers can therefore be one of the themes for such evaluations.

In the evaluations of programmes undertaken between 2011 and 2014 labour market usefulness should have been assessed through questionnaires to alumni. Because of major methodological problems, mainly with regard to low response rates, this was not possible. A number of respondents, including *Lund University*, *the Confederation of Swedish Enterprise* and *the Swedish Association of Local Authorities and Regions [Sveriges Kommuner och Landsting]*, stress the importance of following up alumni students’ experiences and taking them into account when assessing the usefulness of a programme. *Mid Sweden University* points out that a number of subjects in the area covered by its faculty of human sciences have no clear-cut labour market links and that it is therefore important to take into account the differences between different subject areas when assessing the labour market usefulness and the preparation for future careers that different programmes offer. The Government considers it important for the Authority to further develop how assessment of the labour market usefulness of a programme should be undertaken in the light of the current regulations.

For many years the National Agency for Higher Education, and subsequently the Swedish Higher Education Authority, included labour market representatives in the panels of assessors. It has, however, proved difficult to recruit labour market representatives as assessors despite the support offered by labour market organisations. The Government concurs with the opinions of *Karolinska Institute*, *the Swedish University of Agricultural Sciences*, *Örebro University*, *Dalarna University* and *the Swedish Confederation for Professional Employees* that it is particularly important for the Authority to assume responsibility for

identifying working methods that enable labour market representatives to participate and exert an influence. One important prerequisite may be flexible procedures to facilitate for labour market representatives to take part in panels of assessors and to clarify their roles and tasks. Labour market representatives should, like student representatives and other assessors, be given sound guidance and training in what their task involves, what is expected of them and the legislation and ordinances they have to take into account in their roles as assessor.

The Confederation of Swedish Enterprise and the Swedish Association of Local Authorities and Regions consider that employers should be afforded scope to influence which aspects are important to evaluate and that co-operation should be a central quality parameter in all of the components. The conclusions in this document provide a framework for the quality assurance system. The Swedish Higher Education Authority should take responsibility for further development and implementation of the system, which also includes deciding on which aspects should be evaluated in each of the components. It is important for the Authority to undertake this work, as has been pointed out, in consultation with the HEIs and representatives of students and the labour market.

The role of students in the quality assurance system

Sections 4 and 4a of Chapter 1 of the Higher Education Act stipulate that quality assurance procedures are the shared concern of staff and students at higher education institutions and that students shall be entitled to exert influence over the courses and programmes offered by these institutions. These provisions also mean that students should take part in and exert influence on the national quality assurance system. The inclusion of male and female students in the national quality assurance system is therefore important both as interviewers in their role as student representatives in the Authority's panels of assessors, but also as student respondents when they share their experiences through, for example, interviews or questionnaires. The Swedish Higher Education Authority, like its predecessor the National Agency for Higher Education, has always included student representatives in the panels of assessors. Furthermore, it has always been considered important to interview students in different forms of evaluations. Experiences from the programme evaluations in recent years suggest, however, that the quality of student interviews has been uneven, which has made it difficult to base evaluation on them. It has, for instance, been difficult to recruit an adequate number of students prepared to devote time to being interviewed about their studies. In addition, the students interviewed found it difficult to answer the panels' questions about, for example, attainment of the qualification descriptors. Problems were also encountered in recruiting student representatives to the Authority's panels of assessors in spite of the support from the student organisations.

It is therefore important for the Authority to give priority to the work of enhancing and clarifying the role of the students. This should involve developing appropriate methods in order to benefit from the experiences of students. Routines also need to be developed for the recruitment of students to the panels of assessors. The Bologna Process's principles for quality assurance

deal with student influence on quality assurance procedures both at HEI level and in external evaluations and can provide guidance for this work.

International principles for quality assurance have to be taken into account

In order to endow higher education in Sweden with legitimacy abroad it is important that international principles for quality assurance are taken into account. The market for education has become increasingly international with a rise in the number of students completing some or all of their studies abroad. Increasing international mobility among students and teachers has for a long time been one of the priorities in member countries of the Bologna Process and in other international co-operations. There have also been developments leading to an increase in the number of joint programmes offered by HEIs in Sweden and elsewhere in partnership. This has led to a growing need to recognise different countries' quality assurance and to develop shared principles for quality assurance.

The principles for quality assurance that have been developed as part of the Bologna Process have therefore been taken into account in the conclusions on a national quality assurance system presented in this document. These principles apply to both internal and external quality assurance as well as to quality assurance agencies and involve a responsibility for both the HEIs and the Swedish Higher Education Authority to ensure that they are observed.

International assessors

HEIs operate in an international context and there is a general need to augment the internationalisation of higher education. This can be achieved, for instance, by increasing mobility among students and teachers, which among other things presupposes the recognition of Swedish higher education abroad. A number of ways of enabling recognition have been developed in the EU and in the Bologna Process, one of them being the principles for quality assurance. These principles include the employment of experts who are active in countries outside Sweden in the quality assurance process. In addition to augmenting knowledge about the Swedish higher education system abroad, a rise in the number of foreign experts can provide knowledge and skills that will enhance the quality of higher education in Sweden. In addition, it reduces the risk of conflict of interest, particularly in small disciplinary areas. It is therefore proposed that panels of assessors should, to an increasing degree, include external experts who are active outside Sweden. A balance should, however, be struck in the composition of the panels and this should be determined by the Swedish Higher Education Authority for each appraisal. It may be the case that experts from abroad are more appropriate for certain programmes or certain forms of appraisal than for others. And the necessity of including experts who are active in Sweden or well acquainted in some other way with Sweden's higher education system in panels composed of experts from abroad should be taken into account, as is also pointed out by *Örebro University*, *Chalmers Technological University* and *the Swedish Confederation of Professional Associations*.

For mainly language reasons the Authority has so far usually appointed foreign assessors from the other Nordic countries. An increase in the number

of assessors from countries outside the Nordic area would mean that appraisals would be conducted to a greater extent than hitherto with English as the main working language. In those cases where non-Swedish speaking assessors are employed, all or some of the material on which the evaluation is based may need to be available in English. The Authority's panels of assessors may also have to write their reports in English, if they include members from abroad.

If the use of English increases within the framework of the Authority's evaluations, the provisions of the Language Act (2009:600) on the use of Swedish in the operations of public authorities must be complied with. These stipulate, for instance, that all decisions made by a public authority must be written in Swedish and that it must be possible to communicate with the authority in Swedish. There is, however, nothing to prevent decisions and the like being translated to another language. The production of material on which a public authority is to base its decisions in another language, in this case self-evaluations and assessors' reports written in English, is unlikely to contravene the provisions of the Language Act. In cases that have been appraised by the Parliamentary Ombudsmen dealing with, for example, applications for posts, promotion and research funding, the adjudication has been that there is nothing which prevents submission of referees' reports and similar documents on which decisions can be based in English. It is, however, important to emphasise that the Authority cannot require the HEIs to translate the material submitted for evaluation into English, for example, but that in such cases this is the Authority's responsibility. If necessary, it is also the Authority that has the task of translating material in other languages to Swedish.

A legally secure, predictable and transparent quality assurance process

The Swedish Higher Education Authority should, as stated, be assigned the task of assuming responsibility for further development and implementation of the system on the basis of the Government's conclusions, the applicable legislation and ordinances and the principles for quality assurance developed within the framework of the Bologna Process. This task includes ensuring that the quality assurance system is legally secure, predictable and transparent. This can, for instance, involve clarifying the procedures adopted by the Authority for the evaluations, from the appointment of the panels of assessors to the decision made by the Authority after a specific evaluation. Evaluation processes that are legally secure, predictable and transparent can also help to provide the evaluations with legitimacy and thereby adding incentives for the HEIs to develop the quality of higher education. It is therefore important for the Swedish Higher Education Authority to undertake the process of further development and implementation of the quality assurance system in close dialogue with the HEIs.

The Government considers, as do *Lund University*, *Blekinge Technological University*, *Dalarna University* and *Skövde University* that the HEIs should have the possibility of expressing opinions on both the process and the official decisions made by the national quality assurance agency by, for instance, showing that decisions are based on false premises or that the assessment criteria have not been applied correctly. The principles for quality assurance that have been developed within the Bologna Process state that procedures should be legally secure, predictable and transparent. It is made clear, for instance, that

HEI's should have access to procedures that enable them to notify the quality assurance agency of problems and that this agency must deal with such complaints in a professional manner using explicitly developed and applied routines. What is fundamental to the principles is that their application should be adapted to the national legislation and other contextual circumstances. There are therefore no requirements relating to how the work should be organised to attain legal security.

The Administrative Procedure Act (1986:223) lays down regulations about how administrative authorities should manage cases and their other administrative operations. This act contains provisions relating to, for instance, the level of service required, conflict of interest, transparency, disclosure of information about cases and the obligation to justify decisions. In addition there are stipulations about the amendment and review of decisions. Even though several of these provisions apply to the exercise of powers in relation to individuals, often by the very nature of things, authorities should also adhere to the principles enshrined in these provisions in their dealings with other authorities. This should provide the conditions required to create a new quality assurance system that is legally secure, predictable and transparent.

3 Implementation and consequences

Those affected by the conclusions in this document

HEIs accountable to the Government, independent education providers with entitlement to award qualifications and the Swedish Higher Education Authority are affected by the conclusions presented in this document. In addition they affect student representatives and labour market representatives, mainly those who are members of the Swedish Higher Education Authority's panels of assessors. All of these are also affected by the current national quality assurance system.

Implementation

The Swedish Higher Education Authority should be assigned the task of assuming responsibility for further development and implementation of a quality assurance system based on the Government's conclusions, the applicable legislation and ordinances as well as the principles for quality assurance developed within the framework of the Bologna Process. This work should be undertaken in consultation with the HEIs, with students and labour market representatives. It is important to allow time for a process of this kind and it should therefore be possible to begin the evaluations within each component when the development work has been concluded. It is therefore considered that the new quality assurance system cannot be implemented before the second half of 2016.

Economic consequences

The Swedish Higher Education Authority is already today responsible for the quality of courses and programmes and for ensuring that internal quality

assurance procedures exist, a task discharged within existing budget constraints. The evaluations that have been carried out by the National Agency for Higher Education and after that by the Swedish Higher Education Authority reveal that several HEIs have well developed quality assurance procedures and that development is taking place at other HEIs. The resources required for internal work at the HEIs on quality assurance procedures therefore vary, depending on the progress that has been made with their internal quality assurance systems and how they decide to organise this work in the future.

A number of respondents, among them *Kristianstad University, the University College of Arts, Crafts and Design* and *the Swedish Confederation of Professional Associations* point out that resources are needed to develop, implement and administer local quality assurance systems. The Government would therefore like to stress that the requirements worked out by the Swedish Higher Education Authority for approval of the HEIs' quality assurance systems must be reasonable and take into account the HEIs' autonomy when it comes to decisions on how their internal quality assurance procedures are to be structured and therefore what resources are to be allocated for this work.

Even though the Government has added two new components to the new system the Government is of the opinion that the total volume of evaluations per HEI will not increase and therefore neither will their expenditure for work on self-evaluations, site visits etc. The system that the Government concludes should be introduced involves fewer programme evaluations in comparison with today's system. In the future not all programmes and courses will be evaluated, only a selection thereof. This means that there is also scope to evaluate the HEIs' quality assurance procedures and to undertake thematic evaluations without this leading to economic consequences for the HEIs. For the same reason, increased expenditure for the Swedish Higher Education Authority is not considered either. Moreover the system is flexible in terms of when the different evaluations are to be made and to what extent.

The Government concludes in the section *Four components in the national quality assurance system* that the methods used by the Authority for its evaluations should on the whole be the same as the ones used previously. This should enable the Authority to calculate the costs of future evaluations with a certain accuracy so that it can ensure that it will not exceed its budgetary limits.

It is therefore reasonable that any extra costs that may arise as a result of the introduction of a new quality assurance system be defrayed within the framework of the funding allocated to the HEIs and the Authority. The conclusions presented in this document are not therefore expected to have any consequences in this respect on the national budget.

Consequences for gender equality

The Government gives priority to work on gender equality. The Ordinance containing Instructions for the Swedish Higher Education Authority (2012:810) states that the Authority must integrate a gender equality perspective in its operations. Section 5 of Chapter 1 of the Higher Education Act (1992:1434) states that equality between women and men shall always be taken into account and promoted in the operations of HEIs. The Government therefore intends to assign to the HEIs the task of further augmenting their work on the integration

of gender equality. Gender equality is an important quality aspect and it is therefore of great importance for the quality assurance of higher education that the equality of women and men is taken into account.

Consequences for integration policy

These conclusions are not considered to have any consequences for integration policy.

Sweden's membership of the EU

These conclusions do not have any impact with respect to Sweden's membership of the EU.

Number of companies affected

Independent education providers with entitlement to award qualifications are affected by the conclusions presented in this document. Some of these education providers operate as limited companies, others are accountable, for instance, to a foundation or an association. One of the provisions of the Act Concerning Authority to Award Certain Qualifications (1993:792) lays down that courses and programmes are to be offered so that they comply with the requirements stipulated in Chapter 1 of the Higher Education Act (1992:1434) and that independent education providers are required to participate in following them up as well as their evaluation. The education providers are also required to draw up written quality reports every year.

Independent education providers have been included in previous quality assurance systems and it is therefore reasonable for them to be included in the new system as well. Just as for the other HEIs their costs will depend on how they organise their internal quality assurance procedures and how much development work is needed.

Annex 1: Summary of the referred memorandum Assuring the Quality of Higher Education (U2015/01626/UH)

The memorandum is based on a report produced by Professor Harriet Wallberg at the behest of the Government Offices (Ministry of Education and Research).

The memorandum presents a proposal intended to provide the national quality assurance system with greater coherence than it has today. This means that the evaluations for which the Swedish Higher Education Authority is responsible should take greater account of the HEIs' own quality assurance procedures. The Swedish Higher Education Authority's evaluations should focus both on monitoring outcomes and enhancing the quality of higher education. It is proposed that the system should comprise of four components:

- appraisal of applications for entitlement to award qualifications,
- review of the HEIs' own quality assurance procedures,
- evaluation of courses and programmes, and
- thematic evaluations.

The proposal comprises a framework for a quality assurance system and the Swedish Higher Education Authority should be assigned the task of assuming responsibility for further development and implementation of the system on the basis of the Government's conclusions, applicable legislation and ordinances and the principles for quality assurance adopted within the framework of the Bologna Process. This should be undertaken in consultation with the HEIs, with students and labour market representatives.

In addition it is proposed that resources for first and second-cycle courses and programmes should no longer be allocated on the basis of quality evaluations of their outcomes.

It is proposed that the new system for quality assurance and the allocation of resources should take effect from 1st of January 2016.

Annex 2: List of referral bodies invited to respond to the memorandum Assuring the Quality of Higher Education (U2015/01626/UH)

The following referral bodies have submitted opinions: the National Audit Office, the Swedish National Financial Management Authority, the Swedish Higher Education Authority, the Swedish Council for Higher Education, Uppsala University, Lund University, the University of Gothenburg, Stockholm University, Umeå University, Linköping University, Karolinska Institute, the Royal Institute of Technology, Luleå Technological University, Karlstad University, Linnaeus University, Örebro University, Mid Sweden University, Blekinge Technological University, the Swedish Defence University, the Swedish School of Sport and Health Sciences, Borås University, Dalarna University, Gävle University, Halmstad University, Kristianstad University Skövde University, University West, the University College of Arts, Crafts and Design, the Royal Institute of Art, the Royal College of Music Stockholm, Malmö University, Mälardalen University, Stockholm University of the Arts, Södertörn University, the Swedish Research Council, Chalmers University of Technology AB, Ersta Sköndal University College AB, the Evangelical Free Church in Sweden on behalf of the Örebro School of Theology, Johannelund Theological Seminary, Sophiahemmet NGO, Jönköping University Foundation, the Stockholm School of Theology, VINNOVA – Sweden’s innovation agency, the Swedish University of Agricultural Sciences, the Institute for Evaluation of Labour Market and Education Policy, the Swedish Association of Local Authorities and Regions, the Confederation of Swedish Enterprise, the Swedish Confederation of Professional Employees, the Swedish Confederation of Professional Associations, the Association of Swedish Higher Education, the Swedish Association of University Teachers and the Swedish National Union of Students.

Spontaneous responses were submitted by the National Union of Teachers in Sweden, the Swedish Association of Graduates in Business Administration and Economics, the Swedish Association of Graduate Engineers, Samverkansgruppen för högskoleingenjörsutbildning [the Coordination Group for Higher Education Programmes in Engineering], the Association of Swedish Engineering Industries, Almega – the Employers’ Organisation for the Swedish Service Sector, the Swedish Confederation of Professional Associations Student Council, DIK, the Swedish Dental Association, Förbundet Sveriges Arbetsterapeuter [the Association of Swedish Occupational Therapists], Naturvetarna – the Swedish Association of Professional Scientists, and a number of private individuals.

The following referral bodies were invited to submit an opinion but declared that they would abstain or have not submitted one: the Parliamentary Ombudsmen (JO), Beckmans skola AB, the Erica Foundation, the Stockholm School of Economics, the Newman Institute for Catholic Studies AB, the Swedish Red Cross University College Foundation, the Stockholm University College of Music Education, the Swedish Trade Union Confederation and KLYS – the Swedish Joint Committee for Artistic and Literary Professionals.

Ministry of Education and Research

Transcript from the minutes of a Government meeting 10 December 2015

Present: Prime Minister S Löfven, chair, and ministers,
M Wallström, Y Johansson, M Johansson, I Baylan, K Persson,
S-E Bucht, P Hultqvist, H Hellmark Knutsson, M Andersson, A Ygeman,
P Bolund, M Kaplan, M Damberg, A Bah Kuhnke, A Strandhäll,
A Shekarabi, G Fridolin, G Wikström, A Hadzialic

Presentation: Minister Helene Hellmark Knutsson

Government decision: document Assuring the Quality of Higher Education