

**Approval of the Application  
by Swedish Higher Education Authority (UKÄ)  
for Inclusion on the Register**

**Register Committee**  
18/03/2021

Ref. RC29/A89  
Ver. 1.0  
Date 2021-03-24  
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<b>Application of:</b>	11/06/2019
<b>External review report of:</b>	10/12/2020
<b>Review coordinated by:</b>	European Association for Quality Assurance of Higher Education (ENQA)
<b>Review panel members:</b>	Tue Vinther-Jørgensen (chair), Patrick Van den Bosch (secretary), Melita Kovacevic (academic), Gohar Hovhannisyan (student)
<b>Decision of:</b>	18/03/2021
<b>Registration until:</b>	31/12/2025
<b>Absented themselves from decision-making:</b>	N/a
<b>Attachments:</b>	<ol style="list-style-type: none"> <li>1. <a href="#">Confirmation of Eligibility, 17/09/2019 and Update of 12/11/2019</a></li> <li>2. <a href="#">External Review Report, 10/12/2020</a></li> <li>3. <a href="#">Clarification Request to the Review Panel, 04/03/2021</a></li> <li>4. <a href="#">Response to Clarification Request to the Review Panel- Minutes of Video Call, 15/03/2021</a></li> </ol>

1. The application of 11/06/2019 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 28/06/2019 having considered clarification received from the agency on 20/06/2019. Following the agency's letter of 17/09/2019 the Committee updated the eligibility confirmation on 12/11/2019.
3. The Register Committee considered the external review report of 10/12/2020 on the compliance of UKÄ with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee sought and received clarification from the chair of the review panel on 15/03/2021.

## Analysis:

5. In considering UKÄ's compliance with the ESG, the Register Committee took into account the *Institutional reviews of HEI's quality assurance processes (audit), including legal supervision of HEIs as a preparatory step; Programme evaluations and Appraisal of applications for degree-awarding powers (accreditation)* as activities within the scope of the ESG.

6. In the eligibility confirmation, the Register Committee considered the activity *Thematic evaluation* to be related to thematic analysis (standard 3.4), rather than a stand-alone activity. The thematic evaluations were, however, covered as a separate activity within the scope of the ESG both in the SER and external review report. From the panel's findings, the Register Committee learned that the agency performed only one thematic evaluation so far. The methodology was developed suited to the relevant theme. The process included peer review by a panel including a student member. The outcomes were published in a report that discusses matters on, both, systemic and institutional level.

7. Given that thematic evaluations lead to judgements on individual institutions and are about topics related to teaching and learning in higher education, the Register Committee followed the agency's own classification and thus included in its analysis of compliance with the standards also the activity *Thematic evaluation*.

8. The Register Committee noted that *Statistics, follow-up and analysis of HE* are not within the scope of the ESG and, thus, not pertinent to the application inclusion on the Register.

9. The Register Committee found that the report provides sufficient evidence and analysis on UKÄ's level of compliance with the ESG.

10. With regard to the specific European Standards, the Register Committee considered the following:

### ESG 2.3 – Implementing processes

11. The panel noted that UKÄ employs site visits only in the case of institutional reviews; online interviews are organised for programme evaluations and appraisals of degree awarding power.

12. Thematic evaluations do not necessarily include site visits due to their tailor-made nature. The Register Committee further understood that interviews were not part of the one thematic evaluation that the agency conducted (p. 29).

13. The Register Committee sought clarification from the panel in regards to the validation of findings in cases when the agency does not use site visits or interviews.

14. The review panel clarified that the one thematic evaluation implemented so far was a desk based exercise, the panel used the HEIs' self-evaluation reports as main source of information.

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15. The Register Committee welcomed the panel's clarification, but found that the absence of any standard framework or guidance as to the use of site visits or interviews in thematic evaluations, makes it unclear whether the agency has sufficient approaches to validate the evidences provided by HEIs in this activity. In addition, the panel's report touched only briefly on the suitability of online interviews instead of regular site visits in the activities program evaluation and appraisal of applications for degree-awarding powers. Following this, **the Committee was unable to concur with the panel's conclusion, but considered that UKÄ only partially complies with standard 2.3.**

### ESG 2.7 – Complaints and appeals

16. The analysis of the panel showed that UKÄ has no formal complaints procedure in place (p. 34), even though the panel was confident that any issues stakeholders have, related to the work of the agency, are taken up by UKÄ.

17. The report further discussed the advisory role of the appeals committee and the panel was concerned that this approach, paired with the fact that the committee cannot make recommendations how to correct potential errors, could undermine the authority of the appeals committee.

**18. Considering the above mentioned matters, the Register Committee concurred with the panel's conclusion that UKÄ partially complies with standard 2.7.**

### ESG 3.3 – Independence

19. The Swedish government appoints the UKÄ Director General (p. 15). The panel briefly mentioned that the appointment is made based on an open call, following national regulations on public agencies. The Register Committee inquired from the panel to elaborate on the potential involvement of the Advisory Board or HE stakeholders in the nomination and selection of the candidate.

20. The review panel clarified that the Advisory Board has no role in the appointment of the Director General. The panel did not possess further knowledge on the selection process within the ministry.

21. The Advisory Board members are appointed by the Government, after previous consultation with the agency (p. 16). The processes of selection of the members of the Advisory Board and the exact role of UKÄ were unclear except for the student member; the Register Committee therefore requested additional information from the panel.

22. The review panel believed that all Advisory Board members were nominated by the stakeholder organisations, but was not aware of any codified rules about these nominations and did not discuss the details of the process except for the student member.

23. In UKÄ, the Director General solely takes the final decisions, including the final judgements on external review activities. Given the lack of

information on preventing conflicts of interest, the Register Committee asked the panel to clarify this matter.

24. The review panel explained that UKÄ does not employ a Deputy Director General and that the decision-making power does not shift to another individual or body in cases when the Director General might have a conflict of interest (e.g. on a review of their former employer). The panel, however, clarified that the different opinions of the staff and the panel in regards to applications are presented in the final public report and are hence transparent.

25. The panel stated that it was common for the Government to give additional tasks to the agency (p. 15). The Register Committee considered this might endanger the independence of the planning process, and might also impact the work overload of the staff (further discussed in 3.5).

26. The Register Committee welcomed the clarification offered by the panel members, but considered that concerns about the Government's control of all major appointments remain. In particular, the way in which the Director General is selected has not been made fully transparent and it remained unclear whether the involvement of stakeholders in appointing the Advisory Board is secured in official documents. Moreover, the potential conflict of interest that the Director General could come across in their daily operations does not seem to be fully addressed through formal means by the agency.

**27. Taking in consideration in the above, the Register Committee could not concur with the panel's decision and concluded that UKÄ only partially complies with standard 3.3.**

### ESG 3.5 – Resources

28. The review panel noted the continuously high workload and turnover of staff. It further elaborated that the staff and the management had different positions in regards to the reasons (p. 19).

29. The Register Committee learned that the agency has postponed EQA activities and projects (p. 19) and changed methods of work (p. 28) to reduce the workload of the staff members.

30. In absence of detailed comments on UKÄ's plans for using less intensive methods of work (p. 19) in the report, the Register Committee asked the panel for additional information on the findings.

31. The review panel informed the Register Committee about several measures that the agency plans to introduce, including replacing site visits by online interviews and deploying a single expert panel to several institutions. The panel considered that these were welcome measures that enhance UKÄ's activities and their efficiency. The panel saw that some improvements have already taken place, resulting in decreased staff overturn.

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32. The Register Committee took in consideration panel’s response and greeted the agency’s efforts. The Committee found that the agency has a clear plan and capacity to implement changes which will lead to decreased workload for the staff members.

**33. The Register Committee was able to concur with the panel's conclusion that UKÄ complies with standard 3.5.**

34. For the remaining standards, the Register Committee was able to concur with the review panel's analysis and conclusion without further comments.

**Conclusion:**

35. Based on the external review report and the considerations above, the Register Committee concluded that UKÄ demonstrated compliance with the ESG (Parts 2 and 3) as follows:

Standard	Review panel conclusion	Register Committee conclusion
2.1	Full compliance	Compliance
2.2	Substantial compliance	Compliance
2.3	Substantial compliance	Partial compliance
2.4	Full compliance	Compliance
2.5	Full compliance	Compliance
2.6	Full compliance	Compliance
2.7	Partial compliance	Partial compliance
3.1	Full compliance	Compliance
3.2	Full compliance	Compliance
3.3	Substantial compliance	Partial compliance
3.4	Full compliance	Compliance
3.5	Full compliance	Compliance
3.6	Full compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

36. The Register Committee considered that UKÄ only achieved partial compliance with some standards. In its holistic judgement, the Register Committee considered that some issues (ESG 2.3) relate primarily to one occasional activity and that the agency's actual independence (ESG 3.3) has not been called into question in the eyes of the stakeholders thus far. The Committee therefore concluded that UKÄ complies substantially with the ESG as a whole.

37. The Register Committee therefore approved the application for inclusion on the Register. UKÄ's inclusion shall be valid until 31/12/2025<sup>1</sup>.

38. The Register Committee further underlined that UKÄ is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.

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<sup>1</sup> Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

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Swedish Higher Education Authority (UKÄ)  
Box 7703  
Anders Söderholm  
**SE-103 95 Stockholm**  
**Sweden**

Brussels, 28 June 2019

## Confirmation of Eligibility: Application for Inclusion on the Register

### Application no. A89 of 11/06/2019

Dear Anders,

We hereby confirm that the application by UKÄ for inclusion on the Register is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by ENQA – European Association for Quality Assurance of Higher Education fulfils the requirements of the EQAR Procedures for Applications.

In order to prepare the deliberations of the Register Committee on the eligibility of the application and UKÄ's activities within the scope of the ESG, EQAR contacted UKÄ via telephone on 20/06/2019 to clarify the matters below.

We confirm that the following activities of UKÄ are within the scope of the ESG:

- Institutional reviews of HEI's quality assurance processes (audit)
- Programme evaluations
- Appraisal of applications for degree-awarding powers (accreditation)

In the application form, UKÄ noted *that thematic evaluation (thematic review) is a separate external QA activity within the scope of the ESG. Based on the information provided we understand that thematic reviews are part of the external quality assurance, not a separate external QA activity within the scope of the ESG. This activity should be considered in relation to ESG 3.4.*

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EQAR Founding Members:



In the application form, UKÄ stated that it did not consider the following activity to be within the scope of the ESG:

- legal supervision of HE.

We considered the information provided and came to the conclusion that this activity is within the scope of the ESG as it follows predefined process that involve the external quality assurance of individual higher education institution ([see enclosed minutes](#)).

Please ensure that UKÄ's self-evaluation report covers all the aforementioned activities.

We further confirm that the following activities of UKÄ are not within the scope of the ESG:

- statistics, follow-up and analysis of HE

While these activities are not relevant to your application, it is UKÄ's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

We will forward this letter to ENQA in its capacity of the coordinator of the external review. At the same time we underline that it is UKÄ's responsibility to ensure that the coordinator and review panel take account of the present confirmation, so as to ensure that all activities mentioned are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. UKÄ has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Colin Tück'.

Colin Tück  
(Director)

Cc: ENQA (coordinator)



# Application by UKÄ - Swedish Higher Education Authority for Inclusion on the Register

Register Committee

## Minutes of Telephone Conversation

Ref. A89  
Date 2019-06-28  
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<b>Date of the conversation:</b>	20/06/2019
<b>Representative of UKÄ:</b>	Viveka Persson
<b>Representative of EQAR:</b>	Jelena Šantić Stefanoska, Melinda Szabó

1. UKÄ has submitted on 11/06/2019 an application for inclusion on the European Quality Assurance Register for Higher Education (EQAR).
2. In order to prepare the deliberations of the Register Committee on the eligibility of the application and UKÄ's activities within the scope of the ESG, EQAR contacted UKÄ via telephone to clarify the matter below regarding the legal supervision of higher education institutions.
3. UKÄ agreed to clarify the matter by means of a telephone conversation.
4. The activity "legal supervision of HE" is conducted on a regular basis and it serves to review the compliance of public higher education institutions with the applicable rules and regulations in Sweden.
5. UKA applies the *Guidelines for supervision of higher education institutions* which contain six review areas: credit transfer, student influence, course and programme syllabuses, course evaluation, employment of personnel and appeals and complaints. UKA clarified that the guidelines focus on legal matters associated with certain quality assurance aspects from the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).
6. HEI supervision is carried out the year before UKA's institutional reviews of HEIs' quality assurance processes (audit) and are intended to serve as a basis for the institutional reviews. In case shortcomings are identified they will be handled either within the framework of the supervision or during the HEI review.
7. Following the legal supervision review of each HEI, UKA will publish a report.

Anders Söderholm  
Director General

Colin Tück  
Director EQAR

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## Reply to EQAR eligibility confirmation

### Application no. A89 of 11/06/2019

Dear Colin,

Thank you for confirming that the application made by Universitetskanslersämbetet (UKÄ) for inclusion on the Register is eligible (your letter 28 June 2019).

We agree with EQAR that the following external quality assurance activities carried out by UKÄ fall within the scope of the ESG and should be included in the external review of our agency:

- Institutional reviews of HEIs' quality assurance processes
- Programme evaluations
- Appraisal of applications for degree-awarding powers
- Thematic evaluations

However, as for UKÄ's legal supervision of higher education institutions, we argue that what falls within the scope of ESG and should consequently be included in the external review is how the results of UKÄ's legal supervision of HEIs are used within the national quality assurance system, not the legal supervision as such.

UKÄ's legal supervision of HEIs is designed to meet the demands of Swedish law. It is to a certain extent inspired by ESG, but not explicitly designed according to ESG. UKÄ's legal supervision ensures that Swedish HEIs comply with rules and regulations in order to be able to offer high-quality education. Legal supervision of HEIs thus only partly focuses on legal matters associated with quality assurance aspects covered by ESG. On the other hand, the reports that result from UKÄ's legal supervision may serve as one of several grounds for UKÄ's reviews of HEIs' internal quality assurance procedures. The use of these reports within the national quality assurance system therefore seems relevant to include in the external review.

Considering the above clarifications, we kindly request that EQAR revise the scope of the external review accordingly.

Yours sincerely,



Anders Söderholm

Director General

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Swedish Higher Education Authority (UKÄ)

Box 7703

Anders Söderholm

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Sweden

Brussels, 12 November 2019

## Updated Confirmation of Eligibility

Application no. A89 of 11/06/2019 for Inclusion on the Register

Dear Anders,

We thank you for your letter of 17/09/2019.

As confirmed in our letter of 28/06/2019, the application by UKÄ for inclusion on the Register is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by the European Association for Quality Assurance of Higher Education (ENQA) fulfils the requirements of the EQAR Procedures for Applications.

In order to prepare the deliberations of the Register Committee on the eligibility of the application and UKÄ's activities within the scope of the ESG, EQAR contacted UKÄ via telephone on 20/06/2019 to clarify the matters below. Based on your further letter of 17/09/2019, we are pleased to clarify our eligibility decision as in the following.

We reconfirm that the following activities of UKÄ are within the scope of the ESG:

- *Institutional reviews of HEI's quality assurance processes (audit), including legal supervision of HEIs as a preparatory step (see below)*
- *Programme evaluations*
- *Appraisal of applications for degree-awarding powers (accreditation)*

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EQAR Founding Members:



In the application form, UKÄ noted that *thematic evaluation* (thematic review) is a separate external QA activity within the scope of the ESG. Based on the information provided we understand that thematic reviews are part of the external quality assurance, not a separate external QA activity within the scope of the ESG. This activity should be considered in relation to ESG 3.4.

In the application form, UKÄ stated that it did not consider *legal supervision of HEIs* to be within the scope of the ESG.

We considered the information provided in the application form, our telephone call, your website and your letter of 17/09/2019. We came to the conclusion that legal supervision relates to, inter alia but not exclusively, matters covered by the ESG.

At the same time, we understood that legal supervision is not a free-standing activity, but regularly occurs in the year preceding the institutional review and is interlinked with the review. We further understood that it is, primarily, a desk-based activity carried out by UKÄ expert staff.

While recognising its role and purpose beyond that, we concluded that — from the perspective of determining the scope of the ESG — legal supervision should not be regarded as a separate activity but as a preparatory step to the institutional review.

We therefore concluded that legal supervision is (partially) within the scope of the ESG and should be considered together with institutional review. That is, legal supervision may contribute to and influence the way in which institutional review complies with the ESG, but does not need to be reviewed against and comply with the ESG as a separate activity.

Please ensure that UKÄ's self-evaluation report covers all the aforementioned activities.

We further confirm that *statistics, follow-up and analysis of HE* are not activities within the scope of the ESG.

While these activities are not relevant to your application, it is UKÄ's choice — in agreement with the review coordinator — whether those activities should be commented upon by the review panel.

We will forward this letter to ENQA in its capacity of the coordinator of the external review. At the same time we underline that it is UKÄ's responsibility to ensure that the coordinator and review panel take

account of the present confirmation, so as to ensure that all activities mentioned are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. UKÄ has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Colin Tück'.

Colin Tück  
(Director)

Cc: ENQA (coordinator)

Tue Vinther-Jørgensen  
– by email: [tvj@ufm.dk](mailto:tvj@ufm.dk) –

Brussels, 4 March 2021

## Application by UKÄ for Inclusion/Renewal of Registration on EQAR

Dear Tue Vinther-Jørgensen,

The UKÄ - Swedish Higher Education Authority (UKÄ) has made an application for renewal of registration/initial inclusion on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of 10/12/2020 on which UKÄ's application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members as necessary, some matters in order to contribute to the consideration of UKÄ's application:

### In relation to standard 2.3 Implementing process

1. In the case of thematic evaluation, how does the panel validate the evidence and findings in absence of site visits and interviews?

### In relation to standard 3.3. Independence

2. Could you please provide details on the public procedure for appointing Director General? Is the Advisory Board involved in the appointment of the Director General in any way?
3. In the report, you discuss the appointment of the Advisory Board members (p 16) and note that the students are nominated by the Swedish National Union of Student. What is the process of nomination/selection of candidates for the other Board positions? Please explain UKÄ's and the ministry's role in that, and tell us which of the agency staff members are involved in the process.
4. Who makes decisions in cases when the Director General has a conflict of interest regarding an HEI that was evaluated by the agency?

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In relation to standard 3.5 Resources

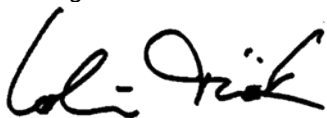
5. In the report, you mentioned that UKÄ plans to use less intensive methods of work (p 19) in order to lower the workload of the staff team. Can you please elaborate on these methods?
6. What internal plans has UKÄ developed to address the issue of staff's work overload in the future?

We would be grateful if it was possible for you to respond by 14 March 2021, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on UKÄ's application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

We acknowledge that it might not be possible to clarify all of the above. However, we appreciate your assistance and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,

A handwritten signature in black ink, appearing to read "Colin Tück".

Colin Tück  
(Director)

**Cc:** Patrick Van den Bosch (secretary)  
ENQA (coordinator)  
UKÄ



# Response to Clarification Request to the Review Panel of –the Swedish Higher Education Authority (UKÄ)

## Minutes of Video Call

Register Committee

**Ref.** A89  
**Date** 2021-03-15  
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<b>Date of the conversation:</b>	15/03/2021
<b>Review panel:</b>	1. Tue Vinther-Jørgensen (Chair) 2. Patrick Van den Bosch (Secretary)
<b>Representatives of EQAR:</b>	Aleksandra Zhivkovikj, Colin Tück

1. UKÄ has submitted the required documentation for registration on EQAR on 26/01/2021.
2. In order to prepare the deliberations of the Register Committee on the findings in the external review report, EQAR contacted the review panel via written letter (attached) for further clarification on ESG standards 2.3, 3.3 and 3.5. In mutual agreement, the panel presented their responses in a video call.
3. In relation to **standard 2.3**, the panel noted that “Thematic evaluations” follow a tailor-made methodology, depending on the topic of the evaluation. In the one evaluation carried out so far, the agency has not used interviews nor site visits.
4. The panel clarified that the evaluation was desk-based and the expert group based their findings solely on HEIs’ self-evaluation reports. The outcomes of the thematic evaluation did not lead to any formal consequence for the HEIs under review. In general, findings from thematic evaluations are not used in other ESG-aligned activities.
5. In relation to **standard 3.3**, the panel noted that the Director General and the members of the Advisory Board are appointed by the government, through processes which are pre-defined in national legislation on the work of public agencies.
6. The panel explained that the Director General is chosen through an open call and any individual can apply. The Advisory Board has no role in the process of choosing a Director General. The panel did not possess further knowledge on the details of the selection process within the ministry.
7. The panel explained that the Advisory Board was formally appointed by the government, but the composition was proposed by UKÄ itself and that proposal usually followed. The panel believed that all Advisory Board members were nominated by the stakeholder organisations, but was not aware of any codified rules about these nominations.

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8. The Register Committee further sought clarification on the decision-making process in cases when the Director General has a conflict of interest with the HEI under review.
9. The panel explained that the Director General takes all final decisions, this was prescribed by law. In practice, staff members evaluate the panel's judgement and can suggest a different outcome. The Director General takes in consideration the panel's and the staff's judgement. Different opinions and changes to the decision are recorded in the final report, and the public can access information about the opposite stances of the panel, UKÄ staff and the Director General.
10. UKÄ does not employ a deputy director. Currently, no shifting of decision-making powers to another individual/body in cases of conflict of interest is possible (e.g. on an application submitted by the Director General's former employer).
11. In regards to **standard 3.5.**, the panel noted that the agency plans to use less intensive working methods (p. 19) and the Register Committee was interested to know more about the concrete plans.
12. The panel informed that the agency plans to introduce less intensive follow-up procedures; lower the number of panel members in system-wide program evaluations; hire same panel members in several program evaluations of similar kin and to increase the number of virtual site visits. The panel saw these as welcome changes that improve the efficiency of UKÄ's processes.
13. The panel believed that due to the size of the agency and its broader scope of work, changes might take longer. The panel saw that, however, some improvements have already taken place, leading to decreased staff turnover.