ENQA AGENCY REVIEW

SWEDISH HIGHER EDUCATION AUTHORITY (UKÄ)

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EXECUTIVE SUMMARY

The Swedish Higher Education Authority (Universitetskanslersämbetet, UKÄ) was reviewed against the ESG following the methodology described in the Guidelines for ENQA Agency Reviews, and in accordance with the Terms of Reference between UKÄ, ENQA and EQAR (November 2024). The purpose of the full review of UKÄ was to evaluate to what extent the agency complies with The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), parts 2 and 3. The outcomes of the review will be used by the agency to apply for a renewal of its ENQA membership and a renewal of its EQAR registration.

The review period lasted from November 2024 to September 2025, with the site visit taking place from May 18th to May 21st 2025, at the premises of UKÄ.

UKÄ is the official national agency of Sweden, operating independently under the Ministry of Education and Research. The agency was officially established in 2013, following a reorganisation in which three previous public agencies were merged (the National Agency for Higher Education Services; the National Agency for Higher Education, and the International Programme Office) into UKÄ and the Swedish Council for Higher Education (UHR). Ordinance (2012:810) with instructions for the Swedish Higher Education Authority is a document in which the Government instructions for UKÄ's operations are defined. UKÄ has a Quality Policy in place (adopted on December 17th 2019 and revised in March 2021), where its vision is described, and four goals were defined to achieve this vision. Those goals are: i) "*To be the acknowledged source of information about higher education and research*"; ii) "*Create results that are beneficial for the development of the higher education and research sectors*"; iii) "*To be an attractive employer where dedicated employees have the possibility to develop*"; iv) "*To work coordinated and resource efficient*".

UKÄ was evaluated against the criteria of the ESG Part 2 and Part 3. The recommendations from the last ENQA review (in 2020) and EQAR's comments were taken into consideration for this review. Since 2020, no changes have been made to the UKÄ management structure. Minor changes have been made within departments, e.g., a third group (or 'unit') was created in the Department of Quality Assurance, focusing on international cooperation and other collaborative tasks and activities. There are four main EQA activities of UKÄ: institutional reviews, programme evaluations, appraisal of applications for degree-awarding powers and thematic evaluations. Aside from the EQA activities, UKÄ also performs other tasks outside of the scope of the ESGs, such as statistical analyses, institutional reviews of research, supervision in legal issues and students' rights etc. Due to the recent adoption of the new guidelines (late 2023/ early 2025), the panel has for some activities had only a small documentation sample, but the panel is satisfied with the information available so far. The panel also commends the agency for full transparency regarding the internal changes and changes related to documentation.

The panel found UKÄ to be fully compliant with all ESG standards described in Part 2 and Part 3. UKÄ is a government-founded public agency, but the panel found that the level of organisational and operational independence of the agency is not threatened. It is rooted in communication between the Ministry, UKÄ and other stakeholders, and there seems to be an understanding of the individual roles and responsibilities of each party. The agency has sufficient resources, both human and financial, to carry out its activities. However, continuous attention should be paid to the number of government assignments and the pressure they put on UKÄ's operations and resources. UKÄ does have various elements of an internal quality assurance (IQA) policy, although there isn't a singular document describing IQA practices. The implementation of the Project Manager's Support Tool supports IQA and EQA processes of the agency. The panel confirmed the high professionalism exhibited by UKÄ's staff members, management, and assessment panel members during the site visit.

Thematic evaluations are different from thematic analyses because the process of external assessment is applied to thematic evaluations, including higher education institutions' (HEIs) production of self-assessment report (SAR) and participating in follow-up activities. Separately, thematic analyses are performed by UKÄ, and the panel welcomes the increasing number of thematic analyses. The coverage of ESG 2.1 through UKÄ's EQA activities is found appropriate for most of the ESG Part 1 standards. As ESG 1.7 is only covered by the criteria for institutional reviews, and this ESG was not fully addressed in UKÄ's reports, the agency should put additional effort to ensure full coverage. UKÄ's EQA methodologies were found fit-for-purpose, and the involvement of various stakeholders in the design of the new methodologies was greatly appreciated by everyone involved in the process. Furthermore, HEIs were satisfied with the level of professionalism by all external assessors, but they expressed that they would like to see more assessors with QA experience on the panels (e.g. QA officers). The panel agrees that involving someone with more QA experience in the assessment processes could be a good way forward. The recruitment of the peer-reviewers is found appropriate, as well as the development of an online training course for the experts. The reports produced by the expert panels were all based on evidence collected during reviews, and all judgments were well-substantiated by the assessment panels. All reports are published in UKÄ's database, including follow-up reports. Furthermore, the agency developed a complaints procedure, which was not in place at the time of the 2020 ENQA review. Although there have been no complaints or appeals since the last ENQA review, the panel considers the current procedures in place fit-for-purpose.

INTRODUCTION

This report analyses the compliance of The Swedish Higher Education Authority (Universitetskanslersämbetet, UKÄ) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted over 10 months (November 2024 to September 2025).

UKÄ has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2020, and a registered agency on the European Quality Assurance Register for Higher Education (EQAR) since 2021. The outcomes of this full review will be used by the agency to apply for a renewal of its ENQA membership and a renewal of its EQAR registration.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

As this is UKÄ's second review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

UKÄ's predecessor agency, Swedish National Agency for Higher Education (HSV), was an ENQA member from 2000 to 2012. After its establishment in 2013, UKÄ became an ENQA affiliate (in 2014). The agency remained an affiliate until 2020, when UKÄ underwent its first full review by ENQA. The review was conducted for the purpose of applying for ENQA membership and EQAR registration. Following the review, UKÄ was granted ENQA membership by the decision made on December 16th 2020. In 2021, UKÄ was admitted to EQAR, based on a decision made on March 24th 2021.

SCOPE OF THE REVIEW

The scope of this review is defined in the Terms of Reference from November 2024, agreed upon by UKÄ, ENQA and EQAR. External quality assurance activities covered under this review include:

i) Institutional reviews.
ii) Programme evaluations.
iii) Appraisal of applications for degree-awarding powers.
iv) Thematic evaluations.

Institutional reviews of the HEIs' quality assurance are conducted to verify that HEIs achieve high quality in their activities and contribute to HEIs' quality development. The review focuses on whether the HEIs' quality assurance processes contribute to ensuring and developing the quality of education and research in a systematic and appropriate manner. Institutional reviews produce two reports- one on education and one on research, for each evaluated HEI. Only the reports on education are within the scope of the ESG.

Programme evaluations are conducted to confirm whether the results of programmes meet the requirements and high standards prescribed in the Higher Education Ordinance, and to contribute to enhancing the quality of the higher education institution's courses and programmes. Higher education institutions are responsible for the quality assurance of their first-, second-, and third-cycle courses and programmes. UKÄ is responsible for conducting evaluations of a sample of the programmes

offered by Swedish higher education institutions. A sample of programmes is determined based on the overarching topic of the programmes to be assessed (for example, real-estate brokerage).

Appraisal of applications for degree-awarding powers is conducted to examine whether a higher education institution meets the necessary prerequisites for students of the European Qualifications Framework (EQF) levels 6, 7 and/or 8 to achieve the goals defined by the Swedish Parliament and the Government for the degree the educational programme should result in.

Thematic evaluations are conducted to confirm whether the HEIs contribute important knowledge and promote development concerning a specific theme. Moreover, these evaluations enable national comparisons of how HEIs work and the results achieved within a specific area. Methods of evaluation are developed for and adapted to the theme in question.

Although not mentioned under the Terms of Reference, the panel briefly addressed the role of legal supervision activities performed by UKÄ, due to the role of these activities in checking for compliance with ESG Part 1.

MAIN FINDINGS OF THE 2020 REVIEW

In the external review of UKÄ in 2020, the same EQA activities of UKÄ were evaluated, as mentioned above. These included institutional reviews, programme evaluations, appraisal of applications for degree-awarding powers and thematic evaluations. Legal supervision of HEIs was described as a 'preparatory step' to institutional reviews, and the results of legal supervision could (but did not have to necessarily) be considered by the institutional assessment panels. The 2020 ENQA panel found the agency to be fully compliant with ESG 3.1 *Activities, policy and processes for quality assurance*; ESG 3.2 *Official status*; ESG 3.4 *Thematic analysis*; ESG 3.5 *Resources*; ESG 3.6 *Internal quality assurance and professional conduct*; ESG 3.7 *Cyclical external review of agencies*.

The panel found the agency to be substantially compliant with ESG 3.3 *Independence*, ESG 2.2 *Designing methodologies fit for purpose*; and ESG 2.3 *Implementing processes*. Only on standard 2.7 *Complaints and appeals*, was the agency found to be partially compliant by the assessment panel.

Pertaining to ESG 3.3, the panel found that the agency had independence, but there was a strong awareness of having to safeguard that independence. The Director General and the Advisory Council were all appointed by the Government, and the Director General was the sole person responsible for decision-making at UKÄ.

Considering ESG 2.2, a heavy workload was put on the HEIs by the agency in conducting its EQA activities. Additionally, stakeholders felt that their suggestions were not implemented as efficiently as they could be.

Under ESG 2.3, the panel evaluated follow-up activities and how they are being conducted. They found that the criteria upon which UKÄ decides on the kind of follow-up procedure were unclear. Additionally, no follow-ups were performed for the appraisals of degree-awarding powers.

Finally, as UKÄ had no procedure for filing complaints, and the decisions of the appeals committees did not have to be followed by UKÄ, the agency was found only partially compliant with ESG 2.7.

REVIEW PROCESS

The 2025 external review of UKÄ was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The

panel for the external review of UKÄ was appointed by ENQA and composed of the following members:

i) Mark Frederiks, Coordinator international policy (dept. Flanders & Luxembourg), Accreditation Organisation of the Netherlands and Flanders (NVAO), The Netherlands, Chair, quality assurance professional (ENQA nominee).
ii) Pegi Pavletić, Post-Doctoral Researcher, University of Rijeka, Croatia, Secretary, academic (EUA nominee).
iii) Inge Enroth; until July 2025: Director of Operations – Professional, Vocational and Maritime institutions, The Danish Accreditation Institution; from August 2025 Senior consultant, the Secretariat for the Danish Accreditation Council, Denmark; Panel member, quality assurance professional (ENQA nominee).
iv) Adrian Korzeniowski, Bachelor student in Electronics and Telecommunication, Lodz University of Technology, Poland, Panel member, student (ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool).

Milja Homan (Project and Reviews Officer at ENQA), acted as the review coordinator. The panel would like to thank Milja for her great support during the review process, her accessibility and the professionalism demonstrated during the review.

The panel conducted its activities according to the Guidelines for ENQA Agency Reviews (ISSN: 1458-1051; 2021), and in line with the ENQA Code of Conduct for Reviewers. The panel also considered EQAR's document on the Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies.

The panel received the revised version of the SAR on March 26th 2025. The panel had its first briefing meeting on April 16th 2025. After this, an online meeting with the agency's resource persons was held on April 28th 2025. One day before the beginning of the site visit, on May 18th 2025, only the review-panel met for a pre-visit meeting. The site visit took place at UKÄ's premises, from May 19th 2025 to May 21st 2025. The site visit was conducted in person by the panel members. The interviews mostly took place either in person or in a hybrid mode.

The first version of the report was submitted to the panel members for comments and suggestions on June 6th 2025. Following the amendments and the consultations among the panel members, the finalised version of the draft was sent to the review coordinator on June 27th 2025. After the corrections, the finalised draft was sent to UKÄ for a factual accuracy check on August 8th 2025. The report was finalised and was submitted to ENQA by the review Chair on September 4th 2025, together with the table of changes implemented in the report after the factual accuracy check and the informal feedback letter by the Chair.

All judgments made by the panel in this report were reached by consensus from all review panel members. The panel considered that the review was well-organised and coordinated from the side of UKÄ. All hybrid meetings were held without any technical difficulties, allowing the panel a smooth transition between sessions. The panel sincerely thanks UKÄ's employees who were at the panel's disposal during the entirety of the site visit, especially in a case in which the panel worked overtime. They were also swiftly responding to all inquiries from panel members and offered additional explanations, as well as documents requested.

All documents requested by the panel were provided by the agency, if there was an opportunity to do so. The internal documents requested prior to the site visit were machine translated and provided to the assessment panel as agreed (e.g. Guidelines for Managing Irregularities, Representation, Conflicts of Interest, and Secondary Employment; Disclosure of Conflict of Interest in Assignments for the

Swedish Higher Education Authority). Some of the documents requested by the panel during the site visit were internal, and the panel could not access them, however, the agency instead provided the panel with explanations or other evidence as needed (e.g. logbook information, selection criteria for external experts). The panel at times also struggled to have to translate a large number of documents from Swedish, particularly related to reports, which made it difficult to ascertain the factual descriptions provided in such documents. The panel believes that, in the future, UKÄ should make sure that in their SARs, all links are accessible to the general public, so that the panel would be able to access them. Otherwise, if internal documents serve to demonstrate ESG compliance, they should be translated for the review panel and added as separate annexes to the SAR (or communicated to the panel in another way). This could alleviate the workload for the panels concerning document translation and interpretation.

The panel met with a variety of stakeholders, and UKÄ suggested panel members with appropriate differences in experience, expertise and mandate duration. The panel found this to be very useful, as it helped to create a better and broader image of UKÄ's practices. It could be useful, in the future, to prepare the final version of the site visit schedule at least seven days before the site visit.

Self-assessment report

The agency prepared the SAR according to its usual project model. The process of undergoing an ENQA review started in May 2024, when UKÄ submitted a request to ENQA and EQAR for the renewal of its membership and registration, respectively. The SAR was finalised in March 2025, when it was sent to the review panel for consideration.

The project of SAR preparation was assigned to the head of the Department of Quality Assurance, a project manager was appointed, and a team of three staff members. The SAR was drafted after November 2024, following the agreement on the Terms of Reference between UKÄ, ENQA and EQAR for the review. All staff were informed of the pending review, and the stakeholders were notified of the general information about the review.

Workshops were organised within UKÄ's Department of Quality Assurance, and a SWOT analysis was performed. Similar activities were organised with UKÄ's reference groups, Advisory Council and the management team.

After the initial draft of the report was created, two members of the international advisory committee reviewed it and suggested improvements. The Director General, the management team, the head of the Department of Quality Assurance, heads of groups, and senior project managers who had not been part of the project team commented on the draft report during its drafting stage.

The SAR is composed of ten chapters, and it contains two annexes. The chapters include: 1. *Introduction*; 2. *Development of the self-assessment report*; 3. *Higher education and QA of higher education in Sweden*; 4. *History, profile and activities of UKÄ*; 5. *Profile, functioning and (EQA) activities of UKÄ (compliance with Part 3 of the ESG)*; 6. *Design and implementation of UKÄ's EQA activities (compliance with Part 2 of the ESG)*; 7. *Opinions of stakeholders*; 8. *Recommendations and main findings from the previous review and UKÄ's resulting follow-up*; 9. *SWOT analysis*; 10. *Key challenges and areas for future development.* The SAR systematically reviews compliance with ESG Part 3 in Chapter 5, and with ESG Part 2 in Chapter 6.

The panel found all portions of the SAR to be informative. However, the panel would wish to highlight the need to provide as much evidence as possible of different practices of UKÄ within the SAR. The panel found that, in the finalised version of the SAR, the agency often used the development of new policies, as well as existing policies, as evidence. While they certainly do represent the evidence and a

background for UKÄ's activities, it would have been very useful for the panel to also have the examples (substantiated with hyperlinks) of practices and implementation of those policies. The panel struggled with understanding UKÄ's descriptions under ESG 3.6 *Internal quality assurance and professional conduct*, where the structure of UKÄ's IQA was initially unclear for the panel. However, during the site visit, UKÄ provided enough evidence to analyse the internal quality assurance processes at UKÄ. Therefore, the panel understood that UKÄ, in fact, has many different practices and is very good in the implementation of its policies.

Site visit

The panel had an internal pre-review meeting on May 18th 2025. The entirety of the site visit took place at UKÄ's premises, from May 19th to May 21st 2025. During the first day, the panel mostly met with UKÄ's staff members. Firstly, the panel met with UKÄ's heads of groups under the Department of Quality Assurance, then with UKÄ's Director General, Deputy Director General and the head of the Department of Quality Assurance. The panel also met with the team responsible for the preparation of the self-assessment report; representatives from the Department of Quality Assurance responsible for EQA activities of the agency; representatives from the Department for Operational Support, Department of Higher Education Analysis and the Department of Legal Affairs; as well as the Advisory Council.

On the second day, the panel met the Ministry representatives; UKÄ's Appeals Committee and the head of the Department of Quality Assurance (because of his role in complaints procedures); heads of reviewed HEIs; QA officers from HEIs; external experts; stakeholders; and students.

On the third day, the panel met once again with the Director General, Deputy Director General and the head of the Department of Quality Assurance, to clarify pending issues. After this meeting, the panel held a final debriefing meeting where the preliminary findings were presented. During the debriefing meeting, there were no questions asked from either side, and no additional evidence was presented.

Specific information on the programme of the site visit is available in Annex 1 of this report.

The interviews were chaired by the Chair of the review panel or the Panel members, while the Secretary took notes during the interviews. All members of the review panel contributed to the discussions and asked questions during the site visit. The panel found that the discussions held during the site visit were open and that all interviewees contributed on a nearly equal scale. Even in cases where the sessions were hybrid, the invited panellists were actively engaged in discussions and were able to express their opinions. The interviewees seemed to be very knowledgeable of their roles and responsibilities related to UKÄ or QA, and they seemed genuinely interested, not only in the activities and outputs of UKÄ's EQA, but in the functioning of the agency as well.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

Higher education constitutes the major part of tertiary education in Sweden. There is also higher vocational education, which is outside of the scope of this review. The higher education system is flexible for first- and second-cycle education, as the students can either enroll in a programme with a set number and type of courses, or the students can attend freestanding courses (which can include micro-credentials) at HEIs to be awarded a qualification (if the requirements of the Higher Education Ordinance are met). The education is provided on campus or at a distance, in an online environment.

The formal requirements that distinguish between different study levels are defined in the Higher Education Act (1992:1434). Bachelor's degrees are three-year programmes, first-cyle higher education corresponding to EQF level 6. Following the attainment of the Bachelor's degree, the students can enroll in Master's degree programmes- second-cycle higher education/EQF level 7. Finally, there is third-cycle higher education/EQF level 8, which includes doctoral degrees and degrees of licentiate (SAR pg. 11). The difference between these two degrees is, as follows: doctoral degree is the highest degree one can be awarded for four years of full-time study; while the licentiate includes only two years of full-time studies. Students must write a research thesis or create an artistic research project equivalent to at least half of the length of the programme. Around 2 750 doctoral degrees were awarded in 2023. 60 ECTS credits of full-time study usually correspond to one year of students' engagement.

In 2022/2023, the number of students in first- and second-cycle higher education was 383 500, with 60% of female, and around 40% of male students. In total, 72 500 students graduated in the same year, which is more than 100% increase since the early 1990s. In 2023, around 17 500 students entered third-cycle higher education (53% women and 47% men).

Higher education (HE) can be provided by universities, university colleges, or by independent higher education providers. The main difference between a university and a university college is that universities can award EQF levels 6-8 degrees, but university colleges can only award EQF level 6 degrees, while they have to apply for permission to award EQF 7 or 8 degrees. The distinction is made between public and independent HE providers- namely public and independent HEIs: majority of HEIs are public (31 out of 49 institutions), 16 of which are public universities, 11 are public university colleges, and four are public art academies. There are 18 independent HEIs, including two independent universities, one independent university college and one art academy.

Relevant HE-related legislation includes the Higher Education Act, which regulates HEIs' operations. The Higher Education Ordinance is an extension of the Higher Education Act, which allows students to choose their own learning path and contains information on entrance qualifications, selection of courses and programmes and the appointment of teachers and doctoral students. The annual public service agreements (decided upon by the Government) are binding to the HEIs, and the Administrative Procedure Act applies to them as well. Independent higher education providers are regulated via the Act Concerning Authority to Award Certain Qualifications (1993:792).

QUALITY ASSURANCE

All HEIs are responsible for the quality of their education and research, as per the Swedish Higher Education Act. The role of UKÄ is to ensure that the HEIs fulfil their responsibility for quality, through its EQA activities: institutional reviews, programme evaluations, appraisals of degree-awarding powers and thematic evaluations. These EQA activities are aligned with Swedish legislation, namely the Higher Education Act, Higher Education Ordinance, Ordinance (2012:810) with instructions for the Swedish Higher Education Authority and the ESG. They focus on accountability of HEIs, as well as providing support for the enhancement of the QA procedures at HEIs.

Outside of the scope of the ESG, UKÄ performs other EQA activities, e.g. institutional reviews of research. The Department of Higher Education Analysis produces background information on the HEIs undergoing a review.

UKÄ operates under the Ministry of Education and Research, and is considered a public authority. The Ministry grants UKÄ a budget on a yearly level and it can give assignments to UKÄ, pertaining to thematic evaluations (e.g. topics of thematic evaluations) or programme evaluations (e.g. mentioning to UKÄ which study programmes, often leading to a professional degree, should be evaluated).

UKÄ

UKÄ was established in January 2013, by merging three national agencies: the National Agency for Higher Education Services; the National Agency for Higher Education, and the International Programme Office. In the process of merging, another agency was founded, operating independently from UKÄ: the Swedish Council for Higher Education (UHR).

UKÄ is an independent government agency under the Swedish Ministry of Education and Research. Ordinance (2012:810) with Instructions for the Swedish Higher Education Authority is a document in which the Government's instructions for UKÄ's operations are defined.

UKÄ has a Quality Policy in place (adopted in December 2019 and updated in March 2021), where its vision is described, and four goals were defined to achieve this vision. Those goals are: i) "*To be the acknowledged source of information about higher education and research*"; ii) "*Create results that are beneficial for the development of the higher education and research sectors*"; iii) "*To be an attractive employer where dedicated employees have the possibility to develop*"; iv) "*To work coordinated and resource efficient*". The agency also mentioned how they plan on achieving those four goals.

To be the acknowledged source of information about HE and research, UKÄ plans on producing reliable knowledge on HE and research, including statistics, analysis, QA and legal supervision. To create results that are beneficial for the development of the HE and research sectors, the agency will perform dialogue with relevant stakeholders (HEIs, student unions, financiers, politicians, decision-makers etc.). To be an attractive employer, UKÄ will implement systematic efforts for a good work environment, take advantage of employees' competencies and provide career-related opportunities. To work coordinated and resource efficient, UKÄ will engage in knowledge exchange, cooperation and collaboration between departments, accounting for economic and work efficiency, and in line with established routines.

The agency is also a member of international networks/organisations: Coalition for Advancing Research Assessment (CoARA), EQAR, Nordic Network of Quality Assurance (NOQA), ENQA, European Consortium for Accreditation (ECA), International Network for Quality Assurance Agencies in Higher Education (INQAAHE), and the Quality Audit Network (QAN). UKÄ also represents Sweden in the work of the Bologna Follow-Up Groups- Thematic Peer Groups C and D, and ENQA Working Group on Quality Assurance of Research. The Department of Higher Education analysis is participating in the work of other networks/organisations: Eurostat (Education and Training Statistics Working Group on Education and adult learning statistics); UNESCO/UIS, OECD, and Eurostat data collection (UOE joint data collection); The Advisory Board of the European Tertiary Education Register (ETER).

UKÄ'S ORGANISATION/STRUCTURE

The Director General of UKÄ is the highest executive officer at UKÄ, responsible for UKÄ's finances and activities. The Director General reports directly to the Swedish Government. The Deputy Director General (currently: head of the Department for Higher Education Analysis) performs the same duties in cases of identified conflicts of interest or the absence of the Director General. There are four departments within the agency, which are permanent structures:

i) Department of Quality Assurance: responsible for carrying out UKÄ's EQA activities.
ii) Department of Higher Education Analysis: monitors HEIs' activities and the efficiency of HE, performs statistical and external analyses, and performs horizon scanning.

iii) Department of Operational Support: deals with the matters related to IT, human resources, communications and manager support.
iv) Department of Legal Affairs: monitors HEIs' implementation of laws and regulations.

All department members are UKÄ's employees, therefore, there is no fixed term applied. The employees are sorted into departments based on their expertise, and, in some cases, based on their own preference.

During the review process, the panel found that, under each Department, there are working groups composed of the members of departments, that work on different topics (related to department activities). Under the Department of Quality Assurance (whose activities have been the primary focus of this review), there are three such departmental groups: the Institutional Reviews Group, the Programme Evaluations Group, the Cooperation and Internationalisation Group. Under other departments, there are working groups established as well.

Additionally, the panel was made aware that the units are different from working groups as they form freely, based on the tasks which should be performed. For example, there could be a working group with one overarching topic, the members of which are unit members, as well as other consultants (e.g. members of reference groups). These working groups are temporary, composed of different number of members, and their mandate in the group expires when the working group is disbanded.

The Advisory Council of UKÄ is a permanent body composed of UKÄ's stakeholders, including students. The Council is appointed for a period of three years and is chaired by UKÄ's Director General. This body helps UKÄ assure transparency, guide its strategic direction and ensure the alignment of UKÄ with national education policy and objectives. The Advisory Council has no decision-making powers.

UKÄ also has three reference groups, composed of different stakeholders: i) representatives of HEIs, students, doctoral students and the union for teachers and researchers in the higher education sector (SULF); ii) representatives of employers and employee organisations; iii) international QA experts. The group with international stakeholders is also known as the International Advisory Committee. Reference groups have no decision-making powers, and they contribute to UKÄ's IQA activities. They can have a different number of members, and they focus on the various perspectives of the three reference groups and on the questions sometimes raised by UKA to the reference groups.

The organigram of UKÄ present in SAR (pg. 23) is shown in Figure 1 below.

Figure 1. The organisational chart of UKÄ's substructures.

UKÄ'S FUNCTIONS, ACTIVITIES, PROCEDURES

UKÄ has three main areas of activity, as listed in SAR (pg. 18): i) quality assurance of higher education and research, and appraisal of the degree-awarding powers of public HEIs; ii) legal supervision of higher

education; iii) monitoring efficiency, follow-up and horizon scanning, as well as responsibility for statistics in the higher education sector. UKÄ hosts the Higher Education Appeals Board and the Higher Education Expulsions Board, and receives government assignments (tasks which the government delegates to public agencies, in the scope of their activities and fields of competence), which are outside of the scope of the ESG. Examples of government assignments given to UKÄ are the assignment to investigate academic freedom in higher education and the thematic analysis with a focus on student and labour market perspectives.

Within the scope of the ESG, UKÄ performs the following EQA activities: i) institutional reviews of the HEIs' quality assurance processes (of education solely); ii) programme evaluations; iii) appraisal of applications for degree-awarding powers; iv) thematic evaluations. These EQA activities generally assess the quality of outcomes of study programmes and contribute to the quality enhancement of the work of HEIs. Institutional reviews are held in six-year review-periods and they verify the quality of HEIs' processes and activities, and their efforts related to quality enhancement. Programme evaluations are not performed in cycles. They are rather performed continuously with updated rolling plans three years ahead. UKÄ can conduct a programme evaluation in the following cases: a programme is determined to be at risk of failing to meet statutory requirements; UKÄ believes more knowledge is necessary regarding a specific programme or types of programmes; the government tasks UKÄ with conducting an evaluation. If UKÄ wants to evaluate specific types of programmes, it is the agency's responsibility to select the programmes for evaluation, based on experience (SAR pg. 64). Procedures on the appraisal of applications for degree-awarding powers are set up to ensure that the HEIs meet the necessary prerequisites for students to achieve the learning outcomes that lead to the degree. Thematic evaluations enable a nationwide comparison of HEIs' work and a collection of information on significant achievements in HE under the topic of thematic analysis. Thematic evaluations can address whether HEIs fulfil the tasks of national HE importance, as required by the legislation and ordinances. UKÄ can initiate thematic evaluations based on findings from previous EQA activities, or the topics could be Government-issued. The methodology is devised separately for each thematic evaluation and there are no general guidelines. There were four thematic evaluations conducted since the last ENQA review in 2020:

i) Widening participation in higher education, 2022.
ii) Broadened recruitment, 2022.
iii) Perspectives on nursing education within the Swedish higher education system, 2023.
iv) Thematic evaluation of collaboration with the surrounding community, 2024.

All four EQA methodologies of the agency were revised and updated recently (between late 2023 and early 2025). Methodologies developed for thematic evaluations are based on individual topics and were implemented by the agency based on a defined time frame of each individual evaluation. Most recently updated methodologies concerned institutional reviews and programme evaluations, so the panel could evaluate a small number of reviews performed by the agency using the updated methodologies. More information about UKÄ's EQA activities can be found under ESG 3.1 and ESG 2.3.

In Table 1, an overview of EQA activities performed by UKÄ for the past five years is given. Please note that a small correction was made by UKÄ: in 2022, two thematic evaluations were carried out; in 2024, one thematic evaluation was carried out.

Table 1. Number of UKÄ's EQA activities performed in the period from 2020 to 2024 (source: UKÄ's SAR, pg. 30).

Year	2020	2021	2022	2023	2024
Institutional reviews (total)	**14**	**8**	**8**	**12**	**0**[26]
- Approved QA processes	2	4	2	2	0
- Approved QA processes with reservations	11	3	6	10	0
- QA processes under review	1	1	0	0	0
Follow-up of institutional reviews (total)	**0**	**4**	**8**	**6**	**6**
- Approved QA processes	0	2	8	6	5
- Approved QA processes with reservations	0	2	0	0	1
- QA processes under review	0	0	0	0	0
Programme evaluations (total)	**99**	**41**	**36**	**40**	**10**
- High quality	59	24	32	27	3
- Under review	40	17	4	13	7
Follow-up of programme evaluations (total)	**38**	**40**	**10**	**11**	**16**
- High quality	35	36	6	11	11
- Programme cancelled by the HEI	2	2	3	0	5
- Revoked degree-awarding powers	1	2	1	0	0
Appraisal of applications for degree-awarding powers (total)	**24**	**17**	**18**	**7**	**9**
- Granted degree-awarding powers	17	6	8	3	6
- Rejected degree-awarding powers	7	11	10	4	3
Thematic evaluations (total)*			**1**	**1**	**1**

*The outcome is in the form of recommendations to each individual HEI.

Outside of the scope of the ESG, UKÄ performs legal supervision of HE, although the panel argued, under ESG 2.1, that legal supervision in part addresses HEI's compliance with ESG part 1; therefore, it should be considered under ESG. Legal supervision applies to the supervision of HEIs' compliance with the Higher Education Act, the Higher Education Ordinance, the Administrative Procedure Act, as well as with HEIs' own regulations. Supervision can be initiated on behalf of the Government, on UKÄ's initiative, or following a complaint from an individual or an organisation.

Additionally, UKÄ performs statistics, follow-up and analysis, due to its responsibility for statistics in HE. These statistics are used by the Swedish Parliament and Government to form decisions related to HE. They can also be used by UKÄ to understand the profile and the efficiency of a HEI under review. Additional activity of the agency outside of the scope of the ESG is UKÄ's institutional review of research.

UKÄ cannot conduct cross-border QA, but the agency is readily involved in activities related to internationalisation. As mentioned under the introduction to the "UKÄ" section in this report, UKÄ is a member of many different international networks and organisations. Additionally, many HEIs are involved in joint programmes under the European Universities initiative. Since 2022, UKÄ has been one of the agencies assigned to develop the Platform for Internationalisation (Plint), which should support HEIs to increase their internationalisation.

UKÄ'S FUNDING

UKÄ receives its full funding directly from the Government. More information about UKÄ's funding is available under ESG 3.5. Here, only a short overview is provided.

In 2025, UKÄ received a budget of 173 554 000.00 SEK (over 15 600 000 EUR), according to the Public Service Agreement. The Agreement is a document describing the budget allocated to UKÄ, listing the government assignments and stating the conditions for grant-funded activities. Once the state budget gets allocated to UKÄ, it is distributed internally between different departments, after the Director General's decision. The budget is allocated based on departmental needs, which are discussed at a meeting with the management team.

Over the last five years, the overall budget allocated to UKÄ remains similar, with an outlier in 2024, when the agency incurred a debt for its activities pertaining to the development of a digital business solution, and additional governmental funding was granted to cover it. Therefore, if the additional finances were not granted, the sum allocated to UKÄ would be similar to that for the period 2021-2025. The overview of finances allocated to UKÄ for the period 2021-2025 is shown in Table 2.

Table 2. Budget allocated to UKÄ from the Government from the period 2021-2025 (thousand SEK) (source: UKÄ's SAR, pg. 40).

	2021	2022	2023	2024	2025
Administrative funding	158,416	171,751	173,509	176,022	173,554
Funding credit	4,752	5,152	5,205	14,081*	5,206
Funding saved from 2024	N.A.	N.A.	N.A.	N.A.	0

* The funding credit was revised by the Government in December 2024 from SEK 5,280,000 to SEK 14,081,000.

FINDINGS: COMPLIANCE OF UKÄ WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

Evidence

As a part of the Quality Policy, UKÄ has defined the following vision statement; "*UKÄ's vision is Developmental Monitoring – Assuring Sweden's status as a Knowledge Society*". The vision of UKÄ is fulfilled through four separate goals:

i) "*To be the acknowledged source of information about higher education and research.*
ii) *Create results that are beneficial for the development of the higher education and research sectors.*
iii) *To be an attractive employer where dedicated employees have the possibility to develop.*
iv) *To work coordinated and resource efficient.*"

These goals are further embedded into UKÄ's operational documents, including Rules of Procedure and the guidelines on UKÄ's external quality assurance (EQA) activities. There are four EQA activities UKÄ conducts regularly, which are aligned with the ESG:

i) Institutional reviews.
ii) Programme evaluations.
iii) Appraisal of applications for degree-awarding powers.
iv) Thematic evaluations.

From 2020 to 2024, UKÄ conducted 41 institutional reviews (zero completed in 2024 due to the revision of UKÄ's EQA methodology); 24 institutional follow-up reviews; 226 programme evaluations; 115 programme evaluations' follow-up reviews; 75 appraisals of applications for degree-awarding powers and four thematic evaluations. This information can be found in the agency's SAR, in Table 1, on page 30. UKÄ pointed to a small correction of the information in the said Table: in 2022, two thematic evaluations were carried out, and one was carried out in 2024.

These EQA activities are conducted under UKÄ's Department of Quality Assurance. Aside from this Department, there are other departments covering non-ESG-related activities. These departments are:

i) Department of Higher Education Analysis.
ii) Department of Legal Affairs.
iii) Department for Operational Support.

UKÄ, within their SAR, emphasised their dialogue-based cooperation with different stakeholders, including students, labour market representatives etc. The Advisory Council is a body created to provide the stakeholders' perspective on UKÄ's activities, and contribute to the transparency of agency's decision-making. The stakeholders are involved in the activities of UKÄ through reference groups as well. There are three groups in total:

i) "*Representatives of HEIs, students, doctoral students and SULF (the union for teachers and researchers in the higher education sector)*".
ii) "*Representatives of employer and employee organisations*".
iii) "*International experts in the field of quality assurance (UKÄ's International Advisory Committee)*".

These groups were formed to help UKÄ ensure the quality of its external quality assurance, and they have no decision-making powers.

Analysis

The expert panel was able to access UKÄ's Quality Policy on both the English and Swedish versions of the website. The policy is somewhat short, as only the goals to achieve the agency's vision were available. However, the Quality Policy was found well embedded in UKÄ's daily activities. In particular, the panel found that the development of the EQA methodology involved dialogue with different stakeholders, including higher education institutions (HEIs), the Swedish National Union of Students (SFS), labour market representatives, UKÄ reference group members and quality assurance organisations-ENQA members. This is described in the following documents:

1. Guidelines for Reviewing the HEIs' Quality Assurance Processes for Education and Research (pg. 4-5).
2. Guidelines for the Evaluation of Third-Cycle Programmes (pg. 5).
3. Guidelines for the Evaluation of First and Second-Cycle Programmes (pg. 5).
4. Guidelines for Applications for Degree-Awarding Powers (pg. 5).

The Quality Policy is also mentioned in the Operational Plans for 2025 and 2024 of the agency, where each goal of the Quality Policy is addressed through different indicators. The panel was made aware that the agency will begin with preparing another document, the Quality Assurance Strategy (provisional name), starting in Autumn of 2025, which shall be broader than the current Quality Policy. It was highlighted by the management team of UKÄ that the current Quality Policy is found too broad, and that other topics, such as working life assessment and the involvement of labour market perspectives in the activities of UKÄ are discussed as areas to add to the document.

It was apparent that the stakeholders are involved in a broad range of activities at UKÄ, which was found commendable by the review panel. During the site-visit, all stakeholders were able to confirm that they have an active role of providing counsel on different developments within UKÄ, such as planning or suggesting topics for thematic analyses, development of EQA activities' guidelines or participating in international activities (e.g. contributions to conferences like the European Quality Assurance Forum etc.). The panel was impressed by the comments from different stakeholders who emphasised the good communication with UKÄ, as well as their readiness to accept feedback and work with the stakeholders on its implementation. Stakeholders were also understanding of UKÄ's position as a governmental agency, which brings limitations to the activities that can be carried out, but they for a given fiscal year experienced UKÄ trying to implement stakeholders' comments and suggestions wherever possible.

In the interview the panel had with student representatives, students mentioned that their collaboration with UKÄ is enjoyable and that the agency readily involves students in EQA procedures, as well as other projects. They provided examples of initiatives in development in collaboration with UKÄ, such as the annual student day. Students also mentioned that the training for students was

developed based on students' feedback to the agency. Another example of collaboration between students and UKÄ involves participation in the European Quality Assurance Forum, with a submission co-authored between students and UKÄ. Overall, students were very satisfied with UKÄ's responsiveness to their needs and ideas and they had a positive outlook on future collaboration.

Overall, the panel is satisfied that the information on UKÄ's vision, activities and goals is available online, in both Swedish and English languages, and that the listed goals are embedded into other daily activities of the agency. The broad involvement of stakeholders in UKÄ's bodies leads to continuous discussions and improvements within UKÄ. The panel noted, as in the past ENQA review in 2020, that the stakeholders have no decision-making roles. However, the panel is also aware of the limitations of UKÄ to change this, due to legislative boundaries.

Panel commendations

1. The panel finds it commendable that UKÄ actively involves a broad range of stakeholders in the development of its methodologies and through other bodies (Advisory Council, reference groups), and implements stakeholders' feedback wherever possible.
2. The panel commends UKÄ for their efforts and engagement with the student community, concerning both EQA procedures and other QA-related initiatives.

Panel conclusion: compliant

ESG 3.2 OFFICIAL STATUS

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

Evidence

As mentioned in the Introduction, UKÄ was established on January 1st 2013, based on the Ordinance with instructions for the Swedish Higher Education Authority (2012:810). The Ordinance mentions that the Director General (formerly known as "University Chancellor") is responsible for tasks concerning higher education, covered under the Higher Education Act (1992:1434), as well as degrees issued by independent providers in accordance with Act (1993:792) on Authorisation to Issue Certain Degrees. The ordinance defines the four EQA activities of UKÄ and mentions that they have to be conducted in alignment with Chapter 1 of the Higher Education Act (1992:1434) and Section 7 of the Act (1993:792) on Authorisation to Issue Certain Degrees. Furthermore, the Ordinance defines UKÄ's responsibilities concerning follow-up, external monitoring and analysis of issues within UKÄ's scope of work. Those responsibilities include producing reports on summary analyses of the operations performed by HEIs; monitoring and reporting on the labour market's need for future skills related to the educational offer; and monitoring and reporting on graduates' positioning in the labour market. The requirement that HEIs must participate in the evaluations conducted by UKÄ is regulated in Chapter 1, Section 12 of the Higher Education Ordinance. In the SAR (pg. 31), it is mentioned that the EQA activities of UKÄ are recognised by HEIs, the government and other stakeholders. The panel confirmed this in the interviews with the HEI representatives, during the site visit.

UKÄ's four EQA activities are aligned with the ESG and are a part of UKÄ's operational area: "*Quality assurance of higher education and research, and appraisal of the degree-awarding powers of public HEIs*".

UKÄ works under two additional operational areas outside of the scope of the ESG, according to the SAR (pg. 18). Those activities are:

i) The legal supervision of higher education.
ii) Monitoring efficiency, follow-up, horizon scanning and statistical analyses in HE.

UKÄ operates under the Ministry of Education and Research and is funded by the government. On a yearly basis, the public service agreement is approved by the Swedish Government, while the budget for HE and research is set by the Parliament (*swe. Riksdag*). In the public service agreement, the Government decides which activities shall apply to UKÄ for a given fiscal year. Activities pertain to new or recurring Government assignments and to UKÄ's finances.

In the SAR, UKÄ defined several areas of improvement pertaining to UKÄ's official status and activities. Those issues include the inability of HEIs to participate fully in joint programme initiatives due to legislative constraints, the inability of UKÄ to operate outside of Sweden (on an international level) and the lack of recognition (by Swedish legislation) of the QA procedures conducted by other EQAR-registered agencies. UKÄ actively works on addressing these issues. For example, through publishing a report on Swedish HEIs' experiences related to QA of joint programmes and the European Universities initiative (SAR pg. 31). The panel confirmed, during the site visit, that these issues are present and recognised by different groups of stakeholders (HEIs in particular). However, the stakeholders mentioned that the international community is receptive to their struggles, and they still have opportunities to participate in joint programmes and the European Universities initiative.

Analysis

The panel was able to confirm UKÄ's legal status through provided legislative evidence, as well as through the discussions with HEIs and the Ministry representatives during the site visit. In particular, the panel found that the HEIs readily undergo UKÄ's EQA activities as necessary, and they find the outcomes of reviews fair and transparent. The Ministry representatives highlighted the respect the agency enjoys in the public system, as well as its high quality of work, particularly related to QA and statistical analysis.

During the site visit, the panel heard from the Ministry representatives that UKÄ did not make a formal request to change anything pertaining to the law on internationalisation, but the report produced by UKÄ gave them the general idea of what the positions of the HEIs regarding this matter are. They recognise the need for UKÄ to expand their activities and engage in cross-border QA, however, they also recognise the existence of legislative barriers and the challenges they face when trying to amend legislation in place. The Ministry representatives mentioned that there isn't a big push from HEIs to introduce these legislative changes, and that, at the moment, they are trying to introduce small changes in internationalisation possibilities for UKÄ, which would be aligned with current legislation. HEIs concurred with the Ministry that they are not currently pushing for large changes pertaining to their international engagement in joint programmes and the European Universities initiative. One person mentioned that their HEI sent a letter to the Ministry regarding this topic, but they have not received an answer for more than 2 years. However, they remain positive that the situation will get resolved.

The panel also examined the Instrument of Government document pertaining to internationalisation (Section 10), and came to the conclusion that there are possibilities for involvement in international activities for UKÄ, though the procedures seem to be quite long and overly administrative. Usually, the Government has the possibility to sign agreements with other states or international organisations. Should the international agreement not require the participation of the Swedish Parliament or the Advisory Council on Foreign Affairs, then it could be concluded by an administrative authority under Governmental instruction.

Panel conclusion: compliant

ESG 3.3 INDEPENDENCE

Standard:
Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

2020 ENQA full review recommendations

1. The panel recommends that UKÄ should take measures to further safeguard its capacity to independently design its methodologies in external quality assurance.

Evidence

i) Organisational independence

To understand the independence of the agency, the Swedish administrative model should be considered. The Parliament is the highest legislative body. In most countries, the Government and the public agencies are separate administrative bodies, but in Sweden, several differences are present. For example, higher education policies, such as the annual public agreements with the agency, as well as the choices for thematic evaluations, are approved by the decisions of the Government and not by the Minister[1]. Another difference is that both UKÄ and HEIs are public agencies and answer to the Government[2]. However, their independence from the Government and Parliament is guaranteed by the Swedish Constitution, called the Instrument of Government (1974:152), chapter 12, section 2 (SAR pg. 32). According to this document, decision-making powers and public authority of the governmental agencies are protected from the governmental influence and it is stated that the Swedish Parliament cannot perform any administrative functions.

In its SAR (pg. 34), UKÄ reported no changes to the legal status from the year 2020, when the last full ENQA review took place. The agency recently (in 2024) underwent an appointment of the new management team, where a new Director General and a new Deputy Director General were appointed, and new heads of departments were named.

In UKÄ's SAR, it was mentioned that there were concerns expressed regarding UKÄ's independence from the Government (SAR pg. 34). The panel found no evidence, either written or verbal, during the site visit, that the organisational independence of the agency is endangered currently, or that it was endangered in the last five years. During the site visit, the stakeholders and Advisory Council members pointed to the large number of governmental assignments that UKÄ needs to perform and report on, which, in their opinion, puts an additional strain on the agency's operational tasks, as well as on institutions under review (see also ESG 3.5 *Resources*). In discussions with UKÄ's management and staff, the panel confirmed that UKÄ is working in good capacity, but any additional workload could pose a threat to the sustainability of UKÄ's operations. This could mean that the staff would have to be reorganised to take up other tasks or the agency would have to prioritise some activities over others, which could endanger the quality of its internal and external work. UKÄ's management firmly stressed that the EQA activities of UKÄ have the highest priority, so no rearrangements could be applied to the Department of Quality Assurance. Despite the concerns, it was clear that, should government assignments to UKÄ pose a threat to UKÄ's everyday work, the Ministry and UKÄ would be open to discussions on how those threats could be mitigated. For example, UKÄ could ask for

[1] Source: https://www.government.se/how-sweden-is-governed/public-agencies-and-how-they-are-governed/
[2] Source: https://www.esv.se/English/Financial-management/Swedish-public-administration

additional finances and temporarily hire additional staff members, deadlines for governmental assignments could be adjusted by the Ministry, or the Ministry could switch priorities on assignments. The panel was provided with several concrete examples of such instances. Ultimately, the panel heard, from UKÄ's employees and management alike, that no large reorganisation of staff had happened despite the large number of Government assignments. They mentioned that, in the past, when more resources were needed following a new assignment from the Government, this was openly communicated within the department units and the staff member had to agree to take up said task. It was made clear that staff members were moved to different tasks, generally because of their experience in the area under evaluation. The panel also heard, from several employees within the Department of Quality Assurance, that they welcome working on different topics related to government assignments, as they offer them the opportunity to experience new work-related tasks and help them develop their organisational and cultural skills. UKÄ, in fact, has been working on (in line with recommendations in the evaluation by the Swedish Agency for Public Management-Statskontoret) enhancing the internal cooperation between departments and making better use of the many competences present in the organisation as a whole. Advisory Council members mentioned that, even if the topic of the government assignments was considered problematic (e.g. assignment on academic freedom), UKÄ still managed to perform those tasks well. The Ministry mentioned that they often confer the positions of UKÄ on governmental assignments to the Government, but that some topics are a political priority, and the Government can still decide to delegate them to UKÄ. However, in such cases, adjustments are usually made as described above. The Ministry meets with UKÄ regularly, approximately every six weeks, and UKÄ submits an annual report to the Ministry. In these meetings, governmental assignments are discussed mostly, but if there are other bigger events or activities coming up for the agency, those are discussed as well.

The HEI-nominated QA experts also shared that their responsibility should be to perform programme evaluations independently from the HEIs they evaluate. The experts mentioned that the governmental assignments to UKÄ concerning programme evaluations (evaluations of a specific field or programme, like Real Estate Brokerage) could be in conflict with the trust and responsibility UKÄ put in HEIs to perform these evaluations. As thematic evaluations and government assignments do not have to concern QA particularly, the HEIs noted that there is a risk that the agency might be moving away from its primary scope of work due to an increased number of governmental assignments. Additionally, they believe that the short deadlines imposed on UKÄ by the Government, to perform the given assignments lead to pressures which can result in incomplete information provided by the HEIs.

The Director General of UKÄ is appointed by the Government following an open call, and he/she is responsible directly to the Government. The Director General is assisted by a Deputy Director General, who makes decisions in case of the Director General's absence or in cases of conflict of interest. The Director General decides on the extent of the Deputy's decision-making powers and appoints the Deputy Director-General. The panel did not get any document stating the Deputy Director General's extent of work or powers. Currently, the Head of the Department of Higher Education Analysis serves as Deputy Director General.

The Advisory Council of UKÄ (*Swe. "insynsråd"*), composed of maximum nine members, is an advisory body to the head of the agency which exercises transparency in the organisation. The Advisory Council members are appointed by the Government (SAR pg. 33). According to the Ordinance, students have to be represented in the Advisory Council. UKÄ's Rules of Procedure (pg. 2, article 2.1) define that the Director General is the chair of the Advisory Council.

Additionally, UKÄ has a Department for Operational support which supports the Director General in the management and planning of the agency's activities; coordinating, planning and developing internal activities of the agency; and is supporting the agency's departments in different areas (archives

and registry, finances, IT, HR etc.). The other three departments also provide support and give advice to the Director General of UKÄ.

During the site visit, in the discussions with the representatives from the Ministry, the panel also had the opportunity to hear that the obligations and rights of public agency employees are ensured by the law. Therefore, no dismissal can be made without valid and substantiated reason. Also, there is an online course (offered to all employees of public agencies) by Statskontoret, which covers the basic responsibilities of civil servants and ethical work principles. Additionally, there is UKÄ's Employee and manager policy in place, which all employees should adhere to.

ii) Operational independence

According to UKÄ's Rules of Procedure (April 2024), and in alignment with the Ordinance with instructions for the Swedish Higher Education Authority (2012:810), the Director General of UKÄ is the head of the Agency.

UKÄ's budget is allocated by the Government for each fiscal year through the Public Service Agreements. In the agreements, the monthly payments to the agency are defined as a part of the payment plan, and conditions for grant-funded activities are described. The latter mentions that the agency can receive grants from the Nordic Council of Ministers, in case assignments from this body are taken up by the agency. The agency receives no external sources of funding (e.g. from HEIs).

The panel sees the Rules of Procedure of UKÄ as very useful, as this document defines the roles of all UKÄ's bodies pertaining to UKÄ's activities, as well as lists the decision-making responsibilities of the Director General. In section six, a list of matters delegated to UKÄ's department heads for decision-making is provided. The department heads can, for example, decide on the operational, personnel and financial matters within their departments; establish procedures and planning documents within their department; decide on staff transfers or termination of employment.

UKÄ's process of nominating external experts is independent from third parties. All experts (subject experts, student representatives, labour market representatives) are appointed to the assessment panels following an open call for nominations sent out to the HEIs by UKÄ. The review panel received a copy of such a call for nominating experts for a thematic evaluation of collaboration with the surrounding community, from August 2023. In the call, the nomination process is explained. For example, the exact number of experts coming from HEIs, students (minimum three) and community members (minimum 3) was described. It was also mentioned what the responsibilities of the experts were, and the minimal requirements (e.g. relevant knowledge and experience in collaborating with HEIs and/or communities) from experts. The agency also developed the Project Manager's Support Tool with instructions on the selection of experts which further prove the independence of the experts' selection for UKÄ's activities (pg. 15-28 of the PDF version of the Support Tool). The composition of the assessment panels also has to be consulted with HEIs, to avoid any potential conflict of interest between the HEI and the panel members appointed by the agency.

iii) Independence of formal outcomes

In the Project Manager's Support Tool (pg. 67-70), the process of decision-making on EQA activities of UKÄ is described. The decisions on the reports concerning institutional reviews, programme evaluations and thematic evaluations are made by the Director General of UKÄ, following the check of the reports for factual accuracy with HEIs and the finalisation of the report. The reports for institutional reviews and programme evaluations contain the expert panel's assessments of each assessment criterion, as well as an overall assessment. The Director General also makes decisions on the procedures for the appraisal of degree-awarding powers, except for the Swedish University of Agricultural Sciences, the Swedish Defence University and independent higher-education providers, where UKÄ provides its position on the report but the final decision on approval is made by the

Government. In case of Director General's absence or identified conflict of interest, the deputy Director General takes these decisions.

Institutions have the possibility to appeal UKÄ's decisions and they can file formal complaints concerning UKÄ's processes.

Analysis

The panel had the possibility to analyse Public Service Agreements of the agency for 2024 and 2025, confirming that the finances for UKÄ's activities are secured by the Government. Concerning the independence of UKÄ from the Government, the panel initially believed that the interference of the Government in the governance of the agency might be high, as the Government formally appoints UKÄ's Director General, and little information could be found within SAR on the procedures for the Director General's appointment. However, during the site visit, several explanations were offered to the panel. The Director General is formally appointed by the Government, but there is a transparent recruitment procedure for this appointment. The call for applications for this position is opened by the Government, and people who fit certain criteria (published in the call) can apply. Those criteria include, for example, sector-specific competencies, experience in leading positions within the HE system in Sweden etc. Historically, the position of the UKÄ Director General was always filled by a former Head or a Deputy-Head of a HEI, specifically due to their experiences in HE, QA procedures and management. There is not a formal set of criteria that the Government uses when opening a call for the position, but it is in the Government's own interest to recruit someone who can provide the agency with the necessary knowledge and competencies to lead the agency. Once the applications are closed, interviews are organised with the candidates and the best candidate is appointed. The last call opened by the Government was in December 2023. The fixed term of appointment of the Director General is six years - same as for all other public agencies. Only in cases of gross misconduct, the person acting as General Director could be moved to another position until six years on their contract expire. The review panel is confident that UKÄ's Director General is able to make decisions concerning formal outcomes and internal organisation of the agency without interference from the Government. This was additionally strengthened by the discussions with UKÄ's employees and stakeholders, who believe that the decisions made by UKÄ, as well as UKÄ's internal operations and management of resources, are independent from governmental influence. Furthermore, the panel was able to confirm that the appointment of the new Director General and his Deputy, impacted the agency positively, contributing to a more structured approach to UKÄ's daily activities.

The Government also appoints the members of the Advisory Council of UKÄ, which serves to increase the transparency of the public agencies like UKÄ. The panel was informed that, due to UKÄ's size (UKÄ is considered to be a small public agency), the agency is not required to have an advisory body. However, the Ordinance (2012:810) with Instructions for the Swedish Higher Education Authority stipulates that UKÄ should have an advisory council (or an '*advisory committee*'; Section 10). Therefore, such body was established under the agency. The members of the Advisory Council are appointed based on the needs of UKÄ, which are communicated to the Ministry prior to the appointment of the Advisory Council members. The only exceptions are the students, who are nominated to the Ministry by SFS directly (one student at the EQF level six or seven, one student at EQF level 8). There is no public call for these positions, as this body is not a decision-making body. The selection of candidates for UKÄ's Advisory Body within the Ministry is made according to internal regulations. The panel is not concerned about the Government's technical/possible influence on the Advisory Council, as this is not a decision-making body. Nothing in the many interviews indicated that the Governmental influence could be a problem. Additionally, UKÄ has dialogues and gets feedback from external stakeholders, not only in the Advisory Council, but in many other contexts/situations.

The Ministry does not interfere with UKÄ's distribution of resources and finances, but they are responsible for supervising the work of the agency. Therefore, the Ministry representatives mentioned it is UKÄ's responsibility to distribute the finances for the work they carry out. If additional finances are needed by UKÄ, they notify the Ministry and they substantiate their request. After that, the Ministry weighs this request against all other expenses and tries to discuss the possible way forward with the management of the agency. In cases where additional funds could not be secured, the Ministry could reduce the workload pertaining to government assignments for the agency.

As the Director General appoints the Deputy Director General, the panel assessed whether the Deputy Director General, who was recently appointed (early 2025) had the chance to make any decisions. The management of UKÄ confirmed that this was, indeed, the case, that, due to an identified conflict of interest of the Director General, some decisions had to be made by the Deputy Director General. The conflict of interest pertained to the decisions related to the HEI at which the Director General was previously employed. The panel was pleased that the decision-making process could be completed in this manner. However, the panel also sees further possibilities to alleviate the decision-making duties from one individual (Director General/ Deputy Director General). For example, a committee could be formed with an advisory role in decision-making. This committee could help the Director General in forming decisions, thereby potentially mitigating stakeholders' concerns related to governmental influence on UKÄ.

The panel found out that there were only a few instances where the decision made by the Director General of UKÄ was contradictory to the assessment of the panel concerning their report. However, this was due to unsubstantiated judgements made by the panel in the report for the procedure for the appraisal of the degree-awarding powers. These cases happen mostly if the project manager (i.e. review coordinator) warns the Director General that the correct procedures were not followed by the panel or if the judgements contradict the findings. There were no such cases for institutional reviews. Before the final decision on the EQA activity is taken by the Director General, if there are issues identified with the report, the Director General would return the report to the panel for reconsideration, rather than make a decision on the received version. Therefore, the review panel is confident that the decisions on formal outcomes are independent from outside pressures, including the pressure of HEIs, the Government or other stakeholders. They remain under the responsibility of the Director General of UKÄ.

All experts recruited by the agency have to undergo training, and they are nominated based on the public call to HEIs or other sources (e.g. the agency's own search for experts). The experts have to declare a conflict of interest and are expected to undergo UKÄ's online training before becoming active as an assessor. At the time of the review, the agency did not formally check that the experts have underwent the training, but in the discussions with the experts, they all mentioned that they were informed of their role and duties in EQA processes. Additionally, in the public call for experts, the role of the assessor is described, where the integrity and impartiality of experts is underlined (e.g. invitation to nominate assessors for the procedure on the appraisal for degree-awarding powers, pg. 2). The panel believes that this is sufficient to underline the experts' personal participation, rather than institutional, in EQA activities as reviewers.

Ultimately, the panel recognises that the agency has a high level of operational independence in the design of its methodologies and in carrying out the procedures. According to the 2020 ENQA review recommendation, the agency should have taken measures to "*safeguard its capacity to independently design its methodologies in external quality assurance*". The Rules of Procedure of UKÄ help in increasing the transparency of the decision-making processes of the agency. Furthermore, the agency independently updated its EQA methodologies, which were consulted with external experts, which is seen as a good practice.

There is no drastic reorganisation of staff within UKÄ needed to cover the governmental assignments. Pertaining to organisational independence, the high level of governmental tasks was seen as a potential threat by different stakeholders. The panel has not seen a cause for concern during the review that there will be a high level of governmental interference, but recognises that there is a hypothetical possibility for a higher governmental interference. The procedures for the appointment of the General Director are clear, public and published by the Ministry. The role of the Advisory Council is clear, as well as the procedures for the appointment of its members. The role of the Advisory Council adds to the organisational transparency of UKÄ. The panel found no cases where the independence of formal outcomes was threatened. Quite the opposite, the panel found that the agency has a high level of independence in decision-making on formal outcomes, and dialogue with UKÄ's panels on any identified issues is complementary to this process.

Panel suggestions for further improvement

1. The panel encourages UKÄ to continue to maintain a good and open dialogue with the ministry representatives, to ensure the financial security of the agency.
2. UKÄ could explore mechanisms for improving governance and its decision-making procedures pertaining to the role of the Director General as the sole decision maker. This could potentially mitigate the stakeholders' concerns pertaining to the dismissal of the Director General and/or governmental influence.

Panel conclusion: compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:
Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

Evidence

According to UKÄ's SAR (pg. 35-40), thematic analyses performed by UKÄ include the analysis of results of the completed EQA activities. For each thematic analysis, a different topic is chosen, and the overarching aim of these analyses is the quality enhancement and promotion in HE. In conducting thematic analyses, HEIs' SARs are considered, as well as the findings of the review panels. UKÄ annually reports to the Government, and the information contained in this report reflects on UKÄ's EQA activities' contribution to quality in HE (including at HEI level). This is why UKÄ considers these annual reports to be thematic analyses as well.

Thematic analyses are performed after a cycle of reviews at UKÄ is completed. At times, larger groups of programmes are evaluated by UKÄ in the national context, so the information contained in these thematic programmatic reports could also be considered as thematic analysis (SAR pg. 36). The heads of the departmental groups confirmed, during the site visit, that thematic analyses were mostly related to programme evaluations, as most reports are produced for this EQA activity. They also confirmed that the discussions are taking place to make the work on thematic analyses more systematic.

Producing thematic analyses is integral to UKÄ's QA activities, as it helps the agency enhance the quality of education, as well as reflect on the findings. On a yearly basis, the thematic analyses are planned, and the tasks pertaining to them are delegated to UKÄ's Department of Quality Assurance.

The national report is produced mostly by the staff from the same Department. The topics for thematic analyses are determined by the Department of Quality Assurance too.

The panel participating in the last full review of UKÄ (ENQA, 2020) suggested that the agency could produce more thematic analyses. For some time now, UKÄ has worked to develop better internal coordination and use of competencies and knowledge in the organisation as a whole. This is, amongst other areas, reflected in the work on thematic analyses. To accommodate for more thematic analyses, the Department of Higher Education Analysis assisted the Department of Quality Assurance in the production of these documents. This close coordination between departments, concerning thematic analyses, has led to better resource efficiency and improved planning for thematic analyses. Furthermore, a unit for Thematic Analysis has been established under the Department of Quality Assurance to help in the planning of the analyses. One of the topics for thematic analysis proposed by this unit includes the issue of language use (Swedish and English) in HE in Sweden. During the site visit, it was also confirmed that UKÄ consults with the stakeholders concerning the topics for thematic analyses.

UKÄ also performs a follow-up on institutional reviews and programme evaluations and makes an annual report to the Government on the findings.

A full list of thematic analyses performed by UKÄ since 2020 can be found on pages 37-39 of UKÄ's SAR.

The panel received no evidence on the procedures UKÄ has in place for conducting thematic analyses. In fact, during the site visit, it was confirmed by UKÄ's management team that such document is not in place and UKÄ is not considering creating one. This is mostly due to the nature of thematic analyses, where a common belief is that a structured document could limit the agency's possibilities in applying different analytical procedures.

Analysis

Since 2020, UKÄ has produced many thematic analyses. So far, UKÄ has conducted four thematic analyses related to institutional reviews, five thematic analyses related to programme evaluations (one in English; one thematic analysis is also listed under independent thematic analyses), and two thematic analyses related to the appraisal of the applications for degree awarding powers. No thematic analyses were conducted since the last ENQA review in relation to UKÄ's thematic evaluations. The panel believes that UKÄ could consider thematic analyses of thematic evaluations as well, despite them having diverse topics, as the analysis could potentially be useful for improving future thematic evaluations. The panel extends a reminder that thematic evaluations are not thematic analyses, but rather a separate EQA activity of UKÄ, and therefore, thematic evaluations were not described under this standard.

Some examples of thematic analyses found appropriate by the panel include the thematic analysis mapping the students' perspective across UKÄ's reports; thematic analysis on working life and collaboration, thematic analysis on doctoral education etc. These thematic analyses cover many reports (even over 60) and they draw joint conclusions from the analyses, some even pertaining to the development of UKÄ's methodology (eg. thematic analysis on working life and collaboration, pg. 42). The panel found UKÄ's annual reports to the Government to indeed fall under the umbrella of thematic analysis, and found the reports to be concise, informative and useful for stakeholders like HEIs.

The documents pertaining to the review of findings of institutional reviews, programme evaluations and the appraisal of applications for degree-awarding powers fall under thematic analyses. In one of the four listed institutional reviews in the SAR (pg. 38), titled: "*Higher education institution reviews in*

rounds 2 and 3 – Reflection report", both a summary of the review findings was provided, as well as a survey was conducted.

Thematic analysis titled: "*Preparatory Study for the Development of the National Quality Assurance System*" is not a typical thematic analysis, because it contains the analysis of findings of the external reviews of UKÄ (conducted by ENQA, Faugert & Co) and includes the internal mapping of UKÄ's IQA and EQA systems. The panel found that the produced document increases the transparency of the agency and shows that UKÄ is interested in transparently showcasing the identified good practices, as well as development areas, and is taking concrete steps to address them.

Furthermore, the panel found that not all documents listed as thematic analyses can be considered as such. For example, a document titled: "*Lessons learned from the transition to distance learning during the coronavirus pandemic"* contains very interesting findings, but it cannot be considered a thematic analysis, as no EQA-procedure-related data was used for the preparation of this report. Rather, the agency worked with raw data collected from the interviews. Another such example is the document "*Improving quality – a developed methodology for UKÄ's reviews*", which summarises the new methodology for EQA developed by UKÄ. In "*Strengthening quality and promoting excellence in Swedish higher education*" the suggestions on the development of the national system were given by UKÄ. A report titled: "*Higher education institutions' commissioned training*" contains information that was collected directly from HEIs, and, therefore, is not entirely considered a thematic analysis, as it is rather a research based on a governmental assignment. Similarly, the report "*The impact of evaluations on the administrative burden in the higher education sector*" also pertains to the governmental assignment and it is a research-based analysis. Despite the documents pertaining to government assignments and documents containing the overview of UKÄ's methodology improvements not strictly falling under the definition of a thematic analysis, the panel found these documents useful for the stakeholders. The relevance of these documents is high in the field of higher education, albeit not originating from the already obtained results of UKÄ's EQA activities.

Thematic analyses performed by UKÄ were appreciated and read by many of the stakeholders interviewed during the site visit (most of all HEIs and students).

Considering that UKÄ produces many thematic documents, some of which fall under thematic analysis, and some do not, the panel believes it would be useful for UKÄ to develop a generalised manual on performing thematic analyses. The panel feels that this could also help the Working Group on Thematic Analyses in planning and preparing for thematic analyses. Having a basic manual would still leave space for designing each analysis in the most useful way. However, it could be useful to make decisive points in the process more transparent (e.g. by specifying that stakeholders be involved more directly in suggesting topics – rather that UKÄ inferring topics from the dialogue with stakeholders).

Overall, the panel found that UKÄ has improved since 2020 in the production of thematic analyses, and used its resources efficiently to contribute to their production. Increasing the possibilities for stakeholders to be involved more directly in the discussions on thematic analyses would broaden the support and dissemination of the thematic analysis.

Panel suggestions for further improvement

3. UKÄ could increase its efforts to involve stakeholders more directly in planning thematic analyses, as they offer an external perspective on the needs/opportunities/improvement areas in higher education.

Panel conclusion: compliant

ESG 3.5 RESOURCES

Standard:
Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

Evidence

According to the Public Service Agreement for 2025 (pg. 5-6), UKÄ was given a budget of 173 554 000.00 SEK for 2025, similarly to the budget for 2023, higher than the budget for 2021 (158 416 000.00 SEK; approx. 14 256 569.00 EUR) and 2022 (171 751 000.00 SEK; approx. 15 456 646.00 EUR), but lower than the budget for 2024 (176 022 000.00 SEK; approx. 15 841 012.00 EUR). The initial budget for UKÄ for 2024 was increased by the Ministry late in 2024 due to issues with the development of a digital business for UKÄ, which required additional finances (SAR pg. 51). Therefore, the initial budget for 2024 was similar to the one for 2023 and 2025.

The allocated governmental funds for UKÄ are internally distributed between UKÄ's departments after the decision on the adoption of the budget is taken by the Director General. The finances between departments are distributed by the heads of the departments as described in Section 6 of UKÄ's Rules of Procedure. In Table 3. (SAR pg. 41), UKÄ provided the panel with an overview of the distribution of funds between different departments for the past 5 years.

Table 3. Division of finances between UKÄ's departments for the period 2021-2025 (in thousands of SEK; source: UKÄ's SAR, pg. 41).

	2021	2022	2023	2024	2025
Department of Higher Education Analysis	40,041	46,675	46,940	46,696	45,783
Department of Legal Affairs	16,853	16,810	18,235	19,251	19,492
Department of Quality Assurance	45,322	48,300	44,980	45,147	46,597
Department for Operational Support (incl. Director General)	58,076	57,869	62,704	60,564	57,728
Strategic operational development		9,394	7,079	7,768	0
Total	**160,292**	**177,049**	**179,215**	**179,426**	**169,600**

From the table, it is clear that the budget of the Department of Quality Assurance has been slowly increasing from 2023 to 2025, while the strategic operational development (update of UKÄ's methodology) finished in 2024. Overall, the total budget for UKÄ's departments decreased significantly (by around 5%) in 2025, from 179 426 000.00 SEK in 2024 to 169 600 000.00 SEK in 2025.

To fulfil the goal of UKÄ's Quality Policy in being an attractive workplace, the agency relies on a tripartite provision work (SAR pg. 41), comprised of:

i) "*Utilising, developing and retaining competences.*
ii) *Attracting and recruiting new competences.*
iii) *Terminating and utilising competences when a staff member leaves."*

Since January 2025, UKÄ has established a complete permanent management team. Before 2025, UKÄ experienced issues in internal governance due to budget allocation, a lack of cooperation between departments and a lack of communication between different subunits within UKÄ (SAR pg. 51). These

findings were substantiated by the report of the Statskontoret, received by the agency in 2024. In 2025, a review reflecting on UKÄ's human resources ("*A review of the strategic competence provision work*"; SAR pg. 41) will be performed.

From 2020 to 2024, the number of employees in UKÄ remained quite steady, with an increase in the number of employees since 2020. The largest number of employees are working under the Department of Quality Assurance (Table 4; SAR pg. 42).

Table 4. The number of employees across UKÄ's departments from 2020 to 2024 (source: UKÄ's SAR, pg. 42).

	2020	2021	2022	2023	2024
Department of Higher Education Analysis	26	30	34	40	37
Department of Legal Affairs	16	20	20	20	18
Department of Quality Assurance	39	39	40	38	42
Department for Operational Support	26	25	25	29	26
Total	107	114	119	127	123

Due to the reduction in funding by the Government and an increase in government assignments, UKÄ identified high staff turnover as a risk area (SAR pg. 43). The panel requested the information about annual staff turnover at UKÄ for the period 2022-2024. According to the data provided by the agency, the annual staff turnover for 2022 was 0%, for 2023, it was +15% (11 staff members were employed), and for 2024, it was -12% (7 staff members left).

Each head of department develops a competence management plan according to UKÄ's internal guidelines for competence provision. These guidelines help identify challenges related to the operations at UKÄ.

Staff members are also regularly involved in activities related to professional development (e.g. ENQA Leadership Development programme). They also have the possibility to work from home (since 2020), which they appreciate.

Analysis

UKÄ's budget is determined by the Swedish Government, and the current finances seem sufficient to cover UKÄ's activities. The panel noted the concerns of stakeholders (see also ESG 3.3 *Independence*) on the amount of government assignments, which are not always separately funded. On the other hand, the management of UKÄ and Ministry representatives confirmed that, should there be a need for additional funding, discussions would be held and a compromise would be achieved. Therefore, the panel has no reason to believe that the current financial resources of the agency endanger its operational capacity.

The panel finds that the annual staff turnover at UKÄ is not concerning, as it has not changed significantly in the past three years. Nevertheless, the panel acknowledges the concerns of the agency related to high staff turnover in cases of an increase in government assignments. The increase in the number of government assignments is also reflected in the data presented in Table 4, where it is visible that the number of employees in the Department of Higher Education Analysis increased more significantly since 2020. The panel further confirmed, in the interview with the department heads, that the reason for the employment of new staff in this Department is due to an increase in government assignments. The dialogue culture between the Ministry and UKÄ seems to have yielded positive results pertaining to the turnover of staff members, but further measures should be taken to safeguard the development of staff competencies in specialised tasks, as well as preserve a low-stress working

environment. The panel found that the UKÄ management seems very aware of this and has plans as part of the strategic work to develop an overall competence provision plan for UKÄ. (SAR pg. 42). Though UKÄ is not there yet, the panel supports these ambitions as vital for the organisation.

Generally, UKÄ's staff were happy to participate in different activities and join different working groups under their department or other departments of UKÄ. The staff mentioned that there is a supportive culture at UKÄ for the development of staff competencies, and the wishes of the employees are discussed (e.g. if an employee wishes to switch to another department or participate in activities outside of their department).

Panel conclusion: compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

Evidence

UKÄ does not have a singular document (e.g. a policy) for IQA. The IQA processes are rather described in a series of internal documents, including the Rules of Procedure, Project Manager's Support Tool and documents listed in Annex 5 to this report.

The Rules of Procedure of UKÄ describe the decision-making system within UKÄ and assure the consistency of the procedures. In Section 2 (point 2.4), there is a description of the Staff Accountability Board, members of which are the Director General of UKÄ, Deputy Director General, the head of the Department for Operational Support, the head of the Department for Legal Affairs and two staff representatives (aligned with the Staff Representatives Ordinance). In the same document, under point 4.1, it is mentioned that all employees of UKÄ must be familiar with the Statutes and policy documents of the agency, and that they need to be impartial and objective in carrying out their duties.

Project Manager's Support Tool was developed by the agency as an online tool to help guide the project managers through the processes of EQA under UKÄ, and to ensure that the systematic approach is applied to these activities. Aside from covering EQA, there are other instructions for project managers, for example, on the preparations for the evaluation (Section one of the Tool). Logbook is developed as a tool for UKÄ's employees, which can be used to identify inaccuracies or ambiguities in information related to the EQA activity taking place. Additionally, all UKÄ employees have to participate in an online course offered by the Statskontoret which covers the basic responsibilities of civil servants and ethical work principles. The principles are also available to UKÄ's staff in UKÄ's Employee and manager policy, which is an internally shared document.

Under the section "Guidelines for the composition of the assessment group", specific criteria are described for the composition of the assessment groups concerning programme evaluations and the appraisals of applications for degree-awarding powers. Some of these criteria include: the chair of the panel should have very good knowledge of the study field or the area of education which is being reviewed; the chair of the panel needs to have a strong connection to the area of the programme. In the institutional reviews, the experts should not have very deep field-specific knowledge or strong connections within the field to ensure transparency. Assessment groups are selected based on the absence of a conflict of interest, and, whenever possible, geographical distribution, gender balance and

international competence. The importance and the equality of students and stakeholders in relation to the academic members of the assessment panel is reiterated under section "Assessor recruitment" of the Project Manager's Support Tool. During the site visit, the panel confirmed that this tool is widely used during every EQA activity, and it is found very useful by the project managers of different evaluations.

Aside from these two documents, UKÄ confirms the competency of its collaborators through other documents listed in Annex 5. They make sure that all experts act ethically by having them declare any conflict of interest openly during the panel selection for the particular assessment. The initial list of experts for the particular assessment panel is sent to the HEIs for approval. Should the conflict of interest be identified, the expert could, for example, either step down from the activity, or be excluded from the decision-making on particular judgements within the reports (e.g. judgements on programmatic reports in thematic programmatic reviews). During the site visit, the panel confirmed that HEIs consider that the panels objectively make decisions on judgments in the EQA procedures, and that the competencies of the members of the assessment panels were high. The HEIs could not name any particular cases where the conflict of interest was an issue during the evaluation procedures.

The panel heard, during the site visit, that UKÄ organises regular meetings and discussions within and between departments and on a managerial level. There is also a document called "*Guidelines for Development Dialogues*", which is used for the dialogues on staff performance appraisal. However, the agency currently collects no feedback from its employees in a formalised manner. During the site visit, it was mentioned that the last formal survey of employee satisfaction was conducted over three years ago. In Chapter 7 of the SAR (pg. 96), it is mentioned that the stakeholders (HEIs, students, the labour market, the Government and other decision-makers) are surveyed, and that they participate in the follow-up and feedback conferences organised by UKÄ. This helps UKÄ to continuously develop its procedures for stakeholders' involvement. Stakeholders are also able to reflect on different topics through discussion in the reference groups of UKÄ. The Report on the Stakeholder Survey for 2024 is internally available on UKÄ's online system. The HEI, students' union and the representatives of the assessment panel (for all EQA activities) also have the chance to provide feedback and engage in discussions on the review processes after the review is completed. After thematic evaluations, feedback conferences are organised between HEIs that underwent thematic evaluations and UKÄ. The agency also recently introduced an online course for assessors where their role and responsibilities are described.

Several documents are in place at UKÄ, which help in safeguarding the tolerance and anti-discrimination practices within the agency. Those include "*Guidelines for Handling Harassment, Sexual Harassment, Reprisals and Victimisation at UKÄ*" [aligned with the Swedish Discrimination Act (2008:567)], and "*Guidelines for crisis management and against threats and violence in the work environment*". Other documents help in outlining appropriate communication with relevant authorities: "*Guidelines for entry and visits*", "*Guidelines for participation in external meetings and study visits at UKÄ*".

Aside from the formal ways of monitoring feedback, UKÄ also participates in activities like Almedalen Week - an annual summer meeting open to the public. There, UKÄ presents their annual report on improvements and organizes a breakfast seminar for heads of HEIs. UKÄ also hosts an annual conference for quality coordinators from HEIs and attends other conferences organised by quality coordinators.

UKÄ does not carry out any EQA activities in cooperation with subcontractors.

Analysis

The panel noted the absence of a singular and publicly available policy on IQA, which could help the agency in defining its IQA system and its activities, as well as applying its IQA processes more

systematically. The reasons why having a singular policy on IQA would be useful include the increase in the transparency of the agency's internal processes toward the general public and UKÄ's stakeholders. Having IQA processes as parts of many documents also creates an additional workload for UKÄ's staff, should any of the internal processes be changed. By having a singular policy, only this document would have to be amended instead of multiple smaller amendments of other documents.

That being said, the panel considers that UKÄ's practices in IQA are well developed and cover all aspects of the ESG 3.6 requirements. In particular, UKÄ developed procedures and tools to help its staff determine whether the experts possess the right competencies in performing EQA activities. The existence of the Project Manager's Support Tool was appreciated by UKÄ's heads of the departmental groups in particular. They also considered having a tool rather than an IQA policy makes the process of improving the procedures faster and less bureaucratic. The heads also confirmed that they regularly read logbooks and identify potential areas for improvement.

The dialogue-based culture helps UKÄ directly collect feedback on different activities within UKÄ's subunits (through working groups and reference groups), as well as on EQA procedures. UKÄ formalised the procedures for the collection of stakeholders' feedback, although there is no formalised feedback mechanism for employee satisfaction appraisal. The panel finds it would be useful for the agency to further develop or formalise this procedure. Collecting information on employee satisfaction more frequently, in a systematic way, would be welcome. This could allow the agency to reflect on its practices and document improvements more efficiently. Stakeholders additionally mentioned that they have the opportunity to participate in providing their opinion through the stakeholders' survey. However, they mentioned that, due to their very diverse nature, stakeholders' responses should be further differentiated by the agency. After collecting stakeholders' feedback, UKÄ holds meetings between relevant departments to identify improvement areas or discuss points raised by the stakeholders. Then the next steps are discussed with UKÄ's leadership and further steps are taken if necessary. It is important to note that the feedback process performed by UKÄ is not a singular process, but that feedback loops are established if needed (e.g. multiple feedback meetings might be held with stakeholders, or working group members might be engaged due to their specific expertise etc.). The panel found the feedback process to be very effective, based on positive stakeholders' reflections and descriptions provided by UKÄ's staff.

Departmental group heads mentioned that the groups meet every week and they decide what the topic of the discussion would be. Their meetings can concern activities or be thematic. They gave the example of a thematic meeting on the working environment. During the site visit, the review panel collected other examples of improvements introduced by UKÄ as a result of different discussions and dialogues with the stakeholders. When UKÄ started developing the research assessment criteria, stakeholders were consulted due to their experiences, and the criteria that they proposed can be found in the final version of the Guidelines for Reviewing the HEIs' Quality Assurance Processes for Education and Research. Stakeholders mentioned that, compared to its predecessor, which did not maintain public trust, UKÄ developed an open, transparent and trustworthy system for stakeholder engagement in discussions on methodology improvements. Students also confirmed that the dialogues held with UKÄ are useful to them and offer the opportunity to reflect on UKÄ's processes.

The panel did not hear of any instances of discrimination or intolerance pertaining to UKÄ's operations, and is satisfied that there are regulations within UKÄ on these topics, which are aligned with the Swedish legislation.

The HEIs and the Ministry confirmed that the outcomes of UKÄ's EQA procedures are relevant in the national context and that the outcomes of these procedures are taken seriously. As UKÄ's activities are based on national legislation, this additionally confirms the relevance of UKÄ's status and operations in the Swedish context.

Panel recommendations

1. UKÄ should consider developing a singular policy on internal quality assurance, which could help the agency in defining its internal quality assurance system and its activities, as well as applying those processes more systematically.

Panel suggestions for further improvement

4. UKÄ could periodically conduct formalised employee satisfaction surveys to collect employees' feedback, reflect on UKÄ's practices and inform the public about their activities.

Panel conclusion: compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

Evidence

This review is the second ENQA full review that UKÄ is undergoing, with the past review taking place in 2020, online (due to pandemic). UKÄ was first admitted to the EQAR Registry in 2021. With this review, UKÄ is reapplying for ENQA membership and EQAR registration.

UKÄ mentioned that the recommendations and suggestions from the last ENQA review (SAR pg. 53) provided the agency with valuable input for methodological development. In 2023, UKÄ organised a voluntary progress visit with the former panel chair and secretary to reflect on the improvements implemented since 2020. Improvements concerned ESG 3.3, ESG 2.2, ESG 2.3 and ESG 2.7.

Aside from the improvements concerning the abovementioned standards, UKÄ also made significant changes to its guidelines on EQA activities, in consultation with stakeholders. Therefore, in Spring of 2024 the new methodology was applied to institutional reviews (the decisions were made in early 2025) and programme evaluations.

UKÄ increased its international engagement in the past five years. Aside from being an ENQA member and EQAR-registered agency, UKÄ established a group on internationalisation under the Department of Quality Assurance.

UKÄ reflected on the impact of the coronavirus pandemic on its operations (SAR pg. 54), mentioning that very few reviews had to be postponed at that time, as UKÄ has broad experience working in an online environment.

Analysis

The panel is aware that UKÄ is reapplying for ENQA membership and EQAR registration, which demonstrates that the agency is undergoing cyclical external review on a five-year basis. The panel is also satisfied that UKÄ addressed, not only the recommendations from the last ENQA full review, but suggestions as well. Therefore, the panel considers that UKÄ complies with ESG 3.7.

Panel conclusion: compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

Evidence

There are four core QA activities of UKÄ, involving institutional reviews, programme evaluations, appraisal of the degree-awarding powers and thematic evaluations. Aside from that, UKÄ performs legal supervision of higher education and monitors efficiency, follow-up and horizon scanning in higher education. Although legal supervision activity of UKÄ is not an ESG-aligned activity, some of the ESG standards (1.2, 1.3, 1.4, 1.5 and 1.9) were covered partly by it (see Table 5). This activity entails checking the compliance with Swedish legislation, mostly the Higher Education Act, the Higher Education Ordinance and the Swedish Administrative Procedure Act. However, in UKÄ's SAR (pg. 60) it was mentioned that the methodology for this activity was revised and not yet implemented. The agency claims that the absence of preparatory legal supervision did not significantly impact students or HEIs as the agency also performs other legal supervision activities (such as handling students' complaints or participating in the appeal process to the Higher Education appeals Board).

Table 5. Overview of ESG Part 1 standards covered in the guidelines for UKÄ's external quality assurance activities and/or in Swedish legislation (source: UKÄ's SAR, pg. 57-58).

Standard	Institutional reviews	Programme evaluations	Appraisal of degree-awarding powers	Thematic evaluations[41]	Swedish legislation
1.1 Policy for quality assurance	AC 1[I] Established procedure and quality culture				
1.2 Design and approval of programmes	AC 4 Establishment and discontinuation	AC Goal/target attainment (first-, second- and third-cycle evaluations)	AC Main field of study/Subject area and main field of study/Subject area (application for awarding powers for first, second, third-cycle or professional degrees) AC Ensuring qualitative targets AC Policy documents	Evaluation widening participation in HE: AC Design, implementation and outcomes	HL[II] 1 ch 4 – 4a §§ HL 2 ch 7 § HF[III] 6 ch 4 §, 9 -11 §§, and 13 – 17 §§ HF Annex 2
1.3 Student-centred learning, teaching and assessment	AC 8 Student-centred learning		AC Educational environment/third-cycle level environment		HL 5 ch 1 § HF 6 ch 24 § HF 12 ch 2 §, 5 § FL[IV] 33 §, 38 §, 41§, and 44 §§
1.4 Student admission, progression, recognition and certification					HF 6 ch 3 §, 4 §, 6 – 7 §§, 9 – 11 §§ HF 12 ch 2 § Instr. UHR[V] 2 § p1, and 7 §

1.5 Teaching staff	AC 6 Competence supply and professional development	AC Staff resource (first-, second- and third-cycle evaluations)	AC Staff	Evaluation of widening participation in HE: AC Design, implementation and outcomes Evaluation of general nurse care education: AC Preconditions	RF[VI] The Public Employment Act The Employment Ordinance 6 -7 §§ HL 3 ch 1 -2 §§ HF 2 ch 2 § p 9 HF 4 ch 3 – 4 §§
1.6 Learning resources and student support	AC 5 Student support, learning resources and infrastructure	AC Staff resource (first-, second- and third-cycle evaluations), AC Third-cycle programme environment (third-cycle evaluations)	AC Resources	Evaluation of widening participation in HE: AC Design, implementation and outcomes Evaluation of general nurse care education: AC Preconditions	
1.7 Information management	AC 2 Continuous monitoring			Evaluation of widening participation in HE: AC Design, implementation and outcomes	
1.8 Public information	AC 1 Established procedure and quality culture, AC 2 Continuous monitoring, AC 3 Periodic reviews				Instr. UHR
1.9 On-going monitoring and periodic review of programmes	AC 2 Continuous monitoring, AC 3 Periodic reviews			Evaluation of widening participation in HE: AC Design, implementation and outcomes	HL 1 ch 4 – 4a §§ HF 1 ch 14 §
1.10 Cyclical external quality assurance	AC 3 Periodic reviews				HF 1 ch 12 § Act concerning authority to award certain qualifications 6 § Instr. UKÄ[VII] 2 § p2

There is a number of guidelines covering UKÄ's QA activity:

i) Guidelines for Reviewing the HEIs' Quality Assurance Processes for Education and Research (adopted in 2023; revised in February 2025).
ii) Guidelines for the Evaluation of First- and Second-Cycle Programmes (adopted in 2023; revised in January 2025; replaces 2016 guidelines).

iii) Guidelines for the Evaluation of Third-Cycle Programmes (adopted in 2024; replaces 2018 guidelines).
iv) Guidelines for Applications for Degree-Awarding Powers (adopted in 2023).
v) Three different guidelines concerning thematic evaluations:
    a. Guidelines for Thematic Evaluation of Widening Participation in Higher Education (in Swedish; adopted in 2023).
    b. Guidelines for thematic evaluation of nursing education (in Swedish; adopted in 2022).
    c. Guidelines for thematic evaluation of collaboration with the surrounding community (in English; adopted in 2024).

The revised versions of the guidelines concerned changes to the standards, as explained to the panel during the site-visit. Changes were introduced to simplify the EQA processes (by reducing the number of criteria and their detail) and avoid duplication, particularly in relation to institutional reviews of research and education. The thematic evaluation of HEIs' collaboration with the surrounding community (conducted mainly during 2024) did not cover specific ESG standards.

The coverage of the ESG within the Guidelines for the evaluation of first- and second-cycle programmes, as well as in the Guidelines for the evaluation of third-cycle programmes is described jointly, under the column: "Programme evaluations" in Table 5 above.

Analysis

To assess whether Part 1 of the ESG is covered in practice by the agency (both in UKÄ's guidelines and across reports), the panel has described the coverage of ESG Part 1 below. The reports were chosen at random from UKÄ's online database. The panel's responsibility under this review was to evaluate the standards since the time of the last ENQA review. Therefore, due to the recent amendments to the guidelines, the panel decided to evaluate the most recent reports using the updated guidelines on EQA activities of UKÄ, wherever possible. In those cases where no such reports were available, analysis of the guidelines was performed to evaluate whether the newly adopted UKÄ's guidelines address the ESG part 1 sufficiently.

Below is the overview of the coverage of ESG part 1 in UKÄ's standards.

i) ESG 1.1 Policy for quality assurance

According to Table 5, ESG 1.1 is covered solely under institutional reviews. In UKÄ's Guidelines for reviewing the HEIs' quality assurance processes for education and research, ESG 1.1 is covered under criterion 1. *Established procedure and quality culture*. Under this criterion (for education evaluation), HEIs need to demonstrate the existence of a description of a QA system, which is publicly available. Additionally, management, staff members and potentially external stakeholders should be involved in QA processes. Overall, the panel can ascertain that the ESG 1.1 is sufficiently covered in institutional reports and in the criteria of the agency.

ii) ESG 1.2 Design and approval of programmes

ESG 1.2 is covered in Swedish legislation, as well as in UKÄ's guidelines for institutional reviews (criterion *Establishment and closure*), programme evaluations (first- and second-cycle; criterion *Goal attainment*; third-cycle: *Assessment of third-cycle programme environment*), applications for degree-awarding powers (criteria *Degree/field of study/main field of study*) and, as an example of guidelines on thematic evaluations, in the Guidelines for Thematic Evaluation of Widening Participation in Higher Education 2020 (criterion *Design, implementation and outcomes*).

In all reports concerning degree-awarding powers, ESG 1.2 was covered through the criteria covering the main study field, where the backgrounds for each degree were provided.

The panel noticed that ESG 1.2 is mostly covered in reports by addressing the design and purpose of programmes and degrees, with a smaller emphasis on the description of the qualification obtained. There was little coverage of the placement of the degree within the national qualifications framework (except in the case of the thematic programme report). However, the panel finds the coverage of ESG 1.2 to be sufficient in the EQA activities of UKÄ, with particular emphasis given in the institutional reviews and degree-awarding powers reports.

iii) ESG 1.3 Student-centred learning, teaching and assessment

According to Table 5, ESG 1.3 is covered under institutional reviews (criterion *Student-centred learning*) and the appraisal of degree-awarding powers (criterion: *Educational environment*) procedures. However, ESG 1.3 is also covered under Swedish legislation, and the panel, during the site visit, confirmed that all aspects of ESGs not covered by UKÄ's procedures are covered through the activities of the Swedish Council for Higher Education.

In the analysed institutional reports and reports on the appraisal of applications for degree-awarding powers, ESG 1.3 was sufficiently covered under abovementioned criteria; although the reports could put further emphasis on the diversity of students, students' assessment processes and formal procedures for students' appeals and complaints. The panel considers that the coverage of ESG 1.3 is sufficient in UKÄ's criteria as well.

iv) ESG 1.4 Student admission, progression, recognition and certification

ESG 1.4 is not covered under any guidelines on QA procedures within UKÄ. Instead, this ESG is covered under Swedish legislation and assessed by the Swedish Council for Higher Education. Even so, the panel found some evidence of tracking students' certification and progression in various reports (degree-awarding powers report from June 2022; degree-awarding powers report from December 2022, first-cycle programme evaluation from November 2021 etc.). The panel did not note any areas of concern in the practical coverage of this standard. On the contrary, the panel heard from HEI representatives that they undergo constant cyclical evaluations, and that UKÄ can, should any issues be found, interfere and evaluate the HEI. Therefore, the panel is confident that the ESG 1.4 is sufficiently covered by the activities of the other public authority, outside of the scope of UKÄ's responsibilities.

v) ESG 1.5 Teaching staff

ESG 1.5 is covered under all QA procedures of UKÄ. In the guidelines concerning institutional reviews, ESG 1.5 is covered under the criterion *Competence supply and professional development*, where the competencies of the teaching staff, as well as the conditions for their professional development, are mentioned. In the guidelines for first-, second-, and third-cycle programme evaluations, ESG 1.5 is covered under the standard *Assessment of staff resources*. In the guidelines on appraisal of applications for degree-awarding powers, this standard is addressed under the criterion *Staff*. In the Guidelines for Thematic Evaluation of Collaboration with the Surrounding Community, ESG 1.5 is covered under the criterion *Assessment area: Governance and organisation*, where the second guiding question focuses on qualifications and recruitment of staff.

All reports analysed were from 2025. In the institutional reports, the competencies of the staff members are mentioned, as well as their opportunities for professional development, recruitment procedures, linking education and research and using innovative teaching methods. Reports on the appraisal of degree awarding powers list staff competencies under criterion *Staff*. Similarly to programme reports, the link between education and research is described, together with teaching staff competencies. In case of thematic evaluations, the reports do not focus on staff, but there are sporadic mentions of staffing and staff mobility in the report. The thematic evaluation report from 2024 reflects

on the importance of broadening teaching staff through collaborations and offering training. Overall, the panel finds that the coverage of ESG 1.5 in all QA activities of UKÄ is appropriate and sufficient.

vi) ESG 1.6 Learning resources and student support

ESG 1.6 is covered under all QA procedures of UKÄ. In the guidelines concerning institutional reviews, criterion *Student support, learning resources and infrastructure* addresses ESG 1.6. In the guidelines for the first- and second-cycle programme evaluations, the criterion *Assessment of staff resources* addresses how the expertise of teaching staff is utilised so that students can achieve the qualitative targets of the programme. For third-cycle programme evaluations, the criterion *Assessment of third-cycle programme environment* addresses doctoral students' study environment and student support structures in place. In the guidelines for the appraisal of applications for degree-awarding powers, ESG 1.6 is covered under criterion *Resources*, where equipment, library resources etc. should be described. In the guidelines concerning widening participation in HE thematic evaluation, criterion *Design, implementation and outcomes* covers ESG 1.6.

In the institutional review reports which the panel analysed, ESG 1.6 is covered through descriptions of student support services, facilities and infrastructure, and library resources. In the reports on the degree awarding powers, the following aspects were described: infrastructure, literature resources, and the accessibility of literature. In reports on thematic evaluations, there is no coverage of ESG 1.6 in one of the 2024 reports, but there is mention of the infrastructure in the report about the nursing thematic evaluation from 2024.

Overall, the coverage of ESG 1.6 in UKÄ's four EQA activities is sufficient, pertaining both to the coverage of the criteria in the guidelines and the criteria implementation in the reports. Concerning thematic evaluations, they are theme-based and do not necessarily involve full ESG coverage. In case of degree-awarding powers, further emphasis could be put on learning resources with consideration for students' diversity, and student support services. Institutional reviews could reflect more on the availability of learning resources.

vii) ESG 1.7 Information management

ESG 1.7 is covered in institutional reviews, under criterion *Continuous monitoring* and in thematic evaluation on widening participation in HE (criterion *Design, implementation and outcomes*).

E.g. in one report of an institutional review on education, ESG 1.7 is described by mentioning that the institution continually collects student evaluations, and annual reports on course and programme analyses are prepared. There is also a mention of a lack of an information management system for continuous monitoring.

The panel concludes that ESG 1.7 is covered in UKÄ's criteria and in the institutional review reports, although the use of data for further improvement of internal processes and programmes could gain more attention. As ESG 1.7 is covered only in institutional reviews, the panel wishes to highlight the importance of fully addressing ESG 1.7 in these reports.

viii) ESG 1.8 Public information

ESG 1.8 is covered in institutional reviews only, under three separate criteria, as listed in Table 5: *Established procedure and quality culture*, *Continuous monitoring* and *Periodic reviews*. In the report from April 2025, information pertaining to the quality development plan published on the intranet is given. Therefore, the coverage of ESG 1.8 in institutional reviews is considered sufficient by the panel, both in the criteria and the reports produced by UKÄ.

ix) ESG 1.9 On-going monitoring and periodic review of programmes

Institutional reviews (criteria *Continuos monitoring*, *Periodic reviews;* additional information under criterion *Established procedure and quality culture*) and the thematic evaluation on widening participation in HE (criterion *Design, implementation and outcomes*) cover ESG 1.9.

In the analysed institutional review report, the information was provided on the improvement of internal procedures at the HEI under the criterion *Established procedure and quality culture*. Furthermore, under the criteria *Continuos monitoring* and *Periodic reviews*, the monitoring of programmes is described, the implementation of feedback from different stakeholders in the QA system, and improving the programme quality. Issues related to programme quality enhancement were mentioned in the report analysed. The panel considers that there is sufficient coverage of ESG 1.9 in reports on institutional reviews, as well as in UKÄ's criteria.

x) <u>ESG 1.10 Cyclical external quality assurance</u>

ESG 1.10 is covered under institutional reviews, criterion *Periodic reviews*.

In the education report analysed, cyclical review (external and internal) was described under the criterion *Periodic reviews*. The panel finds the coverage of the ESG 1.10 sufficient for all institutional reports.

After reviewing the guidelines and reports the panel made some observations. One significant drawback of having ESG activities regulated both by UKÄ and by the Swedish Council for Higher Education is the lack of collected information on the coverage of the ESG. The panel had no access to evaluations of ESG standards per institution/programme against the legislation in place, to prove that there is, indeed, a way for UKÄ to oversee whether the institutions and programmes are ESG-compliant. However, the panel requested clarification on how the agency knows that the HEIs are compliant with ESG part 1 standards covered by the Swedish legislation. To the panel's understanding, the procedure is the following: once the HEI applies to be assessed by UKÄ, the agency's legal supervision department checks that the HEI complies with the Swedish legislation (including their responsibilities towards the Swedish Council for Higher Education). Once the legal supervision department clears the HEI, UKÄ begins the assessment procedure. This procedure is considered useful, but the panel still felt that this information should be made available in the reports. Furthermore, the panel wishes to make it clear that the reports on QA activities of UKÄ do not need to contain full information on those ESG standards covered by Swedish legislation, but the transparency in addressing how the ESG coverage is addressed by UKÄ could be improved. This could be done by the agency providing short statements, summaries or other sources (e.g. legal supervision reports) which systematically and clearly describe institutional/programmatic adherence to all standards belonging to ESG Part 1.

Additionally, during the analysis of the ESG compliance across the guidelines and reports, the panel noticed that the subjects of some ESG standards are addressed and described under more than one UKÄ criteria. For example, the subjects of ESG 1.7 and ESG 1.9 were both described under UKÄ's second institutional criteria, *Continuous monitoring*, where limited information was available on different aspects of each ESG. Since UKÄ's criteria are more open (joint definition of criteria, but no specific evidence is required to be demonstrated for compliance) and less prescriptive, different assessment panels provide different opinions in the reports, according to their views/expertise. Although it is commendable that the system is less prescriptive, UKÄ should be attentive that this does not lead to a lack of consistency in the provision of information within reports. This can be illustrated by the coverage of ESG 1.7 related to HEI's own programme evaluations. ESG 1.7 explicitly mentions that information should be collected, analysed and used to effectively manage programmes and other activities. However, the panel did not find information on the HEI's use of data for further improvement of internal processes and programmes in the reports of institutional reviews analysed.

Panel recommendations

2. UKÄ needs to ensure the full coverage of ESG 1.7 in institutional review reports, particularly related to how information at HEIs is analysed and used to effectively manage programmes and other activities.

Panel suggestions for further improvement

5. UKÄ could consider clearly describing institutional/programmatic adherence to all standards belonging to ESG Part 1 (including those addressed by the Swedish legislation) within their EQA processes.

Panel conclusion: compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

2020 ENQA full review recommendations

1. The panel recommends UKÄ to go further in reducing the HEIs' workload in its quality assurance activities. In doing so, UKÄ should consider to which extent the different activities can be integrated or complement each other better.

Evidence

UKÄ has adopted general guidelines related to institutional reviews, programme evaluations and the appraisal of applications for degree-awarding powers:

i) Institutional reviews: Guidelines for Reviewing the HEIs' Quality Assurance Processes for Education and Research.
ii) Programme evaluations: Guidelines for the Evaluation of First and Second-Cycle Programmes; Guidelines for the Evaluation of Third-Cycle Programmes.
iii) Appraisal of applications for degree-awarding powers: Guidelines for Applications for Degree-Awarding Powers.

These four documents are all in Swedish and in English and they are available on the webpages of UKÄ. The agency also publishes specific guidelines for each thematic evaluation separately. The guidelines pertaining to the past thematic evaluations (since 2020) are listed below:

i) Guidelines for Thematic Evaluation of Widening Participation in Higher Education 2020.
ii) Guidelines for Thematic Evaluation of Nursing Education 2022.
iii) Guidelines for Thematic Evaluation of Collaboration with the Surrounding Community 2024.

All guidelines related to thematic evaluations are also published online, on UKÄ's webpages.

UKÄ submitted a substantive change report to EQAR on the revised methodologies for all four EQA activities in February 2024. Some versions of the documents reported in the substantive change report to EQAR were later additionally modified by the agency. Only those newest versions were available to the panel. The panel's understanding is that the changes reported to EQAR in 2024 refer to these updated documents as well. As the Guidelines for Reviewing the HEIs' Quality Assurance Processes for Education and Research have only been revised on February 12th 2025, only a small number of reviews were conducted according to this revised version of the guidelines. UKÄ's revision of its methodology additionally served to reduce the workload for HEIs undergoing UKÄ's EQA activities. The last cycle of reviews lasted from 2017 to 2022, after which it was concluded that the procedures were quality enhancement-oriented, but resource-intensive. UKÄ began with the methodology revision in 2021, in collaboration with UKÄ's reference groups and the Advisory Council. A detailed procedure on the process of updating the guidelines is available in UKÄ's SAR (pg. 70-72). UKÄ states that the underlying principles of the newly developed methodologies rest on the same principles as the old ones (peer review and method development in consultations with HEIs and other stakeholders). Most of the ESG standards are addressed under institutional reviews. The new review cycle lasts from 2024 to 2030, and it will include the newly developed methodology. The new methodology includes fewer assessment criteria and the assessment areas, which existed in the old methodology, were abandoned. Before, institutional reviews contained only one report covering 18 standards, but now, two separate reports (for education and for research) are produced, covering eight standards per report. The new, more flexible system for determining programme evaluation cycles was developed as well, instead of the classical six-year cycles. UKÄ does not provide HEIs with a SAR template, rather letting the institutions choose the structure of their reports, covering the necessary standards. The panel met with HEI representatives during the site visit, who confirmed that the absence of the template is a welcome change as it allows institutions to showcase their unique perspectives and activities. In the new methodology, all institutions, regardless of the judgment on their EQA procedure, have to undergo a follow-up procedure. Concerning the appraisal of applications for degree-awarding powers, now the process requires institutions to complete their application before the assessment panel is appointed. Additionally, all assessment criteria have to be met to approve an application now. In the SAR (pg. 75), UKÄ recognises that the effects of the improved methodology are yet to be seen due to recent implementation. They also mention several activities that addressed the resource efficiency and workload distribution in EQA. For example, the 2022-2024 pilot study of a new working method in an evaluation of contract education at HEIs.

In most of its EQA procedures, UKÄ introduced dialogue-based discussions with stakeholders (guidelines on institutional reviews, pg. 18; guidelines on programme evaluations for first- and second-cycle programmes, pg. 10; guidelines on programme evaluations for third-cycle programmes, pg. 9-10; guidelines on thematic evaluation of collaboration, pg. 6). The dialogues can either be held after the evaluation process (in institutional reviews and programme evaluations) or before it (thematic evaluations). UKÄ also holds regular dialogues with the HEIs under evaluation, before and during the process, which was confirmed during the site visit. These initial meetings usually serve to explain the review process to HEIs, clarify any pending questions or concerns, etc. HEI heads and officers mentioned that they feel UKÄ's support during the evaluation process was appropriate. Meetings after reviews serve to identify good practices and areas for improvement, and they concern the review process, experts, EQA methodologies and other topics of interest to the meeting parties. To the panel's understanding, UKÄ introduced abovementioned dialogues in the process of amending their EQA methodologies, in an effort to increase the efficiency of EQA process' monitoring.

Analysis

The Guidelines UKÄ has in place for the EQA activities allow the institutions to plan their evaluation cycles transparently, approve members of the assessment panels, plan the activities and resources related to the EQA procedures, reflect on factual errors in reports, and submit complaints or appeals.

The panel is satisfied with the amount of work UKÄ invested in redesigning its previous EQA methodology, and it recognises the importance of a systematic and scientific approach to this process. The panel was able to confirm that all relevant stakeholders: HEIs, students, labour market representatives and international experts were involved in the revision of the past EQA methodologies. Thus, their contribution led to the formation of the new methodology, demonstrating to the panel the width of the stakeholder involvement in the continuous improvement and design of UKÄ's methodologies. Furthermore, the panel believes that the practice of conducting a pre-study consisting of dialogues with different QA stakeholders strengthened the relevance and the fitness-for purpose of the new methodologies. The agency is encouraged to continue this good practice.

In terms of workload reduction, during the site visit, the panel heard conflicting statements. On the one hand, UKÄ's staff received positive initial feedback from other public research institutions (e.g. Swedish Higher Education Council) on workload reduction, but they are yet to collect the feedback from HEIs. The Ministry also believes that the current methodology will reduce the workload for the HEIs. The HEI heads mentioned that the previous institutional review procedure required them to produce two SARs, which was time-consuming. Now, they only need to produce one SAR, making the process more resource-efficient. On the other hand, QA officers at HEIs mention that, although the number of criteria for institutional reviews decreased (18 in the previous methodology), it was not significant, as now they have to cover 16 criteria divided per two reports (eight criteria in each report). They recognise that the criteria are much clearer now and that removing the assessment areas made the evaluation more straightforward and fit-for-purpose, as there are fewer overlaps in the criteria. The ability to write their own SAR, without the limitations of a template, was welcomed by the QA officers at HEIs. They also expressed their gratitude at UKÄ for collecting feedback from the HEI officers regarding EQA processes, and trying to implement it wherever possible. HEI QA officers also mentioned that they appreciate that some reviews (mostly programme evaluations, thematic evaluations, appraisal of applications for degree awarding powers) are conducted online, as they are able to perform their tasks from home, and they find it more efficient. However, the panel also heard different opinions, depending on the institution and the type of EQA activity, on the workload reduction. In particular, some QA officers considered that the reduction of workload was indeed present, in particular for programme evaluations.

The panel recognises the diversity of the interviewees' experiences and the novelty of revised EQA methodologies. Therefore, it is the conclusion of the panel that, at this point in time, it is not possible to determine whether the workload has been reduced in a significant manner. However, due to all the reasons stated above, including positive attitudes of stakeholders and immense effort involved in the preparation of the new methodology by UKÄ, the panel remains optimistic about the workload reduction. The panel therefore suggests that UKÄ continues to monitor the implementation of the new methodology and react appropriately should they discover that the workload did not decrease as expected by the agency.

Having established follow-up processes for its EQA activities, even in cases of positive judgements, assures that the institutions have the possibility to demonstrate improvements based on UKÄ's EQA procedures. Stakeholders were aware of different outcomes of the EQA procedures, and knew what their responsibilities related to follow-up are.

The panel appreciates UKÄ's effort to develop individual guidelines for each thematic evaluation conducted, and considers that this practice should continue under each main topic identified. However, the panel still sees the possibility to further contribute to the systematic implementation of thematic evaluations through creating guidelines for thematic evaluations, as for the other three EQA activities of UKÄ. Instead of describing criteria (which can be identified via thematic guidelines like those currently in place), these guidelines could potentially focus on the process, thus not impacting or restricting the scope of thematic evaluations.

Taking into account all relevant information and documentation listed above, the panel considers the agency compliant with ESG 2.2 *Designing methodologies fit for purpose*.

Panel commendations

3. The panel commends the agency for conducting a pre-study on the development of new EQA methodology, in collaboration with all relevant stakeholders. This approach makes the entire process evidence-based and rooted in the defined actual needs of those stakeholders.

Panel recommendations

3. UKÄ should work on the development of a general document describing thematic evaluation procedures, to ensure that all developed guidelines follow a similar, systematic approach, fit-for-purpose.

Panel suggestions for further improvement

6. The panel suggests that UKÄ monitors the implementation of its revised EQA methodology and react appropriately should it be discovered that the workload did not decrease for the HEIs.

Panel conclusion: compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up

2020 ENQA full review recommendations

1. The panel recommends UKÄ to establish a pre-defined follow-up mechanism for programmes with a positive assessment in the appraisals of degree awarding powers aiming at supporting these programmes in maintaining high quality.
2. The panel also recommends UKÄ to more clearly define the follow-up procedures for those institutions and programmes that have received a positive assessment in the institutional reviews and in the programme evaluations.

Evidence

As mentioned under ESG 2.2, UKÄ has guidelines in place for each of its EQA activities, including separate guidelines for the thematic evaluations, depending on the topic. All guidelines are published and available on UKÄ's website.

EQA activities of UKÄ include the following processes:

i) Self-assessment (except for the appraisal of applications for degree-awarding powers).
ii) External assessment.
iii) Report resulting from the external assessment.

iv) Follow-up.

The content of the SAR HEIs submit for UKÄ's EQA activities (institutional reviews, programme evaluations and thematic evaluations) depends on the scope of the review and the purpose of the QA activities (SAR pg. 78). UKÄ conducts institutional reviews by performing two separate reviews - one concerning education, and the other concerning research. HEIs submit a single SAR, after which the processes for education and research are evaluated separately by a single assessment panel, and two reports are produced. All programme evaluations include a pilot study before the assessment is carried out. In case of the appraisal of applications for degree-awarding powers, no SAR is submitted. Instead, the HEIs submit an application, which has a similar function to SAR (SAR pg. 79). Self-evaluation reports of thematic evaluations can also have a different character, but they also refer to specific areas of assessment, as defined in the appropriate guidelines. The content of these self-evaluation reports for thematic evaluation includes HEIs' perspective on the current status of development, and it allows them to provide evidence of the implementation of different procedures (usually through document supplements).

External assessments are conducted for all four of UKÄ's EQA activities. However, in-person site visits are only applicable to institutional reviews in most cases. Programme evaluations could either include an in-person site visit (very rarely), or an online visit, while the external assessment of the applications for the appraisal of degree awarding powers and thematic evaluations is almost exclusively conducted online. Even before the coronavirus pandemic, UKÄ decided to replace the in-person site visits for programme evaluations with the online visits, as this process was deemed more resource-efficient. Concerning thematic evaluations, in-person site visits and interviews were replaced by dialogue-based workshops.

Reports are drawn up by the assessment panels and contain findings of the external assessment, including identified good practices and areas for improvement. Reports form the basis for the decisions on accreditation made by the Director General of UKÄ. Reports are published together with the decisions in UKÄ's database, which is publicly available in the Swedish language. Appraisal of applications for degree-awarding powers includes a production of a report in a form of statement. In it, the assessment panel makes a recommendation on whether the application should be granted or denied by UKÄ.

Follow-up processes are in place for all UKÄ's EQA activities, according to UKÄ's SAR (pg. 68), although there isn't a singular document with a detailed procedure for follow-ups. In the initial report, explicit recommendations are made by the assessment panels, which allow the HEIs to create action plans or in another way make plans on addressing the recommendations. Follow-up is described differently for each of the EQA procedures of UKÄ, and is available in the guidelines for those procedures. The only exception is the Guidelines for Applications for Degree-Awarding Powers, in which there is no explicit mention of the follow-up or elaboration of the follow-up process. It is only stated that "*higher education institutions are responsible for ensuring that they meet all relevant requirements from the time they receive their degree-awarding powers*" (pg.13). Since UKÄ does not have a document with a detailed procedure for follow-ups, the follow-up was briefly described in SAR (pg. 53-54). The follow-up for positively judged HEIs is a dialogue-based discussion on recommendations and development areas from the original review. It takes place approximately after one year from the initial evaluation. UKÄ, HEIs and the assessment panel members participate in the follow-up. No decisions are made on the follow-up of positively-judged institutions, and the guidelines concerning institutional reviews do not mention the production of a follow-up report for positively-judged institutions. In case the institutions were not positively judged, as there were certain issues identified, a different approach is taken. The follow-up for HEIs approved with reservations, and those under review, is conducted after a maximum of two years. HEIs have to follow-up based on the assessment criteria that were not fulfilled during the original review. A report on the follow-up is produced for HEIs approved with

reservations, and UKÄ makes a decision on the follow-up. Similar procedures are in place for programme evaluations. The Director General makes a decision on the programme evaluation outcome, made on a two-point scale: *high quality*, or *under review*. If a programme is under review, a follow-up is conducted after one year.

Analysis

Since the procedure for the appraisal of the application for degree-awarding powers does not involve the production of the SAR, the panel wanted to check to what extent the content of the application reflects the content of usual SARs. The panel wished to see whether all criteria according to the Guidelines for Applications for Degree-Awarding Powers are addressed in the application. For that purpose, one application was considered, from January 2025.

In the application, information on the fulfilment of UKÄ's criteria according to Annex 1 of the Guidelines for Applications for Degree-Awarding Powers is provided. All standards are addressed, and a template seems to be used for the application. Just like in regular SARs, the HEI offered descriptions on particular criteria, as well as provided the relevant evidence. An appendix containing the programme's curriculum was attached to the application.

The panel was curious about the transition of the agency to almost exclusively online external assessment for programme evaluations, appraisal of applications for degree-awarding powers and thematic evaluations. The reason for this curiosity is the inability to check the factual state of circumstances (eg. facilities and resources) related to a certain programme. Furthermore, in the document: "*Approval of the Application by Swedish Higher Education Authority (UKÄ) for Inclusion on the Register*", from March 2021, under point 11, EQAR Register Committee was concerned about the "*validation of findings in cases when the agency does not use site visits or interviews*". Therefore, the panel wished to clarify these two points during the site visit. The following was discovered:

i) Although programme evaluations, thematic evaluations and appraisals of applications for degree-awarding powers are performed online exclusively in the last years, should there be a need for a site visit (e.g. evaluation of the laboratory equipment), or a panel would request it, it could be funded and organised by UKÄ.
ii) The assessment panels for thematic evaluations sometimes have to write more than 30 reports (one per institution or one joint report with the descriptions per institution), therefore, online interviews are more fit-for-purpose than site visits.
iii) The interviewed external experts prefer online interviews due to the possibility for more people to participate in interviews, there is no need to travel (there are vast distances in Sweden with significant travel time, especially from/to more remote locations), and they believe that their in-person visit to the HEI would not alter the outcome of their assessment.

The panel also heard, from the meeting with the members of the Department of Quality Assurance, that sometimes evidence is asked from HEIs to demonstrate the truthfulness of their claims from SAR. For example, videos or photos of different facilities would have to be sent to the assessment panel.

The external experts mentioned to the panel that all HEIs underwent the first assessment cycle for UKÄ, so they are known to UKÄ and to other HEIs. This is one of the reasons they believe that experts visiting the HEIs is not necessary, as the HEI initially had to demonstrate their quality and appropriateness of facilities and technology for teaching and learning.

Ultimately, there are no regulations on conducting online interviews, as no issue was identified by the assessment panels or HEIs under review regarding this topic before. The panel does not see a growing concern for conducting online interviews, but it acknowledges the concern that the lack of procedural documents on conducting online interviews could lead to inconsistencies in drawing up conclusions

and forming judgements. To align fully with the purpose of the ESG 2.3, to have pre-defined, reliable and useful EQA processes, it would be useful for UKÄ to define the principles of working in an online assessment environment.

Reports on institutional reviews, programme evaluations and thematic evaluations, as well as recommendations (sometimes also called "*opinions*") on degree-awarding powers are available in UKÄ's online database, as checked by the panel. The database also contains follow-up reports. It was discovered that, at times, reports are displaced or not published together with the decisions (see ESG 2.1, 2.2), however, in most cases, they are easy to find through the search engine of the database.

The panel found that the database of reviews also contains the follow-up reports (e.g. in the case of the HEIs reviewed in April 2025). UKÄ's decision on the follow-up procedure, opinion of the assessment panel on the follow-up and supporting documents from HEIs involved in the review were also available. All folders of institutional reviews in UKÄ's database, pertaining to reviews included in the sample analysis by the panel, contained at least the self-assessment report of HEIs, a report from the assessment panel and UKÄ's decision.

The HEIs found the follow-up procedures mostly useful. They appreciated the dialogue-based follow-up concerning thematic evaluations. However, the panel also heard comments from the representatives of smaller HEIs, that, at times, the follow-ups on institutional reviews seem to come too soon (after two years), and that HEIs do not have the capacity to implement changes and report on them so quickly. Other HEIs mentioned that, in thematic evaluations, there are recommendations (so-called "*should suggestions*") and suggestions (so-called "*could suggestions*") issued by the assessment panels. Even in cases where the institution was not able to implement all the recommendations and suggestions, if sufficiently elaborated, UKÄ still judged their efforts positively in a follow-up. Thereby, the panel was able to confirm that UKÄ has established a pre-defined follow-up mechanism for all its EQA activities, even in cases where the initial judgement was positive. Specific examples for follow-ups on positive judgements could not be found by the panel at the time of preparation of this report (end of May 2025), due to the recent implementation of the new EQA methodology. The panel saw many examples of follow-ups on thematic evaluations (theme: broadened recruitment) in UKÄ's database. The panel welcomes the ongoing implementation of follow-up procedures on positively judged evaluations, so it deems the current guidelines as sufficient evidence on the improvement of follow-up procedures since 2020. The panel would also like to see that the follow-up procedures are described for the appraisal of degree-awarding powers procedures, within the respective guidelines. This would help the institutions prepare for the procedures and it would make this process clearer.

Panel recommendations

4. UKÄ should develop guidelines for carrying out online interviews as part of its EQA methodologies. This could ensure a systematic and consistent approach to online evaluations.
5. UKÄ should describe a follow-up process for the procedures for the appraisal of applications for degree-awarding powers, within the respective guidelines.

Panel conclusion: compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:
External quality assurance should be carried out by groups of external experts that include (a) student member(s).

Evidence

All of UKÄ's EQA activities include the appointment of the external expert panel (i.e., the assessment panel). The panels consist of members nominated by HEIs, SFS in the case of student appointments and labour market organisations in the case of labour market representatives. Alternatively, students can also be recruited from HEIs, should the SFS not be able to nominate a student of the needed profile. During the site visit, students' representatives were able to confirm that indeed, in rare cases where the SFS cannot provide the necessary nominations of students (e.g. if a student of a specific or rare study profile and study level is needed), the recruitment of students would also be performed through HEIs. Aside from these nominations, UKÄ can also recruit experts from other networks. In the SAR (pg. 84), UKÄ mentions the issue with recruiting assessors for the appraisal of applications for degree awarding powers.

UKÄ project managers select the assessment panel members based on pre-determined criteria for programme evaluations and the appraisals of applications for degree-awarding powers (e.g. compulsory knowledge, meritorious expertise, QA experience in an international context, etc). For institutional reviews, a departmental group selects the experts for the assessment in question. In case of programme evaluations and the appraisal of applications for degree-awarding powers, subject-specific expertise is a strict requirement. In institutional reviews, broader experience is necessary. Thematic evaluations require the panel members to have a broader knowledge of the topic under evaluation, so this is one of the main criteria for appointing assessors. Aside from assessing the experts' knowledge and expertise, UKÄ also takes into consideration the gender balance and geographical background of the assessors. UKÄ tries to involve international assessors in institutional reviews whenever possible (they are nominated by HEIs, QA agencies, or their contact was provided by other, previously engaged experts by UKÄ), though there are certain limitations present for their involvement. According to the Swedish Language Act, UKÄ's decisions on EQA procedures have to be written in Swedish. However, there are no legal restrictions related to UKÄ's ability to conduct EQA activities in English. The agency also performed assessments in English before, however, there were less assessments in English now compared to the 2020 review. The limited number of EQA activities in English is due to practical reasons, as explained by the agency. This is also why mostly Nordic international experts are used by UKÄ.

The panels are composed of the panel chair, a student, and if necessary, a representative of the organisation outside of academia. There is no designated secretary role, as each of the members of the review panel is responsible for drawing-up their part of the report, as agreed among the panel members. In case of thematic evaluations, where a bigger analysis is performed, a panel is composed comprising all abovementioned roles, but multiple people can have those roles. During the site visit, the panel found that in one thematic evaluation, where more than 35 SARs were submitted by HEIs, there were three chairs and two co-chairs, which divided the evaluations among themselves to more effectively manage the evaluations. Other members of the panel were then distributed to the evaluations in their field of expertise.

All experts have to undergo an online introductory course (implemented by UKÄ since February 2025) from the time they are appointed for the review by the time the assessment panel has their first meeting. The course was developed by a specific working group within UKÄ. This course provides an introduction to the context of the review (Swedish HE system), UKÄ's role, timelines and administrative procedures. The course also includes reflection areas pertaining to possible situations during the review. The online course is available to all experts during the entire evaluation, allowing them to revisit it, if necessary.

The objectivity of assessors is ensured through several steps. The institutions nominating experts need to reflect on possible conflicts of interest related to HEIs under review. Then, individual experts are

required to declare potential conflicts of interest before their appointment. Further on, the HEI under review is provided with the names of potential assessors, and they can state whether a potential conflict of interest, affecting objectivity in evaluation, is present. Lastly, before the assessors sign the contract on their appointment, they must sign a declaration of independence. All procedures related to the objectivity of assessors, applied by UKÄ, are based on the Swedish Administrative Procedure Act.

Analysis

UKÄ's assessment panels are made up of representatives from HEIs, students and labour market representatives, making the assessment panels diverse. The application of additional criteria, like gender balance and geographical balance, is helpful and increases the objectivity of the assessment panels.

During the site visit, the panel heard from HEIs' QA officers that the recruitment of assessors for the assessment of applications for degree-awarding powers is harder, probably due to very specific areas under assessment, and the lack of straightforward links to academic work. Additionally, the recruitment of international assessors is hard due to the requirements stated above, where the assessors need to possess an appropriate level of proficiency in the Swedish language to be able to participate in UKÄ's EQA procedures. The panel was also informed that institutions can request a full review to be conducted in English, although they still need to have all the documents in Swedish, and there would need to be simultaneous interpretation in the interviews. This would create a lot of work and additional costs for the institutions, so, since 2020, there have been no EQA procedures conducted in English. Stakeholders mentioned that the institutions are translating more documents in English (for some HEIs, up to 90 % of PhD students can be international), but that the procedures are still in Swedish. The heads of the departmental groups mentioned that no new, non-Nordic international experts have been recruited for UKÄ's EQA procedures since 2020.

UKÄ's project managers determine the composition of the assessment panels, with a formal decision made by the head of the departmental group, although there are no criteria for specific procedures (as explained by the members of the Department for Quality Assurance). In UKÄ's SAR (pg. 82), the selection is explained briefly. The guidelines on UKÄ's EQA procedures contain information on the competencies which are relevant concerning assessors (e.g. Guidelines for the Evaluation of First- and Second-Cycle Programmes, pg. 12; Guidelines for Reviewing the HEIs' Quality Assurance Processes, pg. 15). However, these documents do not describe how UKÄ performs the assessors' selection, i.e., chooses between candidates based on the appointment criteria. The procedure for the selection of experts was also not described in the invitation letters for nomination assessors, which the panel received. The panel considers that the procedures for the selection of experts could be better defined to increase the transparency of the selection process.

The composition of the expert panels, including the panel chair, a student and a labour market representative, is considered appropriate for all EQA procedures of the agency. The experts who participated in thematic evaluations (whom the panel met during the site visit) appreciated having bigger teams with multiple chairs, as the amount of work could be split, and it led to the clarity of the process. The panel was also told, in interviews with the UKÄ staff, that the only formally defined role in the panel is the role of the panel chair, and all other roles and responsibilities among panel members are shared. This contributes to the equality among panel members in terms of their responsibilities.

All experts must be trained before the start of the review, and UKÄ's project managers check for the completion of the online training course by assessors, as explained in the meeting with the representatives from the Department of Quality Assurance. The panel was curious about this procedure and whether UKÄ defines it as a requirement for the assessors. The representatives from the Department of Quality Assurance mentioned that the guidelines are currently being updated to

include the descriptions of the requirements for assessors' participation in reviews, which would include completing the online training course.

The panel confirmed, in the interviews with the HEIs' QA officers, that the objectivity of UKÄ's assessors is high, and that the panel composition was appropriate in cases of all institutions. They believe the process for the nomination and the appointment of assessors is transparent, although they see room for improvement in including QA experts in assessment panels. They believe that the panels currently offer a lot of academic and stakeholder expertise, but that there should be more experts in QA-related topics in the panels as well. Later, the panel found out that it is hard for the project managers to select QA officers or people with QA expertise in the panels, as the process is considered a peer-review, and peers are considered (not by UKÄ specifically, but rather societally in HE) to be only academics. Historically, the selection of experts was done by including only academics, and now UKÄ had issues when trying to expand the expertise of the assessment panels for institutional reviews, as HEIs considered that the switch of one academic from the panel, for a non-academic, impacts the understanding of the HEI in a negative way. UKÄ's management team mentioned that, in order to satisfy HEIs, they usually choose an academic with QA experience (e.g. someone from HEI's management who is responsible for QA processes), should they have such a person at their disposal. However, the panel noted that in the guidelines concerning institutional reviews (pg. 15), UKÄ states the following: "*The assessors should also have good knowledge and experience of quality assurance work in education and research at different levels*". Therefore, the panel believes that there are no obstacles for UKÄ to engage QA experts more in its EQA processes.

The panel also found out that UKÄ does not have a central system of experts, which is otherwise known as a "pool of experts". Instead, they receive nominations for particular procedures, and keep the names and data on the assessors only for the duration of those procedures. Although the panel understands UKÄ's concern for applying data protection practices, it would be beneficial for UKÄ to find a way to collect the information on assessors, which could be shared among different project managers, to cover those procedures for which the recruitment is difficult (degree-awarding powers applications, for example).

Panel recommendations

6. UKÄ should proactively strive to engage more experts with broad QA experience (eg. QA officers from HEIs or other QA experts) in its assessment panels.

Panel suggestions for further improvement

7. UKÄ could consider creating a procedure (either internal or external) for the selection of experts for the assessment panels based on different recruitment criteria (as established by the agency in the guidelines or in the nomination letters to HEIs). This could contribute to the increase in transparency and the reduction of bias when project managers are selecting the panel members.
8. UKÄ could look into the possibilities of establishing a database of assessors or look into other options that would allow UKÄ to consider nominated assessors in connection with more than one EQA activity.

Panel conclusion: compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

Evidence

As mentioned under ESG 2.1 Consideration of internal quality assurance, UKÄ adopted several guidelines that cover all of the four UKÄ's QA activities. The guidelines are publicly available on UKÄ's website, under the section Guidelines and templates.

Guidelines on institutional reviews contain information on UKÄ's QA activities, and they focus on the review of HEI's QA processes and their efficiency. To assess whether the institutions perform QA processes effectively, eight assessment criteria in line with the ESG (addressing internal and external QA processes) were developed, separately for research and education. These criteria serve as a basis for forming judgements on individual criteria. Criteria for education evaluations: 1. *Established procedure and quality culture*; 2. *Continuous monitoring*; 3. *Periodic reviews*; 4. *Establishment and discontinuation*; 5. *Student support, learning resources and infrastructure*; 6. *Competence supply and professional development*; 7. *Connection between research and education*; 8. *Student-centred learning*. After the report is completed by the assessment panel, it is sent to the HEI for factual accuracy check.

One of the three following decisions can be made by the Director General of UKÄ on the submitted report on institutional review: "*Approved QA processes"*; "*Approved QA processes with reservations*"; or "*Quality assurance processes under review*". In the guidelines for institutional reviews, the validity periods are not defined for each of these decisions, but each decision letter defines the upcoming follow-up deadline. The descriptions of when a certain judgment can be given are provided in the guidelines as well. Panel members provide judgements per criterion (*compliant / non-compliant*), as well as an overall judgement on the report. For *Approved QA processes*, the follow-up takes place approximately within one year of UKÄ's decision, and the QA processes are followed up with a dialogue on the recommendations and development areas described by the assessment panel in their report. *Approved QA processes with reservations* and *Quality assurance processes under review* are judgments for which the follow-up is performed no later than two years after the decision on the report was taken by UKÄ. However, there is no description of how the assessment panel members choose between the two latter judgments.

Guidelines pertaining to programme evaluations describe the assessment process design, implementation and evaluation. Under each assessment criterion description in all the guidelines, a short list of evaluation questions is provided. The basis for all decision-making on programmes are the SAR submitted by HEIs, degree projects, and findings from the interviews. The panel issues a preliminary opinion, which is consulted with HEIs for the identification of potential factual errors, and the final opinion with the suggested judgement is submitted to UKÄ. The panel also makes the judgements on individual criteria (compliant / non-compliant), which are showcased in the report. The decision on the programme evaluation is taken by UKÄ's Director General, on a two-level scale: *High quality* or *Under review*. In the guidelines for programme evaluations, the validity periods are not defined, but each decision letter defines the upcoming follow-up deadline. For programmes *Under review*, the follow-up takes place within one year, and the decision on this procedure can be either that the programme is now of high quality, or that HEI's degree-awarding powers are revoked (Guidelines for the Evaluation of First- and Second-Cycle Programmes, pg. 17).

The assessment criteria described in the Guidelines for Applications for Degree-Awarding Powers includes: i) *Degree/field of study/main field of study*; ii) *Staff*; iii) *Educational environment*; iv) *Resources*; v) *Policy documents*; vi) *Goal attainment*. The primary assessment material for the evaluation is the application submitted by the HEI, but interviews and additional documentation are considered too. The assessment panel makes a recommendation to UKÄ on the approval or dismissal of the application. In case a negative recommendation is proposed, the report of the assessment panel needs to include information on why one or more aspects are found insufficient. The initial report is checked for factual errors by the HEI under review, finalised and forwarded to UKÄ. UKÄ's Director General then makes a decision on the application, based on the judgements made by the panels in the reports received by the agency. The agency mentioned two cases where a different decision was made by the Director General, compared to that of the panel, concerning the appraisal of applications for degree-awarding powers. There were no instances where a different decision was made for institutional reviews. Such decisions were made after the discussions with the project manager took place, in which it was identified that the panel did not follow agency's procedures or if the findings contradicted the judgements. However, in both cases, before the decision was made by the Director General, the report was returned to the expert panel for reconsideration. The panel felt confident that such a procedure ensured the consistency in decision-making by the Director General of UKÄ.

UKÄ cannot make decisions on the applications from the Swedish University of Agricultural Sciences and the Swedish Defence University, as well as independent higher education providers (Guidelines for Applications for Degree-Awarding Powers, pg. 12). The report, UKÄ's position and recommendation on the approval or dismissal of the application are, in these cases, forwarded directly to the Government. In the Guidelines for Applications for Degree-Awarding Powers, on page 13, it is not strictly mentioned that the HEIs undergo follow-up procedures (see also ESG 2.3), and the process is not defined.

In case of thematic evaluations, each guideline document created is different, as the overarching topics are different. Therefore, the assessment criteria are different, and no generic criteria are in place. Thematic evaluations do not include the assessment panels making judgements on selected criteria. Instead, under a certain topic, each HEI receives the assessment panel's opinion on the work of that HEI, as well as recommendations for improvement.

The report-drafting process is characterised by many dialogues between the panel and UKÄ about the assessments and the production of the reports. In this dialogue, UKÄ seeks to support a consistent interpretation and use of its assessment criteria. UKÄ's Project Managers ensure that the procedures for the EQA activities are followed by the panel, and they use the Project Manager's Support Tool to help them with it. The usefulness of this tool in assuring the consistency of EQA procedures was confirmed in the discussions with both the representatives from the Department of Quality Assurance, and the representatives of HEIs, during the site visit.

In the SAR (pg. 88-89), UKÄ mentioned that the new methodology for institutional reviews ensured the reduction of overlaps in content between different previous criteria. The number of criteria for programme evaluations was also reduced compared to the old guidelines. Concerning the criteria for degree-awarding powers, now all criteria must be met in order to get the approval of the application, and the application has to be submitted in full before the assessment panel is appointed by UKÄ. The agency noted it is too early to conclude whether the current assessment criteria are clear enough, as the new guidelines were introduced only recently.

Analysis

Outcomes of institutional reviews, programme evaluations and the appraisals of applications for degree awarding powers include formal decisions as the outcomes of these EQA. Thematic evaluations result in the provision of recommendations by the assessment panel.

The panel evaluated whether the judgments and outcomes of UKÄ's EQA activities were consistently applied by the assessment panels, and whether the decisions made by UKÄ are based on the assessment panels' reports.

Concerning institutional reviews, the panel found a high level of consistency across all reports in judgements made by the assessment panels. In the institutional report on education (March 2025), all criteria were covered by the assessment panels in a systematic manner. The assessment panels made consistent decisions based on their findings and analysis. Those areas for improvement were directly linked to the criterion in question and UKÄ's description of it in the respective guidelines. In the decision on reports concerning the same evaluation, the documents for forming the assessment decision were listed, and the reasoning for the final decision of UKÄ was provided. Information on the follow-up was provided as well.

The outcomes of the programme evaluations of EQF levels 6 and 7 were made consistently, even though the panel is aware of the specificity of these two reports (see ESG 2.6), which do not correspond to UKÄ's usual programme evaluations. In case of the thematic report on programme evaluations from November 2021, the criteria still referred to staff and goal attainment, and reflected the description of UKÄ's criteria for a programme at this study level. In the thematic report mentioned, no information was provided on the follow-up, but the panel recognises that multiple institutions with different judgments were evaluated. Therefore, the panel checked, during the site visit, whether information on the follow-up is shared with the institutions, and confirmed this in interviews with HEI representatives.

The reports of the programme evaluations of EQF level 8 both follow the old guidelines, but the judgements are systematically presented and well-substantiated in both reports analysed. Decisions made by UKÄ, based on the assessment panels' reports contain similar information to the one presented in the institutional review reports, with the exception of the information on follow-up procedures, which was not included. The overall judgement on the procedure was substantiated and the report produced by the panel was referenced in the decisions.

All three reports concerning the appraisal of applications for degree-awarding powers contained judgements which were substantiated with evidence from the review procedures.

The reports on thematic evaluations performed in October and November 2024, as mentioned under ESG 2.6, did not contain information on the assessment panel. Additionally, the report from March 2021, as well as the report from November 2024, contained a description of the national follow-up, while the report from October 2024 did not contain any general descriptions of the thematic evaluation in question. Recommendations in all reports were given based on analysis and explanations provided by the assessors in the main body of text under each criterion. The panel confirmed during the site visit, in discussions with HEI representatives, that indeed, UKÄ provides both recommendations and suggestions ("could recommendations") for improvements in thematic evaluations, and these are found valuable. Decision letters from March 2024 and November 2024 contain the names of the assessors involved in thematic evaluations, their affiliations and role in the panels. Additionally, references to the assessment procedure are provided, and the judgement on the approval of the thematic analysis is given.

Overall, the review panel is satisfied with the presentation of the review outcomes and the elaboration of judgments by the assessment panels in all UKÄ's EQA activities. The panel further recognises the inability of the agency to ensure full consistency between individual thematic evaluations, and does not see this as a barrier, but rather as an advantage. This is due to the different criteria applied between thematic evaluations. Moreover, the consistency across thematic evaluation reports is ensured through the procedures. For example, judgments are based on evidence, and recommendations and suggestions are provided. Decisions on thematic evaluations always refer to the underlying reports.

Furthermore, the panel found that the Project Manager's Support Tool helps with the assurance of consistency in the production of reports and conducting EQA activities.

With the adoption of the new EQA methodology by UKÄ, tabular report templates were replaced with narrative reports. This change resulted in having reports with a more detailed analysis section, which was seen as an improvement by the panel. Therefore, the panel commends the agency for introducing this change, as it allowed the panels to more effectively elaborate their judgements compared to the tabular template.

The panel is aware of the recent implementation of new guidelines, however there were only a few reports available for analysis, which followed the new guidelines, as mentioned under ESG 2.1. Therefore, the panel decided to look at the available reports that followed the new guidelines, for three of the four EQA activities of UKÄ: institutional reviews, appraisals of applications for degree-awarding powers and thematic evaluations. In case of programme evaluations (all three cycles), no reports were available according to the newly updated guidelines. In this case, the panel reviewed several, at random selected, reports available from the period between the past ENQA review in 2020, and this review. Ultimately, the panel saw a high level of consistency across reports in the past evaluation cycle, and the same is indicated through the reports evaluated so far, applying the new EQA methodology.

Panel commendations

4. The panel commends the agency for switching from a tabular template for assessment panels' reports to a narrative one. The panel is of the opinion that this new template allows the panels to be more consistent in forming their judgements.

Panel conclusion: compliant

ESG 2.6 REPORTING

Standard:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

Evidence

All four QA activities of UKÄ result in the production of a report, followed by the agency's decision or recommendation. In case of the procedure for the appraisal of applications for degree-awarding powers, the report is referred to as "statement", as the panel provides a recommendation on granting the application or its denial. All reports and decisions/recommendations are available publicly on UKÄ's webpage, including those with a negative outcome. The reports are available predominantly in Swedish, and the database is only available in Swedish language as well. It is relevant to note that UKÄ publishes follow-up procedures in their database too, and in the folders of those follow-ups, the report and the decision from the original review are present as well. According to UKÄ's SAR, all information and documentation on procedures are usually made available the day after the final decision on the evaluation is made by UKÄ.

In the guidelines for all four EQA procedures, the dialogue between HEIs and UKÄ is highlighted, and all HEIs under review have the possibility to check for the factual accuracy of reports before the report is finalised by the expert panel and submitted to UKÄ.

Reports usually contain the following information: the composition of the panel, information on the site visit, assessment of the fulfilment of UKÄ's criteria according to the respective guidelines for each procedure, and judgements of the assessment panel on compliance (if applicable). UKÄ checks the reports for the coverage of the assessment criteria and for clarity. This is a time-consuming process as it follows all stages of the review process, starting from training the experts. UKÄ also provides the experts with a report template, which was recently changed from a digital form where the panels would have to enter data (this produced tabular reports), to a new template, which is more narrative. In this narrative report, longer descriptions of findings under each standard are provided.

The agency recognises the need to provide information related to the outcomes of their EQA activities in English (SAR pg. 91).

Analysis

The panel was able to confirm that UKÄ regularly publishes reports in their database, and that the database is freely accessible to everyone, in Swedish language. The availability of reports only in Swedish is perceived by the panel as a limitation to agency's QA activities, as interested international experts or professionals are unable to read the reports published. Despite the agency adhering to the Swedish Language Act (no: 2009:600), in Section 10 of the Act, pertaining to the use of language in the public sector, no limitations are set for using English translations (or other foreign languages). In Section 13 of the Act, it is mentioned that "Swedish is the official language of Sweden in international contexts", which could limit the agency in its internationalisation activities, but having English translations alongside original documents in Swedish could not only foster international cooperation, but also gain the agency additional visibility.

Publishing follow-up reports and decisions together with the original review is useful, as it helps the reader understand the context under which the review was taking place. In case of issues with the quality of programmes, the most recent information on the follow-up review (containing UKÄ's decision and the HEI's action plan based on the past review) is followed by the information (decision, report, supplementary documents) from the previous review.

Based on the reports analysed under ESG 2.1 Consideration of internal quality assurance, the panel made the following observations:

i) Reports on institutional reviews

In all reports concerning institutional reviews, both concerning full-reviews and follow-up procedures, the following aspects were defined: the scope of work of the assessment panel (explaining the rationale of the review); the composition of the assessment panel; legislation and regulations pertaining to the review, overall judgement by the assessment panel; and judgements on the fulfilment of UKÄ's criteria by the assessment panel. Consistent use of judgments on criteria is used throughout reports. The assessment criteria are described in the report, and the judgments on those criteria are given right after the criteria title (also described under ESG 2.5). In all three reviews, panels collected sufficient evidence to justify their judgements on criteria, and they often pointed to good practices or shortcomings related to institutional activities. If shortcomings were identified, recommendations were provided by the panel on how to avoid/mitigate them. In the Dalarna University report, under each criterion, sections "Strengths" and "Areas for development" were listed, which is useful as it focuses reader's attention on most relevant findings.

ii) Reports on programme evaluations

One evaluation from November 2021 includes a table with the descriptions of standards and judgements, while in another report from November 2021, the descriptions are narrative rather than tabular (as new report template was used). During the site visit, the panel found out that two

reports chosen by the panel for the analysis within this report are considered "non-typical" by UKÄ. This is due to one of the reviews being conducted due to students' complaints, which is a rare occurrence. The other report was paired with the theme of the thematic evaluation. Furthermore, not all of the programmes evaluated thematically concerned HE provision, as some were organised as trainings embedded in programmes. Therefore, national criteria were followed instead of UKÄ's criteria. However, UKÄ's management stated that, should the programmes want to be conducted at HEIs, they would still have to be evaluated according to UKÄ's criteria. The panel was satisfied with the agency's response.

The panel could not find a separate report of the assessment panel for the follow-up procedure of one programme from November 2021 and one from October 2023. However, in case of another follow-up from October 2023, a separate follow-up report was published. In the evaluated follow-up decision on the programme from May 2023, it was mentioned that a panel of experts was appointed to evaluate the HEI's action plan, and their statement (tabular report) was annexed. The recommendations for further follow-up were available. The analysis and evidence for forming judgements was deemed appropriate in the report.

iii) Reports on the appraisal of degree-awarding powers

The two reports from 2022 were tabular, due to the use of old report template, while the report from January 2025 was narrative. All institutions were assessed against the same criteria, and the analysis provided by the assessment panels in reports justified their judgements sufficiently. At the beginning of each report, a summary with justification of the assessment panel's recommendation on judgement was provided.

iv) Reports on thematic evaluations

The reports on thematic evaluations contain the reflections and summaries of the assessment panel pertaining to the development or implementation of the thematic evaluation topic at a particular institution. The structures of the reports vary: the report from November 2024 contains a national summary, with the tabular individual summaries for each HEI evaluated. In none of the evaluated reports were the names of the assessment panels for particular thematic evaluation given. Only their roles were described and the activities carried out. Tabular summary of analysis and recommendations for the report from March 2024 is available in the folder on UKÄ's database, and the report pertains specifically to that institution. In the thematic evaluation report from October 2024, the analysis was performed and recommendations were made specifically for that institution. No summary of findings was provided in this report.

The panel also noticed that, in some cases, UKÄ's criteria were numbered in reports (institutional reports from April 2025 and March 2023), while in others, they weren't. It would be good for UKÄ to consider numbering the criteria for easier readability and search through the reports.

Overall, the panel found that for all evaluated reports, the judgements made by the panels were sufficiently covered by analysis and evidence. The assessment panels also helped in identifying good practices and areas for improvement or follow-up. Tabular reports were more concise compared to narrative reports, although the narrative reports allowed the panels more freedom to describe their findings and substantiate their judgements. The new template for reports is the one of narrative character, and the panel finds it an improvement compared to the old tabular template. The panel noticed that, in several cases, there were inconsistencies in the publishing of follow-up reports (no separate report is available, or the report is in the folder of the original evaluation), which made the information less accessible. Additionally, it would be useful to have the names of the people who are members of the thematic evaluation and follow-up assessment panels listed in the reports they produced. Having a summary of the reports available in English would help the

agency reach the international higher education community experts (those who do not speak Swedish), sharing experiences and good practices, and increase the agency's visibility within the European Higher Education Area (EHEA). That being said, the panel finds that overall, the agency complies with ESG 2.6 *Reporting*, as they publish full reports together with the decisions made based on those reports.

Panel suggestions for further improvement

9. The agency could ensure that all follow-up decisions published in its database are accompanied by a separate follow-up report in the folder of that very follow-up.
10. The names of the assessment panel members could be added to all thematic evaluation reports and to all follow-up reports (even in cases where the assessment panel is identical to the one from the original review).
11. The agency could consider producing summaries in English of reports that could be interesting for the international community, as well as provide access to UKÄ's database in English language.
12. UKÄ could consider the possibility of numbering their criteria, for easier tracking of the content within reports.

Panel conclusion: compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:
Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

2020 ENQA full review recommendations

1. The panel recommends the agency to establish a complaints procedure. The procedure should be made known to all concerned parties.
2. The panel recommends extending the powers of the appeals committee to make recommendations to UKÄ on how to correct errors in quality assurance procedures that potentially can have affected the assessment outcome.

Evidence

Since the last ENQA review in 2020, no appeals were lodged, and a permanent Appeals Committee was formed. UKÄ's Appeals Committee is an external expert group that has the possibility to make recommendations upon the review of an appeal (SAR pg. 93). The possibility to give recommendations was introduced after the last ENQA review. The role of the Appeals Committee is described in the Guidelines for the Reassessment of Decisions within External Quality Assurance of Higher Education, and is aligned with The Administrative Procedure Act (2017:900). The Guidelines are published and UKÄ makes sure in its communication that HEIs are aware of the appeals procedure, which was confirmed by the HEIs during the site visit.

The Appeals Committee is formed of three members and three alternate members appointed by UKÄ, following a call for nominations sent to HEIs. This call describes the set criteria for the appointments, such as good knowledge of Swedish HE, QA experience, management experience and legal training. Members of UKÄ's advisory or reference groups cannot be appointed to the Appeals Committee.

UKÄ appoints a Chair and Vice-Chair of the committee. The members of the Appeals Committee are appointed for three years with the possibility of renewal.

HEIs can appeal UKÄ's decisions on EQA procedures, after which the Appeals Committee is convened and the appeal is processed. If a member of the Appeals Committee has a conflict of interest, which may be indicated by the HEI lodging the appeal, this member has to refrain from the deliberations and is replaced by an alternate member. UKÄ's staff supporting the work of the Appeals Committee must not have participated in the appealed review. A staff member from the legal department of UKÄ may assist the Appeals Committee if needed. The Appeals Committee considers the appeal based on whether deficiencies in conducting an EQA process could be detected and whether such deficiencies could have affected the outcomes of the review (decisions, judgements). The Appeals Committee can also make recommendations on further handling the appeal. In case deficiencies potentially impact the decisions made in the report, based on the Appeals Committee's recommendations, UKÄ's Director General can decide to perform a renewed assessment of the criteria or review in question.

Following the recommendations from the last ENQA review, UKÄ also established a complaints procedure in 2024, although no complaints were lodged against UKÄ so far. A complaint can be filed by HEIs' vice-chancellors directly to UKÄ's secretariat. The secretariat then forwards the complaint to the head of the Department of Quality Assurance, or to the Director General, in case the complaint concerns the former. Upon receiving the complaint, the head of the Department of Quality Assurance would review it and contact staff from UKÄ responsible for a particular procedure mentioned in the complaint, to address it. This explanation was given to the panel during the site visit, as no cases of procedural handling of complaints was available, since no complaints were lodged so far. The agency has published Guidelines for handling complaints which describe this procedure. During the interviews, HEIs indicated that they were aware of the possibility to file a complaint and that the agency disseminates this information to HEIs.

Analysis

The panel considers that adding the possibility to the Appeals Committees to give recommendations to UKÄ on how to correct errors in quality assurance procedures fully addresses the second recommendation of the 2020 ENQA review panel. Furthermore, the establishment of a permanent Appeals Committee with explicit guidelines is a step forward in assuring the continuity and systematic approach to handling appeals in the future.

In the discussions between the panel and HEIs, during the site visit, it was clear that the HEIs were familiar with the possibilities to file either appeals or complaints to UKÄ. However, they all stated that, due to the dialogue culture and multiple meetings with the agency during EQA processes, even potential concerns are discussed and mitigated. The HEI representatives also mentioned that they consider the appeals and complaints as procedures which should not be used unless gross mistakes were noticed. Therefore, even if they disagreed with some judgements made by the assessment panels, they would not appeal, as the judgements are usually well substantiated. This was also reiterated by UKÄ in its SAR (pg. 95), mentioning the culture of openness and dialogue in QA, as well as by the members of the Appeals Committee during the site visit.

In the interview with the Appeals Committee, the panel found that no special training is organised for the members of this committee, although they did receive all necessary information from the agency when the Appeals Committee was installed. The Appeals Committee members do not have regular meetings but they would be able to organise and meet quickly in case of an appeal. During the site visit it was indicated that, for reasons of continuity and updating on developments in procedures, it could be beneficial to hold an annual meeting of the Appeals Committee with representatives of the agency.

The panel was also satisfied that the members of the Appeals Committee, as well as the head of the Department of Quality Assurance, were well informed on the procedures of appeals and complaints, respectively, despite there being none in the past five years.

Panel conclusion: compliant

CONCLUSION

SUMMARY OF COMMENDATIONS

ESG 3.1 Activities, policy and processes for quality assurance

1. The panel finds it commendable that UKÄ actively involves a broad range of stakeholders in the development of its methodologies and through other bodies (Advisory Council, reference groups), and implements stakeholders' feedback wherever possible.
2. The panel commends UKÄ for their efforts and engagement with the student community, concerning both EQA procedures and other QA-related initiatives.

ESG 2.2 Designing methodologies fit for purpose

3. The panel commends the agency for conducting a pre-study on the development of new EQA methodology, in collaboration with all relevant stakeholders. This approach makes the entire process evidence-based and rooted in the defined actual needs of those stakeholders.

ESG 2.5 Criteria for outcomes

4. The panel commends the agency for switching from a tabular template for assessment panels' reports to a narrative one. The panel is of the opinion that this new template allows the panels to be more consistent in forming their judgements.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, UKÄ is in compliance with the ESG. The agency was found to be compliant with all ESG standards. The overview of recommendations is provided below.

ESG 3.6 Internal Quality Assurance and Professional Conduct

1. UKÄ should consider developing a singular policy on internal quality assurance, which could help the agency in defining its internal quality assurance system and its activities, as well as applying those processes more systematically

ESG 2.1 Consideration of internal quality assurance

2. UKÄ needs to ensure the full coverage of ESG 1.7 in institutional review reports, particularly related to how information at HEIs is analysed and used to effectively manage programmes and other activities.

ESG 2.2 Designing methodologies fit for purpose

3. UKÄ should work on the development of a general document describing thematic evaluation procedures, to ensure that all developed guidelines follow a similar, systematic approach, fit-for-purpose.

ESG 2.3 Implementing processes

4. UKÄ should develop guidelines for carrying out online interviews as part of its EQA methodologies. This could ensure a systematic and consistent approach to online evaluations.
5. UKÄ should describe a follow-up process for the procedures for the appraisal of applications for degree-awarding powers, within the respective guidelines.

ESG 2.4 Peer-review experts

6. UKÄ should proactively strive to engage more experts with broad QA experience (eg. QA officers from HEIs or other QA experts) in its assessment panels.

SUGGESTIONS FOR FURTHER IMPROVEMENT

ESG 3.3 Independence

1. The panel encourages UKÄ to continue to maintain a good and open dialogue with the ministry representatives, to ensure the financial security of the agency.
2. UKÄ could explore mechanisms for improving governance and its decision-making procedures pertaining to the role of the Director General as the sole decision maker. This could potentially mitigate the stakeholders' concerns pertaining to the dismissal of the Director General and/or governmental influence.

ESG 3.4 Thematic analysis

3. UKÄ could increase its efforts to involve stakeholders more directly in planning thematic analyses, as they offer an external perspective on the needs/opportunities/improvement areas in higher education.

ESG 3.6 Internal quality assurance and professional conduct

4. UKÄ could periodically conduct formalised employee satisfaction surveys to collect employees' feedback, reflect on UKÄ's practices and inform the public about their activities.

ESG 2.1 Consideration of internal quality assurance

5. UKÄ could consider clearly describing institutional/programmatic adherence to all standards belonging to ESG Part 1 (including those addressed by the Swedish legislation) within their EQA processes.

ESG 2.2 Designing methodologies fit for purpose

6. The panel suggests that UKÄ monitors the implementation of its revised EQA methodology and react appropriately should it be discovered that the workload did not decrease for the HEIs.

ESG 2.4 Peer-review experts

7. UKÄ could consider creating a procedure (either internal or external) for the selection of experts for the assessment panels based on different recruitment criteria (as established by the agency in the guidelines or in the nomination letters to HEIs). This could contribute to the increase in transparency and the reduction of bias when project managers are selecting the panel members.
8. UKÄ could look into the possibilities of establishing a database of assessors or look into other options that would allow UKÄ to consider nominated assessors in connection with more than one EQA activity.

ESG 2.6 Reporting

9. The agency could ensure that all follow-up decisions published in its database are accompanied by a separate follow-up report in the folder of that very follow-up.
10. The names of the assessment panel members could be added to all thematic evaluation reports and to all follow-up reports (even in cases where the assessment panel is identical to the one from the original review).
11. The agency could consider producing summaries in English of reports that could be interesting for the international community, as well as provide access to UKÄ's database in English language.

12. UKÄ could consider the possibility of numbering their criteria, for easier tracking of the content within reports.

ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
[28.04.2025] - Online meeting with the agency's resource person				
1	09:00-10:30	Review panel's kick-off meeting and preparations for site visit	Review panel.	
2	10:30-11:30	An online clarifications meeting with the agency's resource person regarding the specific national/legal context in which an agency operates, specific quality assurance system to which it belongs and key characteristics of the agency's external QA activities	Senior Analyst, Institutional Reviews group, > 5 years at UKÄ. Senior Analyst, Programme Evaluations group. > 10 years at UKÄ.	Mark Frederiks
[18.05.2025] – Day 0 (pre-visit)				
3	16:00-19:00	Review panel's pre-visit meeting and preparations for day 1	Review panel	
[19.05.2025] – Day 1				
	09:00-09:30	Review panel's private meeting	Review panel	
4	09:30-10:15	Meeting with the three heads of group of the Department of Quality Assurance	Acting Head of the Institutional Reviews group, < 5 years at UKÄ. Acting Head of the Programme Evaluations group, < 5 years at UKÄ. Head of the Cooperation and Internationalisation group, < 5 years at UKÄ.	Inge Enroth
	10:15-10:30	Review panel's private meeting	Review panel.	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
5	10:30-11:15	Meeting with the Director General, Deputy Director General and the Head of the Department of Quality Assurance	Director General, 1,5 years at UKÄ. Head of Department of Higher Education Analysis and Deputy Director General, < 1 year at UKÄ. Head of Department of Quality Assurance, 1 year at the agency, 1 year at UKÄ.	Mark Frederiks
	11:15-11:30	Review panel's private discussion	Review panel.	
6	11:30-12:15	Meeting with the team responsible for preparation of the self-assessment report	Analyst/Project manager, Department of Quality Assurance, > 5 years at UKÄ. Analyst, Department of Quality Assurance, < 5 years at UKÄ (online). Analyst, Department of Quality Assurance, 1 year at UKÄ.	Adrian Korzeniowski
	12:15-13:15	Review panel's private discussion and lunch (review panel only)	Review panel	
7	13:15-14:00	Meeting with representatives from the Department of Quality Assurance responsible for: • institutional reviews; • thematic evaluations.	Senior Analyst, > 10 years at UKÄ. Senior Analyst, > 5 years at UKÄ. Senior Analyst, > 10 years at UKÄ. Analyst, > 5 years at UKÄ. Analyst, > 5 years at UKÄ. Analyst, < 5 years at UKÄ. Analyst, < 5 years at UKÄ. Analyst ,< 5 years at UKÄ.	Inge Enroth
	14:00-14:15	Review panel's private discussion	Review panel	
8	14:15-15:00	Meeting with representatives from the Department of Quality Assurance responsible for: • programme evaluations; • appraisal of applications for degree-awarding powers.	Senior Analyst, > 10 years at UKÄ. Senior Analyst, > 10 years at UKÄ. Analyst, > 5 years at UKÄ. Analyst, < 5 years at UKÄ. Analyst, < 5 years at UKÄ. Analyst, < 5 years at UKÄ. Desk Officer, < 5 years at UKÄ.	Mark Frederiks

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
	15:00-15:15	Review panel's private discussion	Review panel	
9	15:15-16:00	Meeting with representatives from the Department for Operational Support, Department of Higher Education Analysis, Department of Legal Affairs.	Head of Department for Operational Support, < 1 year at UKÄ. Strategist, Department for Operational Support, > 10 years at UKÄ. Head of Communications Unit, Department for Operational Support, > 10 years at UKÄ. Head of Department of Higher Education Analysis, < 1 year at UKÄ. Senior Analyst, Department of Higher Education Analysis, < 5 years at UKÄ. Head of Department of Legal Affairs, < 1 year at UKÄ. Deputy Head of Department of Legal Affairs, > 10 years at UKÄ.	Adrian Korzeniowski
	16:00-16:15	Review panel's private discussion	Review panel	
10	16:15-17:00	Meeting with the members of the Advisory Council	<u>Before and after 1 May 2025:</u> Vice-Chancellor Lund University (online). <u>Before 1 May 2025:</u> Professor and Director of LINK – Centre for Learning, Innovation & Academic Development, University of Oslo, Norway (online). Swedish National Union of Students (SFS) representative (online). <u>From 1 May 2025:</u> Swedish National Union of Students (SFS) representative (online).	Inge Enroth
11	17:00-18:00	Wrap-up meeting among panel members and preparations for day 2	Review panel	
	19:00	Dinner (panel only)	Review panel	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
[20.05.2025] – Day 2				
	09:00-09:30	Review panel's private meeting	Review panel	
12	09:30-10:15	Meeting with the representatives from the Ministry of Education and Research	Deputy Director-General, Division for Higher Education, Ministry of Education and Research. Deputy Director, Division for Higher Education, Ministry of Education and Research. Division for Higher Education, Ministry of Education and Research.	Mark Frederiks
	10:15-10:30	Review panel's private meeting	Review panel	
13	10:30-11:15	Meeting with the representatives of the UKA Appeals Committee, Head of the Department of Quality Assurance.	Deputy Vice-Chancellor,Dalarna University. Associate professor, Chair of Quality Committee, Linnaeus University (online). Head of Department of Quality Assurance, 1 year at UKÄ.	Adrian Korzeniowski
	11:15-11:30	Review panel's private discussion	Review panel	
14	11:30-12:15	Meeting with heads of some reviewed HEIs/ HEI representatives	Vice-Chancellor, Karlstad University, institutional review 2021-2023, programme evaluation 2023-2024. Vice-Chancellor, Royal College of Music, institutional review 2019-2020 (online). Vice-Chancellor, Dalarna University, institutional review 2024-2025 (online). Vice-Chancellor ,Luleå University of Technology, institutional review 2021-2023, programme evaluation 2023-2024 (online). Pro-Vice-Chancellor, Blekinge Institute of Technology, institutional review 2021-2023. Pro-Vice-Chancellor, Stockholm University, institutional review 2020-2021.	Inge Enroth

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Pro-Vice-Chancellor University of Borås, institutional review 2024-2025 (online).	
	12:15-13:15	Review panel's private discussion and lunch (review panel only)	Review panel	
15	13:15-14:00	Meeting with quality assurance officers of HEIs	Quality Assurance Coordinator, Faculty Office, Örebro University, institutional review 2021-2023, programme evaluation 2024-2025 (online). Project manager, University Administration: Division for Quality Enhancement; Quality and Evaluation, Uppsala University, institutional review 2020-2021, programme evaluation 2024-2025. Quality Coordinator, Sophiahemmet University, institutional review 2018-2019. Quality Coordinator, Professional Services – Academic Affairs Office, University of Borås, institutional review 2024-2025. Research and Education Strategist, Office of Management Support and Finance/Planning and Analysis Unit, Dalarna University, institutional review 2024-2025 (online). Coordinator and Secretary of the Quality Committee, Vice-Chancellor's Office, University of Gothenburg, institutional review 2020-2021, programme evaluation 2024-2025 (online). Educational Director, University Services – Planning and Finance Division, Linköping University, institutional review 2020-2021, programme evaluation 2024-2025 (online). Analyst, Planning Office, Umeå University, institutional review 2020-2021, programme evaluation 2024-2025 (online).	Mark Frederiks
	14:00-14:15	Review panel's private discussion	Review panel	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
16	14:15-15:00	Meeting with UKA's external experts: subject experts, student experts, and labour market representatives.	Professor, University of Agder, e.g. institutional review 2024-2025, (online). Pro Vice-Chancellor, Karlstad University, thematic evaluation Collaboration with surrounding community 2024 (online). Professor, Royal Institute of Technology (KTH), programme evaluation 2023-2024 (online). Senior Lecturer, University of Gothenburg, programme evaluation 2024-2025 (online). Chair, Uppsala Union of Engineering and Science Students, Uppsala University, appraisal of applications for degree-awarding powers 2024-2025.	Adrian Korzeniowski
	15:00-15:15	Review panel's private discussion	Review panel	
17	15:15-16:00	Meeting with stakeholders, such as employers, Association of HEIs (SUHF), international stakeholders	Director of Integration Directorate, Quality and Qualifications Ireland (QQI) (online). Secretary General, Association of Swedish Higher Education Institutions (SUHF). Swedish Association of University Teachers and Researchers (SULF). Association of Swedish Higher Education Institutions (SUHF)/ Head of Division for Quality Enhancement, Uppsala University. Analyst Education Policy, Swedish Confederation of Professional Associations (SACO). Expert/Research and Innovation Coordinator, Swedish Association of Local Authorities and Regions (SKR/SALAR) (online). Advisor, Swedish Association of Local Authorities and Regions (SKR/SALAR).	Inge Enroth
	16:00-16:15	Review panel's private discussion	Review panel	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
18	16:15-17:00	Meeting with students: members of the Swedish National Union of Students	Deputy Chair SFS. Student representative SFS.	Adrian Korzeniowski
19	17:00-18:00	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions	Review panel	
	19:00	Dinner (panel only)	Review panel	
[21.05.2025] – Day 3				
20	09:00-09:30	Meeting among panel members to agree on final issues to clarify	Review panel	
21	09:30-10:30	Meeting with the Director General, Deputy Director General and the Head of the Department of Quality Assurance to clarify any pending issues	Director General. Head of Department of Higher Education Analysis and Deputy Director General. Head of Department of Quality Assurance.	Mark Frederiks
22	10:30-12:00	Private meeting between panel members to agree on the main findings	Review panel	
	12:00-13:00	Lunch (panel only)	Review panel	
23	13:00-13:30	Final de-briefing meeting with staff of the agency to inform about preliminary findings	Director General. Head of Department of Higher Education Analysis and Deputy Director General. Head of Department of Quality Assurance. Head of Department for Operational Support. Head of Department of Legal Affairs. Acting Head of the Institutional Reviews group. Acting Head of the Programme Evaluations group. Head of the Cooperation and Internationalisation group. Employee organisation representative (SACO), Senior Analyst, Department of Higher Education Analysis. Employee organisation representative (ST), Analyst, Department of Higher Education Analysis. Analyst/Project manager, Department of Quality Assurance.	Mark Frederiks

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Analyst, Department of Quality Assurance (online). Analyst, Department of Quality Assurance.	

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

TRIPARTITE TERMS OF REFERENCE BETWEEN UKÄ, ENQA AND EQAR

November 2024

1. Background and context

The Swedish Higher Education Authority (*Universitetskanslersämbetet,* UKÄ) is an independent government agency in Sweden. Its operations comprise three main areas: a) quality assurance of higher education and research, and appraisal of the degree-awarding powers of public-sector higher education institutions; b) legal supervision of higher education; and c) monitoring efficiency, follow-up and horizon scanning as well as responsibility for statistics in the higher education sector. UKÄ's operations are laid down in the instructions issued by the Government. These instructions define its areas of responsibility and the tasks to be undertaken. However, UKÄ takes decisions and applies the law independently. Each year the Government issues a public service agreement that specifies the targets and the funding for these operations. The Government also assigns on-going tasks during the year, which are referred to as government assignments.

UKÄ has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2020 (following the ESG 2015) and is applying for renewal of ENQA membership.

UKÄ has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2021 and is applying for the renewal of EQAR registration.

External quality assurance activities of the agency in higher education

Institutional reviews of the HEIs' quality assurance (institutional reviews) – The purpose of UKÄ's review of HEIs' quality assurance processes is both to verify that HEIs achieve high quality in their activities and to contribute to HEIs' quality development. The review focuses on whether the HEIs' quality assurance processes contribute to ensuring and developing the quality of education and research in a systematic and appropriate manner.

Programme evaluations - The purpose of UKÄ's programme evaluations is to check the results of programmes – i.e., that they meet the requirements and high standards prescribed in the Higher Education Ordinance – and to contribute to enhancing the quality of the higher education institution's courses and programmes. Higher education institutions are responsible for the quality assurance of their first-, second-and third-cycle courses and programmes. UKÄ is responsible for conducting evaluations of a sample of the programmes offered by Swedish higher education institutions.

Appraisal of applications for degree-awarding powers - The purpose of the appraisal of applications for degree-awarding powers is to examine whether a higher education institution meets the necessary prerequisites for students or doctoral students to achieve the goals defined by the Swedish Parliament and the Government for the degree the educational programme should result in.

Thematic evaluations – The purpose of UKÄ's thematic evaluations is to contribute important knowledge, promote development and make national comparisons of how HEIs work and the results achieved within a specific area. Methods of evaluation are developed for and adapted to the theme in question.

2. Purpose and scope of the review

This review will evaluate the extent to which UKÄ (the agency) complies with each of the standards of Parts 2 and 3 of the *Standards and Guidelines for Quality Assurance in the European Higher Education*

Area (ESG) and support the agency in its efforts to continually review and enhance its work. Such an external review is a requirement for agencies wishing to apply for ENQA membership and/or for EQAR registration.

2.1 Activities of the agency within the scope of the ESG

To apply for ENQA membership and EQAR registration, this review will analyse all of the agency's activities that fall within the scope of the ESG, e.g., reviews, audits, evaluations or accreditations of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). All activities are reviewed irrespective of geographic scope (within or outside the EHEA) or whether they are obligatory or voluntary in nature.

The following activities of the agency must be addressed in the external review:

- Institutional reviews of the HEIs' quality assurance processes (of education solely);
- Programme evaluations;
- Appraisal of applications for degree-awarding powers;
- Thematic evaluations.

This review should specifically address the changes made in the agency as reported in the Substantive Change Report of 2024-02-29 (see Decision on the Substantive Change Report from 2024-04-04).

Should any substantive changes occur in UKÄ between now and the review (e.g., organisational changes, the introduction or changes of activities within or outside of the scope of the ESG), the agency should inform EQAR at its earliest convenience.

3. The review process

The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with the *Guidelines for ENQA Agency Reviews* and the requirements of the *EQAR Procedures for Applications*.

The review procedure consists of the following steps:

- Formulation of, and agreement on the Terms of Reference for the review between UKÄ, ENQA and EQAR (including publishing of the Terms of Reference on ENQA's website);
- Nomination and appointment of the review panel by ENQA;
- Notification of EQAR about the appointed panel;
- Self-assessment by the agency, including the preparation and publication of a self-assessment report;
- A site visit of the agency by the review panel;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Publication of the final review report;
- A decision from the EQAR Register Committee on the agency's registration on EQAR;
- A decision from the ENQA Board on ENQA membership;
- Follow-up on the panel's recommendations to the agency, including a voluntary progress visit.

3.1 Nomination and appointment of the review panel

The review panel consists of four members: one or two quality assurance experts (at least one of which is currently employed by an ENQA member agency), an academic employed by a higher education institution, a student member, and potentially a labour market representative (if requested). One of the members serves as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the

European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The Review Coordinator will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide the agency with the proposed panel composition and the curricula vitarum of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

3.2 Self-assessment by the agency, including the preparation of a self-assessment report

The agency is responsible for the execution and organisation of its own self-assessment process and must adhere to the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is expected to contain:
  - a brief description of the HE and QA system;
  - the history, profile, and activities of the agency;
  - a presentation of how the agency addresses each individual standard of Parts 2 and 3 of the ESG for each of the agency's external QA activities, with a brief, critical reflection on the presented facts;
  - opinions of stakeholders;
  - the instances of partial compliance noted in the most recent EQAR Register Committee decision of inclusion/renewal and any other aspects that may have been raised by the EQAR Register Committee in subsequent change report decisions (if relevant);
  - reference to the recommendations provided in the previous review and actions taken to meet those recommendations;
  - a SWOT analysis;
  - reflections on the agency's key challenges and areas for future development.
- All the agency's external QA activities (as defined under section 2.1) are described and their compliance with the ESG is analysed in the SAR.
- The report is well-structured, concise, and comprehensive. It clearly demonstrates the extent to which the agency performs its tasks of external quality assurance and meets the ESG.

The self-assessment report is submitted to the ENQA Secretariat, which has two weeks to carry out a screening. The purpose of a screening is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Agency Reviews*, is present. If the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

3.3 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule which must be submitted to the agency at least six weeks before the planned dates of the visit. The schedule is to include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is usually 2,5 days. The approved schedule must be given to the agency at least one month before the site visit to properly organise the requested interviews.

In advance of the site visit (ideally at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

The review panel will be assisted by the ENQA Review Coordinator during the site visit. The review coordinator will act as the panel's chief liaison with the agency, monitor the integrity of the review process and its consistency, and ensure that ENQA's overall expectations of the review are considered and met.

The site visit will close with a final debriefing meeting in which the panel outlines its general impressions and provides an overview of the judgement on the agency's ESG compliance. The panel will not comment on whether or not the agency would be granted/reconfirmed membership with ENQA or registration on EQAR.

3.4 Preparation and completion of the final review report

Based on the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will follow the purpose and scope of the review as defined under sections 2 and 2.1. It will also provide a clear rationale for the panel's findings concerning each standard of Parts 2 and 3 of the ESG. When preparing the report, the review panel should also bear in mind *EQAR's Policy on Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies* to ensure that the report contains sufficient information for the Register Committee to consider the agency's application for registration on EQAR.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language, and it will then be submitted to the agency – usually within 10 weeks of the site visit – for comment on factual accuracy and grave misunderstandings only. The agency will be given two weeks to do this and should not submit any additional material or documentation at this stage. Thereafter, the review panel will take into account the agency's feedback on possible factual errors and finalise and submit the review report to ENQA.

The report should be finalised within three months of the site visit and will normally not exceed 40-50 pages in length.

3.5. Publication of the report and a follow-up process

The agency will receive the review panel's report and publish it on its website once the Agency Review Committee has validated the report. The report will also be published on the ENQA website together with the statement of the Agency Review Committee validating external review reports by assessing

the integrity of the review process and checking the quality and consistency of the reports. Importantly, during this process, and prior to final validation of the report, the Agency Review Committee has the option to request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome.

As part of the review's follow-up activities, the agency commits to react on the review recommendations and submit a follow-up report to ENQA within two years of the validation of the final external review report. The follow-up report will be published on the ENQA website.

The follow-up report may be complemented by an optional progress visit to the agency performed by two members of the original panel (whenever possible). The visit, which normally takes place 2-3 years after the verification of the final external review report (and after submission of the follow-up report), aims to offer an enhancement-oriented and strategically driven dialogue that ordinarily might be difficult to truly integrate in the compliance-focused site visit. The progress visit thus does not have the objective of checking the agency's ESG compliance or how the agency has followed up on the recommendations, but rather provides an arena for strategic conversations that allow the agency to reflect on its key challenges, opportunities, and priorities. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

4. Use of the report

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA.

The report is used as a basis for the Register Committee's decision on the agency's registration on EQAR. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA. The review process is thus designed to serve two purposes. In any case, the review report should only be considered final after validation by the Agency Review Committee. After submission to ENQA but before validation by the ARC, the report may not be used or relied upon by the agency, the panel, or any third party and may not be disclosed without ENQA's prior written consent. Since UKÄ may be obliged to disclose the report to any third party in accordance with the Freedom of the Press Act, the report will not be handed to the agency until the report is validated by the ARC. The approval of the report is independent of the decision on EQAR registration or ENQA membership.

For the purposes of EQAR registration, the agency will submit the review report (once validated by the Agency Review Committee) to EQAR via email before expiry of the agency's registration on EQAR. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, and any other documents that may be relevant for the application (i.e., annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency's application at its Register Committee meeting as stipulated in the indicative review schedule below and before the decision on ENQA membership by the ENQA Board.

To apply for ENQA membership, the agency is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

5. Indicative schedule of the review

Agreement on Terms of Reference	November 2024
Appointment of review panel members	December 2024
Self-assessment completed	28 February 2025
Screening of SAR by ENQA Review Coordinator	March 2025
Preparation of the site visit schedule and indicative timetable	April 2025
Briefing of review panel members	April 2025
Review panel site visit	May 2025
Draft of review report and its submission to ENQA Review Coordinator for verification of its compliance with the Guidelines	July 2025
Draft of review report to be sent for a factual check to the agency	August 2025
Agency statement on the draft report to the review panel (if necessary)	August 2025
Submission of the final report to ENQA	September 2025
Validation of the review report by the Agency Review Committee	October 2025
Publication of report	October 2025
EQAR Register Committee meeting and initial consideration	Autumn 2025
Decision on ENQA membership by the ENQA Board	Autumn 2025

ANNEX 3: GLOSSARY

ECA	European Consortium for Accreditation
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
EQA	External quality assurance
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015
ETER	The Advisory Board of the European Tertiary Education Register
HE	Higher education
HEI	Higher education institution
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
IQA	Internal quality assurance
NOQA	Nordic Network of Quality Assurance
Plint	Platform for Internationalisation
QA	Quality assurance
QAN	Quality Audit Network
SAR	Self-assessment report
SFS	Swedish National Union of Students
Statskontoret	Swedish Agency for Public Management
UHR	Swedish Council for Higher Education
UKÄ	Swedish Higher Education Authority

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY UKÄ

- Self-assessment report (SAR)
- Annexes to the SAR:
    - Guidelines for Reviewing the HEIs' Quality Assurance Processes for Education and Research.
    - Guidelines for the Evaluation of Third-Cycle Programmes.
    - Guidelines for the Evaluation of First and Second-Cycle Programmes.
    - Guidelines for Applications for Degree-Awarding Powers.
    - Ordinance (2012:810) with instructions for the Swedish Higher Education Authority.
    - Improving quality – a developed methodology for UKÄ's reviews.

OTHER SOURCES USED BY THE REVIEW PANEL

- Agency's website (in Swedish and in English).
- Agency's database of reviews.
- Additional documents in the English language (received upon request):
    - Amendment to the Rules of Procedure for the Swedish Higher Education Authority.
    - UKÄ Project Manager's Support Tool.
    - List of UKÄ guidelines at the agency level (also available as Annex 5).
    - Thematic evaluation of collaboration with the surrounding community.
    - The National Quality Assurance System for enhanced quality in higher education and research.
    - Course modules: Assessment training.
    - Operation plan and Budget for The Swedish Higher Education Authority 2025.
    - Operational Plan- Swedish Higher Education Authority 2024.
    - Staff turnover.
    - Public service agreement for the financial year 2025 for the Swedish Higher Education Authority.
    - Public service agreement for the financial year 2024 concerning the Swedish Higher Education Authority.
    - Evaluation of programmes leading to a Degree of Bachelor of Science in Biomedical Laboratory Science.
    - Nomination of expert assessors to review the quality assurance process of higher education institutions.
    - Nomination of student and doctoral representatives to review the quality assurance processes of higher education institutions.
    - Nomination of labour representatives to review the quality assurance processes of higher education institutions.
    - Guidelines for the reassessment of decisions within external quality assurance of higher education.
    - Guidelines for the management of internal governing documents.
    - Guidelines for handling complaints regarding the external quality assurance of higher education institutions.

    - Nominate assessors for the appraisal of applications for degree-awarding powers.
    - Follow-up of degree-awarding powers.
    - Appendix to the form Disclosure of conflict of interest in assignments for the Swedish Higher Education Authority.
    - Guidelines for managing irregularities, entertainment/representation, conflict of interest and secondary occupations.
    - Guideline on skills supply.
- Additional documents in the Swedish language (received upon request):
    - Assignment as a labour representative in the examination for permission to issue degrees at UKÄ.
    - Research support for educational evaluation at undergraduate and graduate levels.
    - Process support for higher education institution audits.
    - Investigator support for examination permit examinations.
    - Support in the work with (project) groups and assessment groups.
    - Invitation to nominate assessors for upcoming exams for permission to issue degrees.
    - Internal quality assurance processes. Opinions in our audits.
    - Invitation to nominate students and doctoral students for assignments as assessors in examinations for permission to issue degrees.
    - Copy of a logbook for institutional reviews.
- Reports mentioned in Table 5 of this report were downloaded from UKÄ's database of reviews, in Swedish. They were translated into English using publicly available online translation software.

ANNEX 5. DOCUMENTS RELATED TO UKÄ'S INTERNAL QUALITY ASSURANCE

GENERAL DOCUMENTS AIMED AT THE WHOLE ORGANISATION:

i) Guidelines for handling internal steering documents at UKÄ.
ii) Guidelines for business planning, budget and follow-up at UKÄ.
iii) Guidelines for document management at UKÄ.
iv) Guidelines for risk analysis at UKÄ.
v) Guidelines for handling harassment, sexual harassment, reprisals and victimisation at UKÄ.
vi) Guidelines for managing irregularities, entertainment, conflict of interest and secondary occupations.
vii) Form for the disclosure of conflict of interest in assignments for UKÄ.
viii) Guidelines for salary setting.
ix) Guidelines for recruitment.
x) Guidelines for business travel.
xi) Guidelines for senior role and development paths.
xii) Guidelines for teleworking and temporary homeworking.
xiii) Guidelines for how we write at UKÄ.
xiv) Guidelines on procurement of goods and services and contract management.
xv) Guidelines for skills supply (competence provision).
xvi) Guidelines for wellness at UKÄ.
xvii) Guidelines for risky and harmful use.
xviii) Guidelines for handling incidents, occupational injuries and rehabilitation.
xix) Guidelines for work environment management at UKÄ.
xx) Guidelines for entry and visits.
xxi) Guidelines for internal communication.
xxii) Guidelines for environmental work.
xxiii) Guidelines for crisis management and against threats and violence in the work environment.
xxiv) Guidelines for systematic information security work at UKÄ.
xxv) Guidelines for the use of IT at UKÄ.
xxvi) Guidelines for development dialogues (staff performance appraisal dialogues).
xxvii) Guidelines for handling complaints regarding the external quality assurance of higher education institutions.
xxviii) Guidelines for participation in external meetings and study visits at UKÄ.

ENQA AGENCY **REVIEW 2025**

THIS REPORT presents findings of the ENQA Agency Review of the Swedish Higher Education Authority (UKÄ), undertaken in 2025.

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European Association for
Quality Assurance in Higher Education