

Swedish National Agency
for Higher Education:
Review of ENQA Membership

April 2012

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1 Executive summary

This is the report of a review of the extent to which the Swedish National Agency for Higher Education (HSV) complies with the European Standards and Guidelines (ESG) for external quality assurance agencies and with the membership criteria of the European Association for Quality Assurance Agencies in Higher Education (ENQA).

The Review was conducted at the request of HSV, and co-ordinated by the Accreditation Organisation of the Netherlands and Flanders (NVAO), which appointed an expert Review Panel. The assessment procedure involved a self-evaluation by HSV; an examination of documents governing HSV and describing its activities to the public; and a two-day visit by the Review Panel, during which it pursued questions raised by the evidence provided.

HSV was established in 1995 and has been a member of ENQA since 2000. Its latest review was in 2005/6, following which the ENQA Board confirmed the Agency as a full member. The Agency is responsible for a range of quality assurance activities, including evaluation of requests for degree-awarding powers in respect of new programmes, and evaluation of current programmes in relation to their conformity with requirements for degrees under Swedish law. The latter responsibility is the more significant in terms of staffing and other resources.

Since the last evaluation, the Swedish Government has prescribed very far-reaching changes to the methods and principles of external quality assurance. The Agency was instructed to develop a new system of evaluation, with closely prescribed features as to focus, evidence, and the nature and range of the judgements to be made. The timetable for the development of the new system and the date of the latest report were specified in detail. The first reports from the new system were not due to be published until March 2012 (i.e. after the Review Panel's visit).

The Review Panel found that HSV was well managed and organised, and that it had had considerable success in engaging HEIs and students with the design of those practical aspects of the new system over which it was given control. However, the extent to which the new system was prescribed cast doubts on HSV's operational independence. The system is not aligned with the fundamental principles of ESG. In the view of the Review Panel, there are weaknesses inherent in the system that make it possible that unreliable judgements will emerge, even on the narrow and reductive basis intended.

These considerations led to assessments of 'full' compliance with ENQA membership criteria 2 and 3; 'substantial' compliance with criteria 4, 6 and 8; and 'partial' compliance with criteria 1, 5, and 7. The Review Panel took the view that the limitations were due to decisions beyond the control of the Agency.

In view of these matters, and of the fact that HSV is shortly to be disestablished and its functions distributed between two new agencies, the Review Panel was reluctant to make recommendations, either to HSV about the improvement of the system, or to the ENQA Board about HSV's entitlement to membership.

2 Glossary

EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, ENQA, 2009</i>
EVA	Danish Evaluation Institute
HEI	Higher Education Institution
HSV	Swedish National Agency for Higher Education
ICT	Information and Communications Technology
NVAO	Accreditation Organisation of the Netherlands and Flanders
SER	Self-Evaluation Report

3 Introduction

Background of the review

The current review was commissioned by the Swedish National Agency for Higher Education (HSV or the Agency) in order to comply with ENQA regulations, which require member agencies to undergo external review at least once every five years. The review was 'type A' under ENQA's guidelines. The terms of reference may be found in Annex 1.

HSV first became a full member of ENQA in 2000. The Agency's latest external review was in 2005/6, when the review panel found that 'HSV complies with all the ENQA standards required for external quality assurance agencies.' The ENQA Board confirmed HSV in full membership in September 2006 on the basis of this judgement.

The review process

The review was organised on behalf of HSV by the Accreditation Organisation of the Netherlands and Flanders (NVAO). The Review Panel¹ comprised the following members:

- Professor Helmut Konrad, University of Graz, Austria (Chair)
- Ms Signe Ploug Hansen, Director of Methodology, Danish Evaluation Institute (EVA)
- Professor Mieczyslaw W Socha, University of Warsaw, Poland. Vice-president of Polish Accreditation Committee
- Ms Anca Prisacariu, National School of Political and Administrative Studies, Romania, and member of European Students Union (ESU) Quality Assurance Students Experts Pool.
- Professor David Timms, Higher Education Consultant, UK (Secretary)

The review was co-ordinated by Mr Axel Aerden, International Policy Advisor (NVAO).

¹ For more information about the panel members, see Annex 2.

The review was based mainly on the information provided by HSV in its self-evaluation report (SER), and its annexes, which amongst other documents included documentation for the public about the Agency's activities, and Acts and Ordinances of the Swedish Government relating to HSV's work. The Review Panel also held interviews with various HSV staff and stakeholders in its quality assurance procedures. The Agency's website (www.hsv.se) provided useful supplementary information.

The Self-evaluation report

A group in HSV's Department of Quality Assurance prepared the self-evaluation report. It was discussed at two seminars in the Department as a whole as well as at a meeting with the management level at the Agency. Comments from other departments were also taken into account. The University Chancellor finally approved the SER. The self-evaluation report provided the Review Panel with a good basis for their investigations.

The site visit

An outline for the site visit was prepared by NVAO in consultation with HSV, and confirmed after consultation with the Review Panel. The panel visited Stockholm 5–7 February 2012. A preparatory meeting was held on 5 February to discuss lines of enquiry. On 6 and 7 February, the panel met a representative of the Swedish Ministry for Education, members of the HSV 'Advisory Board', the 'University Chancellor' (who is chief executive of the Agency) and other Agency staff, vice chancellors and other staff from higher education institutions (HEI), experts experienced in the Agency's quality assurance activities, and students.

The dates of the visit made comment in relation to some elements of ESG difficult or impossible, due to the stage of implementation of HSV's current system of evaluation, which is not due to produce its first reports until March 2012. No published report was therefore available to the Review Panel. The Panel was able to discuss the Agency's intentions with staff and with experts and students who had been involved with the new procedures.

Report preparation

The site visit programme allowed time for the Panel to discuss its findings and judgements. Members agreed judgements on each criterion and overall. Following the visit the Secretary prepared a draft of the report, which was approved by the Chair and the Panel members after amendments. In accordance with the terms of reference, it was then sent to HSV for verification of facts.

The Swedish higher education system

Overall responsibility for Swedish higher education rests with the Swedish Parliament and Government. Higher education, research, adult education and student support are in the remit of the Ministry of Education and Research (the Ministry).

On behalf of Parliament, the Ministry oversees the operation of a Higher Education Act (the Act) and associated ordinances. The Higher Education Ordinance (the Ordinance), containing level descriptors and learning outcomes required for individual awards, is of particular significance for the Agency. The Act and ordinances were first issued in 1992, and last amended in 2010. The Agency publishes a document, 'National Qualifications Framework' (May 2011), based on the Act and ordinances, which defines the structure of programmes and qualifications, including levels ('cycles'), credits, categories of qualifications, and qualification descriptors, among other matters. The Framework is aligned with the provisions of the Bologna process and the European qualifications framework.

Sweden has 14 public-sector universities, and 20 public-sector university colleges. Public sector HEIs are defined as government agencies. Sweden also has 17 private institutions, some generalist and some of a highly specialist nature. In 2010 there were 321,000 FTE students registered for awards at all levels.

HE qualifications are categorised in the law as 'General'; 'Fine, applied and performing arts'; or 'Professional'. Arrangements for cycles and credits are in line with arrangements typical in the EHEA. Universities are entitled to award general qualifications at all three levels, university colleges at first and second levels only, though the latter can apply for powers to award qualifications at the third level. 3 independent higher education institutions are entitled to award qualifications at all levels, and 9 entitled to award first or second-cycle qualifications. 5 further providers are entitled to award qualifications in psychotherapy.

Quality assurance in Swedish higher education and the role of HSV

In general, authorization to provide a programme leading to a degree-level award in the first and second cycles ('degree-awarding powers') is granted by the Agency (with the authority of the Ministry) in the case of the public HEIs, and by the Ministry on the basis of the Agency's advice in the case of independent HEIs. Degree-awarding powers in respect of the Swedish University of Agricultural Sciences and the National Defence College are in the gift of the Ministry direct.

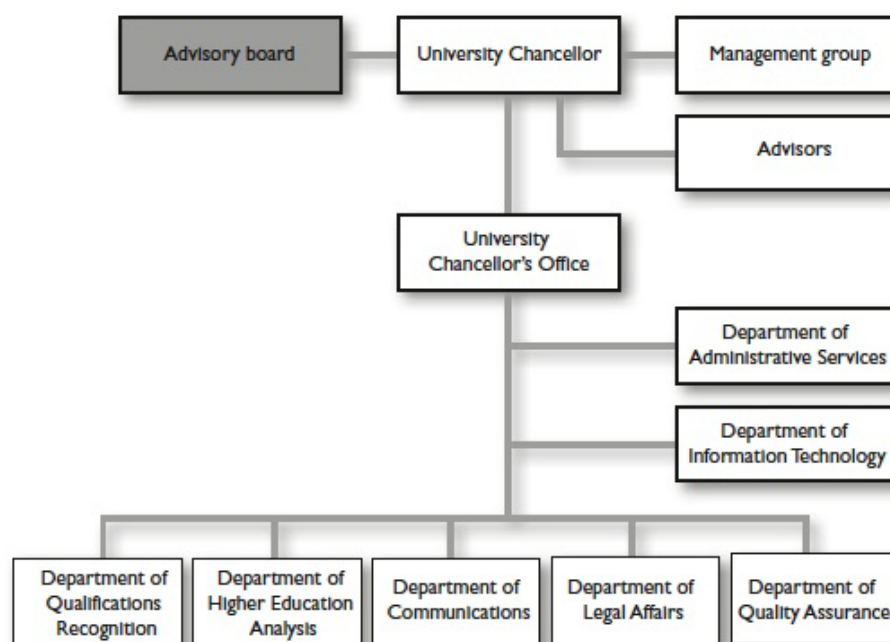
HSV's primary responsibilities for quality assurance in HEIs relate to the recognition of new programmes, and the periodic evaluation of recognised programmes. Both these activities are the responsibility of the Department of Quality Assurance in HSV, and so this report is primarily concerned with its activities. Staff of the Department confirmed the Review Panel's impressions, that 'degree-awarding powers' occupies a minor proportion of departmental resources, and programme evaluation is the Department's chief concern. Given the weighting of the degree-awarding powers procedure in the Agency's work, and given also that it has remained relatively unchanged since the last ENQA review, the greater part of this report is concerned with programme evaluation.

HSV's organisation and funding

HSV was established in 1995 and has responsibilities for a range of matters relating to higher education, including statistical analysis, the provision of information about Swedish higher education, certain legal services in connection with higher education, advice on the recognition of foreign qualifications, and quality assurance. There are departments for each of these responsibilities, plus departments for administrative services and IT, though the Department of Quality Assurance is the largest by some margin, with 32 of the Agency's 150 or so staff. Other departments in HSV assist the Department of Quality Assurance in professional matters, such as production of publications by the Department of Communications; but these activities are supportive of, not central to the Department's work.

HSV is a Government Agency with a budget set annually in a 'public service agreement'. In 2011 the budget was some SEK177m (EUR21m), of which the portion allocated to the Department of Quality Assurance was about 30%. The Agency is also permitted to charge fees for the administration of the Swedish Scholastic Aptitude Test. This activity was expected to yield about SEK3,5m (EUR0,4m) and SEK18,5m (EUR2m) in 2011.

Organizational Chart of the Agency



The University Chancellor is head of the Agency and has sole responsibility for all formal decisions taken in its name: the 'Advisory Board' is strictly advisory. Each department has a head. The Department of Quality Assurance is divided into three teams of roughly equal size, each with a team leader, but all staff in all teams are involved in all the main tasks that fall to the Department: it is very 'flat' as regards both hierarchy and the division of labour.

HSV's main procedures

At the time of the last ENQA review of the Agency (2005/6), a relatively conventional system of national quality assurance was in place. Quality 'audit' covering institutions was gradually being phased out, and subject and programme evaluations were taking greater prominence. During the 2001-07 cycle of review all programmes in 76 subjects were 'appraised'. According to the 2006 ENQA review report, the system of evaluation in place conformed to ESG, and 'the requirements regarding all stages in the procedures [were] met.' Degree-awarding powers in 2012 have only marginally changed since 2006, the chief difference being in practice for 'site-visits', which are now usually simply meetings with proposers at the HSV offices.

At the end of the 2001-2007 cycle, the next cycle of evaluations was initiated. The new system developed from what it replaced, with many of the same elements, but less emphasis on procedure and more on outcomes for students. The Review Panel was told, however, that while HSV, HEIs and students agreed on a replacement method, the Ministry considered the proposals unsatisfactory. The situation was resolved by a determination by the Ministry and Parliament as to the focus of evaluation, the nature of the judgements, and the evidence on which judgements were to be made.

Under a bill enacted by the Parliament in June 2010, internal quality assurance was largely to be left to the universities themselves, and was not the concern of HSV. The existence of learning outcomes specified for all qualifications in statute, and the requirement that all programmes include terminal 'projects' provided the framework for the new system of evaluation, which was outlined in a 'Government Decision' of July 2010 (See Annex 3).

Evaluation was to be by programme and was to focus on ‘results’, defined as the extent to which students in the programme achieve the outcomes specified for qualifications in the [National Qualifications Framework](#). The Government Decision decreed that, subject to the overall responsibility of the National Agency, a selection from the outcomes was to be made in advance by panels of assessors, to include subject experts, students and representatives of ‘social partners’. Three forms of evidence about fulfilment were permitted: independent projects, self-evaluation by the HEIs, and information from site visits and questionnaires completed by students and alumni. The projects were to be given ‘most weight’ in arriving at judgements about programmes. The content of the self-evaluations, also specified, was intended to ‘account for’ outcomes difficult to capture in projects, and to describe ‘prerequisites’ that might affect outcomes. The Government Decision limits permissible prerequisites to teachers’ qualifications relevant to the outcomes, and prior achievements of students. Some flexibility is given as to the questionnaires, but they are nonetheless ‘mainly intended to answer questions about whether a programme fulfils the demands of employability’.

Evaluation was to yield a judgement on a three-point scale on each programme in each institution. The judgements are intended to ‘provide the basis’ for withdrawal of degree-awarding powers from an institution with ‘serious shortcomings’ that fails to improve, and also for the allocation of extra resources to provision of ‘very high’ quality. HSV was instructed to consult employers and HEIs in the detail of design, to begin the new system ‘at the end of 2010/beginning of 2011’, and to complete and report on all evaluations by 15 June 2014. The Agency thus had some six months to design a system [in line with](#) these requirements.

The scheme in operation in February 2012 meets the specification. The ‘cycle’ is divided into four ‘phases’, each covering about a quarter of all students. A panel of evaluators is appointed for each subject. Within guidelines produced by the Agency, assessors propose a selection of outcomes to be tested, from among those in the National Qualifications Framework. Different outcomes, or more or less outcomes, may be specified for different subjects. The assessors also consider what shall be the criteria for ‘inadequate’, ‘high’ and ‘very high’ quality in relation to the outcomes. These matters are discussed with the HEIs under review, and finalised by HSV.

HEIs provide data on all projects completed in the most recent semester (or in previous ones, if the numbers are small). A computer programme selects a set of 5—24 projects at random, depending on the total number produced for each programme. HEIs anonymise the projects selected, and upload them to an HSV database. The projects are then distributed amongst the academically qualified members of the panel of assessors (and also in some circumstances among similarly qualified ‘readers’), who consider them, strictly from the point of view of the outcomes selected for evaluation, and award a mark of 1, 2 or 3 against each outcome for each project. They also provide a short narrative description—in practice a few sentences and sometimes a single sentence or a single word—explaining their marks.

This exercise produces a table for each programme, with the projects on one axis and the outcomes on the other. If the assessors consider that the matrix provides sufficient evidence about goal attainment, it is used to derive an overall score. If goal attainment is not found in the projects, the panel may search for evidence in the self-evaluation, student interviews or in alumni questionnaires. There is no hard and fast algorithm for determining the score, but HEI and HSV staff involved in the first phase stated that ‘about a third’ of marks in the lowest category would be likely to result in an overall mark in the lowest category. The agreed mark is a recommendation to the University Chancellor, who is responsible formally for determining the result.

The Review Panel was informed that explanations of the marks will be compiled for each programme, and form the basis of a short narrative explaining overall the basis for the final mark awarded in relation to each outcome. This will provide a text of three or four pages per institution. It is intended that these will be gathered together to provide an overall report for each subject, with a section for each institution, and an introduction explaining the method and the basis for the marks. The reports from the first phase were due to be finalised in March 2012, so no actual example of a report was available to the Review Panel.

The Review Panel thought it important to describe the Swedish method in detail, because it is so unusual, and because the method itself has such significant implications for HSV's ability to meet ESG and thus the ENQA membership criteria.

4 Findings

4.1 ENQA criterion 1 – Activities (ESG 3.1, 3.3)

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis. The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

HSV undertakes external quality assurance activities on a regular basis: the 'cycle' of evaluations is currently set at 4 years. HEIs rather than HSV initiate the procedure for permission to award new degrees. These activities are core functions of the Agency, and represent the largest demand on its resources, including staffing.

ESG 2.1 Use of internal quality assurance procedures

Standard: External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

Guideline: The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met.

If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

The procedure for degree-awarding powers requires HEIs to explain the quality assurance activities in place to protect the quality and standards of the programme proposed; however, the Review Panel was informed that this was only one of six criteria on which judgements were based.

The Government Decision that determines the parameters for the Agency's system of evaluation instructs that evaluation of 'processes related to outcomes' are 'to be shifted from national to local level'. In the case of a judgement of 'inadequate', a programme has one year to improve, and since a year is insufficient time to generate a new set of projects to re-run the evaluation, the Agency's judgements on progress are to be made by reference to the arrangements HEIs put in place to remedy inadequacies. However,

the SER itself acknowledges that in this system ‘the focus is almost exclusively on results.’

The main external quality assurance activity undertaken by HSV therefore cannot be said to ‘take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.’

Assessment against ESG Standard 2.1

Partially compliant.

ESG 2.2 Development of external quality assurance processes

Standard: The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

Guidelines: In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used.

As external quality assurance makes demands on the institutions involved, a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

The SER does not give a clear statement of the aims and objectives of the quality assurance processes undertaken by the Agency. Some are suggested in the course of the narrative: for instance, the judgements are intended to give information used in apportioning resources; they inform the public; they give reassurance to the government that the requirements of the Act and ordinances are met.

The Review Panel was directed to a ‘Policy’ of some 1½ pages, (Annex 4) which refers to the objective of ‘developing’ the higher education system in Sweden, and to providing information to interested parties, especially students, HEIs themselves, employers and Government. This document was not produced in advance of the implementation of the new method for evaluation, but as it developed, though the brief time allowed to HSV to devise the new procedure perhaps made this inevitable. The Government Decision on which the system is based does not lead with aims, though the objectives of providing information on which to base decisions to close some programmes, and to increase funding for others are stated in the detail.

Given the time available, it appears that HSV did all it could to engage HEIs, students and employers on matters where decisions were not determined in advance. The SER described ‘Reference Groups’, including vice chancellors, experienced subject experts and students, which were consulted on options. The Review Panel learned that the Advisory Board was also consulted in the course of development. Pilot studies of how the new system might work were undertaken, which influenced detail. In the six months available, HSV published a document for the public describing the method (*The Swedish National Agency for Higher Education’s quality evaluation system 2011—2014*. HSV, 2011), a document for HEIs on what to include in self-evaluation reports, and manuals for HSV staff managing evaluation panels and for the assessors themselves.

Expert subject assessors considered that the aims of the system were ‘control’ or ‘ranking’, neither of which was stated as an objective in any ‘official’ paper. The Review

Panel considered that the evaluation system did in fact have the features of quality 'control' rather than quality 'assurance' or 'enhancement'.

Assessment against ESG Standard 2.2

Partially compliant.

ESG 2.3 Criteria for decisions

Standard: Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

Guideline: Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

The Government Decision prescribes that 'most of the overall assessment is to be based on the degree projects', though it provides some latitude on how to interpret 'mostly', in recognition of the fact that some important intended outcomes may not be fully reflected in written projects in some subjects.

The procedure includes discussion with HEIs of the outcomes selected and the criteria for grading them. However, the interviews conducted by the Review Panel suggested that the detail of the mechanism of assessment described above, such as the use of the 'matrix' and the assumption that 'about a third' of 'inadequate' marks is likely to mean a judgement of 'inadequate' overall, has not been communicated to HEIs. The HSV staff managing the subject assessment panels indicated that though all assessors will have read the SER, discussion of the judgement effectively stops if the 'matrix' of marks gives an unambiguous indication of a result. It appeared to the Review Panel that the apparently 'scientific' nature of the quantitative information was in practice likely to overwhelm qualitative considerations based on SERs, except at the very margins. The Review Panel concluded that the institutions and programmes to be judged had not been fully informed on the way in which the criteria were applied.

The numbers of assessors involved in individual judgements provided good grounds to believe that judgements within subjects would be consistent, though the facts that different outcomes, and different numbers of outcomes may be assessed in different subjects suggested that judgement between subjects may be less consistent. However, since no report has yet been published, and the first of four phases is not yet complete, it is impossible to state that this will or will not be the case.

Assessment against ESG Standard 2.3

No reliable assessment is possible, until some reports are published.

ESG 2.4 Processes fit for purpose

Standard: All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

Guideline: Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes. Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance.

Amongst these elements the following are particularly noteworthy:

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task;
- the exercise of care in the selection of experts;
- the provision of appropriate briefing or training for experts;
- the use of international experts;
- participation of students;
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached;
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review;
- recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality.

The fact that the aims and objectives of the Swedish evaluation system are poorly specified means that it is difficult to declare the procedures fit for the purpose intended. On the other hand, the aims and objectives may be 'reverse engineered' from the detail of the system; and if its aims and objectives are simply to eliminate some weak provision and to facilitate a system of preferential funding, then it seems likely to succeed.

Experts undertaking external quality assurance activity are usually nominated by HEIs, though they are appointed by HSV on the basis of CVs and a specification of competences needed. Students and 'social partners' are appointed by similar means. The Review Panel was informed that the number of projects to be read sometimes necessitated the appointment of 'Readers' to assist with assessment: these too were appointed only after consideration of CVs, and were required to meet criteria similar to those applied to panel members. All participants in the procedure, and in the procedure for degree-awarding powers, had training, though the time available appears to have meant that it was training 'on the job' rather than in advance. Nonetheless experts and students engaged in the process indicated that meetings had been frequent and had included a lot of time for discussion of principle and practice. However the 'manual' produced for experts was sketchy, and does not even contain the kind of detail outlined above, such as the marks matrix.

International experts are used in the evaluation procedure, though the Review Panel was informed that a requirement by Parliament that all 'official' reports be written in Swedish meant that only international experts from the Nordic countries were practicable. In fact it appeared to the Review Panel that the reliance of the system on the assessors' ability to read student projects written in Swedish was a more important factor.

Students are represented on the Advisory Board, with 2 students among the 9 members. On the evidence of the students met by the Review Panel, they were very active and effective members of the consultative groups that helped design the detail of the system. They are 'full' members of subject evaluation panels, and though they are not involved in the marking of individual projects, they are fully involved in discussions about overall grades.

The Review Panel was not convinced that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached. The available grades are 'very high quality', 'high quality' and 'inadequate quality'. In fact, the system measures 'standards', not 'quality', and depends on the proposition that a

selection of projects marked in relation to a selection of intended outcomes provides a reliable indication of 'the achievement of outcomes' in a programme overall. Though the Government Directive acknowledges that some important outcomes may not be captured in written projects, and this is why the additional information is included, assessors met by the Review Panel acknowledged that in the first round there had been a tendency to select outcomes that were more amenable to assessment by project. This means that what is likely to be demonstrated is the achievement of some outcomes only.

The Swedish system is based on a self-evaluation/site visit/ published report model of review, though student projects are far more important than any of these elements in practice, and by direction of Government. The SER is not the basis of review but a supportive document only, influencing the final grade for the assessment only when the marks based on the projects are indeterminate. The Review Panel learned that though HSV still uses the phrase 'site visit' what is intended is ICT-based only; though in the view of the Review Panel, the extremely limited focus of the review probably means that a conventional site visit would not be worthwhile. The SER states that there are occasions on which no site visit, however defined, takes place. Even in the degree-awarding powers process, the 'site visit' is a meeting at the HSV offices, though in almost all cases the programmes proposed are from HEIs already known to the Agency and their expert assessors.

The Agency informed the Review Panel that it is not intended that the draft reports will routinely be sent to HEIs for review before publication. Draft reports will go not go to HEIs even in cases where a judgement of 'inadequate' is proposed: it is intended that this will happen only when, following a judgement of 'inadequate', and a follow-up procedure also considered inadequate, closure of a programme is proposed. The SER says explicitly that routine follow-up for programmes in the 'high quality' and 'very high quality' categories would not be feasible in a four-year cycle. The Review Panel was aware of follow-up procedures within months in other European systems.

The Review Panel was informed that the reports that are likely to emerge from evaluation would not include recommendations. In these circumstances it is difficult to see how the objective of 'development' will be facilitated. The reports will give only very limited information to students: they will focus on standards alone, as revealed in student projects, and provide no information about other intended outcomes, or matters such as library provision. Students met by the panel (who had all been involved in subject panels or in consultation groups) considered that the system yielded information about the students whose projects had been evaluated, rather than their programmes. The Review Panel took the view that the only stated objectives that seemed reasonably likely to be fulfilled were the ones about closure of underperforming programmes and the provision of data for funding decisions.

'The importance of institutional improvement and enhancement policies' is 'fundamental' to most national systems, but in the Swedish system it is at best a by-product. If HSV finds that an intended outcome is not achieved, an HEI might take action to make sure that it is achieved in future. HSV staff believe that the system has given encouragement to HEIs to take outcomes more seriously than before, and staff in HEIs believe that assessment practices have improved as a result of HEIs' increased accountability in this area.

It is the Ministry's view that by closing an 'inadequate' programme, Swedish higher education will be 'enhanced' overall; the Review Team considered that this was not what ESG intended by its use of the word.

Assessment against ESG Standard 2.4

Partially compliant.

2.5 Reporting

Standard: Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

Guidelines: In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership. Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone.

In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations. There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers.

Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

It is intended that reports shall be published. Models of the reports seen by the Review Panel indicate that, in relation to each institution, they will be very brief (some 3 or 4 pages with a good deal of white space). The decisions are likely to be clear, in that they will be expressed as single figures, with a few lines of explanation about why marks were awarded. There will be no commendations or recommendations. There is likely to be an introduction explaining the methods used in the evaluation, and listing the outcomes chosen and the criteria for evaluating their achievement.

It is intended to publish the reports on the Agency website, and they will thus be readily accessible. However, no report arising from the new system has yet been published, and so it is impossible to assess matters of style.

Assessment against ESG Standard 2.5

No reliable assessment is possible, until some reports are published.

2.6 Follow-up procedures

Standard: Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

Guidelines: Quality assurance is not principally about individual external scrutiny events: It should be about continuously trying to do a better job. External quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

The Swedish system of quality assurance will punish those who do badly by removing the right to award the degree, and reward those who do well with increased funding. It is explicitly not aimed at helping HEIs 'to do a better job'. Except in the case of 'inadequate' judgements, HSV's role in external quality assurance ends with the publication of the report.

Assessment against ESG Standard 2.6

Partially compliant.

2.7 Periodic reviews

Standard: External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

Guidelines: Quality assurance is not static but a dynamic process. It should be continuous and not 'once in a lifetime'. It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

Government determined the four-year cycle. It appears that the present system was devised in response to the outcomes of previous cycles: it amounts to revolution not evolution.

There is no information as yet on whether the system's demands on institutions will be greater than are necessary for the achievement of its objectives.

Assessment against ESG Standard 2.7

Fully compliant.

2.8 System-wide analyses

Standard: Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments etc.

Guidelines: All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work.

HSV's Department of Higher Education Analysis publishes sector-wide statistical analyses of trends in such areas as numbers of foreign students, numbers enrolled for qualifications at different levels, etc. They are responsible for the very useful data in the Agency's Annual Report on *Swedish Universities & University Colleges*, which is available in a 'short version' on the HSV website. However, the Review Panel learned that there is little joint work between the Department of Higher Education Analysis and the Department of Quality Assurance, and the 'short' Annual report for 2009 (the latest year in which programme evaluations were published) says nothing about the outcomes of the Agency's work in quality assurance.

In the past, the Department of Quality Assurance has produced a range of reports on the outcomes of its activities, identifying emerging good practice and areas of persistent difficulty. Many of them appear on the HSV website, and are explicitly follow-up reports to the work carried out in the former audit and evaluation regimes. It is difficult to imagine what 'system-wide' analyses will result from the present system. The fact that reports on all institutions by subject will be bundled will probably reveal differences in

performance between different outcomes or different institutions. However, in this context it is worth quoting one of HSV's own reports, from 2009:

... simplification of information ... involves a loss of information ... information simplified to the extent called for in weighted ranking lists is hardly information worth the name, in the context of the quality of higher education.

Ranking of universities and higher education institutions for student information purposes?

HSV Report 2009:27

Assessment against ESG Standard 2.8

Partially compliant.

Assessment against ENQA Membership Criterion 1 (ESG 2.1—2.8)

Partially compliant.

4.2 ENQA criterion 2 – Official status (ESG 3.2)

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

HSV is a government agency recognised by the Swedish Higher Education Act first issued in 1992 and updated regularly since. Its role in regulating Swedish higher education is re-defined in the version of the Act passed in November 2011. Detail of HSV's activities is also specified in a range of Government 'Ordinances' and 'Decisions'.

Assessment against ENQA Membership Criterion 2

Fully compliant.

4.3 ENQA criterion 3 – Resources (ESG 3.4)

Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

The Agency employs some 100 staff, 32 of them in the Department for Quality Assurance. In addition, between three and four hundred 'experts' are engaged at any one time in evaluation and degree-awarding powers work.

There is some evidence that the Agency found the resource demands of implementing the new system difficult within the budget proposed, which was unchanged from previous years despite the new demands. The new arrangements for site visits, for instance, were established in part for resource reasons, though the Agency undertook a careful evaluation before it determined their new form.

Staff met by the Review Panel confirmed that resources were available for personal and professional development, as well as staff-development considered desirable for the Agency's own purposes. The premises within which the Agency works are comfortable and well appointed, and, it appeared, well used by members of the HE sector. The Agency itself considers that 'the financial resources available to us today are sufficient' (SER 36).

Assessment against ENQA Membership Criterion 3

Fully compliant.

4.4 ENQA criterion 4 – Mission statement (ESG 3.5)

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

This statement should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

HSV has no glossy 'Strategic Plan', of a kind common in other European agencies. Such plans typically contain 'mission statements' and objectives, and are written in a form that translates their roles as defined by government (or whoever commissions their work) into language that all stakeholders, including the general public, can understand. None was referred to in the SER, and none was provided in any of the annexes that accompanied the SER. The Review Panel asked the University Chancellor whether there was a 'strategic plan', where a 'mission statement' might be found, and he referred them to the statutory 'Ordinance' described above, and to the public service agreement, also devised by Government. The Ordinance states that HSV 'is responsible for issues relating to higher education institutions...' and in particular 'responsible for the quality assurance of higher education' through its procedures for evaluation and degree-awarding powers, and though this is unambiguous, it is less a statement of mission or strategy than a simple statement of function.

The Review Panel was also referred to the 'Policy' (Annex 4) discussed under ESG 2.2 above; but while the 1½ page document might just qualify as a 'Mission Statement', it appears to the Review Panel an inaccurate description of the current goals of the Agency in practice, and did not contain strategy or objectives.

On the other hand, most other matters falling under this heading are dealt with in one or another other document published by the Agency. The SER itself, for instance, is available on the public website, and contains a useful statement of historical context. Report 2011: 3R, *The Swedish National Agency for Higher Education's quality evaluation system 2011—2014*, gives information on the division of labour with the HEIs, and, at least implicitly, shows that external quality assurance is a major activity of the Agency and a systematic approach to achieving its goals and objectives exists.

Assessment against ENQA Membership Criterion 4

Substantially compliant.

4.5 ENQA criterion 5 – Independence (ESG 3.6)

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

An agency will need to demonstrate its independence through measures, such as:

- its operational independence from higher education institutions and governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts);
- the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence;
- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

The Education Act, the Ordinances and the Government decisions all make clear that the decisions of HSV are independent of the HEIs, and there are several instances where the law explicitly states that decisions are to be taken by HSV on behalf of Government. The Act states explicitly, for instance, that it is the Agency, not the Minister, who determines permission to award qualifications in the first and second cycle in HEIs. The Agency is also autonomous in the appointment of external experts, and the determination of the outcomes of the procedures prescribed. In those areas where the Agency recommends to the Ministry (such as whether a private HEI shall have degree-awarding powers), none of the current University Chancellor's recommendations has been rejected. Nonetheless, the Review Panel was unable to conclude that HSV was 'independent'.

It is to be expected of any national agency that its mission, the overall aims and even the general objectives will be established either by government or within a framework established by government. When the agency is designated a 'Government Agency' this expectation is reinforced. However, in the case of HSV, key procedures and techniques, the evidence on which the Agency's judgements are to be based, and the range of acceptable judgments are all determined at government level too. The detail is explained throughout this report.

Having very precisely specified the system that was to operate, when it was to begin, and when all the final reports were to be delivered, the Ministry gave freedom to the Agency to devise a practical implementation plan. It is greatly to the credit of the Agency, and in particular the University Chancellor, that the HEIs were engaged in a way that has resulted in a considerable degree of goodwill, in the context of a system that was recognised by all concerned as a system of 'control'.

Assessment against ENQA Membership Criterion 5

Partially compliant.

4.6 ENQA Criterion 6 – Criteria and processes (ESG 3.7)

The processes, criteria and procedures used by agencies should be pre-defined and publicly available.

These processes will normally be expected to include:

- a self-assessment or equivalent procedure by the subject of the quality assurance process;
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
- publication of a report, including any decisions, recommendations or other formal outcomes;

- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

Agencies may develop and use other processes and procedures for particular purposes. Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people. Agencies that make formal quality assurance decisions, or conclusions which have formal consequences should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

The key processes and procedures used by the Agency are pre-defined and publicly available. The Education Act, the Ordinances and the Government Directive are all public documents. As indicated above, HSV publishes an outline description of its evaluation methods in *The Swedish National Agency for Higher Education's quality evaluation system 2011—2014*, and there is also a document on how to write self-evaluation documents: *General Guidelines for Self-evaluation in the Swedish National Agency for Higher Education's quality evaluation system 2011—2014*.

However, this is another case where the Swedish system meets the standard under a literal interpretation, but does not conform to usual expectations, as expressed in the 'Guidelines' in ESG. The processes include self-assessment, external assessment by a group of experts including a student, and a 'site-visit'. However, in most cases the self-evaluation is a relatively minor part of the process, and staff of the Agency stated that if the judgement is obvious from the scores in the matrix, it will not be necessary to refer to it further. The 'site visit' may not happen at all, and if it does, will not involve a visit to the site. Though reports with decisions will result from the procedures, the reports will not contain recommendations, and there will be no follow-up procedure, except in the case of a programme judged 'inadequate'. The procedures cannot confidently be said to lead to consistent decisions: this matter is discussed above in relation to ESG 2.4. There is no appeals procedure (see below, ENQA Criterion 8).

Assessment against ENQA Membership Criterion 6

Substantially compliant.

4.7 ENQA Criterion 7 – Accountability procedures (ESG 3.8)

Agencies should have in place procedures for their own accountability.

These procedures are expected to include the following:

- i. A published policy for the assurance of the quality of the agency itself, made available on its website;
- ii. Documentation which demonstrates that:
 - the agency's processes and results reflect its mission and goals of quality assurance;
 - the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts;
 - the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties;
 - the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board); an internal reflection mechanism (i.e. means to react to internal and

- external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.
- ii. A mandatory cyclical external review of the agency's activities at least once every five years which includes a report on its conformity with the membership criteria of ENQA.

HSV's SER states that 'a joint policy [for the assurance of the quality of the agency itself] is under development'. The Review Panel noted that HSV has been in existence since 1995, and that ESG was first published, with this standard, in 2006. At present, therefore, there is no 'published policy for the assurance of the quality of the agency itself'.

As indicated above, in relation to ENQA Criterion 4.4 ('Mission Statement'), the single 'Policy' document (Annex 4) defines goals (though no 'mission') that are hard to reconcile with the processes and intended results of the evaluation method now in force. The Agency's report, *The Swedish National Agency for Higher Education's quality evaluation system 2011–2014*, is internally consistent, but the objectives it describes are far more limited than those of the 'Policy', being confined to the HEIs' accountability for their use of public money, and information for students and employers only.

The Agency has arrangements to ensure that experts used as evaluators have no conflict of interest, and the processes of evaluation take pains to ensure that as far as possible the institutions under evaluation are not identifiable from the main evidence considered.

The Agency makes no use of subcontractors in its work.

Though no formal procedure is in place for the overall quality assurance of the Agency's own work, the Agency does make considerable efforts to assure itself that evaluations are undertaken in a comparable manner. A 'Project Manager's Manual' describes how a moderating function is undertaken by Agency staff ('project managers'), and assessors and reviewers in each team compare sample evaluations at the outset to enable them to set standards. Though the individual marks for each project are the work of individual assessors, decisions on overall scores are made jointly. These arrangements for comparability, however, appear to the Review Team to be undermined by the flaws inherent in the method, described above in relation to ESG 2.3 ('Criteria for decisions').

Staff of the Agency do meet to exchange views on the progress of the method for evaluation, and there is a standing 'working group', which includes staff and students, who are consulted on problem aspects. The University Chancellor consults the Agency's 'Advisory Board' regularly.

The Review Panel had no doubt that all these mechanisms were useful, and indicated the Agency's willingness to be self-critical and to respond to the views of its stakeholders; however, they appeared reactive, and did not constitute a 'procedure'. Even such limited tools as exit questionnaires for assessors are still only 'being developed'.

External review of conformity with ENQA criteria at least once every five years is not mandatory for HSV, though the Agency was reviewed at its own instigation in 2006 and 2012.

Assessment against ENQA Membership Criterion 7

Partially compliant.

4.8 ENQA criterion 8 – Miscellaneous

The Agency pays careful attention to its declared principles at all times, and ensures both that its requirements and processes are managed professionally and that its judgements are reached in a consistent manner, even if the judgements are formed by different groups.

If the Agency makes formal quality assurance decisions, or conclusions which have formal consequences, it should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of the Agency.

The Agency is willing to contribute to the aims of ENQA.

In relation to the extent to which the Agency pays attention to its declared principles, see ENQA Criterion 1 (ESG 2.3), and ENQA Criterion 7, above. The Review Panel formed the view, based on the Agency's management of the present ENQA review, and on information provided by students and staff of HEIs, the members of the Advisory Board and the representatives of the Ministry, that the Agency manages its requirements and processes in a highly professional manner, and that this has generated a high level of trust amongst its stakeholders.

The matter of appeals is particularly problematic. The SER (p. 40) says that there is no appeals procedure, and that this was the subject of comment by the last ENQA review team, which stated that 'Swedish law does not allow of appeal against ... decisions'. This statement was re-iterated to the present Review Panel, with the explanation that one government agency may not appeal against a decision by another.

The 2006 Review Panel was aware that the University Chancellor is solely responsible for decisions of the Agency, though they did not mention this fact as an aggravating factor in relation to the absence of an appeals procedure. Moreover, in 2006, there were arrangements under which the descriptive parts of reports were routinely sent to HEIs in advance of publication, for comment. The present system has more significant consequences than the 2006 system, since it is explicitly intended as a device for rewarding some programmes. Though draft reports are sent to HEIs when a programme faces closure, they are not sent before HSV has determined that it is judged 'inadequate'.

Following the 2006 report, the ENQA Chair wrote to the then University Chancellor, stating that while the ENQA Board re-confirmed HSV as a Full Member of ENQA, 'the question of the lack of an appeals process remained a matter for further clarification and consideration', and he recommended that HSV 'explore the question of appeals with the national government before the next national review.'² The present Review Panel was informed that the question had been put to the Ministry, but no answer had been forthcoming. The Review Panel thought this situation even less acceptable than in 2006, due to the circumstances described above, though they recognised that this was another criterion with which HSV was unable to comply due to Government directive.

In relation to the Agency's contribution to the aims of ENQA, a former University Chancellor was a member of the ENQA Board for a three-year period. The Review Panel also saw evidence that the Agency is frequently represented in ENQA working groups. HSV staff regularly participate in ENQA conferences.

Assessment against ENQA Membership Criterion 8

Substantially compliant.

² P Williams to Sigbrit Franke, 16/10/06.

6 Conclusion and development

There is an unusual number of ‘partial compliance’ judgements in this report, especially in view of the experience and standing of HSV. However, the occasions on which the Agency falls short of ‘full compliance’ are consequent on the context in which it is obliged to work, in almost every case.

The Review Panel wishes to stress that the professionalism, expertise and commitment of HSV staff were evident at all levels and at all times in the course of the evaluation. HSV has done all in its power to engage Swedish HEIs with the system of external quality assurance they are required to implement. Vice chancellors, expert evaluators, staff in quality assurance units in HEIs and students interviewed by the Review Panel gave great credit to the University Chancellor and HSV’s Department of Quality Assurance for their efforts to involve them in making these prescriptions work.

However, the present Swedish system is fundamentally at odds with ESG. ESG’s first principle is that external quality assurance should build on the results of internal quality assurance, but the Swedish system takes no account of HEIs’ arrangements for internal quality assurance, except at the very margins. A basic principle of ESG is that quality assurance systems should lead to enhancement. In the Swedish system there are no recommendations for improvement. Though the Review Panel could get no authoritative statement of the aims of the system, the word used most stakeholders interviewed was ‘control’. Staff and students involved in the first phase of evaluations stated that the purpose was described to them as ‘ranking’. ESG are about quality as much as standards, but the Swedish system is interested in standards almost exclusively. It is a fundamental requirement of the ENQA criteria that agencies should be ‘independent’, in terms of the ‘definition and operation of [their] procedures and methods’. HSV cannot be considered ‘independent’, due to the extent to which their procedures and methods, as well as overall aims and objectives have been dictated by Government.

HSV’s opportunities to fulfil some other aspects of ESG and the ENQA membership criteria are inhibited by Government directive, even where they are not frustrated. These matters include the specification of aims and objectives; the engagement of stakeholders with the development of procedures; the coherence of declared aims, objectives and methods; the role of self-evaluation and site visit in reaching judgements; the recognition of the contributions made by institutional improvement and enhancement policies; the content of reports and the formulation of recommendations; arrangements for follow-up; and the availability of an appeals procedure. The haste with which the Agency was required to devise the details of the new procedures, organise the management of a huge mass of data, and train the expert evaluators and students made it very difficult to fulfil some of the details of ESG requirements relating to consulting and informing stakeholders.

It is not possible to reach conclusive judgements about the Swedish system in relation to any aspect of ESG that relates mainly to reports, since none had been published at the time of the review.

Furthermore, the Government intends to reform the three agencies currently responsible for different aspects of higher education and to create two new agencies. The various functions of HSV will be distributed between them, and though one of the agencies will manage arrangements for evaluation, HSV itself will be disestablished. There is no intention to change the method of evaluation, and Agency staff indicated that the broad intention is to separate ‘support’ functions from ‘accountability’ functions in the new structure. These plans seemed to the Review Panel to be consistent with the explicit and implicit aims of the present method of evaluation, but not with those of ESG.

In view of the external constraints on HSV imposed by Government, the limits on the evidence available due to timing, and the imminent disestablishment of the Agency, the Review Panel is reluctant either to make recommendations to HSV about possible changes to the detail of the Swedish system, or to the ENQA Board about HSV's entitlement to membership of the Association.

7 Annexes

Annex 1: Terms of Reference

External review of the National Agency for Higher Education in Sweden

Background

In accordance with the ENQA membership criteria laid down in the Membership Provisions of ENQA, member agencies are required to undergo external reviews against the membership criteria, and there- by the Standards and Guidelines for Quality Assurance in the European Higher Education Area as adopted by the European Ministers in charge of higher education in Bergen in 2005, at least once every five years. The National Agency for Higher Education in Sweden underwent its last review in 2005/06.

Terms of reference

Aim

The aim of the exercise is to establish whether the National Agency meets the ENQA standards with regard to both its external evaluation processes and its internal quality assurance. The review is a type A whose sole purpose is to fulfil the periodic external review requirement of ENQA membership.

The review will be organized by an international quality assurance organisation, the NVAO.

Organisation of the review

The panel members should have expertise in and practical experience of evaluation of higher education. They should be independent of the National Agency. The panel should include international experts on quality assurance in higher education, a student and a secretary.

The panel should have an equal gender distribution.

The co-ordinating body is the NVAO. The language used throughout the review process will be English.

Methodology and criteria

The methods should be based on the principles and criteria established by ENQA in its reports "Standards and Guidelines for quality assurance in the European Higher Education Area" and "Guidelines for external reviews of quality assurance agencies in the European Higher Education Area". Thus The National Agency will prepare a self-evaluation report. The expert panel will meet as it sees fit and is free to seek additional information regarding the National Agency's evaluation activities at its discretion.

The following criteria apply:

- The National Agency is formally recognised by competent public authorities in Sweden
- The National Agency undertakes external quality assurance activities on a regular basis
- The National Agency has adequate and proportional resources, both human and fiscal to enable it to organize and run external quality assurance processes in an effective and efficient manner, with appropriate provision for the development of its processes and procedures
- The National Agency has clear and explicit goals and objectives for its work publically available
- The National Agency is independent to the extent that it has autonomous responsibility for its operations and conclusions.
- The processes, criteria and procedures used by the National Agency are predefined and publically available
- The National Agency has in place procedures for its own accountability.

Report

The panel will prepare a report of a maximum of 40 pages containing its conclusions and recommendations in relation to the aims of the review and the criteria specified above.

Expected workload and time frame

It is estimated that the workload of the panel will be equivalent to approx. two weeks full time for the chair and one week for other members. The self-evaluation report will be submitted to the Review Secretary (NVAO) at the beginning of December 2011. The panel should present its report no later than 16 of March 2012.

Reports prepared for the review

A self-evaluation report will be produced by the National Agency for Higher Education in Sweden (Department of Quality Assurance) in English. The report will be submitted to the Review Secretary.

The panel members are free to request any relevant material besides that which has been specified above. These will be translated into English, if necessary.

Stockholm, Sweden 2011-11-11

Annex 2: Members of the Expert Panel

Chair of the Expert Panel

Helmut Konrad, Professor of Contemporary History, University of Graz. Dean, Faculty Humanities and the Arts. Former rector, University of Graz. Founding president of the Austrian Accreditation Agency (2000-2005). Sole foreign member of German Accreditation Council (1999-2007). Member of ENQA Board (2005- 2007). Member of Kosovarian Accreditation Council 2007 - 2009, since then Chair of the Appeals Council. Head of Appeals Council at ENQA. Member of the International Advisory Board of HAC, Hungary. Member of ACQUIN, Germany (System accreditation). Expert in over 100 evaluation and accreditation procedures.

Secretary of the Expert Panel.

David Timms, Professor of English and former Deputy Vice Chancellor, Bath Spa University, UK. Former lecturer in English and Director of Combined Studies, University of Manchester, UK. Currently Higher Education Consultant specializing in quality assurance procedures, with a wide range of consultancies in UK, Europe and the US. Expert in many UK and European evaluation and accreditation procedures. Trained ENQA expert.

Panel Members.

Signe Plough Hansen, Director of Methodology at the Danish Evaluation Institute (EVA). Initiator of the ENQA Internal quality assurance group (the IQA group) and leading member of its steering group from 2007 to 2011. Since 2011 member of the Advisory Board of the evaluation unit at Malmö Högskola, Sweden. Trained ENQA expert.

Anca Prisăcariu, studying Law at the Romanian American University in Bucharest and a Master degree on Educational Management at National School of Political and Administrative Studies. European Students Union (ESU) Quality Assurance Students Experts Pool (2011-date). Student evaluator for the external review panels in institutional evaluations organized by the Romanian Agency for Quality Assurance in Higher Education (ARACIS) (2009-date). Member of ARACIS's Council and Quality Assurance Department (2010-2011). Vice-Chairperson (Education), National Alliance of Students' Organizations in Romania (ANOSR) (2011-date).

Mieczyslaw W. Socha, Professor at the University of Warsaw, Faculty of Economic Sciences. Vice-president of Polish Accreditation Committee (PKA - for 2012 - 2015). Former Secretary General of PKA and member of PKA Presidium (2005 - 2011); Member of ECA Management Group (since 2008), member of Central and Eastern European Network of Quality Assurance Agencies in Higher Education (CEENQA - since 2011). Expert in many evaluation procedures.

Annex 3: Swedish Government Decision (SER Annex 7)

The translation is not an official translation

Task of evaluating the quality of first and second-cycle programmes in higher education

1 annex

In view of the Government Bill *Fokus på kunskap — kvalitet i den högre utbildningen* [*Focus on knowledge – quality in higher education*] (bill. 2009/10:139), which has been enacted by the Swedish Riksdag (bet. 2009/10:UbU20, rskr. 2009/10:320), the Government is assigning the following task to Högskoleverket (the Swedish National Agency for Higher Education).

1. On the basis of the considerations expressed in the bill and the attached memorandum, the Swedish National Agency for Higher Education is to develop and produce in more detail a system for the quality evaluation of first and second-cycle programmes in higher education. The *attached* memorandum lays down the guidelines which the Agency is to follow in carrying out this task. The task is to be undertaken in collaboration with the higher education institutions, Sveriges universitets- och högskoleförbund (The Association of Swedish Higher Education), Sveriges förenade studentkårer (The Swedish National Union of Students) and representatives of the social partners.

The National Agency is to inform the Government Offices (Ministry of Education and Research) about the progress of the development.

2. At the end of 2010/early in 2011 the National Agency is to start the work of evaluating the quality of first and second-cycle programmes according to the new system. These evaluations will be conducted in four-year cycles and result in an assessment of each programme on a three-point scale.

The National Agency is to report its assessments to the Government Offices (Ministry of Education and Research). The assessments resulting from the final evaluations in the first four-year cycle are to be reported before 15 June 2014.

This task is to be undertaken within the framework of the National Agency's current funding.

On behalf of the Government

Signature

Tobias Krantz

Signature

Ingrid Edmar

Copies to:

Ministry of Finance/BA

Ministry of Defence/MIL

Ministry of Agriculture /ELT

State higher education institutions

Chalmers University of Technology Ltd.

Stockholm School of Economics

Jönköping University Foundation

Stockholm School of Theology (THS)

Evangeliska frikyrkan for Örebro School of Theology

Evangeliska Fosterlands-Stiftelsen for Johannelunds Theological
Seminary Stockholm University College of Music Education (SMI)
Foundation

Ersta Sköndal University College Ltd.

The Red Cross University College Foundation

Sophiahemmet University College Association

The Association of Swedish Higher Education

The Swedish National Union of Students

Guidelines for the task of evaluating the quality of first and second-cycle programmes in higher education

In March 2010 the Government presented its bill *Fokus på kunskap — kvalitet i den högre utbildningen* [*Focus on knowledge – quality in higher education*] (bill prop. 2009/10:139). The bill was enacted by the Riksdag at the beginning of June 2010 (bet. 2009/10:UbU20, rskr. 2009/10:320).

The Government considers that a new system for the evaluation of first and second-cycle programmes in higher education should start at the beginning of 2011. This presupposes the more detailed development and production by the Swedish National Agency for Higher Education, of a system for the quality evaluation of first and second-cycle programmes in higher education. In its work the National Agency shall follow the guidelines presented below.

Basic principles

The Government's proposals and considerations on quality in higher education are based on a policy directed towards increased autonomy for the higher education institutions. This has been developed in greater detail in the bill *An academy for today* (bill 2009/10:149). An important point of departure is that the higher education institutions shall themselves assume responsibility for the development of their operations. This includes the responsibility of the institutions for the quality assurance of their undertakings. The national quality assurance system for which the National Agency is responsible shall focus on educational outcomes. Future evaluations of programmes will therefore differ from the evaluations conducted by the National Agency in the period 2001–2007 in that the appraisals will not focus on the prerequisites and processes on which the outcomes of programmes are based. Responsibility for this kind of programme evaluation – in which prerequisites and processes related to outcomes are reviewed – are to be shifted from the national to the local level. Explanations for these outcomes and measures to develop their operations will in future be sought by the higher education institutions themselves. With the increased autonomy of the higher education institutions operational development will take place locally or in cooperation between institutions, nationally or internationally.

The Bologna Process has also played an important role in the reforms of higher education that have taken place in Sweden in the

field of quality development. For example the qualifications reform of 2007 involved expression of the requirements for different qualifications in terms of intended student outcomes. This has led, in its turn, to extensive development work by the higher education institutions to embody student learning outcomes in programme and course syllabuses based on the qualification descriptors laid down by the government. The task of national evaluations is to assess to what extent these outcomes have been achieved.

As before, the evaluations of programmes will provide the basis for the review of degree-awarding powers. They will also provide the basis to some extent for the allocation of resources. Allocating funding on the basis of quality can help to improve standards by offering the higher education institutions incentives to develop their own quality and so improve goal attainment.

In this new system the National Agency will play a more important role than hitherto in coordinating the evaluations. Even though the appraisals are to be conducted by experts – both subject experts, students and representatives of the social partners – the National Agency will account for the transparency and uniformity of the way in which they are conducted. This is to avoid the risk of the system developing in different directions on the basis of how the panels of assessors interpret and apply various quality aspects.

While future employers and the higher education institutions are to be involved in the design of the system for quality evaluation and external experts are to take part in the evaluations, their outcomes are to be reviewed independently by the National Agency, which will decide on the assessments.

Assessment of educational outcomes

Outcomes is used here to refer to how well a course of study fulfils the objectives stipulated in the Higher Education Act (1992:1434) and the qualification descriptors contained in the ordinances linked to this act. Some of these outcomes are general ones that apply for all courses of study, others reflect the distinctive features of the different programmes. The National Agency is to evaluate to what extent the learning outcomes *achieved* relate to the intended learning outcomes stated in the Higher Education Act and the qualification descriptors.

A number of quality aspects relating to outcomes are to be produced. These are to be based on the requirements laid down in the Higher Education Act and the Higher Education Ordinance

(1993:100). Before each educational evaluation begins the National Agency will have the important task, with the collaboration of the panel of assessors, of adapting and specifying the quality aspects and how they are to be appraised.

The bill presents three forms of material that can in various way provide an indication of educational outcomes and on which the appraisals of the external panels of assessors are to be based: independent projects, self-evaluations by the higher education institutions combined with site visits and student questionnaires. These are described below.

The evaluation process

Representatives of the social partners and of students are to be allowed to play a role in the new evaluation system. As is made clear in the bill, the National Agency shall organise fora for consultation with the social partners before the evaluations and they shall also be represented in the panels of assessors.

Another important task for the agency before each educational evaluation is to adapt and specify, together with the panel of assessors, the quality aspects and how the overall assessment is to be reached. This guarantees the openness and transparency of the evaluations. Furthermore, it is a requirement if the evaluations are to acquire the legitimacy needed for their acceptance by the higher education institutions and to enable their use by the institutions to enhance quality.

The site visits are to supplement the self-evaluations and should provide more detailed information about programmes. The bill cites examples of programmes in which the degree projects are relatively new components and also programmes whose distinctive features are not reflected in the independent projects. In evaluation programmes of this kind site visits can, therefore, play an important role in supplementing the rest of the evaluation. As there are such major variations between programmes and disciplinary domains, it should be possible to vary the organisation and contents of site visits to provide a meaningful supplement to the perception of the outcomes achieved. This is also justifiable in view of the fact that site visits are both time-consuming and costly for the National Agency as well as the higher education institutions.

Degree projects

Degree projects were introduced as a requirement for all qualifications by the qualifications reform in 2007 and play a central role in reflecting the requirements laid down for award of the individual qualifications. This is not least important in relation to the requirements that reflect the general academic level. One point of departure for appraisal of the quality aspects can be found in the requirements laid down in the Higher Education Act for qualifications awarded in the different cycles. The appraisal can then apply to quality aspects such as critical thinking, autonomy, links with research and the relevance of the choice of subjects in relation to the development of knowledge in the field and advances in the labour market. It goes without saying that before each educational evaluation the quality aspects should be adapted on the basis of the specific qualification descriptors to provide as complete an indication of the educational outcomes as possible.

This is not, however, a question of evaluating the results of individuals and therefore involves no review of the judgements made by examiners either. Instead it is a matter of making an overall assessment of educational outcomes and therefore comprises more than the way in which teachers grade individual projects. The panel of assessors' task is, instead, to form an overall view of the educational outcomes taking the different quality aspects into consideration and to relate strengths and weaknesses in the degree projects to these quality aspects. It is the aggregate quality of the degree projects produced in the programme on which the overall appraisal is to be based and not individual excellent or poor projects.

Self-evaluation

Self-evaluation has two purposes. The first, and most important, is to account for outcomes for which the degree projects offer no evidence as the descriptors for individual qualifications may comprise more important requirements than those that the individual projects can be expected to demonstrate. The other purpose is to account for and explain prerequisites that are of more manifest significance for educational outcomes. The account presented in the self-evaluation should normally be supplemented by a site visit.

Accounting for outcomes

For many programmes that lead to the award of professional

qualifications of various kinds it may be particularly important for the self-evaluation to provide a possibility of accounting for outcomes that are not demonstrated in the degree projects, partly because in these programmes the degree projects do not reflect certain central requirements and partly, initially, because some programmes do not yet have long enough experience of degree projects. The National Agency shall then decide with the help of the panel of assessors which outcomes are important for the programme concerned and produce quality aspects that reflect its distinctive qualities and can be used as a yardstick. The appraisal must, therefore, always be based on both objectives related to how the programme meets employability requirements as well as objectives that reflect its distinctive features and do not find expression in the degree projects, such as clinical skills in health science programmes. The task of deciding how outcomes of this kind are to be presented in the self-evaluations will be an important element in the process of developing the system to be undertaken by the National Agency together with the sector.

As pointed out initially, the reforms concerning autonomy and quality that are now being introduced by the Government mean that the higher education institutions will assume greater responsibility for developing and assuring the quality of their programmes. It is important to design the self-evaluations so that they can also serve to enhance quality and offer added value to the higher education institutions. For this reason the institutions must be allowed some scope in their self-evaluations to focus on outcomes that reflect the individual profiles and unique circumstances of their programmes and which can provide the basis for their own analyses and evaluations.

How an evaluation will be undertaken must be clearly understood. Advance knowledge of the quality aspects is a precondition if appraisals are to be analogous, transparent and predictable.

Prerequisites that have a manifest significance for outcomes

Teachers' qualifications and access to teachers constitute a prerequisite that normally has manifest significance for educational outcomes. For this reason they are to be included as one component in the evaluations. It is however important to point out that teachers' qualifications are to be assessed in relation to the objectives stipulated in the individual qualification descriptors. The higher education institutions must therefore present information in their self-evaluations about the qualifications of teachers and their availability and analyse this information in relation to outcomes.

Another important requirement is to enable higher education institutions to account for student prerequisites in their self-evaluations. It is important for the higher education institutions that are successful in their endeavours to broaden recruitment not to be treated unfairly in evaluations but that factors of this kind are taken into account, if they can be viewed as having manifest importance for the outcomes of courses of study. The self-evaluations must therefore offer the higher education institutions scope to present relevant information about student prerequisites and how they have impacted on educational outcomes. Assessment of students' qualifications on admission to a programme can provide an indication of how well they can be expected to achieve educational outcomes. For an account of this kind to influence the overall assessment there must be manifest differences in student prerequisites compared with equivalent courses of study at other higher education institutions. In principle the premise should be that students admitted to a course of study should possess the required capacity to complete their studies. For some individuals, however, special support may be needed.

Questionnaires to students and alumni

Questionnaires sent to alumni are mainly intended to answer questions about whether a programme fulfils the demands of employability. They can also provide answers about how those who are now employed consider that they achieved the intended learning outcomes.

Questionnaires to current students should also form part of the material on which appraisal is based to supplement the perception of their educational outcomes. Like questionnaires to alumni these must be given contents that reflect the educational outcomes on the basis of the objectives of programmes.

Previous experience has shown that there are methodological problems in ensuring that questionnaires possess the reliability and legitimacy required for their inclusion in the material on which evaluations are based. Development work must therefore be initiated without delay by the National Agency so that the questionnaires can be used as a basis for the overall assessment of programmes.

The overall assessment

Evaluations are to conclude with an overall assessment of the quality of programmes using a three-point scale. The National

Agency is to report the overall assessment to the Government Offices (Ministry of Education and Research). An overall assessment may be made not only for each qualification but also for different specialisations in cases where these specialisations have distinct characteristics and are offered at a number of higher education institutions. In the bill *Fokus på kunskap — kvalitet i den högre utbildningen* the master's programme in engineering is cited as one example where it is relevant to make overall assessments of the different specialisations.

In accordance with the considerations expressed in the Government bill the three-point scale should be applied as follows.

1. The programme reveals serious shortcomings. Pursuant to Section 14 of Chapter 1 of the Higher Education Act, the higher education institution is to be given some time to remedy these shortcomings. If the shortcomings subsequently persist, the National Agency may decide to revoke entitlement to award a qualification as stipulated in the same section. A decision to revoke the entitlement of an independent education provider is subject to the Act on Awarding Certain Qualifications (1993:792) and has to be made by the Government on the recommendation of the National Agency. Before such a recommendation is made, the independent education provider must have been afforded an opportunity to remedy the situation (Section 7).
2. The overall standard of the programme is good. Some individual elements in the programme may display deficiencies in relation to some quality aspect.
3. The quality of the programme is high in the independent projects, self-evaluation and responses to the questionnaires to students and alumni. Shortcomings that are less significant from an overall point of view may exist. The higher education institution should be awarded resources based on quality.

Most of the overall assessment is to be based on the degree projects together with the educational outcomes accounted for in the self-evaluations, and here in most cases the degree projects should be given most weight. For some programmes there are grounds for increasing the weight given to the outcomes accounted for in the self-evaluations. This may, for instance, be because important targets for a programme are not reflected in the independent projects or the degree projects do not yet play so great a part in a programme.

The qualifications of teachers and their availability are included in the section of the self-evaluation that is intended to account for prerequisites that have a manifest impact on outcomes. They should be able to affect the overall assessment. If there are serious deficiencies in this respect, or if explicit improvements are required, no programme should be given the highest rating.

Another prerequisite that in specific cases may affect the overall assessment is whether students' qualifications on admission have been shown to have a manifest impact on educational outcomes. For this reason it must be possible, when justified, to allow students' qualifications to tip the balance if a choice has to be made between two alternative overall assessments.

The results of questionnaires to students and alumni supplement the assessment of educational outcomes and should be able to confirm or enhance an opinion that has been reached. If questionnaire responses point to serious shortcomings or the need of explicit improvements in a programme, the highest overall assessment should not be awarded.

As there is some flexibility in the weight that can be attributed to different evaluation material, it is important to indicate clearly how the overall assessment is to be decided before each educational evaluation. Here, in most cases, the weight given to the degree projects is to have greatest impact on the assessment. Similarly, the adaptation and concretisation of quality aspects within the given framework is an important task for the National Agency and its experts to ensure that the educational evaluation system is uniform, predictable and transparent.

The National Agency's policy — this is how we work!

The provision of knowledge and skills is one of the important future global issues. Higher education is vitally important for every country. The Swedish National Agency for Higher Education plays an important role in this respect in its work of maintaining and developing high standards in higher education in Sweden. Our operations must be characterised by expertise, integrity and commitment.

Objectives

The National Agency must enhance Sweden as a knowledge nation by assuring the quality of higher education and its development. The National Agency must be Sweden's foremost authority where higher education is concerned, both nationally and internationally. The National Agency's collective expertise must be communicated.

Who do we serve?

The Government assigns the National Agency its tasks. The National Agency, like other public authorities, has a citizens' perspective. Students form an important group of citizens. The Swedish Riksdag and Government, the higher education institutions and social partners also need information about higher education, from both a national and international perspective.

What do we have to achieve?

The National Agency has to contribute to the development of higher education through its quality assurance processes (evaluating courses and programmes, appraising entitlement to award qualifications, supervision, admission issues and evaluation of foreign qualifications). We must provide the basis for the development by higher education institutions of their programmes and for governmental decisions on higher education. We must also provide students will informed and objective information to enable them to make their choices in higher education.

How do we act?

As a public authority, we require sound knowledge and professional procedures to enable us to make clear and well-founded decisions with integrity. We must conduct penetrating analyses and any enquiries requested. Analysis, statistics and documentation must be objective, up to date, correct and transparent. We must provide rapid responses to those concerned and the information about our results must be correct and adapted to its target groups. The National Agency has to work together with the higher education institutions, teachers, other employees, and also students, as

knowledgeable and committed partners with the shared aim of developing higher education.

The National Agency must provide professional administrative support to the Higher Education Appeals Board and the Suspensions Board for Higher Education.

Qualified administrative support is needed for our successful operation. We must be efficient and service-minded and all that we do must be infused by an integration, diversity and equal rights perspective. High standards must characterise all that we do.

The National Agency's culture

The National Agency's culture must be distinguished by its expertise, integrity and commitment. All members of its staff must understand the overall operations of the agency. We must discuss or own work critically and humbly and remain receptive to the views of the surrounding world on what we do. We must renew our own expertise by being well-read and informed.

Managers and their staff have to develop our operations together. Management has a particular responsibility for creating sound circumstances for our work and a good working environment. Communication and participation are important concepts for us. We must view our tasks as the National Agency's shared responsibility and discharge them with the help of our combined expertise and through commitment and collaboration across departmental divisions. Committed and proactive staff who support and inspire each other contribute to high standards and enjoyment of our work.