

Follow-up report

The Swedish Higher Education Authority's (UKÄ)
response to ENQA's recommendations



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Introduction

The Swedish Higher Education Authority (UKÄ) is an independent government agency under the Ministry for Education and Research.

The agency's operations embrace three main areas:

- quality assurance of higher education and research, and appraisal of the degree-awarding powers of public-sector higher education institutions (in the scope of the ESG)
- legal supervision of higher education institutions' compliance with laws and regulations

- statistics, analysis, and follow-up of higher education, including intelligence and monitoring of HEIs' efficiency.

UKÄ's quality assurance framework comprises the following four types of external quality assurance activities, stated in the agency's instruction:

- Institutional reviews of the HEIs' quality assurance processes
- Programme evaluations
- Appraisal of applications for degree-awarding powers (initial accreditation)
- Thematic evaluations

In 2020, UKÄ was reviewed against the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015). The external review panel appointed by the European Association for Quality Assurance in Higher Education (ENQA) found that UKÄ was fully compliant with most of the areas in the ESG. The panel found that UKÄ was substantially compliant with ESG 2.2 Designing methodologies fit for purpose, 2.3 Implementing processes, and 3.3 Independence, and partially compliant with ESG 2.7 Complaints and appeals. On 16 December 2020, the Board of ENQA took the decision to grant UKÄ membership of ENQA for five years.

In March 2021, UKÄ was included on the European Quality Assurance Register for Higher Education (EQAR).

ENQA's recommendations

The ENQA Board, in its decision on 16 December 2020, recommended UKÄ to take appropriate action, so far as the agency was empowered to do so, on the following issues:

ESG 3.3 Independence

UKÄ is recommended to take measures to further safeguard its capacity to independently design its methodologies in external quality assurance.

ESG 2.2 Designing methodologies fit for purpose

UKÄ is recommended 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.

ESG 2.3 Implementing processes

UKÄ is recommended 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.

UKÄ is recommended 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.

ESG 2.7 Complaints and appeals

The agency is recommended to establish a complaints procedure. The procedure should be made known to all concerned parties.

The agency is recommended to extend 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.

In its decision, the ENQA Board took the opportunity to provide an articulation regarding standard 2.3 Implementing processes, and called upon the agency to continue its efforts to include follow-up processes of the external quality assurance activities in an integrated and holistic manner. Regarding ESG 2.7 Complaints and appeals, the Board seconded the panel’s findings, and reiterated the need for a formalised and transparent complaints procedure of the agency.

A parallel external evaluation of the national quality assurance system

In 2020, following a Government assignment, UKÄ also underwent an external evaluation of the national quality assurance system commissioned to an independent external evaluator (Technopolis Group). There are clear points of contact between this evaluation and the ENQA Agency Review of UKÄ. Reference to the national evaluation will be made below as relevant.

Actions taken by UKÄ

The following table recapitulates the ENQA Board’s conclusions and the expert panel’s recommendations, and describes UKÄ’s actions taken to address them.

ENQA Board conclusion	Panel’s recommendation	Actions taken by UKÄ
ESG 3.3 Substantially compliant	UKÄ is recommended to take measures to further safeguard its capacity to independently design its methodologies in external quality assurance.	<p>ESG 3.3 Independence</p> <p>As noted by the ENQA expert panel, the independence of all Swedish government agencies, including UKÄ, is safeguarded in national legislation. Crucially, neither the Riksdag nor the government or other authorities have the right to interfere with UKÄ’s decision-making, according to the Instrument of Government (the Swedish Constitution) chapter 12 section 2 (SFS 1974:152).</p> <p>Another important consequence of UKÄ’s status as an independent government agency is its independence vis-à-vis the HEIs. In addition, there are no fees connected to UKÄ’s external</p>

quality assurance activities, which further strengthens the agency's independence in relation to the HEIs.

The government establishes the general principles for UKÄ in the ordinance for government instruction (SFS 2012:810), allocates resources, and follows up the activities, among them quality assurance. Accordingly, UKÄ's instruction only describes the overall activities in the national framework for external quality assurance of higher education and research. It is stated that UKÄ is responsible for quality assurance of the operations – teaching, research, 'third stream/mission' - of higher education institutions through:

1. review of the quality assurance processes;
2. evaluations of programmes at the first, second, and third cycles;
3. thematic evaluations;
4. appraisals of issues relating to entitlement to award qualifications (...).

UKÄ is also to report annually how quality assurance has contributed to quality improvement and high quality in the HEIs' operations.

In sum, UKÄ decides independently on the design, implementation, and decision-making of its methodologies in external quality assurance activities. The agency's development work described in this report is evidence of this independence. No formal changes in UKÄ's legal or organisational status are foreseen.

ESG 2.2
Substantially
compliant

UKÄ is recommended 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.

ESG 2.2 Designing methodologies fit for purpose

ENQA's expert panel found that UKÄ has developed 'a robust quality assurance framework, which is broadly recognised and respected by institutions and stakeholders in the higher education system of Sweden'. Nevertheless, the panel also noted that 'UKÄ to some extent suffers from bureaucratic and complex processes', and could work to 'provide even more clarity and reduce the workload of the HEIs' (p. 3).

Similar conclusions were drawn in an evaluation of the national system for quality assurance in higher education conducted by the independent external evaluator Technopolis Group (December 2020). The evaluators found that a 'majority of higher education institutions are satisfied with the current quality assurance system', but also that HEIs 'express that the workload associated with and during the evaluation processes is too extensive'.

Both the ENQA Agency Review and the national evaluation included recommendations to UKÄ on further integration of the four main external quality assurance activities ('components').

Revision of the national quality assurance framework

The two external evaluations in 2020 (ENQA and Technopolis Group), together with UKÄ's continuous self-reflection and internal follow-up, as well as the agency's thematic analyses, were taken as points of departure for a comprehensive revision of the national quality assurance framework, initiated by UKÄ in 2021. As a first step of this ongoing process, UKÄ conducted a pre-study, which was then further developed during 2022, in close dialogue with HEIs and stakeholders. The first reviews following the revised model will be conducted during 2023.

Position and guiding principles

As guidance for the ongoing revision, a number of principles were established:

- Minimised workload and overlap – maximised accuracy, impact and value
- Transparent framework with fewer overlaps
- Flexible and accurate reviews
- Complementary and resource-efficient quality assurance
- Clarified responsibilities and ownership
- Trust-based approach, which calls for adjustments (content and methodologies)

In accordance with these principles, the number of assessment areas and criteria are currently being reduced, as well as the level of detail. Further, UKÄ is developing an external QA model with a common assessment 'core', a model that aims to take into account the HEI's profile and internal quality work, thus allowing for greater flexibility and reduced workload on the HEI. In the case of programme evaluations, the common core will be complemented by optional areas. As a consequence of this reduction of the number of criteria, not all ESG will be assessed in each review. Instead, UKÄ promotes a holistic approach, where the external QA framework will complement the HEIs' internal quality processes, thus recognising the full responsibility of HEIs for the quality assurance of their courses and programmes.

A further choice made by UKÄ is to abandon the previous more or less fixed six-year review cycle concept, in favour of a more flexible and adjustable rolling plan and continuous quality review. This more flexible model will still facilitate long-term planning for HEIs, while permitting annual adjustments to the external QA methodologies, in dialogue with the HEIs. UKÄ's revised

methodology thus aims to ensure continuous update, fit for purpose, and relevance of the national QA framework.

Supporting activities

In order to support the further development and achieve the intended outcomes, a number of activities have been implemented during 2021-2022, such as

- mappings of internal and external experiences of the national QA framework and its four components
- dialogues with HEIs, HEIs' quality assurance coordinators, students' unions, other higher education agencies, UKÄ's national reference groups, and the agency's International Advisory Committee
- discussions with colleagues from, e.g., AAQ, AEQES, AI, AQ Austria, FINEEC, HCERES, NOKUT, and NVAO
- horizon scanning and intelligence
- focus group interviews with all staff at UKÄ's Department of Quality Assurance
- workshops with UKÄ's Director General and management team, and the management team of the Department of Quality Assurance.

Revision of guidelines

UKÄ publishes a number of guidelines targeted at HEIs. The guidelines that specifically concern UKÄ's external QA activities are as follows:

- Guidelines for reviewing the HEI's quality assurance processes (institutional review)
- Guidelines for reviewing the HEI's quality assurance processes for research
- Guidelines for the evaluation of first- and second-cycle programmes
- Guidelines for the evaluation of third-cycle programmes
- Guidelines for applications for degree-awarding powers
- Guidelines for thematic evaluations (as applicable)
- Guidelines for following up institutional reviews and programme evaluations

As part of the further development of the national QA framework, the guidelines are currently under revision. The new guidelines for programme evaluations and applications for degree-awarding powers will be finalised in February 2023, whereas the guidelines for the evaluation of third-cycle programmes and the guidelines for institutional reviews will be ready later in 2023. Following UKÄ's dialogue-based approach, the revised guidelines will be discussed with HEIs, students' unions, UKÄ's reference groups and International Advisory Committee, as well as other stakeholders, before being formally approved, implemented and published.

Adjustments to the four external QA activities

The following section describes the adjustments made or under development for the four distinct but interrelated external QA activities of the national QA framework.

Institutional reviews

The institutional review constitutes the central activity of UKÄ's external QA framework, until now covering all institutions every six years. It is in this core component that most of the ESG are addressed.

The purpose of institutional reviews is to confirm that HEIs' quality assurance processes ensure high quality education and support their quality enhancement and quality culture.

The reviews focus on how well HEIs' quality assurance processes, including follow-up, measures, and feedback procedures, are designed to help ensure and enhance the quality of courses and programmes at all levels, in a systematic way.

Further, the reviews aim to contribute to improving the HEIs' quality, since the assessors in their reports identify both examples of good practice and areas in need of improvement. The reviews also aim to verify that HEIs ensure that courses and programmes at all levels comply with applicable laws, ordinances, and the ESG.

Revisions

As already mentioned, the former six-year cycle will be replaced by a more knowledge-based and flexible review selection and rolling plan. This change will allow annual adjustments to the review methodology, in order to ensure that it is continuously updated and fit for purpose.

The number of assessment areas and assessment criteria will be reduced, as well as the level of detail. All HEIs will be reviewed against a common assessment 'core'. At the present stage of the revision, particular weight is given to ESG 1.1, ESG 1.2, ESG 1.7, and ESG 1.9., thus focusing on HEIs' key internal QA processes, and on aspects that have previously proved to be challenging to HEIs in UKÄ's institutional reviews. It is UKÄ's belief that this narrower and more focused approach will reduce HEIs' workload, and still deliver relevant and beneficial results.

Two of the former 'perspectives' – the student and doctoral student perspective, and the working life and collaboration (third

stream) perspective - will now be integrated in the core of the review. On the contrary, the third perspective, gender equality, will no longer be separately assessed in UKÄ's institutional reviews, nor in programme evaluations or appraisal of applications for degree-awarding powers. Gender equality is considered an important quality aspect, but has proved difficult to capture accurately in UKÄ's external QA activities. However, this perspective may still be assessed in UKÄ's institutional reviews of the HEIs' quality assurance processes for research (part of institutional reviews but outside the scope of the ESG), or may be the topic of a future thematic evaluation.

Programme evaluations

The purpose of programme evaluations is to monitor the outcomes of first-, second- and third-cycle programmes, and to contribute to the HEIs' own quality improvements to the reviewed programmes.

The programme evaluations assess the actual conditions and results, e.g., that a programme meets the requirements in applicable laws and ordinances, ensure that students have opportunities to achieve the national qualitative targets and also achieve these targets.

In addition, programme evaluations assess how well the follow-up, measures, and feedback processes systematically contribute to ensuring and enhancing quality in the evaluated programmes. Failure to meet quality standards may result in the revoking of degree-awarding powers.

The programme evaluations contribute to enhancing HEIs' quality, since UKÄ's assessors provide feedback in their reports on both identified examples of good practice and areas in need of improvement.

Revisions

The main proposed changes to programme evaluations are listed below:

- Knowledge-based selection (to be explained in the next section)
- Fewer programmes evaluated and fewer assessment criteria: focus on staff and qualitative targets of degrees
- Evaluation questions – open questions that encourage 'narrative' descriptions close to programme level
- Possibility to select additional area(s) for quality enhancing discussions (selection grounds e.g. structural issues/challenges/risks identified in previous evaluations).

The evaluation process consists of three main phases:

1. Dialogue/workshop UKÄ and HEIs, prestudy: adaptation and agreement on content and form, knowledge base, and direction
2. Implementation of the evaluation process
3. Dialogue/workshop UKÄ and HEIs: exchange of experiences, analyses, further development.

A knowledge-based approach

The revision of the external QA methodologies includes the introduction of a model for knowledge-based selection of programme evaluations. This new approach replaces the former more comprehensive selection model, where UKÄ evaluated a large number of programmes or programme clusters - e.g., all teaching or nursing degree programmes - during a full six-year cycle.

The underlying principle is that HEIs have full responsibility for the quality assurance of their educational programmes, and that UKÄ conducts a limited number of programme evaluations as an external complementary QA activity.

The knowledge base exploited in UKÄ's programme evaluations may consist of information from both internal and external sources. For example, relevant information may be results from UKÄ's previous reviews or evaluations, or data and analyses from UKÄ's quality assurance activities, such as thematic analyses (ESG 3.4). Valuable information could also be provided by UKÄ's operations in national statistics, follow-up and monitoring of higher education, or by the agency's legal supervision. On the other hand, useful information may also come from HEIs' internal quality assurance of study programmes, or data from other sources, such as other national evaluation bodies, or from horizon scanning and intelligence.

Appraisal of applications for degree-awarding powers

The purpose of the appraisal of applications for degree-awarding powers is to examine whether an HEI meets the necessary prerequisites for students to achieve the objectives and learning outcomes of a given degree, as defined in the Higher Education Act and the Higher Education Ordinance.

Revisions

As this external QA activity is well established (since the 1990s) and well accepted by the HEIs, UKÄ now chooses to make only minor administrative adjustments to the methodology, e.g., reducing somewhat the number of assessment criteria. The relationship between this activity and institutional reviews and programme evaluations respectively is described in a separate section below.

Thematic evaluations

Thematic evaluations assess how the HEIs fulfil tasks of importance for quality in higher education assigned to them by legislation. The primary purpose of the thematic evaluations is quality enhancement, and they do not imply any sanctions for the HEIs. So far, UKÄ has conducted three thematic evaluations, on the following topics:

- HEIs' work with promotion of sustainable development in higher education (2017)
- HEIs' work with promoting and widening participation in higher education (early 2022)
- HEIs' work to support students in nursing programmes in fulfilling the competence and skills required for a Degree of Bachelor of Science in Nursing (late 2022).

In 2023, a fourth thematic evaluation will address HEIs' work with third stream/third mission activities.

Revisions

The methodology applied to thematic evaluations is developed and adapted to the relevant theme, but it should follow the methods used for the other external QA activities whenever possible. Lessons learnt from the previous thematic evaluations, in terms of evaluation methodology as well as results, feed into UKÄ's development work. An example of this is the recently initiated thematic evaluation of HEIs' third stream/third mission activities, where it is UKÄ's intention to apply a further coordinated review approach, as outlined in the next section.

Importantly, when planning its reviews and evaluations, UKÄ takes into careful consideration the potential risk for thematic evaluations to generate an additional administrative burden on the HEIs, a risk also raised by ENQA's expert panel.

Coordinated review – partly ESG

Besides revising the external QA framework, as described in this report, UKÄ has initiated a new activity provisionally labelled 'coordinated review'. The aim is further to integrate the agency's three main operations within its remit:

- quality assurance of higher education and research, and appraisal of the degree-awarding powers of public-sector higher education institutions
- legal supervision of HEIs' compliance with laws and regulations
- statistics, analysis, and follow-up of higher education, including monitoring of HEIs' efficiency.

Insofar as quality assurance is included in such a coordinated review, the methodology will follow UKÄ's external QA framework and will thus be within the scope of the ESG. On the other hand, review activities conducted within the agency's legal supervision, or statistics, analysis, and efficiency monitoring, are not as such within the scope of the ESG, but all contribute to quality enhancement in the higher education sector.

A pilot coordinated review will be conducted in 2023, targeting efficiency, quality assurance, and legal certainty in contract education (a form av commissioned education). An HEI which is accountable to the government and subject to the Higher Education Act may offer contract education pursuant to a specific ordinance. Guidelines for this new activity have been developed and published.

The coordinated review methodology is an example of UKÄ's ambition further to reduce the burden on HEIs of the agency's operations in different areas, within or outside the scope of the ESG. In doing so, UKÄ aims to create maximum quality enhancement and value for the HEIs and the higher education sector at large.

Summing up ESG 2.2

Finally, UKÄ firmly believes that the revisions to the national QA framework described here, aiming at more integrated and complementary external QA activities, will contribute to minimising workload and overlap, and to maximising accuracy, impact, and quality enhancement. This is well in line with UKÄ's overall vision: Developmental Monitoring – Assuring Sweden's status as a Knowledge Society.

ESG 2.3
Substantially
compliant

UKÄ is recommended 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.

ESG 2.3 Implementing processes

This section discusses some important aspects of UKÄ's follow-up processes, and the relationships between the four external QA activities in this regard. Methodology and procedures are under development, and linked to the ongoing design of the agency's knowledge-based approach (cf. ESG 2.2 above).

Follow-up: Appraisals of applications for degree-awarding powers and programme evaluations

ENQA's recommendations on this standard have inspired a discussion of the specific purpose and object of evaluation in the case of, on the one hand, appraisals of applications for degree-awarding powers, and, on the other hand, programme evaluations. The issue at hand is whether these external QA activities

UKÄ is recommended 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.

complement each other in such a way that it is fit for purpose or reasonable to follow up granted applications of degree-awarding powers through programme evaluations.

As UKÄ's appraisal of degree-awarding powers takes place before a programme leading to a certain degree is established, and as it mainly assesses prerequisites, the outcome of an appraisal does not actually reveal whether the programme is of high quality once it is set up and implemented. On the other hand, the quality of a programme is the proper evaluation object of programme evaluations, so there is a connection between the purpose and evaluation object of the two external QA activities. This suggests that appraisals of applications for degree-awarding powers could be followed up within the framework of programme evaluations. A special case is when UKÄ decides to initiate a programme evaluation due to certain circumstances (e.g., students' complaints).

This said, in order not to increase HEIs' workload, it is reasonable to foresee that only a selection of appraisals of applications for degree-awarding powers will be followed up by UKÄ through programme evaluations, and that such follow-up is knowledge-based and quality enhancement-led. At the same time, it needs to be relatively predictable for HEIs which granted degree-awarding powers may be followed up in a programme evaluation. This calls for UKÄ to be open and transparent with its selection of follow-up criteria, and to maintain a close dialogue with the HEIs.

Applications for degree-awarding powers may also be followed up by UKÄ in other ways, e.g., through its thematic evaluations, or in thematic analyses. Two recent examples of the latter are a follow-up of all granted degree-awarding applications in third cycle education during a ten-year period (roughly 2010-2020), and an analysis of experiences and conclusions from all applications for degree-awarding powers appraised by UKÄ 2017-2021. The focus of such follow-up analyses is on feedback, not control.

Follow-up: Institutional reviews and programme evaluations

UKÄ follows up also those HEIs that receive a positive assessment in their institutional reviews or programme evaluations, though not on an individual basis. This includes organising dialogue meetings, surveys and conferences, which are appreciated by HEIs as important arenas for giving and receiving feedback, mutual learning, benchmarking, and exchange of experiences.

UKÄ's four external QA activities are conceptually interlinked. In theory, this system feature would seem to facilitate the setting up of follow-up procedures exploiting one component's specific purpose and scope as a means of following up results obtained in

another component. In practice, however, this is often problematic, as will be discussed in the next few paragraphs.

The government communication *Quality assurance of higher education* (Skr 2015/16:76), a starting point for UKÄ's initial development of the present national QA framework, states, among other things, that the national quality assurance framework and its four components must be fit for purpose. There should be 'flexibility as to how many reviews should be conducted within each component from one year to another, in order to ensure that the reviews are relevant and resource-efficient.' Thus, the form, content, and scope of the external QA activities may vary, depending on the purpose and object of evaluation.

The government communication also emphasises that there should be a link between programme evaluations and institutional reviews. Accordingly, if an HEI does not meet the requirements of an institutional review, UKÄ could decide to evaluate a selection of the HEI's courses or programmes. Conversely, for programme evaluations, in case deficiencies are found in a programme provided by an HEI that had previously received an overall assessment of approved quality assurance processes, UKÄ could consider following up on the HEI's internal quality assurance processes. The underlying idea here being that capturing and correcting shortcomings of an individual educational programme should always be a priority.

However, to date, UKÄ has not initiated any programme evaluations due to a non-approval of an HEI's quality assurance processes. Neither has the agency so far conducted any institutional review due to assessed lack of quality in a programme evaluation. An important reason for this is that the reviews and evaluations have different purposes and evaluation objects, which do not necessarily complement each other in such a way that it is fit for purpose, effective, or resource-efficient to follow up one type of review with another, at least not on a regular basis. In UKÄ's view, this is also true of follow-up procedures for those institutions and programmes that have received a positive assessment.

UKÄ has concluded, therefore, that using one type of review as a form of 'penalty' for a negative result in another type of review is counterproductive to the intentions of our trust-based and enhancement-led external QA framework. It also risks undermining the HEIs' autonomy and responsibility for the quality assurance of their programmes and processes.

Follow-up: Appraisals of applications for degree-awarding powers and institutional reviews

As previously described, UKÄ's institutional reviews assess whether the HEIs' quality assurance work, in a systematic and effective way, contributes to securing and developing the quality of

education at all education levels. The focus of the review is on the continuous improvement of courses and programmes, and that the information generated as a result of internal follow-up and evaluation translates into appropriate development measures. On the other hand, UKÄ's appraisal of applications for degree-awarding powers assesses whether the HEI has the necessary prerequisites for the students and doctoral students to be able to reach the qualitative targets set for a given degree.

The clearest point of contact between institutional reviews and appraisals of degree-awarding power applications is that within institutional reviews, there is an assessment criterion that targets the HEI's processes and routines for setting up programmes: 'The HEI has a clear division of responsibilities as well as appropriate routines and processes for the design, development, establishment, and closure of programmes.' This assessment criterion has a direct connection to ESG 1.2 pertaining to the design and approval of programmes. It is also clearly related to UKÄ's appraisal of applications for degree-awarding powers.

Still, just as with the relationship between institutional reviews and programme evaluations, it is a matter of different objects of evaluation and different purposes of the two external QA activities. In other words, there is no obvious connection between the results of the two. An HEI that has been found to fulfil the assessment criterion given as an example above in an institutional review, may nevertheless face a rejected application for degree-awarding powers. Routines and processes may be in place, but the assessment of whether the conditions are sufficient may differ between the HEI's own assessment and that of UKÄ and the assessment panel.

ESG 2.7
Partially
compliant

The agency is recommended to establish a complaints procedure. The procedure should be made known to all concerned parties. The agency is recommended to extend the powers of the appeals committee to make recommendations to UKÄ on how to correct errors in quality assurance

ESG 2.7 Complaints and appeals

This section addresses ESG 2.7 Complaints and appeals, and UKÄ's position and the procedures in place.

Complaints

UKÄ has not at this stage established a specific formal complaints procedure for the agency's quality assurance. However, a more general possibility for anyone to register complaints anonymously has been added to UKÄ's public website.

As noted by the ENQA expert panel, stakeholders are deeply involved in UKÄ's quality assurance activities, and the overall perception among the stakeholders is that if anyone has a complaint, they are able to approach UKÄ and direct their complaint to the relevant staff or management level. This testifies

procedures that potentially can have affected the assessment outcome.

to the effectiveness of UKÄ's trust-based approach, based on transparency and close dialogue between UKÄ and the HEIs.

UKÄ's operations and its employees must follow the basic values of central government authorities – common principles for a good administrative culture. These are based on the fundamental requirements in the Instrument of Government and consist of the six principles of democracy, rule of law, objectivity, free formation of opinion, respect, as well as efficiency and service. As a consequence, legality, transparency, and good service are guiding principles for all UKÄ's operations.

In all UKÄ's external QA activities, there is a strong focus on preventing complaints, and procedures are in place for quality-assured processes during the course of all activities. Feedback from institutions and students as well as assessment panel members is gathered throughout the assessment process and after, and can contribute to improvement and clarifications in guidelines and manuals. Feedback may be collected in a structured way through, e.g., questionnaires, or more informally. In programme evaluations and institutional reviews, UKÄ has a long-standing tradition of arranging feedback seminars, where HEIs, assessment panel experts, and UKÄ project managers discuss content as well as procedures. Such seminars take place a few months after UKÄ's decision on a review or evaluation.

Further, prior to UKÄ's final decision, the assessment panel's preliminary report is referred to the HEI for review. This applies to all activities under the external QA framework. HEIs are thus provided with the opportunity to correct factual errors, and potential complaints may be voiced and duly addressed. The statement from the HEI is always published as an annex to the panel's report, in an appendix to the decision.

All in all, UKÄ considers that the existence of several ways for HEIs to give feedback during and after the assessment process, and the opportunity for a preview of the report, contribute to avoiding potential complaints as well as appeals.

In line with the above reasoning, UKÄ has not considered fit for purpose at present to establish a formal complaints procedure for the agency's quality assurance operations. At this stage, such a measure is not deemed relevant in the Swedish higher education context. Importantly, no need for such a procedure has been expressed by HEIs or other stakeholders.

However, UKÄ does offer the possibility for anyone to register an anonymous complaint through its whistleblowing function, accessible on the agency's public website. Complaints may be registered via a weblink or voice mail, in Swedish or English.

Appeals

As noted by the ENQA expert panel, UKÄ has an appeals procedure which is clear and well known to all parties concerned, and which can be applied to all four types of external QA activities conducted by UKÄ.

Following the expert panel's recommendation, while respecting the updated Administrative Procedure Act (SFS 2017:900), UKÄ has extended the powers of the appeals committee to make recommendations on how to correct errors in quality assurance procedures that potentially may have affected the assessment outcome. This extension of the appeals committee's mandate is described in the revised *Guidelines for appeals in the quality assurance of higher education* (reg. no. 411-00406-18), approved by the Director General in August 2022, and published on the UKÄ website.

The Swedish Higher Education Authority (Universitetskanslersämbetet – UKÄ) is to contribute to strengthening Swedish higher education and Sweden as a knowledge society. We review the quality of higher education programmes; we analyse and follow-up trends within higher education and we monitor the rights of students.

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