



# **Revision of the SFS Principle Program**

Proposition 3

# Cover Letter

## Background

According to the Charter, the Principle Program shall be revised every three years. In view of the upcoming general election and the need to keep the organisation's positions consistent ahead of the election campaign and subsequent government negotiations, the Board has chosen to present a proposal that focuses on introducing new positions and improving the readability of the document.

The revision proposals were preceded by an investigation carried out by a working group within the Board, which, through contact with the secretariat and the committees, identified areas requiring change. All proposals were presented to the member unions during the spring member meeting, and proposals that lacked significant support have not been included in the document.

To provide a clear overview of the changes, all proposed new text has been highlighted in green. All other content in the proposed Principle Program consists of previously adopted text.

## Proposed Changes

### Summary bullet points

A bullet point summary of each section's content has been introduced above the body text in all sections where the Board has assessed that such a summary would be beneficial for making the document more easily navigable.

### The degree ordinance

The degree ordinance is set out in the Higher Education Ordinance and constitutes a significant part of the government's ability to exercise political control over higher education, but has previously only been addressed as part of the debate on the institutional autonomy of higher education institutions. The Board proposes introducing a formulation in section 2.5, first paragraph, that specifically highlights the degree ordinance as something in need of reform.

### The four aspects of students' academic freedom

During the 2024/25 operating year, SFS launched the concept of the four aspects of students' academic freedom: the freedom to choose one's education, to ask critical questions, to exercise influence over one's education, and to organise. These changes have been made in section 2.5, second paragraph, section 3, sixth paragraph, section 3.5, fourth paragraph, and section 3.6, third paragraph, in order to further highlight these freedoms.

### **Increased reimbursement amounts within the current ceiling**

Sweden as a knowledge nation needs to be able to offer students a sufficiently high-quality education and the right conditions, which requires more resources per student. These views have been clarified under section 2.6 Resource allocation.

### **Total defence**

Everyone living in Sweden is covered by total defence, including students. In light of the current global situation, it is important to clarify how SFS views the role of students in total defence. These views have been introduced under the dedicated section 2.10 Students' role in total defence.

### **European University Alliances**

The development of European University Alliances is moving rapidly and SFS needs to establish a general position in order to help shape further developments. These views have been introduced under the dedicated section 3.11 European University Alliances.

# Proposed Decision

The Board proposes that the General Assembly resolve  
**to** adopt the proposition in its entirety.

**Full text with proposals**

# **SFS Principle Program**

Adopted at the General Assembly 2023

With amendments adopted at the General Assembly 2025

The document is revised every three years.

# 1. Introduction

This is Sveriges förenade studentkårers (SFS) Principle Program. The Principle Program is SFS's ideological platform and describes SFS's idea of the knowledge society and the principles that should permeate higher education. In all political advocacy work that SFS conducts, guidance can and must be taken from the Principle Program. The Principle Program does not aim to present reform proposals or concrete political solutions for SFS to pursue. Instead, all positions taken on political issues and all political focus chosen by the organisation must be made with an analysis and through a rhetoric that is in accordance with the principles expressed here.

In this text, student means the person who is admitted to and conducts higher education at undergraduate, advanced, or postgraduate level. The term study place (utbildningsplats) is used as a synonym for the official designation study slot (studieplats) to describe how many students can be admitted to a programme.

## 1.1 Starting point for advocacy work

SFS's purpose is to represent and safeguard the interests of the member unions and students through advocacy work. A democratic society is a prerequisite for good student influence and for student security. Success in free and general elections provides access to the institutions of democracy and outcomes must be respected. The democratic principles must be safeguarded. SFS as an organisation is based on basic democratic principles and thus safeguards an inclusive approach with respect for gender equality, equality, diversity, and the equal value of all people. The mandate stems from the members and the organisation is built to reflect the members we have. Both in forming and exercising its views, SFS is independent. It is a transparent organisation where outsiders can gain insight and understanding of us. In the same way, SFS must have an understanding of others. The organisation conducts advocacy work with external parties to promote the interests of students and student unions, and collaborates only with organisations that share SFS values, but conducts advocacy work for everyone. As part of the advocacy work, SFS works with the government, regardless of its composition.

## 1.2 SFS's view of the knowledge society

The idea of the knowledge society is based on the fact that the independent and democratic academy has a central role for the development of society and the common welfare. The academy's significance and special position are legitimised through high quality, broad popular support, and a high degree of student influence and collegial co-determination.

The knowledge society is permeated by a conviction and insight that higher education benefits both the public and the individual. Everyone's equal opportunity for higher education is a foundation of how the university is governed and operates, and it is a given that the education is free of charge for everyone.

There is also a comprehensive security system which, combined with decent social and economic conditions in general, provides good conditions for students to pursue higher education. The knowledge society is a global issue and extends across national borders. Academic freedom, integrity, and space for critical dialogue are basic prerequisites for high quality in education and research.

## 2. The Academy's Responsibilities and Prerequisites

- The academy as a matter of public interest
- Legitimacy and public trust
- Democratic and representative governance
- External perspectives and collegiality
- Transparency and fairness of governance systems

The academy's unique role in society makes it a matter of public interest. Higher education, research, and the academy's collaboration with the surrounding society affect people, regardless of whether they themselves work within the academy or not. Through politics, the public can influence what the structural conditions and governance of the academy look like. It is also through politics that the public formulates their expectations and academic needs.

For the public to perceive the academy as legitimate, admission to equal competition at all levels, transparency, legal certainty, consistent popular and democratic representativeness, accessibility, and high quality in education and research are crucial. In order to live up to those expectations, the academy must have a relationship with politics that is characterised by mutual trust and confidence. The academy must also be governed internally according to democratic principles. It is not least important that there is a broad representation of students, academic staff, and other staff on boards and other decision-making and preparatory bodies.

Higher education institutions shall have the opportunity to include external representatives in decision-making bodies in order to promote multifaceted perspectives on the activities. However, the external representatives must never be the largest group. For the academy to function effectively at all levels, the internal leadership, and the well-established collegial decision-making on which this is based, must include a comprehensive, strong, and independent student influence. The internal management of higher education institutions

largely consists of four fundamental systems: resource allocation, quality, employment, and management. These shall strive to be transparent, easy to understand, fair, flexible, nationally compatible, and quality-promoting.

## 2.1 Academic freedom

- Definition of academic freedom and responsibility
- The balance between freedom, politics, and the market
- The responsibilities of the state and higher education institutions
- Prerequisites for funding and independence
- Promoting academic freedom globally

Academic freedom means that students and academic staff must have the opportunity to freely seek knowledge within the academy. Academic responsibility means that higher education institutions and scholars must comply with laws, regulations, rules, and collegially made decisions and have a responsibility towards those who participate and invest in the academy — society and primarily the students. Academic freedom must always be sought after, but in constant balance with academic responsibility.

There is a natural conflict between the academy's freedom and the academy's responsibility, which results in demand and the need for transparency and influence between the academy's stakeholders. For the academy to be able to take on its responsibility, however, the academy's freedom is a basic precondition. Thus, from a long-term perspective, it is important that neither politics nor the market encroach on academic freedom. It is also important that the academy understands society's and students' expectations and needs, but that it is the academy itself that controls its activities so that they may be met. It is the responsibility of both the state and higher education institutions to ensure academic freedom for students and academic staff. Higher education institutions have a special responsibility for the academic freedom of postgraduate students.

To support the academy's freedom and responsibility, the greatest possible long-term perspective, clarity, predictability, and trust from politics are required, as well as adequate funding of the academy's activities. SFS supports eliminating the profit requirement from the state-owned landlords from which higher education institutions rent their premises, in order to ensure that the focus remains on educational quality. Furthermore, politics must have a realistic and solution-oriented approach to the academy's activities and assignments. The surrounding society must cooperate with the academy and the students, but its special interests must never take precedence over the academy's mission. Academic freedom must be ensured so that the academy is not reduced to just one labour market policy instrument. Under strong academic freedom in balance with academic responsibility, the academy will contribute to and stimulate the development of society and individuals. Academic freedom is not only essential for students in Sweden, but also in other parts of the world

where it is under active threat. In order to safeguard academic freedom, SFS considers that Sweden should work to strengthen academic freedom globally.

## 2.2 The special nature and delimitation of the academy

- The distinctive nature of academic education
- Delimitation from non-academic education
- Quality requirements and placement of educational forms
- Freedom of choice between different educational forms
- The academic status of postgraduate education

An academic education is distinguished from other post-secondary education by virtue of providing knowledge, skills, or abilities that rest on a scientific or artistic basis and proven experience, and that are developed in close relation to research. An academic education also always has an educational function beyond the instructional one, and always includes generic knowledge in addition to subject-specific knowledge. The academy is unique in that it provides society with long-term and unrestricted access to knowledge.

An education may be non-academic for two reasons: either because it is not intended to be academic, or because it is not conducted in a way that makes it academic. Among those not intended to be academic are foundation years and other preparatory programmes that provide specific eligibility. These are placed at higher education institutions because they benefit from being organised in the same environment as higher education. These programmes should not be counted towards the education budget, but may well be conducted in collaboration with academic education.

If an education is not conducted in a way that gives it academic qualities, it must either be changed or removed from the academy. Higher education institutions and the state must carefully consider whether an education has academic value or whether it should be conducted within another educational form, such as the vocational higher education sector or adult education. Likewise, education within other forms whose usefulness would increase if given academic qualities should be moved to the academy.

Within the same subject area, there can be both academic and non-academic programmes. It is positive that individuals can choose between different types of educational forms within a given subject area. In this way, it is clarified that different types of education — academic as well as non-academic — can be useful for different individuals, which follows from the fact that usefulness is based on the individual's needs.

Postgraduate education is the highest level of academic education. The principles governing education at postgraduate level are in many ways similar to those governing education at undergraduate and advanced level, but the focus of postgraduate education is always to educate research students to become independent researchers. For postgraduate education to be considered

academic, the individual research student's academic freedom must be protected as strongly as that of other researchers within the academy.

### **2.3 The academy's role and mission**

- Dissemination of knowledge and problem-solving
- The academy as a societal hub
- The individual's development and independence
- Prioritising the long-term societal mission

The academy's core occupation is to create, refine, and disseminate knowledge. The academy therefore plays a crucial role in the development of the knowledge society. Through the academy's dissemination of knowledge, solutions can be created as to how common problems are best handled. Neither politics, the market, civil society, nor the scientific community can solve the great challenges facing society on their own. The academy therefore has an important role to play as a hub between the various activities at local, regional, national, and international level.

The primary purpose of higher education is to give people the opportunity to develop into independent individuals who have the ability to critically examine, understand, and relate to their surroundings. The academy must also give the individual the opportunity for personal development. In this way, education gives the individual a greater power to control their own life and realise themselves.

The desire to meet the short-term needs of the labour market must never exceed the academy's mission to promote the general public and the individual's development in general. The knowledge development that individuals undergo within the academy is absolutely crucial for people's professional development and professional life.

### **2.4 Diversity and norms in the academy**

- The equal value and opportunities of people
- The accessibility and popular grounding of the academy
- Strategies against discriminatory power structures
- The academy's stance in favour of human rights

The equal value of people and opportunities to influence are central to the academy. This means that diversity among students, academic, and other staff is desirable as it brings more perspectives to research and education and thereby contributes to the development of society for all. It is important that the academy is made accessible to society and the individual. For the academy's popular support and trust, it is important that its recruitment results in society's population composition being reflected.

The norms that govern who feels welcome within the academy must be continuously reviewed and questioned. There must be strategies to combat exclusionary structures throughout the academy. It is important to have a critical approach to see structures and injustices. Given the knowledge that exists about power structures within the academy, inequality and structural discrimination should not be accepted. It is important that the academy takes a stand for equality, human rights, and against racism, fascism, and violent extremism. The academy must be characterised by a critical approach to norms and strive to be a role model for other activities in the area of equal conditions.

### **Norm-critical approach**

- A heterogeneous teaching staff and broadened knowledge production
- Recognition of pedagogical skills
- Strategies against gender stereotypes
- The importance of norm-critical pedagogy

The academy must be characterised by a critical approach to norms and strive to be a role model for other activities in the area of equal conditions. A more heterogeneous teaching staff that more closely reflects society would contribute to a broadened production of knowledge and research. In order to achieve a fully open and equal higher education sector, further measures should be taken. For a broad academy, it is important to counter the notion that tasks and fields of science are linked to a particular gender. A norm-critical approach is one of the ways to broaden the academy, in teaching as well as research.

SFS considers that the teaching staff at higher education institutions should reflect the composition of society. Therefore, all higher education institutions should actively counter a skewed recruitment of teaching staff by applying a norm-critical perspective to every appointment in order to achieve diversity and counter discriminatory structures. This should take place alongside long-term work with a focus on recognising pedagogical skills. The academy has not recognised pedagogical skills to the same extent as scientific skills. SFS considers that pedagogical skills should be regarded as equivalent to scientific competence in teaching appointments. An outdated gender-stereotypical view of teaching and administration becomes a trap for women that leads to reduced career opportunities. In order to counter the tendency for certain tasks to usually be performed by a particular gender, all activities within the academy must be given equal status.

Historically, higher education and research have been conducted based on male gender norms, as well as norms relating to whiteness, class, age, and sexuality. This has contributed to pedagogical methods and research on education being adapted to privileged groups in society. A norm-critical pedagogy gives students a broad understanding of the subject area, makes norms within their own discipline visible, and creates space for reflection on norms in learning. Through a critical approach, research results can be made accessible to more people and contribute to social change. SFS considers that all pedagogy within

higher education should be norm-critical. In order to enable a norm-critical pedagogical foundation within higher education, norm-critical perspectives shall be included in higher education pedagogy training for teaching staff and doctoral students, so that it can permeate all teaching at undergraduate and advanced level.

### **Distribution of research funding and gender mainstreaming**

- Breadth in the distribution of research funding
- Inclusion of underrepresented groups
- Anonymised assessment of applications
- Comprehensive gender mainstreaming

SFS considers that research funding should be distributed in a way that promotes the full breadth of the research community within each field of science. In this way, the opportunity increases for more people from underrepresented groups to pursue a career in the field and thereby advance research with a broader perspective. The activities can then also draw on a diversity of experiences that in the long run creates better research and education. If different types of experience are valued by the academy, there are also more incentives for individuals who leave the academy for other careers to return and contribute new perspectives. One step is the application process, where SFS considers that research funding should increasingly be prepared anonymously in order for applications to be assessed more equitably.

The academy as a whole must be gender mainstreamed in order to become more inclusive; this is an important piece of the puzzle in creating a more equal higher education sector. Gender equality, according to SFS, is a perspective that should permeate all decisions, from the choices made by higher education institutions to the individual teacher's decisions on how to structure teaching. For higher education to reflect society, reflection on the consequences of different decisions for different groups is required. Only through awareness of gender equality can the learning process and research reflect different viewpoints that lead to the development of society as a whole.

## **2.5 Governance of the academy's scope and provision**

- Principles for state governance
- Student demand as a governing factor
- Dimensioning based on qualified applicants
- National overview and geographical spread
- Student influence in contract education

The state can govern higher education through direct decisions, through the design of rules and other systems, and through financial means. SFS considers that the state should fund higher education so that it can be made available to everyone on equal terms. The state should be able to set requirements for education and govern its scope and provision at an overall, national level.

Governance should take place openly, in dialogue with government departments and higher education institutions, and with stated objectives. Student influence must be given access to all forums where higher education institutions are governed, such as agency dialogues. **Political control of higher education should also be limited by separating the degree ordinance from the Higher Education Ordinance.**

It is important that governance of the scope and provision of education takes place through regulations and financial frameworks with good predictability for higher education institutions and students. Governance must be long-term so that higher education institutions have good conditions for conducting their activities. SFS considers that students' demand **and freedom to choose their education** should be the most important factor when the scope of Swedish higher education is governed. This applies both to the governance of the total scope of higher education and to the scope of individual programmes. It is the state's responsibility to enable higher education institutions to adapt their educational provision to student demand. The state must investigate the level of demand for higher education, and take into account how the current provision affects demand. Higher education institutions must in turn take account of demand when they establish programmes and set their size.

### **Dimensioning of higher education**

- **Dimensioning based on demand, subject to quality requirements**
- **Flexible resource allocation independent of cost variations between programmes**
- **Protection of strategic and smaller subject areas from pure market governance**
- **Measures to increase attractiveness rather than political control of places**

The knowledge society requires a high proportion of academically educated people. The size of the academy must be governed by the need for a wide range of education and the possibility of conducting research in a large number of areas. It is important that people are not deprived of the right to higher education due to too few study places.

SFS considers that the number of study places in higher education should be governed such that all applicants who are qualified can be offered a place at undergraduate and advanced level. This means that the total number of study places across all programmes should correspond to the number of qualified applicants, provided that the programmes maintain high quality. All qualified applicants should thus be able to secure a study place, though not necessarily on their first-choice programme. The number of postgraduate study places should be adapted to both the needs of the academy and the needs of society. In order to achieve the desired objective, long-term planning is required at both national and institutional level, consistent with the high degree of freedom that SFS considers the academy must have. Flexibility in funding for higher

education is required since study places within different programmes cost different amounts. The total number of study places should not decrease simply because more students choose a more expensive programme. SFS considers that absolute quantitative targets – such as a requirement that a certain number of study places must exist – or proportional targets – such as a requirement that a certain proportion of the population must study – should not govern the provision of higher education. Instead, the education appropriation should be continuously adjusted to meet total demand from those seeking higher education.

Dimensioning all programmes directly according to their corresponding application pressure is a sound governance principle but may be problematic when establishing new programmes or maintaining smaller programmes. SFS therefore considers that maintaining smaller programmes, particularly those linked to a specific sector or research area, may be valuable even when there is not proportional student demand. Establishing new programmes based on the development of society or science may also be important. However, programmes should not expand, or in some cases even be offered at all, if there is insufficient interest or if quality would be lacking. In order to expand a programme or educational form, it therefore seems more appropriate to first increase the number of applicants and then enable an expansion, rather than the reverse.

Furthermore, SFS considers that the needs of the state and society are naturally met by student demand in the vast majority of cases. Where this is not the case, measures should primarily be directed at increasing the attractiveness of the programme or its associated professions, so as to increase the number of applicants and restore the balance – rather than, for example, reducing places in one programme in order to increase them in another, in a way that is not proportional to the respective application pressure.

### **Educational provision and placement**

- Agency responsibility for national overview and researcher databases
- Limiting state governance to the examination of degree-awarding powers
- Inclusion of social and structural factors in assessment
- Strategic geographical spread for national skills supply

The provision of higher education encompasses the different types of programmes and subject areas into which higher education is divided. It is important to have a good overview of the national educational provision in order to assess the need for a new subject area.

Universities and higher education institutions shall be strategically located geographically and spread throughout the country – something that is absolutely necessary to make studies and research a real alternative for everyone and to ensure the supply of skills throughout the country. SFS

considers that an agency should be tasked with creating systems for an overview of educational provision. Higher education institutions should be able to use this overview to take their national context into account when dimensioning their programmes. SFS also considers that there should be a national database of courses offered within the framework of postgraduate education at higher education institutions.

The state's governance of higher education institutions' provision should take place only through extended assessment of degree-awarding powers. The assessment should not be based solely on academic factors, but should also include assessments of the structural and social prerequisites of the programme. This means that, for example, the competence and resources of the academic environment, societal skills needs, access to mandatory placements, and the student's study environment should all be taken into account in order to ensure graduation across the country. Within and between higher education institutions, there must be a great breadth in terms of the research and education that is conducted.

### **Contract education**

- The right of student unions to participate in contract negotiation and decision-making
- Financial compensation for study monitoring within the institution's quality assurance
- Ensuring transparency regarding the direction and scope of the education
- Protection of regular education against negative impact from contracts

Contract education constitutes an important part of the higher education institutions' mission to collaborate with the surrounding society and contributes to high-quality professional development. Student unions have the right to exercise influence over decisions concerning contract education, as set out in Chapter 1, Section 4a of the Higher Education Act. Student unions shall therefore be given the opportunity to participate in the preparation and decision-making of contracts concluded between the higher education institution and the commissioners of contract education.

In cases where student unions undertake a study monitoring assignment linked to participants on contract education, the student union shall be compensated as part of the student union's work within the framework of the institution's quality assurance mission. The student union shall always be given the opportunity to represent participants taking part in joint teaching. The student union's right to transparency regarding the direction and scope of the contract education at the institution shall be ensured. Contract education shall never have a negative impact on regular education.

## 2.6 Resource allocation

- Financing principles for quality
- Participation-based resource allocation
- Preventing erosion of appropriations
- Reinvestment of rental profits
- Funding of new assignments

Resource allocation concerns how programmes are funded and how much resources different programmes receive, but also how the state provides funding to higher education institutions and how institutions use it. Both education and research require substantial resources. There is a significant resource shortage in higher education, and since the 1990s the reimbursement per student has fallen by a third. Any additional resources must prioritise increased funding per student and increased quality, rather than a further expansion of higher education.

In order for the academy to have the right conditions to shoulder its role in the knowledge society, it is necessary that both education and research are financed in such a way that academic freedom and the quality of education are not jeopardised. According to SFS, the majority of research conducted at higher education institutions should be funded by the public through non-competitive public funds.

SFS considers that the resource allocation system should be designed according to the principle that the reimbursement for education corresponds to the cost requirements of that education for it to maintain high quality. SFS supports a resource allocation system that is based to a high degree on participation rather than performance. In this way, neither the institution nor the student group as a whole within a programme is negatively affected if certain students are not approved, and the institution's reimbursement for the programme better corresponds to the actual cost of educating a student. It would also reduce financial incentives for over-admission. A performance-based system risks, over time, reducing the requirements placed on students within the programme's assessment, which in turn risks leading to less support for students since expectations of them are lower. This in turn leads to a reduced educational quality that risks further lowering the requirements placed on students, resulting in a vicious cycle.

Existing programmes shall not suffer as a result of changes to the resource allocation system, and transitional rules may therefore be needed when the resource allocation system is changed. Education conducted in collaboration with external actors must not lead to the erosion of educational funds. With regard to postgraduate education, higher education institutions shall allocate sufficient funds to ensure that the educational environment and education of research students are secured for the duration of their studies. For the funding of postgraduate education, it is essential that institutions have sufficient resources to dimension the programme. Higher education institutions should

not be dependent on external funding to maintain a necessary scale of postgraduate education.

Higher education depends on long-term financial stability in order to keep educational quality at the centre. Erosion of appropriations must be prevented. There must therefore be no requirements for productivity increases, and the price and salary adjustment must correspond to the actual cost increase. To further counter the erosion of resources for higher education, state-owned companies and agencies whose primary purpose is to supply goods and services to higher education institutions should do so primarily as a service to facilitate the institutions' activities. This means they should not be allowed to make unreasonable profits on the goods and services they provide. SFS therefore supports eliminating the profit requirement from the state-owned landlords from which higher education institutions rent their premises. Profits from state-owned landlords that rent to the academy should be reinvested in the higher education sector. Furthermore, a funding principle must apply to all activities at higher education institutions, whereby the state cannot assign new tasks to institutions without increasing the resource allocation. In this way, new tasks can be assigned to institutions without jeopardising their financial planning.

### **Collaboration with the surrounding society**

- Quality through connection
- Innovation and dissemination
- Open access to publicly funded research
- Private funding

A reciprocal connection between higher education and research is a necessity for maintaining high quality in both education and research. Through collaboration with the surrounding society, innovations and knowledge dissemination are created that contribute to the development of the knowledge society. Both the surrounding society and the academy benefit from the dissemination of knowledge that takes place through collaboration within the framework of education and research.

Since a large part of the research is funded with public funds, it is important that both results and data are available to the public. The results of all publicly funded research must therefore be made available through open archives. In order to stimulate the emergence of innovations and promote collaboration, it is also important that private funds can be allocated to research.

## **2.7 The academy's role in sustainable development**

- Sustainability as an integrated part of all activities
- The academy as a role model and source of knowledge
- Global responsibility and international collaboration
- Systematic cross-institutional work

- Independence for effective transition

Sustainable development refers to a development that ensures a healthy and good environment, economic and social welfare, and justice without doing so at the expense of future generations. Higher education, research, and collaboration between academia and the surrounding society are absolutely crucial issues for sustainable development.

All aspects of sustainability are central to society. The state has a special responsibility to set clear requirements at national level for sustainability aspects within academia, especially due to the rapid climate change and its major negative impact on society. Higher education institutions play a major role in the transition, both in terms of reducing their own negative environmental and climate impact and in contributing relevant knowledge to other sectors of society. It is of great importance that governance and funding models for the academy also enable higher education institutions to lead by example, as custodians of scientific and artistic research.

In order for higher education institutions to best contribute to sustainable development, they need to be largely independent actors in society. At the same time, politics, business, and society have significant and legitimate expectations that research and higher education will contribute to a sustainable society. Political steering of resources to higher education institutions in relation to central societal challenges should therefore promote the freedom of institutions, individually or collectively, to develop well-considered approaches and strategic perspectives on sustainability in education, research, and collaboration, rather than restrict them. The academy has a responsibility to disseminate and make use of knowledge about sustainable development and to contribute objectivity to the public debate. The transition to sustainable development cannot be discussed solely from a national perspective but must be seen as a global concern. In order to address the global challenges encompassed by sustainable development, it is necessary to collaborate across national borders.

The academy plays a crucial role in generating new knowledge about sustainability through research. Sustainability can be incorporated in all subject areas regardless of scientific discipline. SFS considers that there should be cross-institutional work on sustainable development. This should take place systematically, be clearly communicated, and be easily accessible to students as well as to others within the academy. Furthermore, within the academy there shall be support for the ability of students and academic staff to contribute to new industries, identify opportunities, and create resources to take advantage of these. It is essential that sustainability issues within the academy are addressed in an international context and that mobility is not restricted. This requires a shared sense of responsibility in the internationalisation that is taking place.

Science and research-based education of the highest quality is a prerequisite for the transition to a sustainable society. SFS considers that long-lived, stable, and resilient institutions and structures are required to bring about that transition. The academy and students in particular are a key actor. Mobility among students, researchers, and teachers between different institutions and countries offers, among other things, opportunities to develop joint strategies for addressing global challenges.

### **The mission of higher education institutions**

- The institution's role as a meeting place for collaboration and mutual learning
- Ownership and integration of sustainability in management structures
- Responsibility for national targets and systematic follow-up of the work
- Financing sustainability work through the regular budget and separate reporting

Higher education institutions occupy a central place in acting as a collaboration partner and meeting place. It is of great importance that the research produced is presented and made visible. The activities that take place on or in connection with higher education institutions play a central and important role in mutual learning. Part of collaboration involves creating points of contact, where the business sector, public agencies, civil society, and other central co-actors are relevant parties. For influencing both individuals and society, making use of the education and research at higher education institutions is a cornerstone.

It is important that there are targets and ambitions for each institution's work on sustainable development, both with regard to the institution's contribution to the transition of the wider society and with regard to the institution's own transition. The institution shall take full ownership of this work. The organisation may vary depending on, for example, the size and focus of the institution. It is important that there is a clearly stated plan for the work, that sustainable development is integrated into existing processes, and that it is linked to clear management and organisational structures.

Higher education institutions shall identify risks, challenges, and opportunities when setting targets, but shall also relate to the national targets that Sweden has committed to. Higher education institutions shall promote sustainable development and be at the forefront of efforts to achieve national targets, regardless of whether the institution is a public agency or not. Follow-up of this work shall take place both by the institution itself and by supervisory authorities. Furthermore, higher education institutions have an additional responsibility to assist other societal actors.

Sustainability work shall be part of the regular operations and each higher education institution shall therefore allocate resources to finance it. In addition to this, SFS considers that there are grounds for each institution to report on its work and initiatives in the area of sustainability in a dedicated manner.

## **The environmental and climate impact of higher education institutions**

- Responsibility to act as a role model through scientifically grounded work
- Student influence in environmental analysis and decision-making processes
- Reassessment of air travel and focus on asset management
- Ambitious targets beyond climate neutrality with digital solutions

Higher education institutions are large organisations and therefore have a significant impact on the environment and climate, both locally and globally. As custodians of scientifically grounded knowledge about the environment and climate, it is important that universities act as role models and also take practical responsibility for their environmental and climate impact. SFS considers that higher education institutions shall identify what within their organisation causes the greatest environmental and climate impact, and which sustainability initiatives are most effective. Student representatives shall be involved in the identification and decision-making processes. Carbon dioxide emissions and asset management are two aspects that SFS considers to be central to all higher education institutions.

State universities and higher education institutions are the public agencies responsible for the greatest carbon dioxide emissions from air travel. Within academia as well as other sectors of society that require air travel, the role of travel in activities therefore needs to be reassessed. Other parts of institutions' activities also account for significant negative environmental impact. SFS considers that each institution shall identify what within their organisation has a significant negative environmental impact and strive to minimise this.

Swedish higher education institutions should have more ambitious targets than merely becoming climate neutral themselves. A prerequisite for this is that institutions have sufficient structural conditions and resources for this work to function, and that measures are implemented and followed up. Sweden, including Swedish higher education institutions, has good opportunities to help the entire world in its transition, which also offers opportunities for students to work in an international context. Internationalisation through travel can lead to increased emissions. Higher education institutions have a responsibility to use digital communication and efficient transport to minimise emissions.

## **2.8 Work environment and mental ill-health**

- Investigation of students' health situation
- Prevention of mental ill-health
- Agency collaboration on work environment supervision
- Support for systematic work environment management

It is of great importance that higher education institutions investigate and address the underlying causes of students' mental ill-health in order to remedy

and prevent them. In order to prevent mental ill-health, SFS considers that the state and its agencies shall ensure that higher education institutions investigate, evaluate, and keep statistics on students' health situation and the causes of students' mental ill-health. A safe and secure work environment is required for good mental health.

Several agencies supervise how higher education institutions fulfil the requirements placed on the work environment and students' situation at the institution. When multiple agencies are involved, collaboration is important – involving anchoring within and between the agencies regardless of which agency has primary responsibility for supervision. The agencies should provide training or otherwise support and contribute to monitoring higher education institutions' systematic work environment management so that it takes place effectively and in close proximity to the student. SFS considers that the agencies shall develop this work together through collaboration, and that the responsibility rests equally on all agencies responsible for students' work environment.

## 2.9 Internationalisation

- Promotion of international mobility
- Development of intercultural competence
- The importance of international contacts
- Prerequisites for remaining in Sweden
- Legally secure processes for residence permits

The academy's function in the knowledge society means that it operates to a very high degree in a globalised context. Students as well as research and teaching staff must be given the opportunity and be encouraged to undertake exchanges and international collaboration. It is therefore important that national regulations are developed to promote mobility for students, academic staff, and other staff.

It is also important that students as well as research and teaching staff are given the opportunity to develop their intercultural competence, in order to enable effective and appropriate communication with other cultures. Internationalisation does not only mean being physically active in another country, but also, for example, making international contacts as a student or academic staff member.

Conditions must also be created for international students at all levels of education within the academy to remain in Sweden after completing their studies, as this is absolutely necessary for society's development and supply of skills. Processes for residence permits both before, during, and after studies must work seamlessly and in accordance with the rule of law. Residence permits must not be the limiting factor for being able to study at a Swedish higher education institution or to take on a position of trust within student life broadly.

## 2.10 Students' role in total defence

- The significance of the academy for the defence of democracy
- Continuity in education and research during crises
- Completion of studies as the main principle
- Purposeful use of specialist knowledge
- Right to return and maintained security

Democratic society constitutes the foundation of the academy's activities, and an independent academy is in turn a cornerstone of a robust defence of democracy. In the event of heightened alert or war, maintaining higher education and research is crucial for the functioning of society. This continuity is a prerequisite for the common welfare, both during and after a crisis. Since the academy provides society with long-term and unrestricted access to knowledge, its activities are to be considered an essential matter of public interest even in wartime conditions.

SFS considers that the main principle in the event of heightened alert should be that students are permitted to complete their commenced studies. This is in order to secure future skills supply and society's ability to handle complex challenges, both in the short and long term. Students' contribution to total defence should primarily take the form of their knowledge development, and any claim on their competence should be secondary – primarily after graduation. Total defence must be organised so that academic competence is used purposefully for both the individual and society's need for specialist knowledge.

For students serving in total defence, the right to return to studies shall be ensured through clear regulations and support measures that compensate for any interruption to studies. The state and higher education institutions share a joint responsibility for ensuring that service does not jeopardise the student's ability to complete their education. This responsibility also includes ensuring that the student's financial and social security is not negatively affected by service.

## 3. High-Quality Education

- Purpose and usefulness
- Objectives of education
- Objectives of postgraduate education
- The value of education
- Collaboration and connections with working life

The purpose of higher education is that it should be useful to the student. The programmes provided must be based on the individual's overall need for knowledge and intellectual development in working life and society. A useful education gives the student the conditions to meet a society in change and

trains subject-specific knowledge, general abilities, and a critical approach to the outside world. For postgraduate education, usefulness means that the research student must become an independent researcher with the ability to manage, expand, and convey the scope of knowledge within the field of science for the benefit of both society and the individual.

The value of an education lies in its usefulness for the individual. A distinctive feature of higher education is that students are equipped to understand and analyse their own life situation and the society in which they operate. In order for this to be possible, students must learn to reflect on the knowledge acquired and the learning process itself. Different programmes have different conditions for meeting this and it is important to create a balance. Some programmes respond to a greater extent to well-known needs in the labour market, while others instead create the conditions for creating new forms of employment.

Within higher education, students and academic staff collaborate with each other in teaching and research. Students play an important role within the higher education institution and can contribute to both education, research, and the institution's collaboration with the surrounding society. This requires the right conditions in the form of skilled and committed teachers and a management that pays attention to the students as an asset. **Safeguarding students' right to ask critical questions and to be taken seriously is an important prerequisite for academic dialogue.**

Students shall have recurring elements of connection to working life throughout their studies. There shall be collaborations between higher education institutions, students, and working life in order to ensure students' opportunities for a future in which they can make use of the competencies acquired during their studies. However, it is important that higher education institutions provide information regarding what overall job opportunities there are for the student, in order to counter the special interests of parties in working life.

### **3.1 Institutional governance of education**

- Student demand governs provision
- Institutional independence in decision-making
- Student influence and collaboration
- Recognition of pedagogical skills and professional development
- Guarantee of research connection in expansion

Higher education institutions shall offer the education at undergraduate and advanced level that students demand, so long as the education meets the criteria for higher education. Higher education institutions are responsible for ensuring that their programmes are academically relevant and of high quality. The development and review of educational provision shall take place on an ongoing basis and with sound grounding, in order to create good conditions for

future planning and to be able to offer students relevant educational options. In this way, a balance between long-term stability and renewal is sought.

It is the obligation of higher education institutions to ensure student influence in the institution's dimensioning and provision. Beyond student influence, higher education institutions have a responsibility to discuss dimensioning issues for all levels of education with a broad range of societal actors. These may include, among others, non-profit organisations, the business sector, and the public sector. Through broad collaboration, higher education institutions determine what belongs to higher education and what is left to other educational forms. The formal decision on the institution's dimensioning and provision must always be taken by the institution itself in order not to risk threatening the academy's independence, freedom, and scientific or artistic foundation.

Higher education institutions should be very cautious about using forecasts of society's or particular actors' needs as a basis for their dimensioning. Such forecasts should only be used for programmes where the need for competence has proved very easy to predict.

In order for teaching staff to have the conditions to be skilled in both research and education, conscious guidance is required from a political point of view and from the institution's management. Among other things, a well-functioning resource allocation system for education and research both from the state and within the institution, access to professional development for teachers, clear career paths, and a functioning security system for the institution's staff are needed. In order to ensure commitment and competence within the framework of education, there must be systems that recognise pedagogical skills for teaching staff.

### **Dimensioning and provision**

- Quality regardless of size
- Geographical spread and accessibility
- Governance based on demand
- Variety of educational forms

SFS considers that all education should be of high quality regardless of whether a programme has a high or low number of places. A certain number of places within a programme should not be a prerequisite for the institution to be able to provide high-quality education. How the programme is structured in relation to the number of places ensures that all programmes, regardless of the number of places, have the conditions to maintain high quality. The programme may also never be dimensioned in such a way that other aspects of a high-quality education suffer. The higher education pedagogical competence of teaching staff and supervisors may never be treated as secondary to an individual teacher's research.

For all people to have the opportunity to make a free choice of education, the geographical spread of each programme is important. While collaboration and cooperation between higher education institutions is important for achieving good regional access to programmes, the state plays a central role in directing institutions to achieve this. This governance must be based on student demand and the conditions for achieving high quality in education. An analysis of student demand shall play a central role when institutions are required to obtain degree-awarding powers. Such an analysis should also cover the conditions for efficiency and quality in education.

It is of great value for there to be a broad range of education. There should be a variety of both subject areas and forms of education, including degree programmes and stand-alone courses. In the academic environment there should be opportunities for exchange between students studying different types of programmes with different purposes. SFS considers that there should be a varied educational offering throughout the country.

### **Research connection**

- Guarantee of research connection
- Quality requirements for postgraduate education
- National access to postgraduate level
- Dimensioning according to the needs of the academy

The exchange between education and research, known as research connection, is central to higher education and to educational quality. SFS considers that a higher education institution should only be able to increase the number of study places within a high-demand programme if good research connection can still be guaranteed. It is therefore important that environments with strong demand for education have the conditions for research to be conducted, in order to prevent an imbalance from arising between education and research that would risk educational quality.

Postgraduate education is a central part of higher education just as undergraduate and advanced level education is. For the quality of postgraduate education, it is necessary that it is connected to a high-quality research environment, which among other things gives the research student the opportunity to discuss their research with other junior and senior researchers in their field. There should be broad access to postgraduate education throughout Sweden in order to ensure a strong connection between research, education, and society, and to make postgraduate education broadly accessible.

It is the responsibility of higher education institutions to determine which postgraduate study places are to be advertised. The dimensioning of postgraduate education should be governed by the needs of the academy and society for researchers. A particularly important aspect of this is the long-term perspective of the academy, whereby the dimensioning of postgraduate

education should satisfy the academy's need for doctoral graduates for high-quality undergraduate and advanced level education.

### **Massive Open Online Courses**

- Pedagogical potential
- Separate funding
- Need for a national strategy

SFS sees that Massive Open Online Courses (MOOCs) have the potential to advance pedagogical development, but that it is not justified to take money from formal education in order to conduct such development work. SFS therefore considers that higher education institutions should not be allowed to fund MOOCs by drawing on education appropriations. SFS considers that a national strategy is needed to create a shared understanding of how MOOCs should be developed and funded.

## **3.2 Prerequisites for commencing higher education**

- Reflection of society's composition
- Accessible study and career guidance
- Inclusive programme design and support measures
- Freedom from tuition fees and the right to education for all
- Inclusion regardless of citizenship status

For people to be able to take part in higher education, potential obstacles must be overcome and there must be a mutually good attitude between the public and the academy. This requires that a number of concrete prerequisites are met for the possibility of commencing, undergoing, and completing higher education.

### **Widened recruitment and widened participation**

- Reflecting society's composition and inclusion
- Clarity in educational information
- Accessibility and role of study guidance
- Inclusive educational environment and language
- The importance of foundation year programmes

Widened recruitment is about ensuring that everyone has the opportunity and conditions to apply for and be admitted to higher education. To achieve this, institutions must improve their recruitment of students from groups that are underrepresented. It lies in the interest of society as a whole to have a well-educated population with different life experiences; this requires an active policy that encourages study and makes it possible for everyone to have the choice to study in higher education. SFS considers that the student group should reflect the composition of society. Through reflection, experiences,

perspectives, and competencies are drawn upon in the development of the knowledge society and knowledge is made accessible to more people.

It is important that higher education institutions inform prospective students about the programmes they offer – not only about their content but also about the ways in which the programmes can be useful. It is, among other things, important that a programme advertised as campus-based should also be so, and the same applies to programmes advertised as distance programmes. This is in order to provide clarity to prospective students.

It is important that there is good study information for prospective students that includes more than just quantitative measures per programme. Study and career guidance plays an important role in informing about the usefulness of higher education. SFS considers that study guidance should be available at upper secondary schools, adult education providers, the Public Employment Service, and municipal libraries, and should offer information and discussions about the possibility of higher studies. Education should be easily accessible and adapted to the fact that students have different conditions, needs, and educational and cultural backgrounds. Study guidance has a particularly important role in ensuring that more people are made aware of higher education.

Widened participation is about designing education so that all admitted students have the opportunity to complete it, including through pedagogical development and the right to support measures. An inclusive programme design ensures freedom from fees and accessible teaching materials. A broad and heterogeneous student group places high demands on treatment and varied educational arrangements that guarantee an inclusive study and work environment. In a heterogeneous student group there is varying knowledge of the academy and its language – a language that a student needs to be able to participate in academic knowledge development. Foundation year programmes are an important key to institutions' work on widened recruitment.

### **Education accessible to all**

- Inclusion regardless of citizenship
- Studies as a basis for residence permit
- Legally secure validation of qualifications
- Opposition to tuition fees
- Cost control and scholarships

Higher education is a human right that shall be independent of citizenship status. People who have not yet obtained a residence permit should therefore be given the opportunity to study in Sweden. Higher education contributes to the individual being included in Swedish society. Full-time study should, in the same way as employment, be a route to permanent residence. Foreign qualifications are a competence and an asset for both the academy and the Swedish labour market. Knowledge should not go to waste; clear and effective

validation of foreign educational qualifications is therefore needed. It is not sufficient to add funds to various agencies — there must also be a uniform, functioning, and legally secure system from which to work in the validation process.

Education shall be free of charge for everyone. SFS is strongly opposed to tuition fees for higher education and distances itself from a higher education funded through student fees. However, in cases where a fee is charged from the student, these fees may never cover more than the costs that are directly linked to the education that the student completes. Higher education institutions should also clearly state how these costs are calculated. Where fees exist, there shall be alternatives to make higher education more accessible for fee-paying students. Such alternatives include scholarships that can be applied for by students subject to fees.

### **3.4 Admission and selection**

- Eligibility requirements based on learning objectives
- Legally secure validation of prior learning
- Transparent and meritocratic admission system
- Cost-free selection instruments for applicants
- Public advertisement of postgraduate study places

Admission matters encompass how students are admitted to higher education. The system for admission matters distinguishes between questions of eligibility and questions of selection. Eligibility concerns what qualifications a person must have in order to be admitted to a programme. Selection concerns which of the eligible applicants are admitted to the programme.

#### **Admission to undergraduate and advanced level education**

- Relevant and necessary eligibility requirements
- Legally secure assessment of prior learning
- Alignment with upper secondary school graduation objectives
- General eligibility for advanced level

The eligibility level for higher education must be justifiable on the basis of what is required to benefit from the programme. Eligibility requirements shall be entirely necessary, meaning they must be justifiable on the basis of the programme's objectives and content. Requirements shall be designed as achieved learning outcomes and be meaningful in relation to the programme's content. Requirements for a particular type of thesis or fees shall not exist, as the form does not in itself constitute a competence.

Eligibility requirements shall be described in terms of general and specific eligibility. For specific eligibility, a description in subject-area eligibility categories shall be provided so that the applicant can easily survey the eligibility requirements. Work experience may only be used as an eligibility requirement in

specific cases. Suitability assessments shall not normally occur, as they are not legally secure and risk preventing persons with the right prior knowledge from studying. Instead, selection shall be based on the applicant's knowledge and skills. The programme shall provide conditions for all eligible applicants to fulfil the programme's objectives based on the prior knowledge requirements.

SFS considers that everyone who has the right competence should have access to higher education, regardless of which educational system they have studied in and regardless of whether they have had the opportunity to study in higher education. All applicants shall have the right to have their formal educational qualifications validated in order to become eligible for Swedish higher education. All applicants shall also be entitled to an assessment of their prior learning and whether the competence corresponds to general or specific eligibility. Prior learning refers to, among other things, competence from working life, non-formal education, and informal learning. Assessments shall be expressed so that they can be used to apply for various programmes within the regular admissions system. There shall therefore also be legally secure national criteria and procedures for the assessment of prior learning.

The general eligibility level shall be aligned with the graduation objectives of all upper secondary school programmes. It is the state's responsibility to ensure that the educational chain is coherent and that there are no gaps between upper secondary education and higher education. Even if not all upper secondary programmes need to provide all subject-area eligibility categories, all upper secondary programmes shall provide general eligibility. Otherwise, students' upper secondary choices may exclude them from higher education, with consequences for the openness and representativeness of the academy.

Eligibility requirements at advanced level shall be designed so that applicants with different undergraduate qualifications can be admitted, unless specific prior knowledge is required. This means that a degree at undergraduate level should normally provide eligibility for programmes at advanced level even within related subject areas where students have sufficient prior knowledge to complete the programme. Eligibility for advanced level shall reflect the fact that knowledge and skills in higher education shall be general.

A qualifying pre-programme, such as a foundation year, shall be able to provide a guaranteed place at one of the programmes for which the pre-programme provides eligibility. Qualifying pre-programmes are an important tool for widening recruitment to certain programmes.

### **Admission to postgraduate education**

- Public advertisement and transparent process
- Countering shadow doctoral students
- Reasonable admission criteria and qualifications
- Inclusion of visiting researchers

Places for postgraduate education shall be publicly advertised and assessed against a clear description of the programme and the position, and shall be available to all prospective research students. The application process shall be transparent and legally secure. The decision on who is admitted and/or employed as a doctoral student should never rest with a single individual. When advertising doctoral student admissions, it shall always be clear whether the admission concerns a licentiate degree or a doctoral degree. It is important that higher education institutions actively work to counter the existence of individuals who are active as research students but are not admitted to postgraduate education — so-called 'shadow doctoral students'.

SFS considers that those who have obtained a degree at advanced level or have equivalent qualifications should be eligible to apply for postgraduate education within their subject area. Admission criteria for postgraduate programmes shall be clear, transparent, and reasonable. For admission to postgraduate education, it may never be a requirement that the applicant has conducted research with the research group in which the postgraduate programme is based. Nor should it be a requirement that the applicant has published articles in academic journals. These may, however, constitute merit.

Research students enrolled at a foreign higher education institution who act as visiting researchers at a Swedish institution for a period should be particularly included in a research group. The institution should be aware of the existence of these research students and be clear about the mutual expectations between them and the institution. Even though these research students are not admitted to a postgraduate programme at the institution where they are active, they should to the greatest extent possible be treated in the same way as admitted research students.

### **Selection for undergraduate and advanced level education**

- Meritocracy, transparency, and fairness
- Equivalent requirements for all students
- Cost-free selection instruments
- The role and merit value of grades
- The SweSAT and other specific tests

Selection concerns which of the eligible applicants are admitted to higher education. Within the selection system there are various selection instruments such as grades, the Swedish Scholastic Aptitude Test (SweSAT), and alternative admission forms. The purpose of the selection system is to choose which students are admitted when there is competition for study places in a programme. It is important that selection for higher education is perceived as legitimate by society, regardless of which admission system is used. The system must therefore be transparent, predictable, and fair. The admission system is built on a meritocratic basis and is intended so that the most merited students are the first to have access to education. This applies to both Swedish and

international students. It is therefore important that all students are admitted based on the same requirements and in the same admission process.

In order to be perceived as legitimate, the selection system should be competition-based and founded on students' merits. SFS is strongly opposed to separate admission quotas for fee-paying students. In order to be able to admit persons with different backgrounds, experiences, and types of merits, several different selection instruments are needed. The outcomes in a competition-based system with different selection instruments are not comparable. Since the system cannot take into account individuals' different conditions for acquiring competitively advantageous merits, all selection instruments shall be cost-free for the applicant. This creates predictability in the selection system. Despite this, SFS considers that a competition-based system with several ways of measuring merit is the most reasonable to use given the large number of study places, study locations, programmes, and applicants. The selection process shall aim to admit those with the best merits, but the study places shall be distributed between selection groups in a way that promotes widened recruitment.

Grades from upper secondary school shall be an important selection instrument. The reliability of grade merits is based on the grades being clearly linked to objectives and on assessment in upper secondary school being legally secure. Since selection shall be based on equal merits being valued equally, grades from supplementary upper secondary education shall be valued equally to regular upper secondary grades. All upper secondary grades shall have equal merit value in order to make the system transparent, efficient, and to avoid unnecessarily directing students' choice of study. SFS therefore considers that there should be no merit point system.

The SweSAT is an important instrument for widening selection for higher education, particularly for persons without competitive upper secondary grades. The SweSAT shall be a study aptitude test that tests aptitude for study based on the student's knowledge. The test shall be adapted to relevantly examine study aptitude for the wide range of higher education on offer. The SweSAT must be an opportunity for everyone. This can be achieved by offering the same opportunities for pedagogical support measures at the SweSAT as admitted students can receive. Nor should there be any fees associated with the SweSAT.

For certain programmes, specific tests are needed to measure relevant prior knowledge. Such tests shall be made as legally secure as possible, for example through anonymisation. SFS considers that selection in the form of lottery, rolling admission, or open admission with selection later during the programme are resource-inefficient and unpredictable.

### **3.5 The student's learning at the centre**

- Shared responsibility for the learning process

- Compulsory higher education pedagogy training
- Legally secure and anonymous assessment
- Relevant and varied teaching methods
- Guaranteed time for recovery

The responsibility for the student's learning process is shared between the student and the person who teaches or supervises. The role as an academic teacher entails special requirements linked to the purpose of higher education. In order for a student to receive the best possible education, it is important that the knowledge is imparted by scientifically or artistically competent teachers. It is just as important that those who teach or supervise have solid higher education pedagogical competence. All learning activities and the teaching and supervision that takes place shall be grounded in science and proven experience of learning. In order to ensure the necessary competence, SFS considers that higher education pedagogical training must be compulsory and recurring for teaching and supervising staff.

It is important that the teaching methods used are relevant to the education and varied so that all students can absorb the knowledge in the best possible way. Teaching methods and higher education pedagogy should also be adapted depending on whether the programme is campus-based or a distance programme. Education must maintain the same quality regardless of where it is conducted. Self-study without sufficient supervision should never occur, as this gives students fewer opportunities to develop the analytical and critical thinking that higher education requires. For education at undergraduate and advanced level, except for independent work, self-study may never constitute the main part of the education.

Research students employed at the institution have a special position as both students and academic staff. As students, they undergo training and meet academic staff in various roles, while in their role as researchers at the beginning of their careers and in their meetings with students in teaching, they are also academic staff. In light of this dual capacity, research students employed within the academy are therefore covered by the rights and obligations that apply to both of these roles.

Students' freedom to exercise influence over their own education shall be encouraged through both formal structures and the opportunity to provide feedback and express wishes, curiosity, and a desire for development.

### **Assessment and thesis defence**

- Clear connection to learning objectives and degree objectives
- Legal certainty, transparency, and anonymity
- Financing and quality assurance of thesis defence
- Scheduling within the framework of the pace of study
- Review of grades and assessment

In order for students to be able to achieve the learning objectives, it is important that the education and assessment are designed in a clear manner in relation to the objectives. All education leading to a degree must also be planned and carried out with clear grounding in the national degree objectives. The assessments must be designed so that it is possible for the student to report that the goals have been achieved. Higher education institutions must strive for a variety of assessment forms.

The student's learning must always be the primary starting point when designing assessment plans. Beyond this, legal certainty must always be ensured. At and before assessment, transparency, predictability, and anonymity are important issues of legal certainty for the student. Research students must never bear the responsibility to finance or quality assure their own thesis defence.

Students must be given the opportunity to plan their everyday life in accordance with the scope of the studies according to the pace of study set out in the course syllabus. Therefore, the times for assessed elements should be scheduled within the scope of the pace of study. A course taught during daytime shall be assessed during daytime on weekdays; likewise, a course taught during evenings shall be assessed during evening hours.

The grading system applied must be appropriate for the education in question and facilitate mobility. Assessment and grades shall always be possible to review. When designing degree programmes, knowledge and skills that are crucial for progression must be ensured through assessment.

### **Time for recovery**

- Consideration of recovery in educational planning
- Security systems for uninterrupted periods of rest
- The right to annual leave for research students
- The role of student health services in recovery

In higher education institutions' planning of the design of education, recovery time shall be taken into account. There must be security systems that make it possible for students and research students to have longer uninterrupted periods of recovery and time for recovery between terms or reading periods throughout their education. There must also be structures that ensure that research students' ability to take annual leave cannot be restricted by their supervisor. Furthermore, it is of great importance that student health services and occupational health services have the resources and competence to assist students and research students in matters relating to recovery.

## **3.6 Quality assurance**

- The institution's responsibility for quality work

- The central role of students in analysis and follow-up
- Countering linguistic barriers to influence
- Inclusive student influence in distance education

Quality assurance work shall secure and strengthen the opportunity for students to attain high-quality education within all levels of higher education. Through quality assurance work, a high minimum level must be guaranteed, but above all, quality assurance work must strengthen the development of the education's content and implementation, regardless of whether the education is campus-based or a distance programme. Universities and higher education institutions operate in an international context, which means that quality assurance work does so as well.

The institution bears the responsibility for implementing quality assurance. The institution is responsible for independently developing quality assurance based on the scientific nature that is to characterise all parts of academic activity. Furthermore, SFS considers that the institution is responsible for developing its own definition of quality based on the institution's conditions and distinctiveness. This definition of quality must be based on the students' perspectives and interests. Students play a central role in all parts of quality assurance work, and especially in its planning, implementation, analysis, and follow-up.

The institution has a responsibility to encourage student engagement and to safeguard students' right to organise. No student shall be subjected to reprisals for their engagement.

### **Barriers to student participation in quality work**

- Language barriers and access to information
- Bilingualism in decision-making bodies
- Equal opportunities for student representatives
- Student influence in distance education

There are several barriers that can affect students' opportunities for student influence. Student influence is largely limited to students who have an understanding of the Swedish language. As Swedish higher education institutions become increasingly internationalised, international students must be offered equivalent access to information and equal opportunities for student influence. There shall be opportunities for students as well as research and teaching staff who do not know Swedish to learn the language effectively. Higher education institutions must be organisationally inclusive even for non-Swedish speakers, regardless of any requirements for official language; this includes that all students must be able to be student representatives at all levels.

In order for student influence to be accessible to all, SFS works to ensure that language barriers should never stand in the way of non-Swedish-speaking

students participating actively in student influence at their Swedish institution. SFS shall therefore work to ensure that higher education institutions make use of bilingualism in bodies where non-Swedish speakers are to be represented. Through bilingualism, participation in student influence becomes more equal for both Swedish-speaking and non-Swedish-speaking students. Furthermore, higher education institutions shall provide at least the summary of all important documents that concern non-Swedish-speaking students.

A large proportion of students in the country study by distance. A barrier to participation may be the inability to attend in person at the institution. Student influence by distance should therefore be in the awareness of higher education institutions and shall also be taken into account in the planning of activities.

### **3.7 Learning environments**

- Fit-for-purpose premises and facilities management
- Student influence in premises matters
- Pedagogically adapted learning environments
- Accessibility and inclusion
- High-quality physical and digital environments

The premises of higher education institutions shall be dimensioned and designed in such a way that they are fit for purpose and promote a good work environment. The management and ownership of premises shall take place in such a way that it benefits activities. Higher education institutions should also be given opportunities to own and manage their own premises. This includes both ownership structures whereby institutions indirectly own their premises through other companies and cases where the institution directly owns the premises. Furthermore, claims for profit or other costs that exceed the actual operating and investment costs for the premises shall not be charged to the institution. This presupposes that staff and students are involved and represented in decisions concerning the institution's premises.

The opportunity to study together is a quality issue. The exchange of experience is one of the academic cornerstones for creating new knowledge. A learning environment refers to a place where learning takes place, and can be both physical and virtual. SFS considers that the learning environment shall be adapted to the pedagogy used at each learning moment in order to stimulate the development of knowledge.

Some forms of education are characterised by physical learning environments. The physical learning environment may contain barriers to participation. Teaching must be accessible regardless of the student population. Likewise, students with children must not be excluded by the absence of, for example, nappy-changing facilities, breastfeeding spaces, or study places where children are also welcome. Just as some programmes need distance teaching in order not to exclude parts of the student population, other programmes need physical teaching in order to guarantee high educational quality and a good social study

environment. A campus-based programme shall as a rule have its teaching on campus. Digital elements may occur but shall not replace campus teaching.

The digital learning environment shall be satisfactory. This means there must be space for discussion and exchange of experience in a natural way through digital learning platforms. Digital learning platforms shall be adapted for text-to-speech, be translatable into other languages, and take into account diverse needs.

### **Social and organisational work environment**

- Right to a safe work environment
- Handling of conflicts and mediating functions
- The role and training of student safety representatives
- High-quality and appropriately sized study spaces
- Access to student ombudsperson and advisory services

Students, like employees, shall have the right to a safe social and organisational work environment. It is therefore of great importance that the state and its agencies have guidelines, laws, and regulations that work towards a good work environment for students. A good work environment for students does not mean exactly the same as for employees. Among other things, it is of great importance for students' work environment that there are well-designed and carefully thought-out course and programme syllabuses that ensure a reasonable workload and coherent programmes of study, as well as accessible, comfortable, and safe physical environments.

In addition to this, there is a general need for support measures at the institution for handling conflicts, both between students and between students and staff. It is also important to ensure the existence of mediating functions between students and any supervisors, particularly in positions where the risk of interpersonal conflicts may arise.

It shall be the role of student unions to appoint student safety representatives at each institution. Student unions shall be given good conditions for appointing and coordinating the functions of student safety representatives. Student safety representatives shall receive training that corresponds to the standard of training for safety representatives. It is the institution's responsibility to provide high-quality training for student safety representatives. It shall be up to each institution, in consultation with the respective student union, to decide which party organises the basic training for student safety representatives. Student safety representatives shall have a status equivalent to that of safety representatives, regardless of whether they work with the physical or psychosocial work environment.

Students' environments shall meet the statutory accessibility requirements, and shall be a good physical and psychosocial work environment for all. A good study environment and study space is a basic prerequisite for completing

higher education. Study spaces shall be well designed to meet the needs of students and the content of the programme. Study spaces shall be dimensioned according to the needs at each campus, in order to ensure that all students have a good study environment throughout their studies.

A student ombudsperson or equivalent function shall be available at the institution to ensure students' right to support and guidance in their study situation. The institution is ultimately responsible for in some form enabling the funding of a student ombudsperson or equivalent function.

### **3.8 Prerequisites for student health services**

- Free of charge and well-resourced student health services
- National standard for student wellbeing
- Clarification of the statutory function of student health services
- Improved collaboration between healthcare providers

The study period involves factors such as stress and uncertain living conditions that can lead to a need for student health services. Student health service clinics – commonly referred to as student health services – are important in giving students the right conditions to stay well throughout their studies. As a result of erosion in the education budget, funds for student health services across the country are being reduced at the same time as students' stress-related problems are increasing. SFS considers that student health services may not charge fees from students. Student health service activities may also not be cut back as a consequence of higher education institutions being forced to make savings. It is also important that a good national standard is established so that student wellbeing is guaranteed, regardless of the choice of study location and programme.

When a student becomes ill or suffers from mental or physical ill-health, there is uncertainty about whether the student should turn to primary healthcare or student health services. In addition to this, there is also uncertainty about the respective responsibilities of student health services and primary healthcare. SFS considers that the preventive function of student health services and their complementary role in relation to primary healthcare must be clarified by means of a statutory definition of their function. SFS also considers that the lack of collaboration is sufficiently serious for the state to actively promote collaborative initiatives between higher education institutions' student health services, student unions, and respective regions, in order to ensure that students are not caught between agencies and regions while waiting for care. Student health services and the preventive work of healthcare services and higher education institutions are a crucial prerequisite for promoting good health among students.

### **3.9 Sustainable development in education and research**

- Integration of sustainability perspectives in all programmes

- Development of relevant sustainability competence
- Institutional responsibility for teacher professional development
- Promotion of research for societal transition

Within the academy, teaching, research, and collaboration take place that contribute to sustainable development. Higher education institutions shall have targets for sustainable development at all levels of education and within all subject areas.

Relevant perspectives on sustainable development shall be integrated into all programmes. Different societal challenges may be relevant to the subject area in question. Sustainable development should be integrated into education from a multi-disciplinary approach, since the various societal challenges cannot be addressed in isolation. There shall be a systematic follow-up and development of education in which sustainable development is addressed.

Education shall give students sustainability competence that is relevant to their subject area and the purpose of their education, in order to facilitate students' contribution to the transition to a sustainable society. The transition to a more sustainable society concerns all fields of science. SFS therefore considers that all programmes can and should address relevant sustainability perspectives, which presupposes that the necessary competence exists among teaching staff. Where competence is lacking, SFS considers that higher education institutions have a responsibility to supply it. The nature of this competence varies between subject areas.

Integrating sustainable development into programmes should be done by developing students' knowledge of sustainable development, their ability to contribute to sustainable development, and by teaching taking place in a sustainable and inclusive manner. SFS also considers that work on sustainability in programmes means working to a greater extent across subject discipline boundaries in order to address the ecological, social, and economic societal challenges the world faces.

Research is required for the transition to a sustainable society. This applies both to the development of innovations and to their implementation. Higher education institutions have different conditions and opportunities in this regard, for example researchers and teachers with both the knowledge and resources to work on these issues. Research requires resources and while all researchers shall be free to choose their research problems, the state, higher education institutions, and other societal actors have a responsibility to promote research that contributes to sustainable development.

### **3.10 Artificial intelligence in higher education**

- Forward-looking and sustainable use of AI
- Upskilling of teachers in new technology
- Protection of human interaction and critical thinking

- Legal certainty, integrity, and inclusion

In view of the rapid development of artificial intelligence (AI), higher education institutions must adopt a use of AI that is forward-looking and sustainable. Training of university and higher education teachers in AI is crucial, and they should be equipped with the knowledge and tools to navigate this new technology in a purposeful way.

SFS shall work to ensure that AI is used in a way that improves higher education. Higher education institutions shall have good procedures for keeping up to date with developments in AI and for guaranteeing that education and research are only positively – not negatively – affected. AI shall not be used to replace important human interactions, and a critical approach shall be safeguarded. SFS's vision is to see a higher education in which AI serves all students in a legally secure manner, and in which integrity, inclusion, and innovation are the cornerstones of this digital development.

### **3.11 European University Alliances**

- Swedish statutory student representation must be safeguarded
- Students shall democratically elect their representatives
- Students shall have influence in all preparatory and decision-making forums

University alliances within the EUI aim to strengthen cooperation between European universities and to create more integrated, competitive, and internationally attractive educational environments. Since the first university alliances were formed, many Swedish higher education institutions have joined various university alliances, and as a result many Swedish students are also automatically students at a European University. Developments are moving rapidly and look very different in many respects.

The purpose and objectives of the initiative are sound, but further development challenges the structure that has previously existed in relation to higher education at international level. Developments must take into account the Swedish context, in which student representation is established in law, which is not a given in all countries with which Swedish universities collaborate. The formal structures for student representation and influence that exist in Sweden must be safeguarded. This is done by using the Swedish model for student influence as a leading standard, while incorporating good aspects of other models.

European University Alliances must develop common structures for student influence, and common definitions of central concepts linked to student influence must be developed. These shall be based on the principle that only students can represent students and elect their representatives, and that students shall have the right to attendance and representation in all forums and spaces where decisions are made and prepared. The mandate to represent

students therefore derives from democratic elections carried out by students, not from representatives appointed by the institution.

## 4. Prerequisites for Studies

- Equal study conditions and accessibility
- Pedagogical support measures and national guidelines
- Social and financial security
- The design and scope of the student financial aid system
- Student housing as a social right and responsibility

Prioritising accessibility and adaptation to meet needs is a prerequisite for all students, regardless of background and needs, to be able to take part in higher education with equal study conditions. Legally secure admission and assessment are crucial to ensure equal study conditions.

Students bring with them varying prior knowledge and different levels of familiarity with the academy into their studies. In order to make knowledge of academic ethics and the art of both writing and speaking academically accessible to all, there must be a national responsibility for securing the provision of free courses in academic writing, academic speaking, and writing workshops at higher education institutions across the country. Such courses must not be jeopardised by the financial circumstances of higher education institutions.

### 4.1 Studying with a disability

- Accessible design of learning tools and environments
- National funding of pedagogical support measures
- Privacy protection and anonymity in assessment
- National guidelines for a uniform minimum standard
- Individual adaptation and clear information

All higher education shall be designed to be accessible to everyone. Assessment forms, teaching environments, and learning tools need to be developed beyond the norms of how teaching has traditionally been conducted. Beyond a developed and accessible higher education, there is a need for pedagogical support measures. Pedagogical support measures shall aim to reduce or remove barriers for students with documented disabilities so that all students can study on equal terms regardless of disability.

A disability shall never be a barrier to applying for or fully participating in and completing higher education. Inadequate pedagogical support measures or premises that are not accessible shall not be reasons for a student to discontinue their studies. SFS therefore requires that at national level there shall be secured funding for pedagogical support measures. SFS also requires that systems shall be in place to verify that these funds are channelled into

pedagogical support activities. Likewise, support shall be available for students in need who wish to study or undertake placements abroad, so that these students have equivalent opportunities.

Assessments are occasions on which many students with disabilities are disadvantaged. In order for the assessment to be fair, students must receive the special support and aids to which they are entitled. It is not sustainable for students to have to prove before each assessment that they are entitled to support, as this entails an increased workload and planning burden for the student. It also means that a great deal of staff come into contact with sensitive personal data unnecessarily, and that the possibility of being anonymous at, for example, a written examination is reduced. There should also be a national system that keeps track of what support students are entitled to and enables them to register their need for support at the same time as they register for assessment. The individual student's privacy regarding sensitive personal data shall be strongly considered.

There are no national guidelines for what is meant by special pedagogical support measures. The absence of national guidelines contributes to an imbalance between Swedish higher education institutions in the provision and design of pedagogical support measures. Nor is there a minimum standard for what a student can expect in terms of support when admitted to a course. SFS therefore wishes guidelines to be prepared for national consensus. With a common definition, SFS wishes to see a standardised basic provision of pedagogical support measures. Pedagogical support should then be able to be individually adapted to meet the needs of each individual student. Information about available support functions shall be clear for both prospective and admitted students. Insufficient information about available pedagogical support measures shall also not prevent study abroad.

## 4.2 Psychosocial health

- Work environment focus against mental ill-health
- Sustainability through secured recovery
- Balance between self-study and teacher-led time

Mental ill-health is a societal problem that also affects many students. A student's mental health can affect their ability to complete their studies, and if fewer students complete their studies due to mental ill-health, this will entail increased costs for both society and the individual. A great deal of the mental ill-health experienced by students is more directly linked to the study situation and the work environment at the institution.

### Recovery

Recovery is an essential prerequisite for a long-term sustainable study situation. Workload is one of many factors that affect the need for recovery. Within the concept of workload, the need for a balance between self-study and teacher-led time throughout the programme is encompassed, with the aim of

creating an even workload. When the possibility of recovery is lacking, health can also be affected.

### **4.3 The student's finances**

- Need for comprehensive and adapted security systems
- Student financial aid linked to actual cost levels
- Extended number of weeks of student financial aid for lifelong learning
- The institution's responsibility for costs of study materials
- Full reimbursement for expenses during placements and work-based learning

A socially and financially secure existence during the study period is crucial for students' wellbeing and opportunities to take on, undergo, and complete their studies. The opportunity to study must be equal for all. Therefore, financial barriers to study must be minimised. Students must be covered by comprehensive security systems and shall not need to be occupied to a greater extent than full-time in order to live a decent life.

#### **Social security systems**

- Comprehensive security systems for wellbeing and study results
- Sickness insurance and rehabilitation equivalent to that of employees
- Secure employment conditions and ombudspersons for research students

Access to financial and social security systems affects widened participation. Financial security through the student financial aid system reduces the need to work alongside full-time studies in order to make ends meet. The social security system provides support when a student becomes ill. During periods of illness, student health services play an important role. When the illness becomes more prolonged, students must be covered by a well-functioning security system in order to have time to rehabilitate back into their studies. Likewise, those who are parents and students must be covered by a well-functioning security system.

Students who become ill or unemployed shall never be forced into poverty or have to leave their education due to injustice and dysfunctional security systems. All students shall have the right to social security to the same extent as employees and shall be covered by a full security system adapted to students' needs.

A functioning social insurance system is a prerequisite for a full social security system. Students shall be able to make use of the insurance when they are ill. SFS considers that students shall be able to be on sick leave on a part-time basis. They shall also have the right to rehabilitation back into their studies after a period of illness if they so wish. Responsibility for students' rehabilitation rests by law on the education provider. It shall be clear what measures the student is

entitled to and what the education provider is obliged to offer. Students' sickness insurance and compensation for care of a sick child shall be linked to the activity of studies rather than to the student financial aid, in order to encompass all students. SFS considers that the qualifying period for sick leave and care of a sick child shall be a maximum of 7 days.

It is important that parental insurance is adapted to students. Students shall be able to start a family without losing their activity and shall be able to resume their studies after parental leave.

Since housing costs vary between different students, housing benefit may be needed to ensure that housing costs do not constitute too large a proportion of a student's income. SFS considers that housing benefit shall be designed in such a way that it is a real alternative for everyone who needs it. It is important that housing benefit is adapted to different housing and life situations and that the rules are clear.

Research students employed within the academy have a dual role as both students and academic staff. The security conditions for research students vary depending on their form of funding and whether they are employed. SFS considers that all research students shall always have secure employment. Like other staff, research students shall have good, predictable working conditions from day one. For research students who are employed elsewhere than in the academy, the institution shall ensure that the research student is insured through the other employer. A doctoral student ombudsperson or equivalent function shall be available at the institution to ensure research students' right to support and guidance in their study and employment situation.

### **Student financial aid system**

- State funding for an open and equal higher education sector
- Student financial aid that covers actual expenses and standard of living
- Adaptation for lifelong learning and extended number of weeks

The student financial aid system is a basic prerequisite for an open and equal higher education sector. A state-funded student financial aid system is absolutely necessary for all people to have equal opportunities to apply for higher education. It needs to be adapted to a heterogeneous student group in order to guarantee that everyone, regardless of background, dares to take the step into higher education. In order for student financial aid to serve its purpose, it must be adapted to society's cost levels. SFS's general principle is that student financial aid should fully cover students' actual expenses and enable a reasonable standard of living with recreation and leisure. The majority of student financial aid shall consist of grants from the state, subject to the distribution being balanced.

The Bologna Process meant that programmes at advanced level became one year longer. This has contributed to reduced opportunities to commence more

programmes and courses than a bachelor's programme and a master's programme. The student financial aid system shall be adapted to the length of the programmes. SFS considers that the number of weeks for which student financial aid can be applied for shall be sufficient for at least eight years of full-time study. The fact that the weeks of student loans are limited is also a direct barrier to lifelong learning and Sweden as a knowledge nation. The student financial aid system shall be a dynamic system in which a student who has repaid a certain number of weeks of their student loan can once again use these for funding studies. SFS also wishes for the grant and loan weeks of student financial aid to be possible to split and thus drawn upon separately.

Students with children are a group that is particularly financially vulnerable. There shall therefore be satisfactory benefit systems to enable student parents to cover the additional costs that come with being a student parent. It is important that all student parents who have additional costs are entitled to the supplementary benefit, regardless of their family situation otherwise. Other circumstances, such as where the child is registered for tax purposes, shall also not affect the possibility of receiving the benefit.

Working alongside studies shall be an option and not a necessity in order to finance one's time as a student. SFS is fundamentally positive towards a free income allowance, as it is a guarantee that it shall always be possible to finance one's studies with student financial aid without needing a supplementary income. However, the free income allowance shall not, for example, constitute a barrier to the sale of property or the transfer of capital between accounts. Account must also be taken of the fact that as an employee or contractor it is not always possible to predict or plan when payment is made. Students shall not become liable for repayment due to unforeseen or unplanned income. SFS also considers that the free income allowance shall only apply during the weeks in which the student receives student financial aid.

### **Costs associated with studies**

- Institutions' responsibility for free teaching materials and tools
- Increased accessibility through libraries and digital licences
- Full reimbursement for travel and accommodation during work-based learning

Teaching materials or learning tools are instruments that the student needs in order to achieve the learning objectives of the course. Higher education in Sweden is required by law to be free of charge, but if students need to pay for teaching materials and learning tools in order to achieve the course objectives, higher education is not free of charge for the individual student. Study materials and learning tools required in order to be given the conditions to achieve the course objectives shall therefore be funded by the institution and not the student. A list of the teaching materials and learning tools needed for students to participate in a course shall be published no later than two months before the start of the course. Regardless of whether a student needs the study material

to be read aloud or needs time to plan their participation in the course, the individual student should be informed of the conditions well in advance and be able to plan their participation.

Initially, funds should be added to institutional libraries to increase the availability of course literature. This also means that institutions need to broaden the provision of, for example, open-access course literature and licences for digital editions. Since not all education is characterised by course literature or campus-based learning, the software required for a programme must be made available to all students. The materials required for practical elements in the programme shall be available to students at the institution. Since there are many hidden costs for students participating in work-based learning (WBL/VFU), it is important that students are compensated for the expenses they incur in connection with WBL. Students shall therefore receive full reimbursement for all costs associated with placements or WBL, including travel and accommodation.

## 4.4 Student housing

- Requirements for equivalent housing standards and accessibility
- Shared responsibility between state, region, and municipality
- Rent ceiling linked to student income
- Housing guarantee and assistance for international students
- Responsibility for housing during compulsory placements

Access to housing is a social right. A shortage of housing is a major societal problem that hits economically vulnerable and otherwise disadvantaged groups particularly hard. All students shall have access to secure forms of housing throughout their studies. A shortage of housing also means that many people hesitate to study in a particular location. This contributes to increased skewed recruitment to programmes across the country; the state, municipalities, regions, and higher education institutions have a responsibility here to contribute to students' security.

### Starting points

- Housing standards in accordance with the same requirements as the rest of society
- Promotion of rental housing and mixed development
- Accessibility and acceptance of temporary planning permissions when needed

The student population is a heterogeneous group with diverse needs. These needs shall be met in the same way as for other members of society. It is therefore a very important starting point that no lower requirements are placed on students' housing than on housing for others. Furthermore, it is important that students have the same good access to societal services, infrastructure,

and recreation. SFS advocates the idea of mixed development, and housing for students should therefore not be concentrated in certain areas.

A group with particular housing needs is students with children, who often need larger flats. It is important that the housing supply is adapted to the mixed student group with housing in various forms. SFS therefore encourages housing providers to supply housing in different forms of tenure. Few students can afford to buy a home. It is therefore important that access to rental housing for students increases.

Good housing standards are important for the student's wellbeing and ability to complete their studies. Housing that is built shall meet a high standard and meet accessibility requirements so that the housing stock becomes accessible to all. Housing shall be accessible so that all students can live in it regardless of functional capacity, and shall meet the same standards as other housing. In order to facilitate housing construction, SFS sees value in continuously reviewing whether there are rules that can be relaxed or reformulated without either accessibility or living quality being reduced. It is therefore important that operation and maintenance are not neglected. SFS considers that the same rules and taxes shall apply to maintenance regardless of the form of tenure.

When reviewing rules and requirements for housing, the basic principle shall be that students are not treated differently from others in the proposed changes. In order to meet acute housing needs, SFS is cautiously positive about housing construction under temporary planning permissions. It is also very important that housing built under temporary planning permissions meets the same standards as permanent housing. Temporary planning permissions shall only be granted on land that already has a detailed development plan. Tenancy conditions for housing under temporary planning permissions shall be clear and provide security for tenants.

### **The responsibility of public institutions for the student housing situation**

- Rent ceiling at 30 per cent of student financial aid
- Protection against market rents to safeguard study conditions
- Municipal planning monopoly as a tool for housing supply
- Regulation and written contracts on the subletting market
- Time requirements and scope for a functioning housing guarantee

The state must take its responsibility for ensuring that all groups in society can access good housing. It is clear that a shared responsibility between state, region, and municipality is required to create a good housing situation for students across the country. SFS views the housing shortage for Sweden's students as a problem linked to a general housing shortage. Students are one of the groups affected when housing shortages exist, since students generally have strained finances and often have to move to new locations in order to study. Many students are young and have therefore not had the opportunity to

be on a housing waiting list for a long time. In a situation of housing shortage, it is therefore important for there to be housing dedicated to students, where students can live throughout their studies.

SFS is positive towards investment subsidies for the construction of small rental properties. Small rental properties fulfil an important function in society and should therefore be prioritised. The investment subsidy must be designed to be long-term, predictable, and create incentives for building more housing for students. It shall also be linked to requirements for lower rents. A rent that students can afford is central to the possibility of pursuing studies. SFS therefore has as its starting point that rent should not exceed 30 per cent of a student's income in the form of student financial aid. For this reason, SFS also opposes the introduction of market rents, since SFS considers this would disadvantage students. It is also important that housing companies' income requirements for tenants are reasonable and adapted to students' situations. SFS considers that municipalities' housing supply responsibilities shall be followed up with national targets for housing construction, and that the state shall clarify what requirements are placed on regions and municipalities. There is also a need for clearer requirements on municipalities to plan the use of land.

Through municipalities' exclusive right to determine how land within the municipality is to be used — the so-called planning monopoly — their actions become key to creating conditions for housing supply for the entire population of the municipality. Public housing companies fulfil a special role in providing housing for students. SFS considers it important that municipal housing companies take a special responsibility for building housing and that the public housing stock is not sold off. It is not only municipalities that have higher education institutions within their boundaries that shall take responsibility for ensuring there is housing for students; surrounding municipalities must also do so.

It is important to seek a good balance between citizens' opportunities for influence in the planning process and society's need for an efficient process. SFS considers that the planning process should be reviewed to investigate whether it is possible to shorten the time between decision-making and the commencement of construction. This must, however, be done with consideration for ensuring that democratic influence is not jeopardised.

When the detailed development plan is adopted and building rights are granted, municipalities shall set time limits for the implementation of the plan. An important tool for putting pressure on construction companies to actually build on the allocated land is not to have unnecessarily long implementation periods, and one way of taking responsibility for avoiding long lead times.

The housing market is complex and it may therefore be difficult for a newly arrived student to know which housing companies exist in a location. It must be clear for students moving to a municipality or geographical region what housing options exist and how the process of applying for housing works. It is important that all students are treated equally in housing waiting lists. Special rules may,

however, be permitted for students with children, as they are often in a particularly vulnerable position.

The subletting market shall be seen as a complement to the regular rental market. SFS considers that there shall be safe and legally secure conditions for those who rent in the second-hand market; a contract with a reasonable rent shall exist. It shall not be possible to live in an unsafe situation and be forced to pay an unreasonable rent. In order to increase security for the tenant, there shall be a requirement for a written contract. SFS considers that increased regulation of the subletting market is needed to strengthen security.

A housing guarantee fulfils a function in addressing the housing shortage for students in the short term. In order to fulfil SFS's definition of a housing guarantee, housing shall be available within 30 days of the start of the course or throughout the duration of studies. The long-term solution is for the housing shortage to be resolved for the population as a whole through new construction.

### **Consideration of student housing matters in educational dimensioning**

- Institutions' responsibility for housing dialogue and accurate marketing
- Guaranteed housing support for international students
- Protection against dual housing costs during compulsory placements

SFS considers that higher education institutions shall have a responsibility to maintain good dialogue with municipalities and regions about how the student population is expected to develop, and to work towards municipalities providing students with housing. Higher education institutions also have a responsibility to provide information about the housing situation in the location or locations where they are situated, and to ensure that the information gives an accurate picture of the situation to both prospective and current students.

However, it is not the responsibility of higher education institutions to supply their students with housing by acting as housing agents or housing managers. Higher education institutions shall, however, take their responsibility and ensure that housing is provided to the international students who under their agreements have the right to housing in Sweden.

International students are a particularly vulnerable group since it may be difficult to understand how the Swedish housing market works. It is important that higher education institutions inform prospective students about the situation on the local housing market in their marketing. The institution shall also offer international students assistance in their search for housing. Where higher education institutions have committed to providing housing for international students, it is their responsibility to ensure that this housing is available. Higher education institutions shall not transfer this responsibility to student unions or other student-run organisations.

Within certain programmes, there may be compulsory work-based learning where a student is placed at a location so far from their place of study that daily commuting is not possible. SFS considers that no student should be left with dual housing costs in order to benefit from their education. It shall be the responsibility of higher education institutions to provide housing if they are unable to offer a placement to which there are reasonable transport links from the place of study.