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Political Interference in Higher Education Quality Assurance. The Swedish Case

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POLITICAL INTERFERENCE
IN HIGHER EDUCATION QUALITY ASSURANCE
THE SWEDISH CASE



This paper presents the Swedish national Quality Assurance system for Higher Education introduced in 2011. The system was created by officials at the Ministry of Education and introduced by the Government in spite of a) widespread criticism from the Swedish Higher Education sector, students, national and international expertise, and b) the existence of a well accepted proposal for a new system created by the Higher Education Agency in collaboration with academia and students. The system caused Sweden to be excluded from the European Association for Quality Assurance in Higher Education (ENQA). The article reflects on the need for organisations as ENQA not only to guarantee quality but also to guard the border between the Higher Education Institutions and the political powers.

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THE PHENOMENON and practices of audits and quality assurance systems have increased dramatically in all sectors of society during recent decades. Since mass education became a reality the turn has also come to academia, which previously has lived a comparatively secluded life in relation to state control. This does not necessarily need to be a bad thing if done wisely (although it may take some getting used to for academia itself). All stakeholders in higher education (HE); policymakers, students, businesses and organizations must be granted the right to some insights and information about the quality of HE activities and operations. In countries where HE is funded through taxes, this obviously also applies to the country's taxpayers. As policy instruments a national quality assurance (NQA) system is also the best and perhaps the only really powerful tool to drive development in a systematic manner. The HE sector must be considered one of the most important actors when it comes to shaping our future; contributing with much needed innovations and solutions and not the least, students' with new mind-sets, ready to deal with humanities' grand challenges (Adamson 2014). For this we need intelligent quality assurance systems (possibly) combined with national and international benchmarking systems (Adamson 2013), in order to utilise all the knowledge and creativity that exists within academia in the best possible way. But this is something different from excessive needs of state control combined with ignorance and political prestige.

This paper is an analysis of the Swedish national quality assurance system for HE introduced in 2011 (Högskoleverket, HSV/The National Agency for Higher Education 2010). The system is based on an unusually detailed Government bill 'Focus on knowledge' (Regeringen/The Swedish Government 2010a) passed in Parliament late spring 2010. This bill was fully prepared at the Ministry of Education, which meant excluding its competent authority, at the time HSV from the process.¹ This was primarily

1. The state administrative system in Sweden consists of the Govern-

driven by the then Secretary of State, the continuous driving force behind the process during which time (2009 to 2014) there has been three ministers of education involved.

The system was introduced despite widespread criticism from the Swedish HE sector, the Association of Swedish Higher Education (Sveriges Universitets och Högskoleförbund, SUHF 2010), the Swedish National Student Union, the Swedish Association of University Teachers (Sveriges Universitetslärarförbund, SUHF 2010), the European Student Union, (ESU 2012), and national and international expertise. It fulfils only three of the fourteen standards in the European Standards and Guidelines, (ESG: ENQA 2009a) adopted at the Bologna ministerial conference in Bergen 2005 and subsequently has caused Sweden to be excluded from membership in the European Association for Quality Assurance in Higher Education, ENQA, from 2014 (ENQA 2013), an organization that Sweden once was part of creating.

The paper is based on Adamson (2013a), it begins with a general background on the development of quality assurance in HE within the Bologna process, then a section describing the (political) processes around the Swedish case followed by an analysis of the system. It ends with some reflections on political interference in quality assurance of HE. The paper also uses concrete examples from evaluations done with the system to illustrate certain points.² Annexed is also a Timeline illustrating some of the central events from 2009-2014.

mental offices including the ministries with overall political responsibilities of submitting legislative proposals to the Parliament and implementing the Parliament decisions. Tied to each ministry there are one or more Government agencies (competent authorities?). Government bills are produced at the ministries but normally based on the reports from government assignments produced at the competent authorities tied to the ministry or other external expertise.

2. Information about evaluations made during the period 2011-2014 used in this article has been accessed from the website of the Higher Education Authority (UKÄ), Resultatsok <http://kvalitet.uka.se/resultatsok.4.25ae7641136bb9ef9e38000719.html>

*Quality Assurance and Higher Education.
A Summary of the European Development
Within the Bologna Process*

The Bologna process started out much as a structural reform, working towards European degrees to become more similar in terms of length and credits in order to obtain greater compatibility and comparability between the different countries. The two-cycle model (bachelor and master) was adopted in the Bologna declaration, 1999, and a third cycle (doctoral) was first mentioned in the Berlin communiqué 2003, and later adopted in Bergen 2005.

The topic of quality assurance was however mentioned already in the Bologna declaration, the subject was revisited in Prague 2001, but the big leap occurred at the ministerial meeting in Bergen, 2005. Here the Qualification Framework for European Higher Education Area (QF-EHEA, ‘the Dublin Descriptors’ also ‘the Bologna Framework’) was adopted together with the aforementioned European Standards and Guidelines proposed by ENQA. The ESG has since become a very important document listing standards (criteria) both for HEIs and the national quality assurance agencies. It is currently going through a revision before the next ministerial meeting in Yerevan, Armenia in 2015.

A further step was taken in London where the European Quality Assurance Register (EQAR) was endorsed and later founded by the E4 group (ENQA, the European Student Union, the European University Association, and the European Association of Institutions of Higher Education) in 2008. This register now includes 32 European quality assurance agencies. Since 2006 the E4 group has also jointly organised The European Quality Assurance Forum (EQAF), where European developments in quality assurance are discussed on different themes on a regular basis.

Two main issues have been discussed during these years, a) the relationship between the HEIs and the quality assurance agencies and b), the balance (especially in national quality assurance

systems), between accountability and promoting quality. A general consensus between most parties exists in that HEIs are the ones that carry the main responsibility of quality assurance and that the ultimate goal of all quality assurance, internal or external, is to enhance quality and quality culture (Adamson & Flodstrom 2013). This is especially pertinent in the case of the Swedish system described in this article, where the dimension of promoting quality was ruled out and that of accountability ('results') instead was made the leading principle (The Swedish Government 2010a, 2010b).

In sum, the Bologna process, in particular members of the E4 group but also many others have truly put quality assurance issues on the agenda as one of the key drivers for educational quality. Here 'the learning outcome paradigm' ('outcome based teaching and learning' in US), has been emphasised as the key component for driving 'the transition towards student-centred higher education and away from teacher-driven provision' as it was formulated in the London Communiqué in 2007.

As a signatory of the Bologna Process the country agrees to be part of creating a harmonized (not standardized) European Higher Education Area (EHEA), which operates in the interests of Europe's development. This includes the creation of a national QA system which is in line with the Bologna intentions.

The Development of the Swedish System

National quality assurance systems were originally introduced in Sweden during the 1990's, and has then had a few different formats but in general been geared towards quality enhancement, not quality control. The system originally planned for use from 2007 to 2012³ however, got very severely criticized by the

3. For the sake of clarity; this paper refers to three QA systems, nr 1 2007-2012 but stopped 2008, nr 2 presented to the government in September 2009 but discarded, and nr 3 the system introduced 2011 and the cause of Sweden's exclusion from ENQA.

HE sector and was therefore withdrawn by the new University Chancellor in autumn 2008.

The critique was published in a report by the Swedish Association of Higher Education (Sveriges Universitets och Högskoleförbund, SUHF 2008), and made public in an article in the major daily newspaper *Dagens Nyheter* (DN 2008). The article was signed by seven university Vice Chancellors.

The major point of concern was a lack of transparency and that evaluation results were found to be very unreliable when they were compared both between programs and between HEIs. In addition, the system did not take into account the significant changes initiated and prompted the Bologna process. In 2008, many Swedish HEIs had begun to embed these changes into their curricula in accordance with the Swedish Higher Education Ordinance (HEO) of 2007.

At this juncture, relations between the HE Agency⁴ and the HEIs in Sweden were toxic. All trust had been eroded. The result was that the head of the Agency's quality assurance department, who (together with the former University Chancellor) was responsible for the 2007-2012 system, resigned in early 2009.

After withdrawing this system the new University Chancellor, requested a formal Governmental assignment to create a new national quality assurance system, where collaboration with HEIs and the national student union should be stipulated as the *modus operandi* in the terms of reference. At the time it was crucial that all parties involved (including the staff at the Agency who were not accustomed to this approach) were fully informed of their shared responsibility and of their shared opportunity to influence this process.

4. At that time The Swedish National Agency for Higher Education (HSV), reorganised in 2013 to The Swedish Higher Education Authority, UKÄ. The terms HE Agency and Agency will also be used through out the paper.

The Government assignment

When a new national quality assurance system is created the starting point ought to be an initial analysis of what sort of driving forces the Government wants to initiate. This is where the ideological and political considerations have their legitimate place. The system can then be constructed based on these decisions.

The ideological and political standpoints of the 2011 system were first expressed in the written, formal Government assignment that went to the Agency (HSV) in March 2009 (Regeringen/The Swedish Government 2009). Here it was stated that the system should have ‘a stronger focus on results’ than previous systems. This was uncontroversial since the Bologna process had already put the spotlight on what students should ‘know, understand and be able to do’ after the study period and hence also more outcome and ‘results’ focused. This was in fact one of the criticisms from the HE sector concerning the 2007 system; it was almost exclusively focused on input variables (numbers of teachers and their degrees, localities, libraries, laboratories etc.) instead of adopting this new approach where the planning and performing (i.e. processes) and the results of the teaching was evaluated. However, these standpoints gradually changed during the six months HSV had to accomplish the assignment into something else; that the system ‘should evaluate results’. Note that these changes never were subject for any formal decisions by the Ministry (i.e. a new version of the Government assignment), but only communicated verbally to HSV staff at informal meetings at the Ministry. In addition these meetings were never preceded by any formal agendas and no official minutes were allowed (the expression ‘soft governance’ was used). In other words, there were now two assignments; one written and formally passed through the normal Government decision process and one informal, verbal, from the Secretary of State. The latter mainly communicated via one official at the Ministry at the regular meetings HSV were ordered to attend for reporting on the on going work. HSV chose to follow the formal assignment.

In the terms of reference in the assignment the Government also requested that the new system should be constructed so that it could constitute the basis for allocating some of the yearly financial resources to HEIs. In short, the results of the coming evaluations should be done on a graded scale where HEIs with programmes that received a top grade would be rewarded with money. The ones receiving the lowest grade would, as in previous systems, have their degree awarding powers first questioned, and if sufficient changes had not been done after one year, withdrawn.

*The delivery of the Government assignment
and the time after*

On the 15th of September 2009, as requested, the University Chancellor proposed a fresh national quality assurance system to the Government. The proposed system had been designed in cooperation with all Vice Chancellors and their quality assurance officers, the National Students' Union and representatives of the national labour market organisations through a series of hearings. Most were positive to the new proposal; many received it with enthusiasm, a fact that must be considered unique in this context. The reason for this can only be speculated about, but the proposed system strongly promoted developing teaching and learning methods into activating, modern and student centred methods in line with the Bologna process requirements. When this was turned into national requirements it was probably perceived as a validation and strong support to all those individuals who had been engaged in this type of work, often regarded as low status work at universities in comparison to the high status research activities. This may explain some of the enthusiasm, possibly combined with the interactive process between the Agency and HEIs while creating it, contributing to a sense of common ownership.

The proposed system (Högskoleverket, HSV 2009) was structured as three quality indicators and based on the learning out-

comes approach; the first reviewing intended learning outcomes (written statements in course/module descriptions), their assessment and the teaching and learning methods used ('aligned teaching'), the second reviewing achieved learning outcomes (here; actual student results in the shape of theses for bachelor and master degrees) and the third, stakeholder opinions (students, alumni and other stakeholders).⁵

However, the then Minister of Education and the Secretary of State were not satisfied with the first indicator concerning aligned teaching since this by definition would constitute the evaluation of processes and not just of results.

A bizarre process then started. The Agency did not receive any feed back from the Ministry but was at the same time invited to numerous HEIs and conferences to present the system. At the same time the Agency was reached by rumours that the Secretary of State considered the situation to be a constitutional crisis since the Agency had not delivered what was asked for. This was not communicated to the University Chancellor, although informal communication between the Ministry and the quality assurance department at the Agency took place during this period of time. Further rumours during the autumn and winter of 2010 were that officials at the Ministry now were creating their own proposal of a new national quality assurance system. In February 2010 a concerned letter was sent to the then Minister of Education, by the Chair of the Association of Swedish Higher Education on behalf of all her colleagues; Vice Chancellors of all HEIs in Sweden (Sveriges Universitets och Högskoleförbund, SUHF 2010). In this letter it was pointed out that the HEIs were supporting the newly proposed system by HSV, which was considered to become a strong driver of quality in an efficient manner. No official answer was given to this letter.

5. This system has later been transformed into The European Institute of Innovation and Technology's Quality Assurance and Learning Enhancement system, QALE <http://eit.europa.eu/interact/bookshelf/handbook-planning-labelling-and-follow-reviewing-eit-master-and-doctoral>.

On short notice Vice Chancellors, the National Student Union and the Swedish Association of University Teachers were invited for a presentation of the Ministry's own proposal for a new system on the 15th of March. The HSV management was not informed and later barred from attending this meeting. At the meeting a power point presentation of the system was presented. Instead of a regular consultation process where a report is sent out to all relevant stakeholders, opinions on this power point were 'welcomed to be sent to the Ministry', by the end of this meeting. The Ministry received letters from 29 organisations where 26 of these were highly critical. In the letter from the Swedish Association of Teachers (Sveriges Universitetslärarförbund, SULF 2010) one could for instance read: 'the proposed system from the Ministry is inappropriate, unfortunate, indistinct and partly incomprehensible'.

No consideration to these opinions were taken and the bill (Regeringen/The Swedish Government 2010a) with the rationale for the new national quality assurance system was (by then heavily delayed) presented and passed in the Parliament the 2nd of June 2010. This bill is written in an unusually detailed manner. It also contains a number of contradictions but the most noteworthy is what is found on page 12; the national quality assurance system ought not include reviewing 'the planning and performing of teaching' at HEIs. This was a very clear message to HSV; the system should review results and nothing else. This was later repeated in a new Governmental assignment to the Agency in June 2010 (Regeringen/The Swedish Government 2010b).

This whole process led to that the Minister was reported to The Committee on the Constitution, concerning the omission to observe customary requirements for official and formal consultations. The process also resulted in the resignation of the University Chancellor (Myklebust 2010) and somewhat later also the Secretary General/Deputy Head of HSV. The former University Chancellor (responsible for system 1, withdrawn in 2008) and a number of staff from HSV's QA department chose

on unexplained grounds to support the Government's results model.⁶

The system was then created in detail by HSV during 2010 and the first reviews started to take place 2011. A review of the system was made by ENQA the first time in 2012 and was then heavily criticised by the review group for a) basically not being a quality assurance system and b) because of the political interference in the work of the HSV (ENQA, review group 2012). These risks had been presented in a memo to the Minister and the Secretary of State in February 2010 by the University Chancellor. Later that spring the Ministry had asked for a meeting with the chair of ENQA and two of the Ministry's officials had already then received the same message. Hence, the critique did not come as a surprise.

Sweden's membership was subsequently put 'under review' in September 2012, and in 2014 the final decisions were made; Sweden's membership in ENQA was terminated (ENQA 2014). For HE-related issues, these events have received unprecedented coverage in the Swedish media. The whole affair (sometimes called ENQA gate) has been brought up in a great number of debate articles over the years⁷, it has been investigated in a series of in depth programmes by Sweden's Radio One, been subject to a review by the Danish Center for Research Analyses (2014) initiated by the Swedish Parliament, and it has been brought up for four interpellation debates in the Swedish Parliament by both the Swedish Social Democratic Party and the Swedish Green Party, every time defended by the Minister as 'a system that will lead the European way'. A number of astounding statements can be found in the protocols of these debates, for instance that 'HSV is a member of ENQA. They are now taking part with full

6. The former University Chancellor expressed this in her private blog, containing only this together with some family pictures, published before the bill was presented in Parliament but later removed from the Internet.

7. About forty documents and a large number of weblinks are gathered at <https://kvalitetsutvardering.wordpress.com/artiklar-och-lankar/>

force in the efforts of renewing ENQA's guidelines for how quality assurance should be conducted. We are not at all outside; we are full members' (Riksdagen/Swedish Parliament 2012).

A Description of the Swedish National QA System and its Basic Principle: to Review 'Results'

The Government bill stated that the system should be based on 'results', defined as whether students had achieved the overarching learning outcomes as expressed in the Higher Education Ordinance (HEO). This HEO includes overarching learning outcomes (descriptors) for general degrees for all three cycles and also for a large number of professional degrees in both the first and second cycles (e.g. medical doctors, nurses, psychologists, civil engineers, etc.), all based on the QF-EHEA.

In the designing and execution of the system by the HE Agency this was implemented as peer review teams assessing a sample of five to twenty theses, regardless of the number of students attending the programme. Each theses was to be assessed on a selection of the HEO learning outcomes on a three-graded scale, then summarised to a final evaluation of the programme, equally on a three-grade scale; Low, High or Very High Quality.

What was also new was the introduction of tying financial resources (approx. 30 million € per year) to be allocated to HEIs with programmes receiving the grade Very High Quality. Low Quality on the other hand meant a new evaluation again within twelve months where the HEI's degree awarding powers would be withdrawn if better results were not presented by then. The actual procedures for this second review were not presented until a few years later.

In addition to samples of theses, HEIs were also asked to produce self-evaluation reports and the system was originally (and in accordance with the bill) also supposed to include opinions from alumni. The latter was excluded during the first year the system was in use due to that the Agency did not succeed in gathering this information in sufficient numbers.

A further component that was to be included in the process was site visits. These have later been executed in the shape of Skype meetings between the peer group and representatives from the Agency on the one side, and three to four representatives from the programme under evaluation on the other.

As a curious component in the system (and as a response to the wide spread critique that the system evaluated student quality rather than educational quality and hence prone to a very strong bias related to socioeconomic status), HEIs were allowed to include ‘relevant information about students’ back ground and argue how these have influenced the results found in the evaluation’ in their self-evaluations, which was explained: ‘This is so that HEIs working actively with widening participation should not be disadvantaged in the system’ (Högskoleverket, HSV, 2010: 9). This part was quickly labelled ‘the excuse component’ by one of the Vice Chancellors.

Before analysing the system in more detail a number of fundamental problems can immediately be identified. First, in a result based system there is no room for self-evaluation reports. These can by definition only *describe* student results, they are not in them selves student results. Second the system builds on (small and not representative) *samples* of theses from large programmes but on *all* theses in small programmes. Third, the grading scale does not allow for Satisfactory Quality, which in fact is a grade always included in all HEIs’ grading systems when assessing theses (in a logical sense all theses with this grade ought then be assessed as Low Quality when assessed by the review teams).

Last but maybe first; the system is based on the (results-) question ‘Have *students* achieved the overarching learning outcomes of the HEO’ instead of the (quality-) question ‘Do *programmes* ensure that students achieve the overarching learning outcomes of the HEO’. Hence the system focuses more on student quality rather than programme quality. This will be explained and discussed in the next section.

The Basic Problem of the System – to Review ‘Results’

Achieved learning outcomes, students’ study results, are never only the result of educational quality. In all educational systems, students’ performances are heavily influenced by their socioeconomic status and background (SES). This is the fundamental problem with the Swedish system. Methods wise, in the social sciences, one would talk about the SES as a confounding variable, where the quality in the students’ work could not be explained by education quality, before this confounder had been statistically treated. Consequently, the evaluations of programmes cannot distinguish between high or low ‘programme quality’ or high or low ‘student quality’. What then should be remedied in a programme deemed having low quality? Should the HEI develop teaching methods or recruit a different student body? This is where the political and ideological dimension enters the scene. The driving force with a system exclusively based on student results (for HEIs who wants to come out well in the system) becomes avoiding recruiting students from lower income families and ethnic minorities and thus working in the opposite direction of a (much needed) widening of participation agenda. This in turn awards the old, traditional HEIs and disadvantages the smaller, regional ones. These facts were clearly explained to the Ministry but was never commented on whether this was the political unspoken agenda or not. In hindsight, we can see that also other reforms and decisions in both the school system and the HE system has worked the same way.

Regardless of the political/ideological aspects (which would have been legitimate had they been expressed openly and clearly in normal democratic ways in a democratic society), the system that evaluates quality of HE programmes would, methods wise, be rejected in any peer review process for neglecting the most powerful of all variables in both social and other sciences; socioeconomic status.

Practical Problems with Evaluating 'Results'

In order to evaluate the results of any phenomena one needs measures that *cover* what is evaluated. The only 'student results' accessible on a national, system level in Sweden consist of (first cycle) bachelor and (second cycle) master's theses (the so called 'independent project' which should encompass at least 15 ECTS each). All other student results (tests, exam papers etc.) are owned by the students themselves, and the only information that is kept in official records is the name of the courses which students have passed and the number of ECTS these carry.

For the bachelor degree (180 ECTS) the theses covers eight per cent of the whole programme and can in fact be written during the mid part of the student's study period (this is true for first cycle general degrees). For the master programmes the theses covers twenty-five per cent of the full programme (120 ECTS). Hence, the quality assurance process evaluates very small parts of the full degree programmes. To be clear, the Swedish system does not include a final exam. The thesis instead is a paper (often a small study or project) chosen by the student together with a supervisor on a specific topic, thus, content wise covering just a small part the full programme.

With other words, it is not possible to gain a full picture of a whole programme and whether it contains the relevant content it should do or not, solely by studying samples of theses. This is illustrated in the reviewers' report in the evaluation of a masters programme in sociology. Here the review team clearly state that criteria concerning both sociological methods (where both quantitative and qualitative methods should be covered) and theories (where both classical and contemporary theories should be included) were difficult to evaluate in the material provided. Following the results logic of the system this programme was evaluated as of 'low quality' on the grounds of that three theses out of six (the sole basis of this particular evaluation) did not pass on three of the five evaluation criteria. A decision affecting the whole 120 ECTS programme which then was

put under review with the risk of having its degree awarding powers revoked.

To summarize, the system drives development in a pre-Bologna direction towards very traditional approaches to academic achievement; a text demonstrating knowledge, disregarding the skills needed to produce it. The system impacts on professional programmes especially hard; in the future we will know nothing about whether psychology students only learned cognitive behavioural *or* just psychodynamic therapy methods, whether future teachers have learned anything about teaching mathematics or grading their pupils' work, if social workers have learned anything about evidence-based treatment methods or just sociological theories, if future engineers have learned anything about solid mechanics when they build bridges and nuclear power plants for us, or if economists have been taught anything about accounting. What we possibly will know is if some of them can write a thesis. The system is thus unable to evaluate anything to do with the Bologna process such as personal development, the usefulness of the programme on the labour market, the fostering of citizens in a democratic society (Council of Europe 2007), or 'new' competences such as creativity, innovation and entrepreneurship, which are much needed on the European labour market (Adamson & Flodström 2011).

A Selection of Other Problems

The system cannot be applied to large sections of courses and programmes

Some educational programmes either do not demand theses work of their students or, more common, do not produce five (5) or more theses per year, set as a minimum for a programme to be included in the quality assurance process. In addition, naturally all new programs where students have not yet written their thesis also have to be excluded in such a system.

When it comes to the third cycle programs these have also been excluded but not for the lack of products to evaluate – doctors’ theses. These have already been subject to external reviews by one opponent and an examination board and also defended in public in the Swedish system. In many disciplines a doctoral thesis is also compiled of a number of already published and peer reviewed papers. To introduce a system of ‘second opinions’ on this from a state authority, maybe overruling both universities’ judgments and decisions and also the scientific community at large, would most probably have elicited uproar in academia. One guess is that this was anticipated from the Ministry, and hence avoided by not including third cycles programmes in the new system.

As already stated, basing the system on reviews of theses leads to that a large proportion of each program under evaluation does not get reviewed, but also, on an aggregated level, that a significant proportion of the Swedish HE system cannot even be included for evaluation (some say 25%, some 35% of the total amount of first and second cycle programmes) because of its construction with sole focus on results.

General problems with assessing theses

The problems with fair and reliable assessment of theses are well known in academia; different assessors value the same work differently even though they have access to written grading criteria (‘rubrics’). As an example this author once initiated a project where fifty teachers, first individually and then in groups of eight, assessed six bachelor theses on a three-grade scale. This resulted in one thesis receiving the same grade from everyone, two receiving two different grades, and three theses receiving all three grades; both ‘pass with distinction’, ‘pass’ or ‘fail’. Teachers working in groups around assessment tasks, where they gradually form a culture of similar values seems to be the only way to improve this, but theses assessment will most probably never become an exact science. This problem is naturally the same for

a quality assurance system that rests on assessing theses, but this has not been acknowledged by the HE Agency. The review teams have also been left themselves to organize this work. This means that a number of different solutions have been chosen and used; one reviewer per thesis in one evaluation, two reviewers per thesis in another, or even one reviewer assessing one criteria of all the theses in the review and then another reviewer for the next criterion. The reliability problems can only be said to be gigantic.

Another source of error when only using theses as the basis for quality assurance, is that teachers/supervisors may sometimes play a central role in the production of these theses. The Swedish system does not provide much extra resource for supervisors when re-examining dissertations. This leads to a certain fatigue in teachers when they have to re-examine the same dissertation again. It can be tempting to give extremely detailed suggestions for changes and even rewrite whole passages. The awareness that the HE Agency will evaluate the coming year's theses may of course increase this practice.

In summary, we cannot say that the assessment of the theses are performed in a sufficiently fair and reliable way to form the basis for decisions on programme quality. In fact the results of one evaluation could hypothetically produce a different result if new groups of reviewers were brought in, or a different selection of the HEO descriptors were chosen.

*No checking for plagiarism –
extra financial resources for what?*

A growing problem in academia is plagiarism (ironically the Legal department of the HE Agency has produced excellent reports on this). The processes and the systems in HEIs for working with this, still vary substantially. The Agency has no system for checking for plagiarism of the theses that are used in their system, neither do they require from the programmes under review that this should have been done before the thesis samples are made.

This means that in theory quality assurance results leading to a high grading (resulting also in extra funding) of a programme may in fact be based on plagiarism.

The self-evaluations – a confusing and costly matter

According to ESG (and all known HE quality assurance praxis) a national quality assurance system should always include a self-evaluation. This is a document produced by the persons responsible for the programme under evaluation and serves in most systems as the main bases for the review. In the Swedish system the role of these self-evaluation becomes very confusing. These documents can by definition only describe preconditions (such as numbers of teachers and their qualifications etc.), process matters (details around the actual teaching) and *descriptions* about student results, but not results. In a result based system self-evaluations simply do not have a role to play. The reasons for still including these in the system can only be seen as grandstanding and an attempt to superficially follow ESG and traditional quality assurance culture and (as with the situation for third cycle programmes) prevent an uproar from academia who would not recognise themselves in the national quality assurance context without these as a major part of the process.

It is also interesting to have followed a few of the reviews close up in reality, to see how academic staff has almost totally neglected the fact that the core of the system is a small sample of theses. Instead main focus and resources has all been put into the self-evaluation work. In a sense this is yet another piece of evidence that the model is so unrealistic that many has just refused to believe its construction. However immoral, the most effective way of coming out good in the system would have been for department heads to for instance allocate double resources for theses supervision and a very strict control on theses assessment the year before the national evaluation.

To continue, the instructions from the Agency for writing the self-evaluations have been particularly vague and as stated

earlier there are no evaluation criteria provided for these reports for the review teams to use. The consequence is that the approximately 2300 self-evaluations (2011-2014) have been written in very different formats and thus impossible to compare.

Information from meetings between the University Chancellor and a group of Vice Chancellors in spring 2012 (Bremer 2012) also tells that the Agency itself considers these documents to 'have a very limited value when it comes to decision makings'. Contrarily to this statement, they have been used for making final decisions of programme quality; this will be discussed in a later section.

Financial aspects

Financial aspects of national quality assurance systems are rarely discussed which is unfortunate. The following is stated in ESG (p. 20):

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.

To produce a self-evaluation report requires substantial resources in time for staff. A likely estimate is that about 2,300 self-evaluations will have been produced throughout the four-year period the system has been in use. Drawing on data from approximately twenty-five self-evaluations from several different disciplines and HEIs, a mean estimate of working hours (regardless if one or many persons had been involved in the work) is between one and one and a half months of full-time work per self-evaluation. Still very approximately, this equals salary costs of 16-24 million euro for the four-year period the system has been in place. These are costs for a component which basically has no place in a result based system, and implemented in sector of society where the hollowing out of financial resources is

estimated to around 750 million euro since 1993 (Frtzell 2012), mainly affecting teaching time. To this must be added the nearly doubled yearly budget for the HE Agency in comparison to the previous systems, and the 30 million euro a year that is used for rewarding HEIs with programs which receive the grade ‘Very High Quality’, another 120 million euro for the entire evaluation cycle.

A simple cost effectiveness analysis would have revealed that such a system could not be considered economically justified.

Form over function

The information about the results of the new system is presented on a website (Resultatsok <http://kvalitet.uka.se/resultatsok.4.25ae7641136bb9ef9e38000719.html>) in a very clear and structured manner. This is new in a national quality assurance context where ENQA already in 2009 stated ‘detailed and reliable information on the quality of individual study programmes, faculties and higher education institutions’ as one important priority for the near future of HE QA (ENQA 2009b: 7).

However, elegant packaging does not improve content and this commendable information system has in fact led to that results produced by the system has received unusual media attention. Here journalists have been sadly seduced and have continuously reported on decisions from the Agency on ‘Very High’, ‘High’ and ‘Low Quality’ of hundreds of programmes without mentioning any of the problems with the actual *quality of the quality* information.

In addition, the results are also reported in to the website ‘Study in Sweden’ (<https://studyinsweden.se/>) where students look for information about programmes before making decisions on where to apply; a fact that has worried both Vice Chancellors and representatives of the National Student Union, all with the knowledge of how the system actually works. A number of Vice Chancellors have taken the decision not to publish this sort of information on their own university websites, re-

ardless if their own evaluations were positive or negative, others have not.

In fact, this type of information on Swedish HE programmes has never been so systematically covered in the Swedish news, including interviews with upset students wanting to quit programmes they recently have joined.

Does the system work as intended?

Does the system work on its founding principle; are decisions on programme quality based on results and not also on processes, that is ‘the planning and performing’ of the programmes, prohibited in the bill? Both the Agency and the Government claim without giving further evidence that it does, in that ‘it is possible to establish whether students have reached the learning outcomes of the HEO descriptors by evaluating a selection of theses’. In e-mail communication with the then head of the quality assurance department at the Agency, with a direct request of evidence for these statements, the answer was simply ‘we and evaluators say so’ (Maria Sundqvist, personal communication 15th of May 2012).

However, by looking into Resultatsok (the previously mentioned information system) on individual evaluations one finds a completely different reality, two examples follow.

The review team for the Psychologist training programme simply stated that the majority of the selected HEO descriptors for this particular evaluation could not possibly be demonstrated in a thesis and therefor instead used the self-evaluation reports as the basis for their evaluation and subsequent recommendations for decisions. To be clear, they evaluated the ‘planning and performing’ of the programmes instead of solely the ‘results’. This resulted in that all Swedish psychologist programmes were granted the grades High or Very High Quality (which they were no doubt worth). However, if the system had been applied according to Parliament decisions all programmes would have re-

ceived Low Quality, meaning they would have one year to remedy the situation otherwise be closed down.

The review team for master programmes in Public Health reasoned in the complete opposite manner. They too stated that the selected HEO descriptors could not be traced solely in the students' theses (in some of these programmes written in the format of published papers), but came to the conclusion that since this was what was required from the team, they were forced to give some of these programmes the grade Low Quality.

These are just two examples of the big variation between how individual review teams have handled the situation. The consequence is a national quality assurance system where no one knows what will be evaluated and on what criteria (remember, there are no existing criteria for evaluating the self-evaluation reports since these should not be the basis for any decisions). This in a system that results in extra funding for those who come out well, and (even more serious) the possible withdrawal of degree awarding powers for those who do not come out well.

All this has been fully ignored by the Agency, responsible for following and implementing Parliament decisions. The Government has equally ignored it.

To conclude, this national quality assurance system does not comply with European standards, it has no legitimacy in the HE sector, it cannot be used in large sections of the HE system, it delivers non transparent results that has been compared with a giant lottery system (Myklebust, 2012) and it consumes large amount of financial resources where financial resources are very scarce. In addition, the system does not allow for any international peer review processes since most theses are written in Swedish and no other documents such as programme, course or module descriptions (which often do exist in English), are permitted in the review process. It also encourages HEIs to put their efforts into recruiting students who can be relied upon to produce traditional academic theses rather than to develop their educational programmes into more modern forms suitable for the 21st century. This does not rule out that individual evalua-

tions have led to quality development (self assessments in any system most often do), but here we must distinguish between the individual cases within the system and the quality of the system as a whole.

On Political Interference in a National Quality Assurance Context

One of the reasons for this system not being judged as complying with the ESG was the heavy political interference when the system was created. This is not to say that the ESG is unreasonably strict on this point. On the contrary, they are fully compatible with the Swedish political system where the agencies connected to the ministries are considered to be ‘independent’. What it does say is that a national quality assurance system has a very strong impact on a sector of society, which (in comparison with other sectors) has a special position in relation to the political power. The temptation for politicians to use this tool is obviously high.

In ESG it is stated the following under the standard *Independence*:

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 (ESG 2005/2009: 25).

This was originally included to prevent unwanted interference in politically authoritative systems (Christian Thune, personal communication 2009). However, we can see from the Swedish case that the temptation for politicians in all systems, to use the national quality assurance system as a tool for gaining power over the operations in academia obviously can be high. It also shows us the necessity to have organisations as ENQA; they do not only guarantee the quality of HE for students and stakeholders, they also guard the boarder between the HEIs and the political powers.

Epilogue

In April 2014 a few weeks after the last interpellation debate in Parliament on this issue, to everybody's surprise, the Government suddenly announced that a new national QA system should be proposed by December 2014, and that the current University Chancellor was to resign in June 2014 (prior to finishing his mandate period). The explanation of this sudden turn is most probably explained by the upcoming election in September 2014, the national quality assurance system has been a problematic issue for the (now resigned) Government. The current system will be closed down by the end of 2014.

The new assignment was given to a former Vice Chancellor of one of the most prestigious Swedish universities (Karolinska Institute, KI) who later also was appointed as the new University Chancellor.

This time, the task description from the Government was very short but included the crucial point that a new system should be aligned with European requirements that is, ESG.

This paper is written while we are waiting for the proposal and the implementation of a new system. The conditions are good in the sense that a new Government is in place hopefully with a clear memory of what political interference in the national quality assurance of HE can lead to – exclusion from the European QA collaboration and the subsequent consequences for both students and HEIs in the international context.

Timeline

- 2008 late autumn: The national QA system planned for 2007-2012 (system 1) was closed down by the University Chancellor, due to severe criticism by Academia.
- 2009 March 11th: HSV (the HE Agency) received a Government assignment to create a new QA system 'with a stronger focus on results' than previous systems.

- 2009 April-August: A series of hearings about a new QA system with all Swedish university Vice Chancellors and their quality officers, the National Student Union and representatives from the national labour market organisations.
- 2009 September 15th: Government assignment (system 2) submitted by HSV to the Ministry of Education.
- 2009 October-December: No response from the Ministry to HSV –rumours about a new system being created at the Ministry.
- 2010 February 4th: Letter from the Swedish Association of Higher Education (SUHF) to the Minister expressing worries about these rumours and strong support of the system 2 proposal.
- 2010 March 3rd: University Vice Chancellors but not HSV (University Chancellor or Secretary General) invited to a seminar at the Ministry of Education where a power point presentation of their self-made system is presented.
- 2010 March 19th: Government bill ‘Focus on knowledge’ (Prop. 2009/10:139) passed in the Parliament.
- 2010 March: Written Question to the Minister of Education by the Social Democrats.
- 2010 April 26th: The Minister reported to the Parliamentary Committee on the Constitution (due to lack of proper submissions for comments/consultation).
- 2010 July 1st: University Chancellor resigns from HSV.
- 2010 June: HSV receives new Government assignment based on the bill.
- 2010 July: Secretary General/Deputy Head leaves HSV.
- 2010-2011: New system (system 3) is created and launched.
- 2012 April: ENQA’s review panel delivers critical report. (The report was published on the HSV’s website but with a very misleading Swedish summary on the first page. The then Vice Chancellor of Stockholm University blogs that one should read the full English report by the ENQA review panel instead: <http://karebremer.wordpress.com/2012/04/19/hsvskvalitetsutvarderingar-3/>

- 2012 April 19th: Press release from Swedish Association of Higher Education (SUHF) expressing critique and strong worries about the present system.
- 2012 May: Interpellation debate in the Parliament requested by the Social Democrats.
- 2012 spring: The first results from evaluations done by the new system presented by the new HE Agency, UKÄ.
- 2012 September: UKÄ receives ENQA status ‘under review’.
- 2012 October: Interpellation debate in the Parliament requested by the Social Democrats.
- 2014 February: UKÄ receives letter from ENQA stating that their ‘under review membership’ cannot be extended and will expire in September 2014. Again misleading information is published at UKÄ’s website, noticed by The Swedish Association of University Teachers: ‘The HE Agency conceals information of ENQA membership’: <http://www.sulf.se/Pressopinion/Pressrum/Pressmeddelanden/Universitetskanslersambetet-morkar-om-uteslutning-ur-ENQA/>
- 2014 March: Interpellation debate in the Parliament requested by the Social Democrats.
- 2014 March: Interpellation debate in the Parliament requested by the Swedish Green Party.
- 2014 April: New Government assignment to propose a new quality assurance system (‘compliant with European standards’) is announced at the Government website.

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