

Responsible internationalisation

Interim report on a Government assignment



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UHR's report series 2024:6 Swedish Council for Higher Education

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ISBN 978-91-7561-134-1

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Foreword

The Swedish Council for Higher Education, the Swedish Research Council, and the Swedish Governmental Agency for Innovation Systems (Vinnova) have worked together on a Government assignment to promote responsible internationalisation in education, research, and innovation collaborations. In this report, the three public agencies are reporting back on the first part of the assignment, relating to proposals for national guidelines for responsible internationalisation. In December this year, the public agencies will submit a final report on the assignment, which will also include proposals for support for the implementation of the guidelines, and increased knowledge and awareness about issues relating to responsible internationalisation.

Overall, it is a complex assignment that will not be concluded once the report from the public agencies is published. Responsible internationalisation requires well thought-through and long-term working practices that are developed in line with changes in the world around us. It is important for public agencies and higher education institutions, individually and jointly, to create a culture and adequate processes for managing the difficult deliberations that may arise in international collaborations.

The starting point for the work has been that internationalisation in education, research, and innovation is fundamentally positive, and constitutes a necessary precondition for developing new knowledge and new technologies. Internationalisation is therefore an indispensable value that needs to be safeguarded and cared for. At the same time, higher education institutions are working in an ever more complex and splintered world, with increasing geo-political tensions that create new challenges for higher education institutions. This entails increased focus on protecting national interests, knowledge, and technologies.

The work with responsible internationalisation is a joint responsibility for higher education institutions, funding bodies, and the Government. The proposed system for responsible internationalisation gives the Government background documentation for decisions while at the same time providing guidance and support to higher education institutions, funding bodies and other actors involved in the work of acting responsibly internationally.

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Sammanfattning

Universitets- och högskolerådet, Vetenskapsrådet och Vinnova har i uppdrag av regeringen att föreslå hur arbetet med ansvarsfull internationalisering inom högre utbildning, forskning och innovation kan främjas.

För ett litet land som Sverige, starkt beroende av samarbeten med omvärlden för utveckling och välbefinnande, är internationalisering en nödvändighet. Det system för ansvarsfull internationalisering som myndigheterna föreslår ska ses som ett stöd till att bedriva internationella aktiviteter så öppet som möjligt och så säkert som nödvändigt.

Utformningen av riktlinjerna har gjorts främst med lärosäten som mottagare, men med ambitionen att de ska kunna följas även av forskningsfinansiärer och andra aktörer. Arbetet har tagit avstamp i existerande riktlinjer och checklistor, utvecklingen inom EU samt behovet av ett delat ansvar.

Myndigheterna i uppdraget föreslår ett system för ansvarsfull internationalisering som bygger på en ansvarsfördelning på tre nivåer.

- **Policy** – En övergripande strategisk inriktning för ansvarsfull internationalisering som beslutas av regering eller riksdag.
- **Vägledande nationella riktlinjer** som mer i detalj redogör för bedömningar och ställningstaganden som behöver beaktas i arbetet med ansvarsfull internationalisering.
- **Riktlinjer som är anpassade till den egna verksamheten.** Utifrån de vägledande nationella riktlinjerna föreslås att enskilda lärosäten, finansiärer och andra utarbetar riktlinjer som är anpassade för den egna verksamheten.

I rapporten ges förslag på hur en policy skulle kunna utformas och på vägledande nationella riktlinjer.

De vägledande nationella riktlinjerna är indelade i fem dimensioner:

1. Den svenska kontexten handlar om vikten av att förstå och navigera genom nationella förutsättningar för internationellt samarbete, bland annat med hänsyn till juridiska och politiska faktorer som internationella sanktioner och vetenskapsdiplomati, samt sektorsspecifika samarbeten.

2. Förhållanden kring den egna verksamheten handlar om att identifiera och skydda skyddsvärden inom det egna lärosätet och forskningsverksamheten; identifiera hot, risker och sårbarheter med

fokus på specifika antagonistiska hot; bedöma vilka begränsningar eller möjligheter som finansieringen ger.

3. Den utländska kontexten handlar om aspekter som kan påverka handlingsutrymmet i internationella samarbeten som motpartens lands lagstiftning, demokrati rättssäkerhet och mänskliga rättigheter, akademisk frihet och en allmän hotbild.

4. Kännedom om samarbetspartnern omfattar en bedömning utifrån öppna data om aktörens status och graden av autonomi hos samarbetspartnern.

5. Utformning av samarbetet omfattar vilka åtaganden som görs genom samarbetet och vilka beroendeförhållanden som kan skapas under samarbetet och hur ska de hanteras. Det berör frågor som god forskningssed, forskningsintegritet och etik, öppen vetenskap samt hållbarhet och jämställdhet.

Myndigheterna i uppdraget framhåller vikten av internationella samarbeten, men också att de möjligheter de erbjuder behöver vägas och bedömas mot eventuella utmaningar eller risker.

För att främja ansvarsfull internationalisering är det också viktigt att identifiera och adressera målkonflikter som kan uppstå. De kan exempelvis röra lärosätets akademiska frihet och institutionella autonomi kontra säkerhetsmyndigheternas mål att trygga nationens säkerhet.

Arbetet med ansvarsfull internationalisering är komplext och avhängigt av ett långsiktigt förhållningssätt, där erfarenhet och kompetens behöver byggas över tid. För att hantera svåra avväganden behöver det etableras en kultur av ansvarsfull internationalisering på flera nivåer inom lärosätena, liksom inom andra myndigheter, där olika funktioner involveras för att bidra med sina olika kompetenser.

Myndigheterna ser att den erfarenhet som byggs över tid kommer att visa på behov av att revidera riktlinjerna. De kommer att behöva vidareutvecklas genom samverkan med lärosätess sektorn och relevanta myndigheter för att på bästa sätt motsvara de behov som finns.

Myndigheterna utreder fortsatt hur behoven av ett nationellt stöd ser ut. Det ska slutredovisas den 15 december 2024.

Summary

The Swedish Government has tasked the Swedish Council for Higher Education (UHR), the Swedish Research Council, and the Swedish Governmental Agency for Innovation Systems (Vinnova) to produce a proposal for how to promote responsible internationalisation in higher education, research and innovation.

For a small country like Sweden, which is strongly dependent on the outside world for both development and prosperity, internationalisation is vital. The system for responsible internationalisation the three agencies propose in this interim report is intended as a support mechanism, so international activities can be conducted in a way that is as open as possible and as safe as necessary.

The guidelines have been developed primarily for higher education institutions, but with the ambition that research funding bodies and other stakeholders in higher education will also follow them. The guidelines draw on existing guidelines in other countries, developments in the European Union and on the need for shared stakeholder responsibility.

This report outlines a proposal for a system for responsible internationalisation with three levels of responsibility:

- Policy – an overarching strategic approach that sets the direction for responsible internationalisation, to be decided by the Government or the Riksdag.
- National guidelines – more detailed guidelines for assessments and considerations within the context of responsible internationalisation.
- Local guidelines – higher education institutions, research funding bodies and other stakeholders could use the national guiding principles as a template and develop their own guidelines for responsible international collaborations.

It also proposes a design for the policy and national guidelines.

The national guidelines are divided into five dimensions:

1. The Swedish context, where the focus is on the importance of understanding and navigating national conditions for international collaboration, including factors such as legal and political considerations, such as international sanctions, science diplomacy and sector-specific collaborations.

2. The local context, where the focus is: the need to identify and protect sensitive data and assets at the higher education institution and in research activities; to identify threats, risks and vulnerabilities, focusing on specific antagonistic threats; to assess limitations or possibilities associated with the funding.
3. The foreign context, which focuses on aspects that may affect the room for manoeuvre in international collaborations, such as the national legislation of the cooperation partner, democracy, rule of law and human rights, academic freedom and the general threat level.
4. Gaining knowledge about the collaboration partner(s), which involves using open-source data to assess the status and level of autonomy of the partner(s).
5. Planning and organising international collaboration, which concerns commitments within the framework of a partnership, potential dependencies resulting from this and how to respond to them. This covers issues such as good research practice, research integrity and ethics, open science, and sustainability and gender equality.

The three agencies emphasise the importance of international collaborations, but also highlight that their potential must be assessed and weighed against possible risks or challenges.

Identifying and addressing any potentially conflicting goals is also important in promoting responsible internationalisation. These could include a higher education institution's level of academic freedom and institutional autonomy in relation to the relevant authorities' aim of safeguarding national security.

Responsible international collaborations are a complex undertaking, requiring a long-term strategic approach in which experiences and competencies need to be built over time. To successfully manage difficult considerations, a mindset for responsible internationalisation must be established at different levels within higher education institutions and other stakeholders, so different organisational units can contribute their opinions and experiences.

The three agencies envisage that experiences and competencies gained in international collaborations will necessitate regular revisions to the guidelines. This should be done in cooperation with the higher education sector and other relevant authorities, to best meet current needs.

All three agencies tasked with this assignment will continue with more detailed investigation of the needs for a national support system. A final report is due on 15 December 2024.

The work on the Government assignment

In June 2023, the Government decided to task the Swedish Council for Higher Education (UHR), the Swedish Research Council, and the Swedish Governmental Agency for Innovation Systems (Vinnova) to propose how to work on responsible internationalisation in higher education, research and innovation at Swedish higher education institutions (hereafter 'HEIs'), governmental research funding bodies, and other public agencies can be promoted. See Appendix 1 for the assignment in its entirety.

The assignment covers two parts, to:

1. develop national guidelines. Interim report on 31 March 2024.
2. propose how further forms of support for knowledge and experience exchange between HEIs, governmental research funding bodies and other public agencies and organisations involved can be developed and designed. Final report on 15 December 2024.

The assignment shall:

- be conducted in close collaboration with governmental research funding bodies and HEIs.
- maintain a dialogue with other public agencies, organisations, and actors that can contribute competence and experience, both nationally and internationally. The Swedish Armed Forces, the Swedish Security Service, and the National Inspectorate for Strategic Products are particularly indicated.
- be coordinated with the agency collaboration that is done via the Platform for Internationalisation (PLINT).
- consider other national initiatives relating to responsible internationalisation, in particular the work done within the Association of Swedish Higher Education Institutions (SUHF), and the Swedish Foundation for International Cooperation in Research and Higher Education (STINT)

The assignment description highlights the importance of international collaboration in higher education and research, but also emphasises the changed global security situation, where openness and collaboration are at risk of being used by a foreign power. The Government gives the changed security situation as the primary reason for the assignment.

The Government underlines the need for joint responsibility shared between HEIs, research funding bodies, and the Government in relation to responsible internationalisation and the protection of Swedish education, research, and innovation. The national guidelines shall provide support for exchanges of knowledge and experiences, and contribute to international collaborations being conducted as openly as possible and as safely as necessary, and in a long-term and sustainable way. In addition, it states the importance that Sweden develops in line with the world around us, and implements measures for responsible internationalisation just as many other countries have already done.

The work was carried out by a joint agency team

The work on the assignment was carried out by a joint agency team consisting of representatives from UHR, the Swedish Research Council, and Vinnova, and the three agencies subscribe to the proposal. The work was led by UHR.

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Starting points in the work

The three agencies interpreted that the assignment applies to all international activities at higher education institutions (HEIs), and that the guidelines shall be possible to follow also by funding bodies.

The starting point of the work was to provide support to HEIs and public agencies in their work with responsible internationalisation. The guidelines shall show both the challenges and the opportunities of international collaborations, and not be limiting.

When designing the guidelines, the agencies used the following as starting points:

- Existing guidelines and checklists
- Developments in the European Union
- Respect for division of roles and shared responsibility

Existing guidelines and checklists

In 2020, the Swedish Foundation for International Cooperation in Research and Higher Education (STINT) published a report on responsible internationalisation¹ that included aspects that HEIs/researchers should consider in international collaborations. STINT followed up with a further report in 2022.²

Several HEIs already have guidelines in the form of checklists or other guidance documents. The Association of Swedish Higher Education Institutions (SUHF) also has sector-wide joint guidelines in the form of a checklist for Global Responsible Engagement.³ No corresponding guidelines have been identified at other actors in the sector, for example at the research funding bodies.

Several countries have also introduced guidelines for responsible internationalisation and knowledge security. They are described briefly in a separate section of the report, and a selection are summarised in Appendix 2.

Developments in the European Union

Although the guidelines proposed are intended for national use, there is also a context within the European Union (EU) where these aspects are discussed, from one perspective or another. During the Swedish presidency of the EU, an open discussion was held in the Competitiveness Council on 23 May 2023 on knowledge security and responsible internationalisation.⁴

The EU context is currently focusing primarily on the antagonistic aspects of responsible internationalisation.⁵ Nevertheless, the EU's work, for example within the economic security strategy and the EU's framework programme, constitutes important preconditions.

Respect for division of roles and shared responsibility

In its decision to task the three agencies with the assignment to promote responsible internationalisation, the Government writes that "the work with responsible internationalisation and protection of Swedish education, research, and innovation is a joint responsibility for higher education institutions, research funding bodies, and the Government". It is therefore a shared responsibility. Considering the autonomy of HEIs and academic freedom, the three agencies have used as a starting point

¹STINT. Responsible internationalisation: Guidelines for reflection on international academic collaboration, R20:01, 2020.

²STINT. Recommendations to higher education institutions on how to work with responsible internationalization, R22:05, 2022.

³SUHF. Global Responsible Engagement: Checklist, RECOMMENDATION 2023:4 (REVISED)

⁴ Video recording from the meeting: <https://video.consilium.europa.eu/event/en/26846>

⁵ See the section The world around us – what is done in other countries and the EU.

the fact that responsibility should be shared between public agencies and HEIs, and within the HEIs.

Implementation and knowledge gathering

The agencies based a large part of the knowledge gathering on publications from public agencies and the EU, studies of other countries' guidelines, and a large number of dialogue meetings with public agencies and HEIs.

Dialogue meetings have been held with representatives from public agencies, HEIs and organisations (Appendix 3). Through these, the three agencies involved in the assignment were able to learn about their competences and experiences, and to capture many valuable viewpoints. Particular weight were given to dialogues with the Swedish Armed Forces, the Swedish Security Service, the Inspectorate for Strategic Products, the Association of Swedish Higher Education Institutions (SUHF), the Swedish Foundation for International Cooperation in Research and Higher Education (STINT), and the Platform for Internationalisation (PLINT), which were all indicated in the Government assignment. The dialogue meetings have also contributed to securing support for and creating wider understanding for the development of national guidelines and support structures.

International outlooks have also been conducted. Study visits have been made to European actors who have recently implemented similar tasks, to learn from their working practices and results. A visit has also been made to the European Commission, to learn about the work done at EU level, as it is important to design guidelines that link to the work carried out within the EU. At the same time, it is important to emphasise that national guidelines must relate to the Swedish context, as the academic systems, and also threats and risks, differ in different countries.

The guidelines and recommendations for responsible internationalisation that have already been produced by SUHF and STINT have been an important source for the development of national guidelines. Through regular dialogue meetings with both SUHF and STINT, greater understanding of the worries and hopes that exist in the sector relating to the development of national guidelines has been obtained. The dialogue meetings held with representatives from a number of selected HEIs have also been valuable for the design of the guidelines.

During the work, the agencies involved in the assignment have also met the investigator in the assignment to produce proposals for measures to increase the competence on security issues at governmental HEIs.⁶ To increase the understanding of responsible internationalisation in a Swedish context, the researchers Tommy Shih and Sylvia Schwaag Serger have contributed knowledge and insights. They are, for example, conducting a research project in the area, which is expected to be published during the second half of 2024, and will contribute to the continued work on this assignment.

Furthermore, international practices have been obtained through literature studies and through international collaboration on responsible internationalisation, for example by taking part in workshops arranged by STINT, the Global Research Council, and the Academic Cooperation Association (ACA).⁷

In parallel with the development of guidelines, the work on designing a support structure has begun. This work will be presented in more detail in the final report on the assignment.

The report was produced jointly by the three agencies involved in the assignment, and all support its proposals.

Delimitations in the implementation of the assignment

A crucial delimitation of the work has been the short period set aside for implementing the assignment. The time aspect has meant that the three agencies have focused on producing guidelines that are aimed particularly at HEIs. Given the complexity of the assignment, the guidelines presented in the report must also be seen as preliminary. They will have to be further developed in collaboration with the higher education sector and relevant public agencies.

The Government assignment states the reason for the assignment as being that in an ever more polarised world, there is a risk of foreign powers abusing collaborations, and that there is therefore a requirement for greater awareness of the need to protect national interests. As described in the chapter "On responsible internationalisation", the concept of responsible internationalisation covers more than security issues. The agencies involved in the assignment have striven to include the whole range of issues covered by the concept in their work. Given the time aspect, however, the agencies have chosen to initially place the focus on security aspects.

⁶ U2024/00153 *Ökad kompetens i säkerhetsfrågor vid universitet och högskolor.*

⁷ Experiences from meetings and conferences both before and after the agencies were given the assignment have been used.

It is a challenge to clearly indicate the limits for what the Government, the Riksdag, or public agencies should prescribe, and what questions HEIs themselves should manage when it comes to responsible internationalisation. The state should make sure that national interests are safeguarded, while HEIs, in accordance with their institutional autonomy and academic freedom, should make sure that the HEIs' individual interests are safeguarded. The borderline is not always clear, and there are reasons to discuss in greater detail where it lies. The second part of the assignment, relating to how support for exchanges of knowledge and experiences between HEIs and public agencies can be developed and designed, deals with these issues.

The assignment also includes identifying the needs and opportunities for providing support to other actors. The agencies involved in the assignment will be discussing this in more detail in the final report, but consider that many of the aspects discussed in the proposed guidelines are also relevant for other actors. However, other actors partly follow other logic systems, and need to take other considerations into account than HEIs and public agencies do.

Use of some central concepts

While well aware that most HEIs are public agencies, the agencies involved in the assignment are still using the concept of “public agency” for agencies excluding HEIs in the report, unless otherwise emerges from the context. Universities and other higher education institutions are designated, varying and synonymously as “HEIs”.

The assignment states that the agencies involved in the assignment shall propose “national guidelines”. The agencies have decided that what they are to produce shall be guiding, national, and state the direction. The concept of “guideline” is understood as a “principle that can or should be followed”.⁸ This means that the guidelines the agencies propose shall not be perceived to be too codified or prescriptive. From this follows that more concrete guidelines may be needed that are adapted to the target group, and that are developed by individual HEIs or funding bodies.

The report refers to international activities varying as “international collaborations” and “international initiatives”. The concepts shall be understood in a wide sense, and can describe proper collaborations, but also international recruitment. The national guidelines are intended to

⁸ For the word “guideline”, see Wiktionary <https://sv.wiktionary.org/w/index.php?title=riktlinje&oldid=3815108> See also how the National Board of Health and Welfare uses the concept of guidelines. National guidelines: “The National Board of Health and Welfare’s national guidelines are a support in prioritisations and provide guidance on the therapies and methods that different operations in healthcare and social services should invest resources in.” <https://roi.socialstyrelsen.se/riktlinjer>

cover all types of internationalisation in higher education, research, and innovation.

The report makes many references to “collaboration partner” or “collaboration country” in the singular. Collaborations often occur between more than two partners. “Collaboration partner” or “collaboration country” therefore refers to each individual partner in a collaboration, even if it covers several partners.

On responsible internationalisation

Responsible internationalisation is a new concept

The assignment from the Government relates to responsible internationalisation. This is a concept that is primarily used in Sweden and the Nordic countries, but corresponding or closely related concepts are used in several other countries and at EU level. Examples are “trusted research” (UK, New Zealand), “knowledge security” (Netherlands), “principled cooperation” (USA) and “foreign interference” (EU, Australia). The European HEI collaboration The Guild has also started to use the concept of responsible internationalisation.⁹

Internationalisation is a fundamental part of higher education and research. There is also a great deal of concept and theory formation relating to internationalisation. The Internationalisation Inquiry reviews several of these in its interim report, where the investigator primarily uses the US researcher Johan Hudzik’s concept of “comprehensive internationalisation” as the starting point. Comprehensive internationalisation impacts on the entire operation of an HEI and informs its basic views and values. Internationalisation should therefore be welcomed by the HEI’s management, governance structure, teachers and researchers, students, and all support activities.¹⁰ The agencies involved in the assignment consider that responsible internationalisation is correspondingly a matter for the operation of the entire HEI.

STINT was one of the first bodies to issue a publication on responsible internationalisation in a Swedish context. STINT did not decide on a definition of the concept, but focused primarily on the instrumental aspects. The background to the initiative was that STINT, in its role as a research funding body, had noticed when assessing applications that certain applicants planned to carry out projects without sufficient contextual knowledge and risk analysis. Some applications showed a lack of consideration of ethics, risks of dual use, or serious infringements of human or individual rights. The cases were considered sufficiently many or serious to be recognised in a wider context, and to

⁹ Statement from The Guild, dated 9 November 2023. “The risks of international collaboration must be balanced with the risks of non-collaboration.”

¹⁰ See for example the interim report from the Internationalisation Inquiry. *Internationaliseringsutredningen SOU 2018:3*, Chapter 3.

give HEIs support to prevent international projects that were too risky.¹¹

Based on the introductory work by STINT and work at a number of HEIs, SUHF has developed its own guidelines for responsible internationalisation via a checklist, under the concept of global responsible engagement.

Responsible internationalisation is also one of the areas of work of PLINT, the platform for internationalisation of higher education, research, and innovation created in 2022.¹² Collaboration has occurred there between research funding bodies, UHR, STINT and representatives from HEIs¹³ and students. The work within PLINT has been paused as a result of the Government assignment on responsible internationalisation.

There is currently no overall interpretation of responsible internationalisation in Sweden at national level. This assignment will therefore form documentation for an initial such focus.

Responsible internationalisation is a multidimensional concept

Responsible internationalisation does not have any well-developed theory formation, and it lacks a generally accepted definition. To enable the work in the area of responsible internationalisation within PLINT to be more focused, a definition was produced:

“Responsible internationalisation covers the aspects that a national actor in higher education, research, and innovation needs to consider to be able to set up, keep up, and follow up a relationship with one or several actors in other countries in a responsible way.”¹⁴

The agencies involved in the assignment have used this definition as the basis for their work. Other definitions do exist. For example, Shih has presented a developed definition of responsible internationalisation.¹⁵

Some main themes can be found in the proposed definition. The first is that responsible internationalisation is an actor-oriented concept,

¹¹ Written background documentation for the interim report from STINT.

¹² Read more about PLINT on UHR's website <https://www.uhr.se/internationella-mojligheter/Plattform-for-internationalisering/>

¹³ Appointed by SUHF.

¹⁴ See Appendix 4 for further developed reasonings about the definition.

¹⁵ “Responsible internationalization focuses on the discretionary responsibilities that researchers have when building international relationships. This means that researchers need to develop their ability to reflect on contextual factors so that a complex portfolio of risks encountered when national borders are crossed can be proactively and realistically managed. For responsible practices to be effective they also need to be co-created in relationships, rather than representing the expectations of one side only.” Tommy Shih, (2024) Points of departure and developing good practices for responsible internationalization in a rapidly changing world. Accountability in Research: Policies and Quality Assurance.

relationship shall respect the actors' respective status and provide preconditions for long-term interaction with mutual exchanges (which do not have to be balanced).

The third main theme is the temporal one. It is a proactive process, based on the relationship needing to be valued, cared for, and followed up over time. Basic preconditions can change, and it should be clear right from the start what will happen if the collaboration can no longer be maintained securely.

The fourth main theme is that the relationship is affected by contextual circumstances. This includes national goals, geopolitics, and differences in political systems, legislation, or culture between countries.

Fifthly, several different aspects need to be considered in responsible internationalisation. They include, but are not limited to, research ethics and ethical technology development, research integrity, open science, sustainability and climate, protective security (including cyber security), gender equality, export controls, and also foreign policy and science diplomacy.

Responsible internationalisation in relation to academic freedom and institutional autonomy

It is not possible to write about responsible internationalisation without mentioning academic freedom and institutional autonomy¹⁷. There are many reasons why academic freedom and autonomy are important to consider in issues relating to responsible internationalisation. Four aspects have been particularly relevant to the three agencies' work on the Government assignment.

Firstly, academic freedom and institutional autonomy are values that must be protected in international activities. Chapter 1, Section 6 of Swedish higher education legislation states that "in the activities of higher education institutions, a general principle shall apply that academic freedom shall be promoted and safeguarded."¹⁸

Secondly, in accordance with "academic freedom shall be promoted", it should also be seen as a fundamental principle to be promoted in international initiatives.

Thirdly, the limits for what the Government, the Riksdag, or public agencies should prescribe, and what questions HEIs themselves should manage when it comes to responsible internationalisation should be considered. As described in other parts of the report, there is a risk that

¹⁷ See Appendix 5 for a brief description of academic freedom and institutional autonomy.

¹⁸ *Högskolelag (1992:1434)*. The principle of academic freedom is also established in a number of international agreements, such as Magna Charta Universitatum, the Rome Ministerial Communiqué, 2020, EHEA.

goal conflicts will arise between national security considerations on the one hand, and academic freedom and autonomy on the other. The borderline is not always clear. There is therefore reason to discuss in greater detail how the potential goal conflict should be managed.

Fourthly, and related to what has been mentioned previously, academic freedom and autonomy are also accompanied by academic responsibility. The Government and public agencies have a responsibility to provide national guidelines, but HEIs also have a responsibility to act responsibly in their international activities. In relation to this allocation of responsibility, the agencies involved in the assignment consider that the responsibilities need to be distributed, but also coordinated, both between the Government and the HEIs, and also within the HEIs. Neither individual researchers nor individuals HEIs shall have to be left alone in making assessments of difficult goal conflicts.

The opportunities of internationalisation

Sweden is a small country and strongly dependent on collaboration with the surrounding world for development and prosperity. In terms of knowledge production, Sweden only produces a small fraction of global research.

Internationalisation is not a goal in itself, but a means to “achieve increased quality and relevance in its activities, to strengthen Swedish society in other respects, and contribute to sustainable development nationally and globally”.¹⁹ For a small country like Sweden, internationalisation is a necessity. The internationalisation inquiry states four primary reasons for internationalisation.²⁰

Academic reasons – improved quality of education and research

The development of quality in education and research is a primary reason for the internationalisation of HEIs in Sweden.

It can, for example, be seen that international co-publications are also of higher quality compared to studies that are not co-published (where citation impact is used as a measure of quality). The mechanisms for this are not always entirely clear, however.²¹ For this reason, it is also important to design international collaborations so that quality is also increased. Internationalisation can contribute to institutional development, which can for example entail strategic alliances.

International collaboration, for example through the recruitment of prominent researchers, can contribute to a raised profile and increased status for the HEI.²² International collaboration can also give access to empirical data or to research environments that are necessary for the research.

Internationalisation at home, not least in higher education, provides intercultural and international perspectives that are important for

¹⁹ SOU 2018:3 *En strategisk agenda för internationalisering*, p 70.

²⁰ The following sections are based on SOU 2018:3 *En strategisk agenda för internationalisering*, pp 70ff and 174f.

²¹ *Vetenskapsrådet, Svenskt publiceringssamarbete i ett globalt perspektiv, VR 2016.*

²² There are several ways of measuring such profiles, for example The Times Higher Education World University Ranking <https://www.timeshighereducation.com/world-university-rankings> and the Shanghai Academic Ranking of World Universities <https://www.shanghairanking.com/>

preparing all students for the labour market of today and tomorrow.²³ But HEIs shall also work together with research funding bodies to increase synergies between internationalisation of education and the international collaborations of research.

Swedish HEIs collaborate with HEIs in other countries on contents and design of various educational programmes. The exchange of experiences and the knowledge it generates contribute to improving the quality of education.

Political reasons – science diplomacy and global challenges

Political reasons link research and higher education to Swedish foreign policy, for example in relation to addressing the challenges of globalisation. Swedish HEIs thereby affect the image of Sweden in other parts of the world.²⁴

Internationalisation of higher education and international collaboration in research are also important parts of what is known as ‘public sector diplomacy’. Public sector diplomacy, of which science diplomacy is a part, can be described as when a state communicates with the population in other countries to create understanding of the state’s own ideas and ideals, its institutions, culture, and policies.

Higher education and research are also important parts of the Swedish development policy.²⁵ Examples are the International Science Programme at Uppsala University²⁶ and the previous funding of development research by the Swedish Research Council.²⁷

Higher education and research are also important tools for reaching the Sustainable Development Goals (Agenda 2030).²⁸

Economic reasons – competitiveness and knowledge utilisation

The economic reasons relate both to the contribution by research to economic development and growth in the country and the surrounding world, and to economic contributions to the HEIs’ own activities.

²³ SOU 2018:3 *En strategisk agenda för internationalisering*, p 73.

²⁴ See the Internationalisation inquiry and the report from the Globalisation Council, *Sverige i världen*. Ds 2008:82.

²⁵ SOU 2018:3 *En strategisk agenda för internationalisering*, p 76.

²⁶ Information on Uppsala University’s website. <https://www.isp.uu.se/>

²⁷ Vetenskapsrådet. *Inga nya bidrag inom utvecklingsforskning*. <https://www.vr.se/aktuellt/nyheter/nyhetsarkiv/2023-06-27-inga-nya-bidrag-inom-utvecklingsforskning.html>

²⁸ Sustainable Development Goals. <https://www.globalamalen.se/om-globala-malen/>

The Government's strategy for Sweden's foreign trade, investments and global competitiveness states that "[a] dynamic environment for research and an effective innovation support system are central preconditions for the global competitiveness of Sweden and Swedish companies".²⁹

Research in Sweden can contribute to development and growth through effective knowledge valorisation and commercialisation of knowledge, for example through spin-off companies. When this occurs in international collaboration it is, for example, important to identify the opportunities and limitations that exist in relation to intellectual property rights.

With the ambition to make Sweden a leading knowledge nation follows that well-educated personnel is also needed in Sweden, and the entire world constitutes the recruitment pool for many important areas. For this reason, higher education has an important function in contributing to competence supply on the labour market.³⁰

Economic reasons for international collaboration can for example be found in major international donations, or funding of collaboration projects or visiting researchers. The internationalisation inquiry also pointed out economic reasons for international recruitment of students when they are fee paying students.³¹

Large-scale research infrastructures that are important to research are so cost and resource-intensive that they need to be operated in international collaboration. One example is the research infrastructure ESS in Lund.³²

Cultural reasons – intercultural understanding

Apart from there possibly being overarching activities that support intercultural collaboration and understanding through centres at HEIs and initiatives funded by the Swedish Institute, there are mostly social reasons at personal level.

²⁹ UD2023/01758 *Strategi för Sveriges utrikeshandel, investeringar och globala konkurrenskraft*.

³⁰ SOU 2018:3 *En strategisk agenda för internationalisering*, p 80f.

³¹ SOU 2018:3 *En strategisk agenda för internationalisering*, p 79f.

³² See <https://europeanspallationsource.se/>

The challenges of internationalisation

The world is changing, and with this also the preconditions for conducting higher education, research, and innovation in international collaboration. As mentioned in previous sections, developments in the world around us provide opportunities, but also challenges.

Global competition leads to geopolitical challenges³³

The temperature level of global politics is high. In addition to wars and smouldering conflicts around the world, there are several “hot spots” that can develop into further destabilising areas. Over and above these concrete events, there are more long-term lines of development in the geopolitical context, as well as rivalising views of the stability of the geopolitical system and its foundations. These developments are having consequences for internationalisation.

The concrete example that is closest to us is Russia’s full-scale invasion of Ukraine, which has not just led to direct effects on the direction of security policy and defence policy, but also on Russia’s interaction with the world of research. The multi-dimensional conflict in the Middle East is also reflected on HEI campuses around the world.

Longer lines of development are climate changes, with changes to the physical environment. This has consequences, such as conflicts about natural resources and raw materials, but also continued urbanisation and globalisation, which are however changing character from mutuality to zero-sum games.

The world order is being challenged by several actors, who wish to create their own legitimate sphere of interest and a multi-polar world. The EU has developed into a geo-strategic actor in an entirely different way than previously, through clear positions on countries such as USA, Russia, and China.

³³ For a review of global development, see for example the Munich Security Report 2024, from the Munich Security Conference.

Changes in the threat situation creates new challenges for Sweden

The security situation in Sweden and Europe has changed drastically over the last few years.³⁴ At overarching level, the Government established in its declaration of foreign policy in 2024 that “The threat situation facing Sweden is becoming ever more complex. Influencing campaigns aimed at harming Sweden has palpable democratic, economic, security-related and foreign policy consequences.”³⁵

The security policy situation is also creating opportunities for Sweden’s knowledge supply. Swedish membership of NATO makes even deeper collaboration possible for defence research and defence innovation.³⁶

The Swedish Security Service describes the security situation as seriously worsened, and external influences and threats have had great impact on internal security. The countries that are pointed out as sources of the greatest threats – Russia, China, and Iran – have ambitions to obtain knowledge about technology and innovation in Sweden, at Swedish HEIs among other places. The Arctic, artificial intelligence, and space are areas indicated as being of interest to foreign powers. All these areas have a strong research focus.³⁷

As the need for technology, information, and knowledge increases, the threats against Sweden are becoming more obvious. The Swedish Security Service sees that increased vigilance is needed in several sectors to protect Sweden against sabotage and espionage. The need to protect our secrets, confidential information, and other protected assets is increasing. We have a common interest in contributing to keep Sweden safe.³⁸

Research and innovation in the new world situation

The China-USA relationship is perhaps the clearest factor for the global geopolitical and geoeconomic development in the coming years. Both world powers see success in new technology as a crunch issue; without it, their competitiveness and interests cannot be safeguarded. Technological development is crucial for both the civil sphere and the military sphere.³⁹

The security situation entails increased antagonistic threats from foreign interference in research. Foreign interference refers to activities

³⁴ For a description of the security policy situation, please see *Allvarstid*, the Defence Committee’s security policy report for 2023. Ds 2023:19.

³⁵ *Regeringen. Utrikespolitiska deklARATIONEN 2024.*

³⁶ *Regeringskansliet. Strategisk inriktning för försvarsinnovation.*

³⁷ *Säkerhetspolisen. Säkerhetspolisen 2023-2024.*

³⁸ *Säkerhetspolisen. Säkerhetspolisen 2022-2023*, p. 6 och 17.

³⁹ *Regeringskansliet. Strategisk inriktning för försvarsinnovation.*

that are carried out by foreign powers, foreign organisations or individuals for the purpose of influencing a country, a higher education institution, or an individual researcher or research team to benefit the foreign country's own interests. Foreign interference is in part linked to the security aspect, but also to the trusting and mutual exchange between parties.

Export controls are intended to prevent sensitive technology, products, and knowledge ending up in the wrong hands. Export controls are therefore relevant to research activities. However, lack of knowledge about export controls at HEIs, and their decentralised operations, constitute a challenge. As with other protected assets and confidential information, it is unclear what products and what knowledge is covered by export controls.⁴⁰

Research and innovation in the new world situation also need to protect the academic values and principles for how research and innovation are conducted. When assessing international collaboration in higher education, research, and innovation, it should be ensured that the research can be conducted in a responsible way, so that good research practice is not compromised or ethics dumping occurs due to demands from an international collaboration partner.

In dialogue meetings with the Swedish Armed Forces, it emerged that it regards the civil research and innovation ecosystem as having an ever more important role in strengthening Sweden's ability to defend itself. With this, new demands are also emerging to develop the ability and knowledge about information security, and what constitutes protected assets and confidential information at higher education institutions.⁴¹

The changed world situation can also have repercussions on HEI campuses. This may be in the form of direct or indirect influencing situations in classrooms, or foreign students or personnel improperly getting access to the HEI's premises or information.

⁴⁰ Dialogue meeting with National Inspectorate of Strategic Products.

⁴¹ Dialogue meetings with the Swedish Armed Forces and the Swedish Defence Materiel Administration (FMV).

Balancing opportunities and challenges

The previous chapters describe the fundamental reasons and drivers of internationalisation, but also the threats and challenges that internationalisation can bring with it.

In an international collaboration, these opportunities need to be balanced against any possible challenges or risks. A clear message put forward in the dialogues with higher education institutions is that the opportunities need to be emphasised and balanced against any risks.

It was established that a lot of the international work focuses on threat-driven perspectives (for example within the EU), and what is **not** possible to do in relation to collaborations. The perspective of what collaboration in higher education, research, and innovation can **achieve** is often missing. The opportunities must, however, be clarified in a balanced analysis.

Figure 2. Balancing opportunities and challenges.



In the overall assessment of responsibility in an international initiative, it is therefore of the utmost importance to identify the advantages the international initiative in question provides, in order to balance them against any challenges.

Formats for overall balanced assessments

As the first step in an overall balanced assessment, you need to identify the opportunities and challenges of the internationalisation in accordance with the dimensions and aspects described in the chapter “National guidelines for responsible internationalisation”.

Thereafter, the measures that need to be taken have to be identified, either to realise the opportunities, or to limit the challenges.

The next step is to make an overall assessment of risks and opportunities, against the background of the proportionality of the measures. Here, opportunities are balanced against risks, but also against proportionality. Are any risk-limiting measures proportional to the risks, consequences, and costs? The result of this calculation may be that the measures required to manage certain challenges might not be economically defensible, or even possible to take. Other collaborations can be realised with limited measures. What constitutes a proportional measure may vary from case to case, depending on the collaborating partner and the contents of the activities. When making this assessment, it is probable that different competences within the HEIs need to be used. Some assessments should not be made by a sole individual.

Against the background of the overall assessment, a result will be reached that may mean that the planned collaboration can be implemented, possibly with certain measures, or not implemented, as the challenges are still too great.

Figure 3. Process for overall balanced assessments.



The outcome may also be that it is not possible to arrive at an unambiguous result. If the first assessment is done by an individual researcher, a supplementary assessment can be made at another level within the HEI (faculty/HEI management). Under some circumstances, a

possible national support structure could provide advice or make a supplementary assessment. The agencies involved in the assignment will return to the issue of a national support structure in the final report on the Government assignment.

Overall balanced assessments are not made at any given point in time. The assessment of opportunities and challenges needs to be done continuously, not just ahead of a planned collaboration. Factors in the world around us change. Likewise, the preconditions can change in a collaboration that has begun, or a recruited researcher can change the focus of their research. A harmless collaboration can become a risky one, according to how circumstances change.

Managing goal conflicts

The assignment states that “the guidelines shall provide guidance for the international collaborations of the higher education institutions and the agencies involved, and be a help in making assessments of ongoing and potential international educational and research collaborations.” Many times, the assessments will be about taking a position on conflicting goals. Against the opportunities of the international activity are ranged threats against national interests, or the interests of the HEI or research team in question. In this context, it should also be added that it is a threat against our long-term national interests not to collaborate internationally, and in this way miss out on the advantages that collaborations also offer.

Goal conflicts can arise at several levels. Legislation that is too strict and regulating at national level can impact on the HEIs’ institutional autonomy and academic freedom. Legislation that is too strict can have the undesirable consequence that a certain type of research is not carried out in international collaborations, as it is prohibited, or is felt to be too complicated to conduct. The security agencies’ goal of safeguarding national security can therefore in some cases conflict with the wording in higher education legislation that “research questions may be freely chosen”.⁴² Correspondingly, terms and conditions for funding by funding bodies that are too strict, or strict HEI regulations, can affect what research is carried out.

Goal conflicts can also arise within collaborations. The open science goal can conflict against data protection legislation in other countries, or vice-versa. One partner in a collaboration may want to publish, while the other partner has the goal of obtaining as many patents as possible. Striving to act in an environmentally sustainable way by collaborating

⁴² *Högskolelag (1992:1434)*, Section 6.

digitally may conflict with the collaboration partner's security, if they are working in a repressive and surveillance state.⁴³

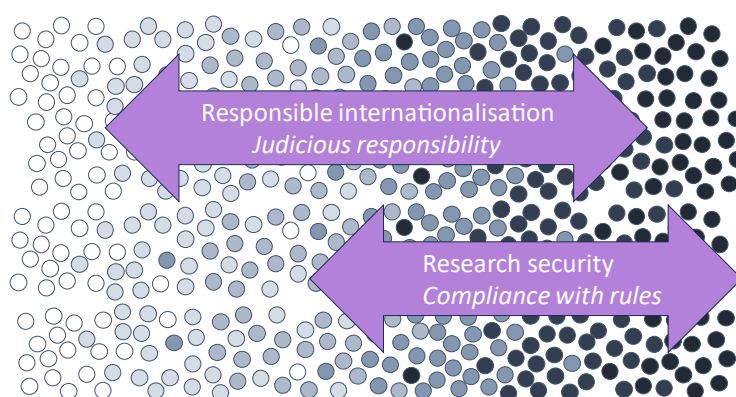
Create a culture of accountability

To manage goal conflicts, a culture of accountability must be created. In his research, Shih differentiates between research security and responsible internationalisation where the former requires goal compliance and the latter judicious accountability. These two overlap in part, but follow different logic systems.⁴⁴

In the proposed guidelines, the agencies involved in the assignment bring up aspects that require both compliance with rules and judicious accountability. Compliance with rules is, for example, needed for information security or research that is regulated by export controls, while judicious assumption of responsibility is needed in the assessment of whether your own research is a protected asset, or relating to certain research ethics considerations.

Figure 4 illustrates the relationship between research security and responsible internationalisation. The figure is a further development of an illustration by Shih.⁴⁵ Responsible internationalisation and research security are reported on a risk spectrum of a number of possible collaborations, for example for Sweden or for an individual HEI. Each single collaboration is represented by a single dot. They are divided up along a risk spectrum where the least dangerous collaborations are shown on the left (white dots) and the most unsuitable or even illegal are on the right (black dots). In between is an area with shades of grey.

Figure 4. Risk spectrum.



⁴³ Examples from a dialogue meeting with an HEI.

⁴⁴ Tommy Shih. (2023). Responsible Internationalization - Why, What and How?, pp 11 f.f.

⁴⁵ Tommy Shih. (2023). Responsible Internationalization - Why, What and How?, p 16.

In a theoretic risk spectrum, the grey shades are evenly graded according to the spectrum. But in reality, collaborations that are initially seen as risk-free turn out after assessment, or when the collaboration has begun, to be of greater risk (that is, a darker dot to the left of the spectrum) and vice versa, that is, collaborations that initially were thought to be of high risk turn out after assessment to be relatively problem-free (a lighter dot to the right of the spectrum).

When it comes to legislation and rules, it is rarely difficult to comply with them where they are known. The challenge is to manage goal conflicts that arise in a grey zone, as illustrated in figure 4. Most of the challenges raised in the three agencies' dialogues with HEIs have been in this grey zone.

To manage the difficult balances, a culture of responsible internationalisation needs to be established at the HEIs, where different functions are involved to contribute their specific competences. Shih and Garvi emphasise in a STINT report that a culture of responsibility must be created, that permeates large parts of the organisation.⁴⁶ The issue has also been raised in several of the HEI dialogues.

The guidelines proposed in this report will not alone be sufficient for creating a culture of accountability in internationalisation; the issues are too complex for this. The national guidelines shall be seen as a contribution to this. Cultures need to be created from the inside, at the HEIs and the public agencies. The support structure that the agencies involved in the assignment are to propose in the final report in December this year will also be part of creating this culture of responsible internationalisation.

Role allocation and shared responsibility

Considering the autonomy of HEIs and academic freedom, responsibility should be shared both between public agencies and HEIs, and within the HEIs.

Implementation of the guidelines should be adapted to the level or actor at which it is aimed, which means that the responsibility for responsible internationalisation follows a sort of subsidiarity principle, that is, responsibility rests at the level that is best suited to assuming the responsibility.

The agencies involved in the mandate propose an actor-oriented working practice that entails the actors themselves assuming responsibility for an overall analysis of opportunities and challenges for

⁴⁶ Tommy Shih & Miriam Garvi, (2022). Recommendations for the promotion of responsible internationalisation at Swedish higher education institutions. In Recommendations to higher education institutions on how to work with responsible internationalization, R22:05. STINT, 2022.

international collaborations. This is preferable compared to national 'black lists' of non-approved collaboration partners or countries.

The culture of responsible internationalisation described needs to be complemented with a process for managing difficult assessments, and an allocation of responsibility within the HEIs and between HEIs, public agencies, and the Government.

For the HEIs, this means that they need to establish a process within the organisation with an allocation of responsibility that ensures that internationalisation activities are conducted in a responsible manner. How this process and the allocation of responsibility are to be designed is best decided at each individual HEI. The agencies involved in the assignment do, however, realise that an organisation or a process is needed that is given resources and supported by a clear chain of responsibility. It needs to involve various competences within the HEI and build up experience over time. It also needs to be proactive and be able to support individual researchers.

The agencies involved in the assignment have noted the proposal to give boards increased responsibility for security issues, as proposed in the memorandum *Ökad kompetens i säkerhetsfrågor vid universitet och högskolor* ("Increased competence in security issues at higher education institutions").⁴⁷ This might be one step in the implementation of a process for responsible internationalisation.

⁴⁷ U2024/00153 Remiss av promemorian *Ökad kompetens i säkerhetsfrågor vid universitet och högskolor*.

Proposal for a system for responsible internationalisation

The agencies involved in the assignment propose a system for responsible internationalisation on three levels that take into account the allocation of responsibility between the Government, public agencies, and HEIs, and that respects the HEIs' institutional autonomy.

The system is based on a unified structure that is also in line with the ongoing work within the EU.⁴⁸

The agencies have been tasked to develop national guidelines. To avoid the national guidelines being too static and difficult to update, the agencies consider that the actual content of the guidelines should be separated from a decision on the strategic focus. The national guidelines should be possible to revise without decision-making processes that are too long.

During the dialogue meetings the agencies involved in the assignment have held with SUHF, STINT and representatives of the countries that have introduced some kind of guidelines, it has emerged that, over time, needs arise to update and adjust the guidelines.

As the implementation of the guidelines is largely dependent on developments in the world around us, the guidelines need to change when circumstances in the world around us change. These might be geopolitical changes, new or changed threat situations, new legislation in the home country, or in potential collaboration countries. Experience is also built up over time, which might influence the design of the guidelines.

The agencies involved in the assignment have chosen to designate the overarching national strategic focus as 'national policy'. A policy refers to a declaration of intention, or intention to steer decisions in a desirable direction.⁴⁹ It shall facilitate the governance of responsible internationalisation by stating overall goals and by clarifying the responsibility the actors have for responsible internationalisation. The

⁴⁸ See for example Proposal for a Council recommendation on enhancing research security, 2024/0012 (NLE).

⁴⁹ The word 'policy' is described on Wikipedia <https://sv.wikipedia.org/wiki/Policy>

policy describes what responsible internationalisation entails, and stipulates that HEIs and other public agencies shall work with the issue. Any decisions relating to the policy shall be made at national level, by the Government or the Riksdag.

Figure 5. System for responsible internationalisation.



In addition, the agencies involved in the assignment propose national guidelines that state the assessments and positions that should be considered in international activities, such as collaborations and recruitments. A public agency appointed by the Government should be responsible for supporting the implementation of the guidelines, and to update them.

Within the various parts of the education, research, and innovation sector, more specific guidelines may be needed, for example for HEIs and funding bodies, but also for other types of actors, either joint (for example via SUHF), or for individual actors. These guidelines are decided on by the individual HEI, public agency, or other actor, with consideration for the national policy and the national guidelines.

The agencies involved in the assignment also consider that updating of the guidelines and support in the implementation of them should be linked to the support structure that the agencies have been tasked to propose in the final report on the Government assignment.

Policy for responsible internationalisation

The agencies involved in the assignment propose an overarching strategic focus for responsible internationalisation that is decided by the Government or the Riksdag. The agencies have chosen to call this 'a national policy' in the report.

An overarching strategic focus in the form of a policy, separated from the national guidelines, gives the Government the opportunity for political control of the work. By dividing up the policy and the guidelines, the sector and its actors are given the opportunity to change and develop the national guidelines as needed.

An overarching policy is also in line with the work ongoing in the EU in relation to research security.

Policy for responsible internationalisation in educational, research, and innovation operations

Higher education and research must be characterised by academic freedom, openness, and of researchers' opportunities to freely share results, for example with researchers in other countries. These values must be safeguarded and protected. Openness should form the basis for international collaboration, at the same time as there must be an awareness of the need to protect national interests, knowledge, and technology. Swedish actors in education, research, and innovation must conduct their international collaboration in such a way that it is secure, discerning, trusting, mutual, and sustainable.

Internationalisation in its various formats is an entirely important and necessary component of educational, research, and innovation activities, while it is simultaneously important that Sweden is, and is perceived as, a trusty and reliable partner in international collaborations.

The importance of internationalisation for Sweden

Internationalisation is a fundamental part of research and innovation activities, as well as of higher education. Sweden is a small country and, as such, strongly dependent on collaboration with the surrounding world for its development and prosperity. Sweden only produces a

small proportion of global research and innovation, and needs to get access to what is produced in other countries.

Definition of responsible internationalisation

Responsible internationalisation is defined as:

“Responsible internationalisation covers the aspects that a national actor in higher education, research, and innovation needs to consider to be able to set up, keep up, and follow up a relationship with one or several actors in other countries in a responsible way.”

The definition places the focus on relationships between international actors. This relationship can be multi-faceted and formed in many ways, but should always be based on it contributing to mutual value for the parties in the relationship. The fundamental principle of the relationship shall be “as open as possible, as secure as necessary”.

The policy applies to actors in higher education, research, and innovation

The policy applies primarily to HEIs, funding bodies, and other governmental research and innovation actors. It can also be relevant for other, non-governmental actors.

For the actors involved, the activities of the entire organisation and all types of international activities are covered. This includes, but is not limited to, research and innovation collaborations, recruitment, exchanges, international students, visiting researchers, research funding, research infrastructures, test beds, and science parks.

Start with the national guidelines, and develop adapted guidelines

As a complement to the policy, there are national guidelines, which shall form the basis for actors’ work with responsible internationalisation. The guidelines are intended to create common preconditions for responsible internationalisation for Swedish actors, alone or in interaction, and describe the assessments and positions that should be considered in international activities.

Based on the national guidelines, specific guidelines shall be produced, adapted to the individual operation, so that the work with responsible internationalisation can be implemented in the way that best suits the purpose of the operation. A joint vision should be striven for with other Swedish actors in international collaborations.

Establish the organisation and process

The work with responsible internationalisation shall be carried out consistently and permeate the entire organisation. The actors involved shall establish an organisation and process to clarify and facilitate this work.

The work with responsible internationalisation shall be followed up and reported.

National guidelines for responsible internationalisation

The agencies involved in the assignment propose national guidelines that in greater detail describe the assessments and positions that need to be taken into account in the work with responsible internationalisation.

The guidelines shall provide guidance and support when assessing the opportunities and risks of a collaboration. The agencies involved in the assignment have identified aspects that should be used in the assessment of responsible internationalisation.

The guidelines clarify the aspects a researcher, research team, or HEI need to take into account in their assessment of a collaboration or recruitment. Some aspects are best dealt with at overarching HEI-level, others are best assessed by individual researchers or research teams.

The national guidelines shall be able to function as an encyclopaedia for researchers and HEIs on the aspects that need to be considered, and what they entail. They shall be regarded as a support for making conscious choices ahead of and during a collaboration or recruitment.

As shown, the proposed national guidelines need to be realised in other guidelines for the sector, in the first instance at HEIs and funding bodies. In this way, they will form a framework for other guidelines.

The national guidelines proposed by the agencies involved in the assignment will not be sufficient on their own to create the culture of accountability in internationalisation that is needed, as the issues are too complex. In their work on ensuring the draft guidelines become established, the agencies involved have received comments that guidelines focusing too much on security threats and compliance with rules do not entirely fulfil the needs of the HEIs. The proposed guidelines will need to be supplemented with other support and be further developed in collaboration with the higher education sector and relevant public agencies.

In the design of the guidelines, the agencies involved in the assignment have grouped the aspects to be considered together with the opportunities offered by the international activity into five dimensions.

The intention is to clarify relationships in the own and the collaboration partner's operations, as well as the contextual circumstances both in Sweden and in the collaboration country/countries. Contextual circumstances refers to circumstances that the individual research or HEI cannot influence⁵⁰, such as legislation and so on. In addition, the guidelines relate to aspects associated with the collaboration as such.

Several aspects are also linked. There are synergies between different aspects, where interventions for managing risk in one aspects can contribute to reduced risk in another.

The dimensions are here described firstly in brief. Thereafter they are described in greater detail under separate headings, and with the aspects that need to be considered in each dimension. To facilitate understanding of what is to be achieved, requests are separately marked. In the dimensions, there are also case studies and proposed guiding questions that can be used in assessments of opportunities and challenges in the international activity.

1. The Swedish context is about the importance of understanding and navigating the national preconditions for international collaboration, for example with consideration for legal and political factors, such as international sanctions and science diplomacy, and sector-specific collaborations.

2. Circumstances relating to the own activities are about identifying and protecting confidential information and protected assets within the own HEI and the research activities; identifying threats, risks and vulnerabilities with focus on specific antagonistic threats; assessing the limitations or opportunities the funding provides.

3. The foreign context is about aspects that can influence the room for manoeuvre in international collaborations, such as the collaboration country's legislation, democracy, rule of law, and human rights, academic freedom, and general threats.

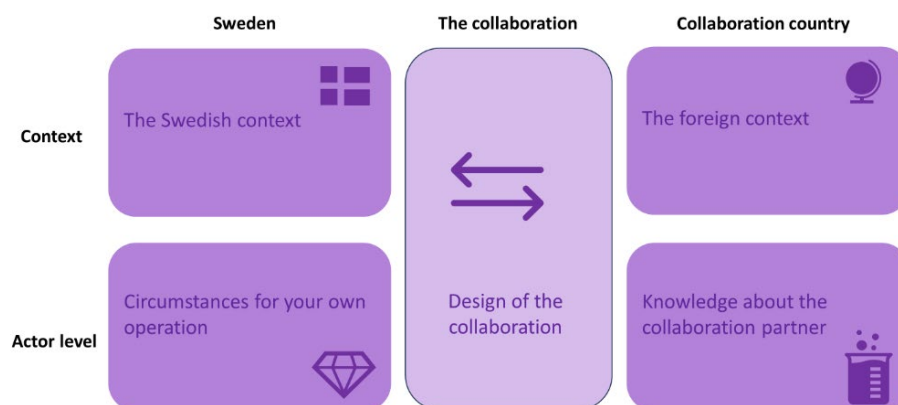
4. Knowledge of the collaboration partner includes an assessment based on open data about the actor's status, and the degree of autonomy of the collaboration partner.

5. Design of the collaboration includes the undertakings made via the collaboration, and the dependency relationships that may be created during the collaboration, and how these are managed. It relates to issues

⁵⁰ Factors relating to aspects of the collaboration that neither the Swedish nor the foreign partner can change or influence; they are so to speak 'given', and shall be possible to 'read' without any great effort. The exception could be an assessment of the collaboration partner's legislation, where more detailed background documentation needs to be accessible compared with the current situation. The Government assignment may return in the report on support systems to how such information can be of benefit to researchers.

such as good research practice, research integrity and ethics, open science, and also sustainability and gender equality.

Figure 6. The national guidelines' five dimensions.



1. The Swedish context

This dimension deals with national preconditions for international collaboration, for example with consideration for legal and political factors, such as international sanctions and science diplomacy, and sector-specific collaborations.

Existing agreements relating to research, innovation or trade, with other countries and international actors, can be a support in the internationalisation work, as (parts of) the assessment of responsible internationalisation has already been done in these. In this way, such agreements promote internationalisation, but they can also entail limitations.

The aspects that need to be considered in this dimension are how legal frameworks, Sweden's role in the geopolitical context, other countries' collaboration projects, and other actors' agreements can affect the collaboration.

Legal frameworks

Investigate what legal frameworks may apply for the international initiative in question, and ensure they are complied with.

Here follows a selecting of governing/mandatory national regulations that are important in this context. Please note that it is not a complete list. It is of the utmost importance to investigate what governing regulations are applicable in the specific case.

- *Högskolelag (1992:1434)* (law governing higher education) samt *Lag (2019:504) om ansvar för god forskningsed och prövning av oredlighet i forskning* (law governing good research practice and investigation of research misconduct)
- Export control legislation aims to protect technology and knowledge from ending up in the wrong hands. The legislation covers war materials⁵¹ and dual-use products⁵²
- Legislation governing secrecy and public access to documents aims to identify confidential information, that therefore needs to be covered by secrecy.⁵³
- Protective security legislation aims to provide the protection necessary for confidential information.⁵⁴
- Legislation governing review of foreign direct investments aims to ensure that direct investments can be done in a reassuring way.⁵⁵
- The international sanctions that Sweden complies with are usually issued by the UN or the EU. The website of the Government Offices has a summary of the sanctions applicable.⁵⁶

Sweden's role in a geopolitical context

Investigate what national agreements or political strategies that may affect or be affected by the international initiative in question.

Higher education, research, and innovation do not occur in isolation, but are deeply integrated in the surrounding world. For this reason, they are also affected by developments in the surrounding world, both at political level and also economically and socially.

It is therefore important to reflect on how the international initiative in question is affected by and affects conditions in the surrounding world. Attention must also be paid to the Swedish Government's foreign policy positions, science and innovation diplomacy, and also traditional diplomacy. Here, prioritisations and agreements at national level can

⁵¹ *Lag (1992:1300) om krigsmateriel* and *Förordning (1992:1303) om krigsmateriel* (with appendix)

⁵² Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021 setting up a Union regime for the control of exports, and in Swedish legislation *Lag (2000:1064) om kontroll av produkter med dubbla användningsområden och av tekniskt bistånd*, and *Förordning (2000:1217) om kontroll av produkter med dubbla användningsområden och av tekniskt bistånd*.

⁵³ *Offentlighets- och sekretesslag (2009:400)*.

⁵⁴ *Säkerhetsskyddslag (2018:585)* and *Säkerhetsskyddsförordning (2021:955)*. There are also the Swedish Security Services's instructions on protective security (*PMFS 2022:1*).

⁵⁵ Regulation (EU) 2019/452 of the European Parliament and of the Council of 19 March 2019 establishing a framework for the screening of foreign direct investments into the Union, and *Lag (2023:560) om granskning av utländska direktinvesteringar*.

⁵⁶ See the Government's website on sanctions <https://regeringen.se/regeringens-politik/utrikes-och-sakerhetspolitik/sanktioner/>

contribute to and facilitate international initiatives in research and innovation, but also entail some limitations.

Through the Government Offices, Sweden has science & innovation counsellors located at a number of embassies abroad. In addition to providing indications of what the Swedish geographical priorities are, the science & innovation counsellors can also assist with international research and innovation initiatives.⁵⁷

The Swedish Government also has strategies or overarching focuses for collaboration, both focused on certain countries and regions, and more thematic ones, such as for trade promotion and for export.⁵⁸

Sweden's membership of the European Union is another important context for internationalisation.⁵⁹ In addition to offering funding for collaborations in education, research, and innovation, the EU has developed into a geo-strategic actor in an entirely different way than previously. When it comes to research collaboration, the EU has its own research agreements, and also a strategy for international research collaboration.⁶⁰

Overarching HEI collaboration

Investigate whether there are other collaborations in Sweden or at your own HEI that can contribute experiences or contacts with a certain country or HEI.

There are broad international research and innovation initiatives that are good to know about and relate to. Some examples of broad networks for collaboration between Swedish HEIs and HEIs in other countries are: Mirai (Japan)⁶¹, SASUF (South Africa)⁶², SIREUS (USA)⁶³ and ACCESS (Chile)⁶⁴.

There is also the European Universities Initiative, which was launched in 2018 as a flagship initiative within the European area for education.⁶⁵ The European Universities are cross-border alliances between higher education institutions for long-term strategic collaborations. At present,

⁵⁷ See further information in the internationalisation report, *Internationaliseringsutredningen, SOU 2018:78*, p110f and the Government's website: <https://regeringen.se/regeringens-politik/innovation/regeringens-innovations--och-forskningsrad-i-utlandet/>.

⁵⁸ For example UD2023/01758 *Strategi för Sveriges utrikeshandel, investeringar och globala konkurrenskraft*.

⁵⁹ Read more about the EU in a later section of the report.

⁶⁰ See International cooperation. <https://www.vr.se/aktuellt/nyheter/nyhetsarkiv/2023-06-27-inga-nya-bidrag-inom-utvecklingsforskning.html>

⁶¹ More information on MIRAI's website: <https://www.mirai.nu/>

⁶² More information on SASUF's website: <https://www.sasuf.org/>

⁶³ More information on SIREUS' website: www.sireus.org

⁶⁴ More information on ACCESS' website: www.accesschilesweden.org

⁶⁵ More information on UHR's website: <https://www.utbyten.se/program/europauniversiteten/>

nineteen Swedish HEIs take part in the European Universities initiative.⁶⁶

Overarching agreements can provide inspiration and function as a compass in a new international initiative, by indicating the collaborations that are encouraged, are desirable, and those that may possibly need limiting. They can also contribute experiences on how relationships between actors can be regulated, and thereby facilitate the establishment of new collaborations.

Other actors' agreements

Find out what national agreements or political strategies may affect or be affected by the international initiative in question.

In addition to the agreements entered into at governmental or ministerial level, there are also those entered into at public agency level. For example, some research funding bodies have indicated countries that are prioritised in international collaborations. In some cases, these prioritisations are based on more or less formal agreements. Agreements and existing collaborations at both national and public agency level can sometimes be used as frameworks and levers for international collaborations with a certain country, or can govern the type of collaborations that are desirable (or undesirable).

Funding bodies also issue calls in collaboration with other countries, and work on influencing policy and producing strategic research and innovation agendas. These can also be a support when developing new, international research and innovation initiatives.

Examples of guiding questions

Are there any laws or sanctions that specifically impact on the collaboration?

Are there any agreements or other collaborations in progress with the country that can support the initiative?

Is there any previous experience of collaborations, at your own or other HEIs, to learn about as guidance?

⁶⁶ Information from the EU's website, 8 February 2024: <https://education.ec.europa.eu/education-levels/higher-education/european-universities-initiative>

2. Circumstances relating to the own operation

The second dimension is about circumstances relating to your own operation in Sweden. The own operation covers both your own HEI, company, or other research and innovation actor, and also the part of the organisation that is the operational part in an internationalisation initiative, such as an HEI department, a research team, a research project, or the department or unit where the initiative is located.

The research and innovation ecosystem as a whole is playing an ever more important role in strengthening Sweden's ability to defend itself, and is also extremely important for solving military and security-related challenges HEIs are becoming ever more significant for defence research and defence innovation, which affects their own operations that are considered in this dimension.

The fact that this is significant has also been emphasised in the dialogues the agencies involved in the assignment have held with the Swedish Armed Forces, and it is also brought up in the Government's defence policy bill⁶⁷, as well as in the Government's new defence innovation initiative, *Strategisk inriktning för försvarsinnovation*⁶⁸.

This entails in part new opportunities, but also new preconditions, requirements, and challenges. An increase in the amount of protected assets and confidential information at many HEIs and other research and innovation actors is expected.

International collaboration is also a fundamental part of the work on defence research and defence innovation, within both the EU and also NATO. It is therefore of the utmost importance that Sweden is seen as an obvious and trustworthy collaboration partner that can both protect sensitive technology from ending up in the wrong hands, and promote research and innovation.

The aspects that need to be considered in this dimension is to map protected assets, identify antagonistic threats in internationalisation, the own funding, and measures for protecting security.

Mapping protected assets

Identify the operation's 'crown jewels'.

Traditionally, protected assets cover security-sensitive activities and security-classed information. For research and innovation actors, economic values, valuable personnel, sensitive or expensive equipment/instrumentation, unique data or research results, brands or

⁶⁷ Proposition 2020/21:30 Totalförsvaret 2021 – 2025.

⁶⁸ Regeringen. *Strategisk inriktning för försvarsinnovation*.

reputations should also be included in the mapping. They are often designated as ‘crown jewels’ in international discussions.

The Swedish Security Service has also established that there are challenges for many operations “to identify which specific parts of the operation are particularly worthy of protection. This makes it difficult to achieve well-adapted protective security.”⁶⁹

Products and knowledge covered by export controls or constituting critical technology

Export controls aim to ensure that products and knowledge do not fall into the wrong hands and damage Swedish or other interests. It covers two parts – defence materials and dual-use products; that is, knowledge, technologies or other solutions that can have both civilian and military uses. The National Inspectorate of Strategic Products (ISP) is the public agency responsible for export controls. Further information is available from ISP⁷⁰, which also maintains dialogues with HEIs, public agencies, and companies about the need for export controls.

Basic research is not normally covered by export controls (with the exception of knowledge relating to weapons of mass destruction), but there may be parts of the research collaboration that is conducted higher up, at the Technology Readiness Level (TRL), and could therefore be covered by export controls. This applies even more so to innovation collaborations.

Although it does occur, HEIs’ activities are covered to a limited extent by export controls relating to defence materials. Dual-use products are more common, on the other hand. Export controls are based on legislation at EU level and Swedish level. For the research or innovation activities that are covered by export controls, special rules apply for how knowledge, drawings, materials, instruments, or products may be passed on to another international party.

In addition to the regulations governing export controls, critical technologies⁷¹ that are of significant importance to the EU’s economic security have been identified within the framework of the EU’s work on economic security. An international research or innovation initiative should also take this list into account.⁷² There is currently no such Swedish list, but there are corresponding lists of critical technologies in other countries.⁷³

⁶⁹ Säkerhetspolisen. *Säkerhetspolisen 2023-2024*. p 18.

⁷⁰ More information on ISP’s website: <https://isp.se/pda/>

⁷¹ They are also designated as ‘new and emerging technologies’.

⁷² EU. Commission Recommendation of 3 October 2023 on critical technology areas for the EU’s economic security for further risk assessment with Member States

⁷³ The Australian think-tank ASPI’s Critical Technology Tracker, and a Canadian list of sensitive technology areas. <https://www.aspi.org.au/index.php/report/critical-technology-tracker><https://science.gc.ca/site/science/en/safeguarding-your-research/guidelines-and-tools-implement-research-security/sensitive-technology-research-areas>

Case study/example

A Swedish research conductor was part of a consortium with grants from the security research part of the EU's framework programme. Participants from third countries were part of the consortium. The Swedish contribution to one of the consortium's work packages was covered by export controls relating to dual-use products. The research conductor therefore introduced a condition in the consortium agreement that third countries could not partake of the results in the work package.

Review of foreign direct investments

Foreign direct investments are of great importance to Sweden's economy and competitiveness, but there are also risks involved when foreign actors make acquisitions that include protected operations.

In Sweden, the National Inspectorate of Strategic Products (ISP) is the review authority responsible for foreign direct investments. The review system covers operations that conduct research into or supplies products or technology in emerging technologies or other strategically protected technologies. Operations with the ability to manufacture or develop such products or such technology are also covered.

For HEIs, it is relevant to consider the legislation governing foreign direct investments when the international initiative covers parts of the HEI's operations that include company entities, for example the HEI's holding company, incubator activities, risk capital companies, researchers' own companies, and so on.

Please note that all investments in protected operations must be reported, even when a Swedish company invests in another Swedish company.

Regulations governing foreign direct investments exist both at national and EU level. Further information can be found on ISP's website.⁷⁴

Research and results covered by secrecy

Research results or research data can be covered by secrecy. Information that is covered by secrecy must not reach individuals or organisations that are not authorised to partake of the information. Swedish public access to information and secrecy legislation (*Offentlighets- och sekretesslag (2009:400)*) governs what is covered by secrecy.

⁷⁴ More information on ISP's website: <https://isp.se/utlandska-direktinvesteringar/>

Protected research data⁷⁵

The transition to an open science system (that includes open access to research data) is a strategic initiative where openness and collaboration are seen as central for driving research forwards, and crucial for addressing economic and societal challenges. In many research and innovation collaborations, access to data is crucial for achieving results.

Openness can, however, entail risks of theft, disruption, or unwanted transfer of knowledge and results in ways that researchers and other actors in the research and innovation system do not intend. Different types of data are of differing sensitivity for sharing and disseminating. Great care in their management is required, so that only persons with a real need have access to sensitive data, and so that data cannot be disseminated in an improper way or be left open to access via cyber attacks.

Assessments of whether research data can be made openly accessible based on the principle of “as open as possible and as limited as necessary” requires well-developed processes for information security. New opportunities to process the information creates new risks that need to be taken into account in the assessment.

It has emerged from the Swedish Research Council’s mapping of open access to research data⁷⁶ that it gives rise to questions about information management that are not just about open access, but part of data management in a broader sense that also includes information security. The mapping shows that there is a general need for knowledge-enhancing initiatives and guided support, for example on what research data cannot be made openly accessible.

The Swedish National Audit Office described in 2023 several shortcomings in the systematic information security work at HEIs, and drew the conclusion that HEIs do not carry out effective information work to protect research data.⁷⁷ The Swedish National Audit Office writes that many HEIs have stated that it is difficult to comply with the instructions from the Swedish Civil Contingencies Agency (MSB)⁷⁸ and

⁷⁵Research data are regulated in the EU Directive on Open Data and the Re-use of Public Sector Information, known as the Open Data Directive (2019) and is complemented at national level by open data legislation (*Lag (2022:818) om den offentliga sektorns tillgängliggörande av data*). Research data are defined in the Open Data Directive as “research data: other documents in digital formats than scientific publications, collected or produced within the framework of scientific research activities and used as proof in the research process or that are generally accepted as necessary for validating research findings and research results by the research community”.

⁷⁶ See *Vetenskapsrådet, Öppen tillgång till forskningsdata – en kartläggning, analys och bedömning 2023, VR2322*

⁷⁷ *Riksrevisionen, Informationssäkerhet vid universitet och högskolor – hanteringen av skyddsvärda forskningsdata, RiR 2023:20*. The review covered 24 HEIs that carry out research in natural sciences and engineering.

⁷⁸ See MSB’s publication *Cyberangrepp mot samhällsviktiga informationssystem* that includes 25 recommendations for strengthened protections against cyber attacks. MSB also provides further advice on its website, www.msb.se.

the HEIs are also requesting support in risk assessments in international collaborations.⁷⁹ In conclusion, it proposes that a joint support function for information security is established.⁸⁰

In their appropriations directives for 2024, the HEIs have received a strengthened assignment to report on their information security work. The HEIs shall, among other things, report the measures they have taken to protect research data, and to raise awareness of and competence in information security.⁸¹

Case study/example

A researcher with unique skills, originating from one of the three countries that the Swedish Security Service points out as particularly problematical, has for several years studied and researched at a prominent Swedish HEI. The researcher has thereafter become employed at a Swedish leading-edge company that carries out company-sensitive R&D, production, and sales. On the advice on the Swedish Security Service, the researcher's application to extend their work permit is refused when the Security Service finds out about the researcher and the encumbering information linked to this person. During the subsequent analysis of the researcher's data-related activities at the company, it emerges that the researcher has not only had full access to a research database containing company secrets, but has probably also illicitly extracted data from the same. The subsequent assessment of what happened shows that the loss of information can be valued as a major potential loss of income.⁸²

Personnel, doctoral students, researchers, and students

Students and personnel, including doctoral students and researchers, are a central resource for HEIs, and also for other research and innovation actors. They are included in the organisation's protected assets, and the potential impact of an international initiative on individuals should be considered. It is important to ensure that they can carry out their work – studies, education, research, and so on – in a secure way, without outside, unwanted interference. Opportunities to recruit and retain personnel should also be assessed.

⁷⁹ Riksrevisionen. *Informationssäkerhet vid universitet och högskolor – hanteringen av skyddsvärda forskningsdata*, RiR 2023:20, p 62.

⁸⁰ Riksrevisionen. *Informationssäkerhet vid universitet och högskolor – hanteringen av skyddsvärda forskningsdata*, RiR 2023:20, p 76.

⁸¹ U2023/03645 (in part), U2023/03658 Regleringsbrev för budgetåret 2024 avseende universitet och högskolor.

⁸² Dialogue meeting with the Swedish Security Service.

If the international initiative involves travel and stays abroad during short or long periods, it is very valuable to have a travel policy that includes aspects bringing up issues of undesired interference and security. Security protection during travel can be a challenge, not least protective IT security. HEIs and funding bodies need to develop their own guidelines for what should apply in these cases. The UK's National Protective Security Authority (NPSA) also publishes guidelines that can be used.⁸³

Students travelling abroad also need training in how to assess potential risk situations that can arise during a stay abroad. Students travelling abroad should therefore be offered knowledge-enhancing initiatives before they travel.

Case study/example

The Chinese Confucius Institutes are an example of foreign influence via personnel from China and financial support. These institutes offer language courses in Chinese, and introductory courses in Chinese culture. The institutes are governed by the Chinese Ministry of Education, and are established at foreign HEIs after they have signed an agreement with a Chinese university. The foreign collaboration partner provides the teaching premises, while the teaching personnel comes from China. The administration is done jointly, and the teaching is based on Chinese curricula and Chinese funding. Donations are sometimes made. Altogether, this gives the Chinese government influence over the operation. The agreements specify that they must not breach Chinese legislation. Critics consider that this does not only limit academic freedom, but also gives China the opportunity to influence teaching about Asia, by promoting China's positions on various issues, including political ones. Increased tensions between the West and China has made the issue of the Confucius Institute's activities topical. In recent years, several have closed down, including the four that existed in Sweden.

⁸³ See more on NPSA's website. Trusted Research Countries and Conferences
<https://www.npsa.gov.uk/trusted-research-countries-and-conferences>

Commercial values and intellectual property

Interest in commercial values and intangible assets varies between different types of research and innovation actors, where the perspective of the business sector often differs from that of academia.

For all actors, and for Sweden's competitiveness, it is important to utilise the intellectual property that are created in an international initiative. In particular, there is an expectation and a need to obtain more value from state-funded research and innovation.

For this reason, it is necessary to reflect on how the intellectual property that will potentially be created in an international initiative can best be utilised and create the greatest possible benefits. It is important to do this already before the initiative starts, so that what applies is clear to all the parties involved. It is also important to protect the information that is brought into the collaboration.

Innovation offices at the HEIs, whose role it is to promote utilisation of research⁸⁴, play an important role in supporting the work on identifying and managing commercial values and intellectual property.

Patents are one way of protecting technologies and other assets, but it is often a good idea to use a combination of methods to benefit from the results of research and innovation initiatives.⁸⁵ The fundamental principle, "as open as possible and as secure as necessary" applies here as well. Individual researchers or research teams need to have a strategy for how results are taken care of, and possibly commercialised.

Interests of third countries

A third country can influence the protected assets that exist if the collaboration covers technology contents originating from that country, and the country assesses that it has a legitimate interest in protecting or controlling this technology or knowledge.

This applies, for example, to US export control legislation, which according to the US position has global reach, that is, no US partner is necessary for the technology and knowledge to be covered by US export controls. Serious breaches of US export controls can result in Swedish actors being barred from certain US technology.

Brand and reputation

Protecting your brand by being aware of and having the ability to manage security-related risks is of the greatest importance for all HEIs and organisations in the research and innovation system. A strong brand is among the most valuable intellectual properties, and entails many advantages. It makes it easier to attract talent at all levels, opens

⁸⁴ Proposition 2008/09:50, *Ett lyft för forskning och innovation*

⁸⁵ See the Swedish Patent and Registration Office's website, <https://www.prv.se/sv/>

doors for collaborations with well-reputed partners, and strengthens the preconditions for receiving government funding and financial contributions.

In a global perspective, the brands of individual Swedish HEIs are largely based on the brand of Sweden as a knowledge nation. That means the overall image of Swedish higher education and research, that all Swedish HEIs contribute to jointly and that is based on common values. That each individual HEI and organisation feels responsible for acting responsibly and safeguarding our common values is crucial for ensuring that Swedish higher education and research has a good reputation internationally. This benefits Sweden and the organisations involved.

It is, however, extremely important that safeguarding the own reputation is placed in perspective, so that it does not become utterly governing, leading to a culture of silence where problems are hidden or diminished at the expense of solid work to correct any mistakes. The most important thing is that actors have reliable structures and processes in place to protect that which needs protection, and therefore are trustworthy international collaboration partners.

It is also very important that security assessments are fit for purpose, and in balance with the assessment of the opportunities, so that it does not become “too difficult” to be part of international collaborations. If Sweden is perceived as a “difficult” country, there is a risk that researchers and other actors choose to collaborate with other countries instead.

Antagonistic threats in internationalisation

Make an assessment of concrete and specific threats, risks, and vulnerabilities in and towards your own organisation/HEI, the laboratory, or the personnel/students.

This aspect is about identifying the specific threats, risks, and vulnerabilities that exist, specifically against or in your own operation. They can constitute foreign interference of different types, or physical intrusions (break-ins, theft). A general picture of the threat at country level is described in the dimension for the foreign context.

Foreign interference is in part linked to the security aspect, but also to the trusting and mutual exchange between parties. Without wishing to access concrete information, interference can occur to achieve decisions in desirable directions from an antagonistic party.

In January 2021, the European Commission published a toolbox for managing foreign interference. This defines foreign interference as activities carried out by a foreign power, either direct or via an agent.

They are compulsive, secret, and misleading or corrupting, for the purpose of benefitting the interests of the foreign country. Interference can be of various kinds, for example through digital intrusions, through using people who have been forced, recruited, or placed in strategic positions, or through investments and funding.⁸⁶

Cyber attacks

The international initiative can entail risks of cyber attacks. According to the Swedish Security Service, cyber attacks occur on a daily basis against operations across the whole of Sweden. Cyber attacks can be used as tools for lots of different purposes, such as creating foreign policy and security policy advantages, benefitting the foreign country's own research and development, creating competitive advantages for the foreign country's own companies, or producing documentation for influencing operations.

Those that are behind cyber attacks can be both foreign powers and criminal groups, and the threat from these is assessed to be high by the Swedish Security Service. According to the Swedish Security Service, several states are active, but it particularly mentions Russia, which has increased its technology and knowledge gathering in recent years. Foreign powers use different methods; in some cases their intelligence services carry out direct attacks from their own offices. In other cases, external companies or universities are used, to make it more difficult to link the attacks to the foreign states.⁸⁷

A report on cyber security, *Nya regler om cybersäkerhet*, makes proposals for how Swedish law can be adapted to allow the implementation of the Directive (EU) 2022/2555 of the European Parliament and of the Council of 14 December 2022 on measures for a high common level of cybersecurity across the Union (NIS2 Directive) and Directive (EU) 2022/2557 of the European Parliament and of the Council of 14 December 2022 on the resilience of critical entities (CER Directive). They will affect the work of public agencies and HEIs on cyber security.⁸⁸

⁸⁶ EU. Tackling R&I foreign interference. Staff Working Document, p 12

⁸⁷ *Säkerhetspolisen, Säkerhetspolisen 2022-2023*, p 35 ff).

⁸⁸ *SOU 2024:18 Nya regler om cybersäkerhet*

Case study/example

In summer 2023, the University of Manchester suffered a major cyber attack. Via phishing emails, the attackers entered the university's computer systems and were able to use weaknesses in these to obtain access to protected data resources. Data was stolen, but no data was encrypted; instead, it was always accessible for users at the university. Among the data stolen were patient data from the National Health Service for more than a million patients at 200 hospitals, information collected by the university for research purposes.

When the attack was discovered, the university focused on keeping the systems accessible as much as possible, instead of taking them down. The starting point for this was that higher education is particularly affected by cyber attacks, in that all parts of an HEI are affected, but the negative effects are most noticeable for researchers and students if the systems are not accessible. To alleviate the effects, the university worked out a strategy that, among other things, included informing the employees, students, and public agencies involved about what had happened. Guidelines for all employee categories were also created on how to counteract cyber attacks.⁸⁹

Security threats against Swedish HEIs and research

There are security threats against Swedish research and innovation that differ in expression, for example knowledge theft, influencing operations, and other forms of foreign interference.

Sweden is at the forefront of technology and innovation, and is therefore an attractive target for intelligence gathering. Both the Swedish Security Service (SÄPO) and the Swedish Military Intelligence and Security Service (MUST) state that there are foreign powers that are interested in knowledge and technology for both civilian and military purposes.

Intelligence gathering can occur in research collaborations and at Swedish HEIs.⁹⁰ The intelligence gathering that occurs in Swedish research and innovation environments in the form of illicit knowledge transfer is conducted either to support the foreign country's economic development, or to support the foreign country's own military ability.

⁸⁹ See more on the University of Manchester's website:

<https://www.manchester.ac.uk/discover/news/cyber-incident-statement/>

⁹⁰ *Säkerhetspolisen. Säkerhetspolisen 2022-2023 och Försvarsmakten, Årsöversikt 2022 MUST*

Besides this, there are in some cases also security-threatening activities in the form of mapping regime critics (refugee espionage) and other types of information gathering/espionage.

Influencing operations can cover both the institutional level and individual persons or groups of persons at an HEI. Individuals who are taking part directly in international research and innovation initiatives are at risk of being exposed to threats or other influences. Potentially threatening, unpleasant, and physically or mentally damaging situations need to be recognised and, as far as possible, prevented. There must also be preparedness in place to manage any incidents.

Another risk is that individuals with the necessary competence for some reason choose, or are forced, to start a collaboration or leave a collaboration. Preventive work is needed here too, to minimise the risk of this happening, and to manage the situation if it should happen.

This can also apply to influence on or through a diaspora from a nation or ethnic group of students or employees. The reason may be to create a direct effect on the operation, or an indirect effect (for example by influencing the HEI management or department management).

To avoid intelligence gathering and pressure, recruiting the right persons to the organisation is fundamental. For this reason, it is important to use responsible internationalisation as a guiding principle also when recruiting students and employees. There must be procedures in place, and close collaboration between relevant departments and the place where the person is to work, as well as good procedures for background checks.

In a dialogue, the Swedish Security Service told of a case where a student had applied to study an “insensitive” subject, but had a background at a military university in their home country. This raised questions about their reason for the studies at the Swedish HEI. The Swedish Security Service considers that in some cases it is more important for a person **to** become enrolled/employed at a Swedish HEI than **what** they enrol/are employed for. This is because being accepted or becoming employed gives access to infrastructure at the HEI, which can make it possible to gather information on a broad front.⁹¹

Another example to be aware of are students who start off by studying an “insensitive” subject, and are therefore given residence permits, but who then change the focus of the studies to something more “sensitive”. The student is then already living in Sweden on legal grounds, and this therefore becomes a case that is difficult to manage.⁹²

⁹¹ Dialogue meeting with the Swedish Security Service.

⁹² Dialogue meetings with the Swedish Migration Agency and the Swedish Security Service.

Case study/example

Illegal intelligence activities is a crime designation that was added to cover a gap in the law, as became clear in a case with a young Russian who worked at a Swedish HEI and was contacted by a Russian intelligence officer. It was in this case clear that the Russian intelligence services were seeking information, and finally the young Russian was arrested. During the investigation, it was established that the man could have obtained information at the HEI, but nothing that could be linked to any danger to Sweden's security. The prosecutor was therefore obliged to let the man go in the end. This case did, however, lead to new legislation being introduced, where the activities that the intelligence officer carried out, plus the participation the young man had agreed to, were criminalised. It is the activity that is punishable, as it is carried out using conspiratorial methods, that is, secretly or using fraudulent means.

These two persons clearly had some kind of intent, and an intelligence officer does not put in the effort unless there is a specific purpose. This type of activity does therefore not have to lead to a person obtaining information that is so sensitive that it is linked to Sweden's security; instead, it is the actual efforts (the actions and behaviour) that is criminalised. Gross illegal intelligence activities are punishable by imprisonment for up to four years, which should be compared to the more serious crime of espionage, where gross espionage can lead to lifetime imprisonment.⁹³

Physical security

Physical security includes the protection of buildings, infrastructure, and equipment.

It can, for example, relate to theft of laboratory equipment, data, and other information, both at work and while travelling. A burglary or a theft can occur at any time, and does not have to be particularly linked to an antagonistic threat. On the other hand, thefts with antagonistic intentions can have more disastrous effects. There is a difference between stealing a computer in order to earn money by selling the hardware, and stealing a computer in order to sell the data it contains.

Reviewing which premises and areas are open to the public and which should be locked can be a first step towards minimising the risk of burglary and theft. To also minimise the number of persons who have access to the locked premises (all employees, or a few chosen ones) can

⁹³ Dialogue meeting with the Swedish Security Service.

also reduce the risk. The same applies to access to research data and other digital infrastructure. Make sure that only those who need to have access to some information have it. This can, for example, relate to access to databases, cloud services, and intranets.

Drawing up specific procedures for receiving visitors, both before and during the visit, and to carry out identity checks on arrival can also be a tool for reducing the risk of burglary and theft.

Case study/example

In 2022, a suspected Russian spy who had been active at Tromsø University was arrested⁹⁴, and in 2024 a suspected spy was arrested at Tartu University.⁹⁵

According to the Swedish Security Service, there are cases where researchers recruited internationally use their employment at Swedish HEIs to access research results from other research teams that lack relevance to their own research, in addition to research results from the own research team.⁹⁶

Your own funding

Review the funding of your own activities and determine any influence on the international initiative in question.

The terms and conditions that exist for funding of the Swedish partner in an international initiative, both for the initiative itself and other funding at the partner, can affect the initiative in question.

The funding of the international initiative at your own HEI is an important factor. In many cases, it will probably not constitute a risk, but in those cases where the funding comes from other channels than those that are recognised/established, it might be worth considering. For example, if your own funding comes from a foreign actor, it is important to make the same assessment as for possible collaborating partners. The same applies if the funding comes from a company or other organisation or individual in Sweden with links to foreign actors. It is important to make a thorough review of the terms and conditions that apply for the funding. It can be important also for any other sources of funding for the collaboration, both public and private. They, in turn, may have requirements or set conditions for how the rest of the funding is designed.

Other agreements relating to funding that exist within the organisation can also include terms and conditions that affect the initiative in

⁹⁴ SVT Nyheter. *Misstänkt rysk spion beskrivs som nyfiken*

⁹⁵ Dagens Nyheter. *Misstänkt spion kopplas till Uppsala universitet*

⁹⁶ Dialogue meeting with the Swedish Security Service.

question, for example an agreement with a partner from USA, where the conditions may exclude collaborations with China as a result of restrictions in USA.

Specific regulatory frameworks apply for protective security

Find out whether the activity is affected by protective security legislation, and, if so, take suitable action.

Find out whether the activity is affected by protective security legislation, and, if so, take suitable action.

There are several measures that can be adopted to prevent and counteract threats and risks against responsible internationalisation, as shown in the aspects of this dimension. Protective security is a measure covered by specific regulations. This gives reason to specifically recognise them here.

Protective security is the way in which information covered by secrecy shall be protected. Protective security is regulated in *Säkerhetsskyddslag (2018:585)* and *Säkerhetsskyddsförordning (2021:955)*, and in instructions from various public agencies, among them the Swedish Security Service and the Swedish Civil Contingencies Agency.

The legislation applies to all who carry out security-sensitive activities, both public and private actors.

Protective security has several components, among them protective security analysis. Public agencies and private actors who carry out security-sensitive activities shall also investigate the need for protective security by means of a protective security analysis, according to the legislation.⁹⁷

Information security

International collaborations, in particular research collaborations, require information to be shared with others. This constitutes a risk that protected research data and research results are disseminated in a way that is not desirable. Systematic information security work is required to identify the data and other information that need to be protected.⁹⁸

All public agencies, including governmental HEIs, are obliged to conduct systematic and risk-based information security work. The purpose is to protect information sufficiently, based on its value. Information security

⁹⁷ For more information on protective security analysis, see *Säkerhetspolisen, Säkerhetsskyddsanalys (PMFS 2022:1)*. One example of such a protective security analysis is found on Stockholm University's website *Säkerhetsskyddsanalys 2021*. <https://www.su.se/medarbetare/organisation-styrning/styrdokument-regelboken/s%C3%A4kerhet-och-f%C3%B6rtroendeskadligt-agerande/s%C3%A4kerhetsskyddsanalys-2021-1.608128>

⁹⁸ MSB. *Arbeta systematiskt med informationssäkerhet och cybersäkerhet*

covers all of the organisation's activities and all information, irrespective of whether it is contained in computers or on paper.

The Swedish Civil Contingencies Agency (MSB) has a mandate to support and coordinate the work with society's information security. MSB is also authorised to issue instructions about information security for public agencies.⁹⁹ MSB has also produced method support and the service *Infosäkkollen*, to provide support for the work of implementing systematic information security work.¹⁰⁰

Examples of guiding questions

Does the operation include protected assets or confidential information (such as export controls, critical technologies, secrecy, commercial values)?

Can the knowledge, data, or tools/instruments be used for other, undesirable purposes (for surveillance, police-related purposes, social control, discrimination, and so on)?

Do you have any control over where the results of the research or innovation activities may end up in your collaboration?

Are there any risks for you, for students, or for personnel (such as threats, pressures, or influencing campaigns)?

What risks are present at your normal place of work, and what risks arise when travelling or during longer stays abroad (for example as a visiting researcher)?

Who funds the Swedish partner/share of the international initiative in question, and what are the terms and conditions? Is there any other funding for the Swedish partner, with terms and conditions that could affect the international initiative in question?

Does the HEI carry out comprehensive information security work according to MSB's instructions? What information security measures need to be taken in my activities? What other measures may need to be carried out?

⁹⁹ MSB. *Föreskrifter om informationssäkerhet för statliga myndigheter (MSBFS 2020:6)*

¹⁰⁰ The method support including the internet tool *Infosäkkollen* is available on MSB's website <https://www.msb.se/sv/amnesomraden/informationssakerhet-cybersakerhet-och-sakra-kommunikationer/systematiskt-informationssakerhetsarbete/>

3. The foreign context

In collaborations with other countries, an assessment of country-specific opportunities, risks and challenges must be carried out. The aspects that need to be considered are, among others, how legislation, the implementation of the legislation, the degree of academic freedom, democracy, and human rights, intellectual property rights, and export controls can affect the planned or ongoing international activity.

Legislation

Assess the preconditions set by the legal systems (national, regional, or federal) collaborating partners act under. Is there legislation that limits or entails risks in the collaboration?

There may be legislation relating to secrecy, the ability to commercialise/obtain patents (intellectual property rights), limitations for foreign persons to act within the country, for research data, personal data, export controls (for transfer to Sweden), or requirements that citizens shall act in the interests of the country. All these rules can affect the preconditions for the collaboration partner to act, and therefore the preconditions for the entire collaboration.

In the ideal situation, the collaboration partner is open towards the Swedish collaboration partner on what can affect the collaboration, but this is not always the case. Clarify with your proposed collaboration partner what laws and ordinances that either partner must comply with, and what values they or you cannot compromise on.

Requirements and conditions are not always clearly expressed. The legislation may be applied haphazardly, and legislation and other regulatory frameworks can change over time. Some circumstances may also vary within the country.

It is difficult for an individual researcher to have knowledge about other countries' legislation. The same difficulty also applies to any personnel within the HEI administration who should be able to help. Learn from your colleagues' experiences if they have worked in the country, and build up knowledge within the organisation.

Democracy, the rule of law, and human rights

Assess the conditions in the foreign country in terms of democracy, the rule of law, and human rights, and how they can affect the international initiative.

Failings in democracy, the rule of law, and human rights can constitute a risk for your own security, but also for the collaboration partner's

security. This needs to be taken into account. These failings do not automatically constitute a disqualification for international collaboration, but they need to be considered in an overall assessment, and may affect how the collaboration is designed.

To assess the collaboration country's degree of democracy and human rights, there are open sources that can be accessed, for example V-Dem¹⁰¹, UNESCO¹⁰², and the Swedish Ministry for Foreign Affairs' reports on human rights¹⁰³, and others.

Academic freedom

Assess the degree of academic freedom the collaboration partner has in their national, regional, or federal system.

The degree of academic freedom in the collaboration country affects which and how international collaborations can be conducted. The principle of academic freedom is established in Swedish higher education legislation and also in a number of international agreements.¹⁰⁴ The Bonn Declaration from 2020 establishes that freedom of research is a norm that shall be guiding in all types of research collaboration and innovation initiatives where EU Member States participate.¹⁰⁵

To assess the collaboration country's degree of academic freedom, there are open sources that can be accessed, for example Academic Freedom Index¹⁰⁶.

Lack of academic freedom does not automatically constitute a disqualification for international collaboration, but needs to be considered in an overall assessment.

Learn from your colleagues' experiences if they have worked in the country, and build up knowledge within the organisation.

Corruption

Assess whether corruption may be a risk in the international activity.

¹⁰¹ See V-Dem. <https://www.v-dem.net/>

¹⁰² See the Global Democracy Index. <https://www.unesco.org/en/world-media-trends/global-democracy-index>

¹⁰³ See the Swedish Government's reports on human rights, democracy and the principles of countries governed by the rule of law around the world. <https://www.regeringen.se/regeringens-politik/demokrati-och-manskliga-rattigheter/rapporter-om-manskliga-rattigheter-i-varlden/>

¹⁰⁴ Examples are Magna Charta Universitatum, the Rome Ministerial Communiqué, 2020, EHEA.

¹⁰⁵ European Research Area. Bonn Declaration on Freedom of Scientific Research, adopted at the Ministerial Conference on the European Research Area on 20 October 2020 in Bonn.

¹⁰⁶ See Academic Freedom Index. <https://academic-freedom-index.net/>

A high degree of corruption can constitute a risk of not achieving the goals of the activity. Corruption in the collaboration country may constitute an economic risk, but can also contribute to those chosen to take part in the activity not being the best suited or not having the best merits.

There are a number of organisations that publish assessments of the degree of corruption in the world's countries, such as Transparency International¹⁰⁷ and the World Bank's Worldwide Governance Indicators, which also include the degree of rule of law and political stability.¹⁰⁸

General threats and challenges

Assess the general threats that exist for the security of the organisation and individuals in conjunction with activities with the collaboration country.

This refers primarily to antagonistic threats, and there are openly accessible general assessments of the security situation and links to certain countries in the annual reviews of the Swedish Security Service (SÄPO) and the Swedish Armed Forces (the Swedish Military Intelligence and Security Service, MUST)¹⁰⁹.

According to the Swedish Security Service, several countries carry out intelligence activities targeting Sweden, in particular Russia, China, and Iran. The purposes vary depending on the country involved, but are usually to gather knowledge, information, and technology – for civilian and military purposes. Knowledge gathering is done against several different Swedish entities, such as businesses, the defence and space industry, and also research institutions and HEIs.¹¹⁰ Technology acquisition is described as an important component for countries with major power ambitions, as well as research conducted at Swedish HEIs.¹¹¹

Threats and challenges may also come from non-antagonistic threats that can have major consequences for the preconditions for internationalisation, or the ability to act in a certain country or part of the world. Examples are natural disasters, climate-related events, health-related situations, and conflicts. Some of these can be difficult to predict, but guidance in specific cases can be obtained from the travel recommendations issued by the Swedish Ministry for Foreign Affairs.

¹⁰⁷ See Transparency international. <https://www.transparency.org/en/>

¹⁰⁸ See Worldwide governance indicators. <https://www.worldbank.org/en/publication/worldwide-governance-indicators>

¹⁰⁹ See *Försvarsmakten, Årsöversikt 2023 MUST* and *Säkerhetspolisen, Säkerhetspolisen 2023-2024*.

¹¹⁰ *Säkerhetspolisens årsbok 2022-2023*.

¹¹¹ *Säkerhetspolisens årsbok 2022-2023*.

More overarching descriptions of the situation in a country or region can be found in the Swedish Institute of International Affairs' country guide (*Landguiden*)¹¹², and a corresponding US resource is the US intelligence service CIA's World Fact Book¹¹³, describing the conflict situation in different countries.

Examples of guiding questions

Is there legislation that limits your or the collaboration partner's opportunities to act freely in international collaborations?

Are there, for example, laws relating to data protection or intellectual property rights that threaten or limit the opportunities for collaboration?

Are there circumstances that risk affecting the opportunities to choose the focus of the research collaboration?

Is there a risk that the collaboration or the recruitment will affect the academic freedom at your own HEI?

Can contacts with a researcher in another country constitute a risk for the researcher?

Are there risks to your personal security (diseases, terror threats, criminality, and so on) involved in travel to the collaboration country?

Is there a risk that the collaboration partner will enter into the international initiative to gather knowledge for their own country's intelligence services or defence industry, and not to achieve mutual goals?

4. Knowledge about the collaboration partner

To be part of a collaboration, you need knowledge about the partner or partners you will be collaborating with.

The aspects covered by this dimension are background checks, the collaboration partner's legal position, autonomy, funding, and whether the collaboration partner's own collaborations can affect the collaboration.

¹¹² See the website of the Swedish Institute of International Affairs. <https://www.ui.se/landguiden/>

¹¹³ See CIA's website. <https://www.cia.gov/the-world-factbook/>

Background checks based on open data

Make a reasonable assessment of the collaboration partner based on open sources.

It is important to make a reasonable background check (often called 'due diligence') of the collaboration partner you wish to work with, in order to assess risks. This applies in other relationships too, such as recruitments.

The consequences of not assessing the collaboration partner are not just associated with the risk of antagonistic threats. A collaboration partner with unstable or insufficient funding can lead to economic damage, and collaboration partners with unsatisfactory ethical standards can have repercussions on an HEI's brand and reputation, and lead to legal difficulties.

A thorough investigation of the collaboration partner also reduces the risk of entering into collaboration with actors in countries with high levels of corruption, or with HEIs with shortcomings in scientific basics and good research practice. It is important to make as thorough a background check as possible using the open sources accessible to an individual researcher or HEI, but it is equally important to agree on joint values and principles in advance.

It is, of course, difficult to make an assessment of whether a counterpart constitutes a threat or not, in particular if the counterpart is trying to hide this. But with open sources it is possible to come a long way towards finding out who owns, controls, and funds the collaboration partner, or if they are included on international control lists.

During dialogue meetings, the Swedish Migration Agency stated that if HEIs carried out more thorough background checks of students, doctoral students, and researchers during the recruitment process, then fewer would be stopped in the process of obtaining a resident's permit. The process would then also be made quicker for all other applicants. To achieve this type of background checks, HEIs would probably need to have access to other types of information than they currently do. But a simpler assessment of sensitivity of the activities the recruited person is to carry out in relation to the person's background can be made¹¹⁴.

When suspecting potential antagonistic threats from the proposed collaboration partner that cannot be assessed based on open source, contact may need to be made with the Swedish Security Service. The

¹¹⁴ Here, questions will naturally arise about the degree to which HEIs shall conduct security policy, and on what grounds other than formal merits an applicant for an education programme shall be assessed.

agencies involved in the assignment intend to return to the issue of to what extent a support structure can be a help in such cases.

Autonomy of the collaboration partner

Assess the degree of institutional autonomy and funding the collaboration partner has in their national, regional, or federal system.

This refers to a more specific assessment of the collaboration partner's independence and autonomy. Such an assessment should be done in as much detail as possible, preferably for the research team, department, or faculty in question.

Such an assessment includes ownership or control of the counterpart, and any affiliation to other actors. One such example is Chinese universities that constitute the “seven sons” of China's national defence¹¹⁵.

Use open and official sources

There are a number of resources internationally that can be used for background checks. They are often published as lists or databases by actors with certain characteristics or purposes, and should therefore be used judiciously.

They may be good for obtaining basic information, but they should, firstly, be used as background documentation and not be accepted as the absolute truth and, secondly, they do not necessarily reflect circumstances that are relevant for Swedish actors. Here follow some such international examples (in a support structure, a more systematic mapping of the corresponding resources could be provided). There are no corresponding Swedish lists.

The US Department of Commerce publishes a consolidated screening list of organisations, companies, and individuals who must not obtain access to certain US technology according to US export controls.¹¹⁶

The think-tank Australian Strategic Policy Institute (ASPI) publishes a mapping of Chinese HEIs' links to the defence area (China Defence Universities Tracker).¹¹⁷

¹¹⁵ See Wikipedia. Seven sons. https://en.wikipedia.org/wiki/Seven_Sons_of_National_Defence

¹¹⁶ U.S. Department of Commerce. International Trade Administration <https://www.trade.gov/consolidated-screening-list>

¹¹⁷ ASPI. China Defence Universities Tracker. <https://unitracker.aspi.org.au/about/>

Canada publishes a list of specifically named organisations that cannot receive federal research funding.¹¹⁸

Avoid bogus universities

Make sure, as far as possible, that the proposed collaboration partner is recognised by public agencies or other organisations with mandates to recognise education or research institutions in the country in question, and that it is not a question of a bogus university or an institution with major quality problems.

In nearly all cases, a search of open sources, such as the World Higher Education Database¹¹⁹ is sufficient, but even this database has on occasion by mistake listed HEIs with unclear status. In doubtful cases, the Swedish Council for Higher Education (UHR) can help to assess a foreign HEI. UHR is Sweden's ENIC-NARIC office¹²⁰, and as such UHR provides information about recognition of higher education and education providers in other countries to individual persons who are planning to study or work abroad, to employers, and to Swedish HEIs. The Swedish ENIC-NARIC office has good knowledge of foreign educational systems and of recognised and non-recognised universities and other actors in higher education. UHR can also assist Swedish HEIs with information by contacting the equivalent functions in other countries.

Case study/example

An international office at a Swedish HEI that is responsible for exchanges receives a request from an HEI that states it is active in Ireland to enter into an agreement on a bilateral exchange programme. It is not possible to confirm via open sources whether the HEI is actually recognised. Following contacts with the Swedish ENIC-NARIC office at UHR, the Swedish HEI receives information that the foreign university is a bogus university.

The collaboration partner's own collaborations

Investigate whether the proposed collaboration partner has other collaborations that impact on your collaboration or your reputation.

¹¹⁸ Government of Canada. Named Research Organizations. [https://science.gc.ca/site/science/en/safeguarding-your-research/guidelines-and-tools-
implement-research-security/named-research-organizations](https://science.gc.ca/site/science/en/safeguarding-your-research/guidelines-and-tools-implement-research-security/named-research-organizations)

¹¹⁹ See World Higher Education Database website. <https://www.whed.net/home.php>

¹²⁰ See ENIC-NARIC's website. <https://www.enic-naric.net/page-about-ENIC-NARIC-Networks>

Firstly, the collaboration country's or the collaboration partner's own collaborations can affect the proposed collaboration. If Sweden collaborates with Country A, which in turn has a conflicted relationship with Country B, then the proposed collaboration with Country A may influence how Country B regards the Swedish actor. This can be problematic, in particular if Country B has a good relationship with Sweden, and there is then a risk that this relationship deteriorates.

Another case is when Sweden is collaborating with Country C, but not with Country D (for example as a result of export controls, security threats, or sanctions), but where Countries C and D have a good relationship. A Swedish actor may then need to reassure themselves that there will be no leakage of knowledge to Country D from Country C.

Yet another case is where Sweden is collaborating with Country E, and where this country collaborates with one or more countries with low levels of academic freedom, doubtful research practices, or poor ethical standards. Here, trust may be damaged through 'guilt by association'.

Case study/example

A university in North America enters into several research collaborations with Chinese universities that belong to the "Seven Sons" category of universities.¹ They are civilian universities under the Ministry for Industry and Information Technology, but work closely with China's defence industry. The collaborations between the North American university and the Chinese partner universities relate in some cases to new technology in the field of artificial intelligence, which can be used for both civilian and military purposes. Worries arise that the North American university is thereby involuntarily contributing to making advanced research accessible, not just to the partner universities, but also to the Chinese military.

Guiding questions

Who owns, controls, or funds the collaboration partner?

Can the collaboration partner be exposed to pressure or otherwise be abused by another, underlying actor (such as police, military, or a non-democratic actor)?

Is the HEI autonomous, and what is the level of academic freedom? Is this possible to assess using open sources? Does the HEI's autonomy cover all dimensions of autonomy: organisational, financial, administrative, and academic, or are there limitations?

Are there other Swedish or international actors who have experience of collaboration with the proposed collaboration partner?

Are there any other actors, such as public agencies, in higher education in the country that needs to be informed/consulted before an agreement can be entered into?

If the counterpart is an HEI, is it a recognised HEI, and is there any relevant quality assurance?

What existing international collaborations does the collaboration partner bring to the collaboration?

5. Design of the collaboration

International collaborations can arise in many different ways, and can develop over time. When a formal collaboration is to start, it is important to set down the preconditions in an agreement, based on the opportunities and risks identified.

Discuss with your proposed collaboration partner what laws and ordinances that either partner must comply with, and what values they or you cannot compromise on. Reach agreement on the principles that will apply, and the goal of the collaboration, for example how research results are to be dealt with. Write this into a collaboration agreement. Agree also that the selection of participants (students or researchers) in the collaboration shall be done in an open manner.

How a collaboration is regulated via an agreement offers some opportunities, but can also create vulnerabilities. Review the dependency relationships that may arise during the collaboration, and how they are to be managed. Here, issues such as reciprocity (do both

partners get something from the collaboration?) and ethics in the collaboration can be considered, as well as who is to own the result, and how it may be used, and so on (the 'teacher exception'¹²¹).

Options to change or end the collaboration should be included, but also producing an exit strategy in advance, possibly with criteria for when an ending should be initiated.

Aspects that need to be considered in this dimension are the importance of agreeing in a collaboration on issues relating to good research practice, research integrity, ethics, open science, sustainability, and diversity.

Good research practice, research integrity, and ethics¹²²

Ensure that the internationalisation can be done according to good research practice and open science, without serious ethical transgressions or trust-damaging deviations from research norms and standards.

Research carried out in Sweden shall be conducted according to good research practice by law.¹²³ According to an inquiry that preceded the change in higher education legislation, “[g]ood practice in research is the moral practice that develops when the different actors in research reflect critically on the research activities in dialogue with the surrounding society.”¹²⁴ The requirement for good research practice applies also in internationalisation.

Swedish HEIs work actively with issues relating to good research practice and ethics. The Association of Swedish Higher Education Institutions (SUHF) has an expert committee on ethics issues¹²⁵ and has produced guidelines for HEIs’ work to prevent and manage deviations from good research practice.¹²⁶ Uppsala University operates a website for these issues.¹²⁷

Good research practice is a broad application that can cover many aspects, which are usually expressed in ethics questions in research. Good research practice is also closely linked to the concept of research integrity, and there is a common European codex for research integrity

¹²¹ Intellectual property rights of academic staff.

¹²² This section is based primarily on the Swedish Research Council’s report Good Research Practice from 2017 (an updated version is expected in 2024).

¹²³ *Högskolelag (1992:1434)*, Section 3 a and *Lag (2019:504) om ansvar för god forskningssed och prövning av oredlighet i forskning*, Section 4

¹²⁴ *SOU 1999:4 God sed i forskningen*, p 24.

¹²⁵ See SUHF’s website. Expert committee on ethics issues.

<https://suhf.se/arbetsgrupper/expertgruppen-for-etikfragor/>

¹²⁶ SUHF. *Vägledning för lärosätens arbete med att förebygga, hantera och följa upp misstankar om avvikelser från god forskningssed*. REK. 2020:3 REVIDERAD Dnr SU-850-0057-18

¹²⁷ See Uppsala University’s website. *CODEX regler och riktlinjer för forskning*
<https://www.codex.uu.se/>

with the following fundamental principles for integrity in research: reliability, honesty, respect, and responsibility.¹²⁸

The research ethics questions exist to ensure that legitimate interests are considered, and that an informed balance is struck when different interests conflict with each other. Serious deviations from good research practice (fabrication, falsification, and plagiarism) are designated as 'research misconduct'.

The Swedish Research Council's 2017 report *God forskningssed* ("Good Research Practice") underlines that the ethics dimension is also a quality factor in research, and that these issues concern all who take part in the research process.¹²⁹ Good research practice is therefore a fundamental factor to consider in internationalisation activities. One example of a deviation from good research practice and ethics rules is the existence of "ethics dumping" – that is, lowering the ethics requirements when research is conducted.

Compliance with good research practice is also a condition for recipients of grants from governmental sources of funding, such as the Swedish Research Council. In the EU's framework programme, all the research funded is also covered by an ethics appraisal procedure.¹³⁰ In a statement from 2022 by the collaboration body for the world's research funding bodies, the Global Research Council, on research ethics, integrity, and culture, the need for responsible internationalisation is also identified under the designation "principled collaboration".¹³¹

Research shall be based on the principle of open science¹³²

Ensure that research in international collaboration can be conducted and published according to open science.

Open science aims to make the scientific process more open and inclusive. Creating an open science system is a fundamental part of the Government bill on research and innovation policy from 2020.¹³³

Open science can refer to several aspects. Usually it refers to open access to scientific publications or to research data, but also open source code, open learning resources, and citizen science.

¹²⁸ The codex is produced by the European collaboration organisation for the European academies, ALLEA. The European Code of Conduct for Research Integrity.

¹²⁹ *Vetenskapsrådet*, Good research practise,, report 2017. A new version of the report is published in 2024.

¹³⁰ EU. Horizon Europe. P 23ff

¹³¹ Global Research Council. Statement of Principles and Practices for Research Ethics, Integrity, and Culture in the Context of Rapid-Results Research

¹³² The section is based on information from the websites of the Swedish Research Council www.vr.se and www.suhf.se, and the Government bill *Proposition 2020/21:60. Forskning, frihet, framtid – kunskap och innovation för Sverige*, Section 10.2.2.

¹³³ *Proposition 2020/21:60. Forskning, frihet, framtid – kunskap och innovation för Sverige*.

Open science aims to create a more effective research system, where research is transparent, accessible, and reusable, not least via the internet. By enabling access to research results, other researchers can review, reply to, and continue building on studies. This contributes to increased attention to detail and reliability. Open science also facilitates collaboration between researchers and HEIs, which can lead to more rapid advances and innovations.

Research data form the material that scientific results are based on. If research data are published openly accessible on the internet, this means that access to research data is open. Far from all research data can be fully openly accessible. The assessment of openness shall be based on applicable legislation, and the principle of “as open as possible and as limited as necessary”.

Open learning resources focus more on higher education than on research, and mean that educational and teaching materials can be freely shared and reused.

Open science contributes to wider participation and engagement from society, for example via citizen science, where the general public is directly involved in research projects, or different parts of the research process. The work on open science is done globally, and is supported by organisations such as UNESCO¹³⁴ and the OECD, as well as through initiatives such as the European Open Science Cloud (EOSC)¹³⁵ within the EU.

Open science is a fundamental principle within Horizon Europe, the EU’s framework programme for research and innovation. By integrating the principle of open science in research policy, international research collaboration can be promoted, and the European Research Area (ERA) strengthened. Furthermore, the implementation of ERA is supported via the Coalition for Advancing Research Assessment (CoARA), where several Swedish funding bodies and HEIs participate.

Sustainability, gender equality, and diversity

Ensure that issues relating to sustainability, gender equality, and diversity are addressed at an early stage, and are kept active during the collaboration.

Issues relating to sustainability, gender equality, and diversity are assumed to permeate the day-to-day activities, and therefore also international collaborations. Having different starting points and views on these issues can lead to conflicts of interest during the collaboration.

¹³⁴ See UNESCO Recommendation on Open Science. <https://www.unesco.org/en/open-science/about>

¹³⁵ See EOSC’s website. <https://eosc-portal.eu/>

It is therefore important that they are addressed at an early stage, and are kept active during the collaboration.

The United Nations (UN) defines sustainable development as “development that satisfies current needs without jeopardising the opportunities of future generations to satisfy their needs”.¹³⁶ Striking balances based on environmental, social, and economic influences and working towards the sustainable development goals¹³⁷ is therefore also a way for research to act responsibly. When different goals conflict with each other, dilemmas can arise, and priorities may need to be worked out. For example, short-term gains versus long-term social and environmental sustainability, or technological development versus environmental damage.

The directives to Swedish public agencies stipulate that the gender equality perspective shall be integrated in the agencies’ operations¹³⁸ and, within the EU, the issue is emphasised via the gender equality strategy for 2020–2025, for example.¹³⁹ The experiences, competences, and knowledge of the entire population are needed to ensure everybody can utilise society’s potential to the full extent. Promoting gender equality and diversity in international collaborations is therefore a precondition for sustainable societal development, and crucial for the research and innovation ability. Promoting domestic/global goals can, on the other hand, be a challenge, as they may contradict local traditions and needs. Inequality in access to resources and capacity can create dilemmas when it comes to promoting gender equality and diversity.

Follow-up of the collaboration

Assess the collaboration continuously and evaluate it after it has ended.

Assessment of the collaboration should not just be done before it starts but also continuously. The preconditions for your own and the collaboration partner’s interests and aims for the collaboration can change over time. The degree of risk should influence how often, and how carefully, such follow-ups should be done. Take into account that risks can increase or decrease over time. In the former case, the more frequent/intensive the follow-up has to be, and in the latter case, vice-versa.

¹³⁶See UN. Report of the World Commission on Environment and Development: Our Common Future. Also known as the ‘Brundtland Report’.

¹³⁷ More on the sustainable development goals: <https://www.globalamalen.se/om-globala-malen/>

¹³⁸ Funding bodies shall also work to ensure sex and gender perspectives are included, when applicable, in the initiatives funded. See for example the Swedish Research Council’s guidelines for gender equality in the research funding process.

¹³⁹ EU. Gender equality strategy for 2020–2025.

You should also evaluate the collaboration after it has ended, to gather experience for future collaborations.

Case study/example

In a collaboration funded by a Swedish research funding body, it turned out that the Swedish and the foreign collaboration partners did not have the same aims for the collaboration. After the collaboration ended, the foreign partner had applied for a large number of patents based on the result of the collaboration, while the Swedish partner had not applied for any.

Examples of guiding questions

Does the dependency on the collaboration partner increase through the collaboration? Financially? In research terms?

How is the collaboration designed (degree of undertaking)?

Are there potential ethical or moral aspects of the activities or in the research data that can be abused or be given access to unintentionally?

Is there reason to limit access to the HEI's information system or premises?

Is it possible to comply with norms for scientific activities (research integrity, ethics, open science, academic freedom, and so on) in the collaboration?

Can the research work be conducted in a reassuring way without risk of compromising research integrity, or by having to make 'shortcuts'?

How does the initiative contribute to the sustainability goals?

For all parties involved in the initiative: What is the participation like in relation to gender allocation and diversity?

How many journeys for physical meetings are needed in the initiative? Is it possible to travel in an environmentally friendly way? What alternatives are there to physical presence in places outside your own workplace?

How are sustainability and gender equality managed at the collaborating partner, and by the country it is working in? Can the initiative contribute to improvement?

Does the result impact on women and men in the same way? If not, what differs, and why?

Are there differences in how the result impacts on different groups in society? In what way?

How and when shall the collaboration be followed up?

How is the collaboration assessed to develop in the future? (increased/decreased risk?)

Is there an exit strategy?

Guidelines for research funding bodies and other actors

A consequence of the geopolitical situation is that education, research, and innovation need to take national interests into account to a greater degree than before. Governmental sources of funding for education, research, and innovation are a tool for safeguarding this. For this reason, sources of funding also become relevant for responsible internationalisation.

The focus in this section is on the role of sources of research funding. But responsible internationalisation is relevant also for sources of funding for international educational collaborations. The development within the EU's Erasmus+ programme¹⁴⁰ is to focus ever more on democratic value systems, sustainability, and risk and capacity audits in the assessment of applications. However, research funding bodies usually play a greater role in assessments of applications for funding than the Swedish Council for Higher Education (UHR) has in the assessment of applications within Erasmus+, as a large part of the assessments within Erasmus+ is done centrally by the European Commission. But as the national office for Erasmus+, UHR plays a role in supporting Swedish HEIs also on issues relating to responsible internationalisation.

There are also other scholarships affected by guidelines for responsible internationalisation, such as scholarships for fee-paying students that both UHR and the Swedish Institute administrate.

In addition to higher education institutions and funding bodies, there are other actors in Sweden who may need to relate to responsible internationalisation, such as knowledge-intensive regions and other national public agencies.

The role of research funding bodies

Bodies for funding research and innovation can have mandates that cover both global (sustainable development) goals, and the country's own interests.

¹⁴⁰Read more about Erasmus+ on the European Commission's website. <https://erasmus-plus.ec.europa.eu/sv>

Making responsible internationalisation a condition or otherwise promoting it through the research and innovation funding bodies is one way of putting the focus on these issues. A potential way forward here could be if the focus of the funding bodies would be on creating understanding of and explanations of the compromises that must be considered in the work with responsible internationalisation.¹⁴¹

The Swedish landscape for externally funded research is diversified¹⁴², as a result of the different tasks of the various funding bodies. Because of this, needs for responsible internationalisation also vary. No Swedish governmental funding body has its own guidelines for responsible internationalisation. Nor is there any joint position on responsible internationalisation between the funding bodies.

On the other hand, the Swedish Research Council currently has a mandate to “consider Sweden’s foreign policy, security policy, and defence policy interests in its operation”.¹⁴³ The Swedish National Space Agency has a mandate worded in the same way.¹⁴⁴

The research funding report also proposes that the new research funding agencies shall all have the corresponding mandates in their directives in relation to military research and dual use products.¹⁴⁵ The agencies involved in the assignment do, however, consider that this proposal is far too limited and closely set in view of what responsible internationalisation covers, and does not cover the palette of aspects that responsible internationalisation entails. The proposal focuses primarily on antagonistic threats at policy level, and not on the more concrete challenges that individual researchers are facing.

The report also proposes a national system of guidelines. The policy and the guidelines shall form the basis of the work that the research and innovation funding bodies need to carry out to promote responsible internationalisation and to develop their own guidelines that are suitable for the operation. In these, it is of the utmost importance that a balance is struck between exploring opportunities and positive effects, and to safeguard responsibility. Desired positive effects shall also be balanced against the increased resource and knowledge needs of both applicants and funding bodies.

The work on responsible internationalisation would be significantly strengthened by guidelines at the funding bodies too. As proposed, it

¹⁴¹ Tommy Shih (2024) The role of research funders in providing directions for managing responsible internationalization and research security. *Technological Forecasting and Social Change* Volume 201

¹⁴² The research funding inquiry reviews the landscape in its final report, *SOU 2023:59 Ny myndighetsstruktur för finansiering av forskning och innovation*.

¹⁴³ *Förordning (2009:975) med instruktion för Vetenskapsrådet*, Section 1 a.

¹⁴⁴ *Förordning (2007:1115) med instruktion för Rymdstyrelsen*, Section 1 a.

¹⁴⁵ See Section 6.3.3 in *SOU 2023:59 Ny myndighetsstruktur för finansiering av forskning och innovation*, and the proposals for directives for the proposed agencies.

should be up to the funding bodies to establish the formats for how responsible internationalisation shall be implemented in their respective operations, in the same way as for HEIs. Consideration must of course be paid to the differing mandates, where funding of researcher-initiated basic research differs from needs-focused research. The agencies involved have been in contact with the funding bodies of other countries and otherwise obtained some background documentation on how funding bodies regard responsible internationalisation.¹⁴⁶

The funding bodies should propose, jointly or separately, their own guidelines, based on the system of guidelines proposed in this report. Such work has already been initiated within the informal interaction that is already established between the main governmental funding bodies.¹⁴⁷ The greatest possible unity between the funding bodies would be very valuable.

In the drawing up of any joint guidelines, private research funding bodies should also be included in the work.

Funding bodies' own international collaborations

Responsible internationalisation also includes the funding bodies' own international collaborations, for example in bilateral or multilateral calls and for research infrastructures. The calls that are chosen and the terms and conditions that shall apply for them may be affected by responsible internationalisation.

However, international collaboration does not only cover funding, but can also entail developing strategic research and innovation agendas, science communication, policy influencing, and so on.

Responsible internationalisation within the framework of calls

Already in current calls there are terms and conditions that are within the framework for responsible internationalisation.

For example, several research funding bodies require that those who are awarded funding from them draw up a data management plan. The plan shall describe how data collected shall be managed during and after the research process, and how they will ensure that data are managed according to the legal rules that apply. The data management plan does not have to be submitted; instead, the HEI shall confirm, according to the general grant terms and conditions, that a data management plan will be in place when the project starts, and that the plan will be maintained. The template for data management plans has been

¹⁴⁶ The concepts used vary between countries, however, as 'responsible internationalisation' is primarily a Swedish concept.

¹⁴⁷ Via the "small consultation group" with the director generals of the Swedish Energy Agency, Formas, Forte, the Swedish National Space Agency, the Swedish Research Council, and Vinnova.

produced in collaboration with the Association of Swedish Higher Education Institutions (SUHF).¹⁴⁸ SUHF has also adopted a recommendation for information management.¹⁴⁹ Sunet (the Swedish University Computer Network) at the Swedish Research Council also provides a service where researchers can create and maintain data management plans.¹⁵⁰

Funding bodies' opportunities to direct

The opportunities of funding bodies to direct the work on responsible internationalisation by applicants is considerable. A number of different ways in which funding bodies can work on responsible internationalisation have been identified. It can be established that there is great variance in how this work is done.

Funding bodies should continue to map international experiences as background material for developing their own guidelines. The following five models constitute an initial mapping, but is not an exhaustive list. Mixed models may also exist.

Draw up terms and conditions for applicants

The terms and conditions for applicants can clarify what the allocation of responsibility is between funding bodies and the applicant/HEI in relation to responsible internationalisation, that is, who is responsible for risk assessment, implementation, and follow-up. The terms and conditions can include options to end the funding. The terms and conditions of the US research funding body the National Science Foundation (NSF), for example, states which tasks an applicant can contract out to others (subcontractors or other research conductors).¹⁵¹

Require applicants to confirm that an assessment of responsible internationalisation has been carried out

In its simplest form, this could be done via a check box, where applicants do not otherwise describe how this is done. If so, no assessment of the information will be carried out during the review process. The Swedish Foundation for International Cooperation in Research and Higher Education (STINT) requires its applicants to confirm this. The UK funding body UK Research and Innovation (UKRI) is also considering a system where UKRI 'certifies' HEIs and thereby accepts the assessment

¹⁴⁸ Vetenskapsrådets generella villkor för beviljade medel till forskning och forskningsstödjande verksamhet, fastställda den 19 december 2022. <https://www.vr.se/soka-finansiering/krav-och-villkor/vara-bidragsvillkor.html>

¹⁴⁹ SUHF. Reviderad rekommendation för datahanteringsplan, REK 2018:1 REV, 2019, Dnr. 0005-17.

¹⁵⁰ More information on Sunet's website. Datahanteringsplan.

<https://www.sunet.se/services/molnbaserade-tjanster/sunet-datahanteringsplan>

¹⁵¹ Verbal information from NSF.

that they make, without the funding body itself making any assessment.¹⁵²

Require applicants to describe their collaborations and other undertakings

Applicants are asked to describe any previous collaborations that relate to the research for which they have applied for funding, and/or any planned international collaboration¹⁵³. Potential conflicts of interest must also be described, such as grants from other countries, visiting professorships at other countries' HEIs, and so on. The US research funding body the National Science Foundation (NSF), for example, requires its applicants to describe their international collaborations during a number of months prior to the application. The NSF also requires applicants to describe all their other undertakings, such as grants from other countries and talent programmes.¹⁵⁴

Require applicants to describe their identified risks

A funding body can choose to require applicants to also describe what conclusions they have drawn of their analysis, and what risks they foresee for responsible internationalisation in the activities for which they are applying for funding. A research funding body can direct how such a description shall be designed, or leave it open. The Flemish research council Fonds Wetenschappelijk Onderzoek (FWO)¹⁵⁵ introduces a simple traffic light model for assessing risk.

Assess the risk in relation to responsible internationalisation

If a funding body has asked for background documentation from an applicant, the funding body can also choose to use this documentation in the review of the application, and it then becomes part of the assessment model. This, however, requires changes to how applications are reviewed, as the skills to make such an assessment are currently not found either among the funding body personnel who process the applications, or in the review panels. Funding bodies that carry out such reviews at present are, for example, the NSF (USA) and the UKRI (United Kingdom). For example, the UKRI is developing a system for internal risk assessment (risk management protocol) of all applications, based on a ten-degree scale. The evaluation shall in the first instance be done ahead of the work in the review panels, but in some cases also after a grant decision has been made, but before the grant is paid out.

¹⁵² Dialogue meeting with the UKRI.

¹⁵³ Planned international collaboration may include co-applicants, international postdocs (incoming/outgoing), visiting researchers, field studies, use of international research infrastructures, and so on.

¹⁵⁴ Verbal information from the NSF.

¹⁵⁵ Dialogue meeting with the FWO.

Guidelines for others actors

The assignment does not exclude that other actors in the Swedish research, education, and innovation system may need their own guidelines. Such actors may, for example, be research and innovation-intensive regions and municipalities, or public agencies other than the research funding bodies who fund education, research, or innovation.

The design of such guidelines must, however, greatly consider the activities in question. For this reason, no general guidelines can be given, and the agencies involved in the assignment do not intend to propose such guidelines either.

The world around us – what is done in other countries and the EU

In the work with drawing up guidelines for responsible internationalisation, the agencies involved in the assignment had read guidelines and other policy documents for internationalisation produced by other countries, within the EU, but also in other international collaborations. Here follows a review of their main contents. Summaries of each country's guidelines, including references to sources, are shown in Appendix 2.

Responsible internationalisation in other countries

As previously mentioned, the concept of 'responsible internationalisation' is used primarily in Sweden. Norway uses *ansvarlig internasjonalt samarbeid* ('responsible international collaboration'), Denmark *ansvarlig internationalisering* ('responsible internationalisation'), and the guidelines for Australia and New Zealand instead use the concepts 'foreign interference' and 'trusted research' respectively. The latter is also used in the United Kingdom, interchangeably with 'research security', while the Netherlands use the concept 'knowledge security'.

In Australia and New Zealand, the guidelines are linked to overarching national strategies in the areas of science, research, and innovation, and to a striving to enable the countries to increase the proportion of international educational and research collaborations, which declined drastically in scope in conjunction with COVID-19. The Norwegian guidelines for responsible internationalisation were produced in conjunction with a review of Norway's overarching strategy for increased collaboration in research, higher education, and innovation with countries outside the EU and the EEA.

Responsibility for producing the guidelines has rested on differing actors in higher education in the different countries. In 2020, the United Kingdom's equivalent of the Association of Swedish Higher Education Institutions (SUHF), Universities UK, produced guidelines at the request of the UK Government. In subsequent years, other actors linked to research and higher education have also produced guidelines. This has resulted in an entire flora of guidelines to comply with. In Germany, the country's equivalent of SUHF, Hochschulrektorskonferenz (HRK),

produced a set of guidelines and standards for international educational and research collaborations; in Norway, the Research Council of Norway and the Norwegian Directorate for Higher Education and Skills (HK-dir) were tasked in 2022 to produce national guidelines for responsible internationalisation; and in Switzerland, Swiss Universities produced guidelines for responsible internationalisation in 2022.

The guidelines are in several cases general, and highlight several aspects of responsible internationalisation. The Australian and New Zealand guidelines are more narrowly focused on 'foreign interference' and 'trusted research' respectively. Germany also has a set of general guidelines, but also specific guidelines for educational and research collaborations with China. The need for more detailed guidelines for China in particular is not just based on the large volume of collaborations between the countries, but also from an increasingly problematic situation on the part of the Chinese, with influencing operations and limitations of academic freedom, for example.

The position taken on academic freedom in particular is common for nearly all the countries' guidelines, and academic freedom and institutional autonomy are seen as crucial preconditions for successful internationalisation that is sustainable in the long term, and as fundamental values that are non-negotiable. The international dimensions of education and research are seen as crucial preconditions and impulses for innovation in studies, education, and research and, in the longer term, for skills supply and economic growth. The need for guidelines to enable collaborations that are sustainable in the long term has therefore been seen as a necessity, in particular in relation to collaborations with countries with limited freedoms and rights, academic as well as political and social ones.

All guidelines have examples of risks associated with international educational and research collaborations, both from national and international perspectives, but they also emphasise that the guidelines are not intended to be used in such a way that they restrict academic collaborations with other countries. Internationalisation is fundamentally positive, necessary, and developing. Universities of the future, according to the German guidelines, are transnational in character and sustainable in the long term only if they are part of a global academic community.

Although responsibility for producing the guidelines of the various countries has rested on differing organisations, it has been done in dialogue with HEIs, research funding bodies, and other actors in higher education. They are also relevant for HEIs, funding bodies and others, and it is in several cases emphasised that the guidelines should be followed up and evaluated continuously.

Responsible internationalisation within the EU

Within the EU, work is ongoing on several tracks that are relevant for responsible internationalisation. Firstly, it can be noted that the concept of 'responsible internationalisation' has not become a generally used concept within the EU as yet. To begin with, the EU's policies and legislation relating to responsible internationalisation are described, and thereafter the concrete activities conducted within the EU.

During the Swedish presidency, the ministers for education in the Council had the opportunity in May 2023 to conduct a debate under the heading of responsible internationalisation. No formal conclusions were drawn from this discussion, however.

The framework programme and other programmes

The terms and conditions for taking part in the EU's framework programme for research and innovation, Horizon Europe, includes several sections that are relevant for responsible internationalisation.

Participation in Horizon Europe is, firstly, entirely open to European researchers. But participation in the framework programme is also, in principle, open to researchers from any country at all, provided they can fund their own participation. The focus for research collaboration in the EU can be described with the words "as open as possible, as closed as necessary". This characterises the global strategy for collaboration in research and innovation that the European Commission produced in 2021, and that was adopted as a recommendation by the Council in 2022.¹⁵⁶

Researchers from a limited number of associated countries can participate on the same terms and conditions as European researchers. But there is, for the first time in a framework programme, options to limit the participation and research results from certain countries and actors through conditions in the regulation for the framework programme.¹⁵⁷ Up until January 2024, 31 such exceptions had been made.¹⁵⁸ The limitations do not just apply to the framework programme, but may also be conditions in calls in other EU programmes, such as DigitalEurope and the European Defence Fund.

¹⁵⁶ See the Communication from the Commission on the Global Approach to Research and Innovation 8929/1/21 REV 1 and the Council conclusions (adopted on 28 September 2021) Global approach to Research and Innovation - Europe's strategy for international cooperation in a changing world 12301/21.

¹⁵⁷ Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013. In particular Articles 22.5, 22.6, and 40.

¹⁵⁸ EU. Communication From the Commission to the European Parliament and the Council, Advancing European Economic Security: An Introduction to Five New Initiatives, p 7.

The EU regulation on establishing Horizon Europe regulates that “[a]ctions carried out under the Programme shall comply with the applicable security rules”, which may include protective security protection agreements.¹⁵⁹

A call under the framework programme may have a requirement that a European applicant shall be independent of any non-European party, such as a foreign-owned subsidiary. The applicant may then have to provide information for a separate ownership and control assessment.¹⁶⁰

Applicants shall also, when applicable, describe any threats and measures.¹⁶¹ This relates primarily to information covered by secrecy, and participation from countries outside the EU. Applicants shall also account for the ethics deliberations made, or that need making, within the framework of the planned activities. During the review of the application, an initial assessment is made of the need for more in-depth assessment, whereafter an ethics assessment of the application is made by ethics experts.¹⁶²

Thereafter, they are scrutinised for security ahead of the scientific assessment by review panels. The design of such security scrutinies varies, and is adapted as needed. The scrutiny is carried out by a designated Security Scrutiny Group, consisting of national security protection experts. They establish the protection need and the continued processing of the application is adapted accordingly. Applicants may need to submit supplementary information.

Besides the European Defence Fund (see the following section), it is primarily the security research parts of the framework programme (within the Civil Security for Society cluster) that are relevant for secrecy and export controls, but it cannot be excluded also for other parts of the framework programme.

The European Defence Fund and other programmes

In addition to the framework programme, there are other programmes within the EU that fund research and that need specific regulations.

¹⁵⁹ Article 20 of the Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013.

¹⁶⁰ See the European Commission’s website. Ownership and Control assessment Funding Tenders Opportunities <https://webgate.ec.europa.eu/funding-tenders-opportunities/display/IT/Ownership+and+Control+assessment#OwnershipandControlassessment-OwnershipandControlAssessment>

¹⁶¹ Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe, Article 20.

¹⁶² See the Horizon Europe (Horizon) Programme HE Programme Guide.

The European Defence Fund is formally a part of Horizon Europe, but is in practice self-governing, with partly separate rules and assessment criteria. Security protection issues are very relevant here.

Other research programmes that may need to recognise responsible internationalisation are DigitalEurope, and the Asylum, Migration and Integration Fund.

Research is part of the EU's economic security strategy

In summer 2023, the European Commission presented a communication with a proposal for an economic security strategy to increase resilience and economic competitiveness.¹⁶³ The work on the economic security strategy has since continued.

The Commission establishes that there are risks everywhere, including in research. The strategy itself is based on three components:

- ✓ Promoting the EU's economic foundation, competitiveness, and growth
- ✓ Protection against economic security risks
- ✓ Partnership on economic security (with other countries)

When it comes to protection of economic security, it must be possible to exclude countries from research collaboration or from getting access to results from research to strengthen technology security, and to avoid technology leakage. Research security shall be strengthened in particular for those areas indicated, and in October 2023 the European Commission presented a recommendation with identified technology areas that entail some form of risk.¹⁶⁴ The recommendation includes a list of ten critical technology areas, of which four are identified as highly likely to be the most sensitive and with the most immediate risks to technology security and technology leakage: advanced semi-conductor technology, technology for artificial intelligence, quantum technology, and biotechnology.

As part of the work on implementing the security strategy, in January 2024, the European Commission presented a further developed proposal for protection of economic security in five sections.¹⁶⁵ Two of them relate to further development of already existing EU regulations: the export control directive and the directive on scrutiny of foreign direct investments. A new section also covers control of outgoing

¹⁶³ Joint Communication to the European Parliament, the European Council and the Council on "European Economic Security Strategy" JOIN(2023) 20 final. See also *Regeringskansliets Faktapromemoria 2022/23:FPM115 En europeisk strategi för ekonomisk säkerhet*.

¹⁶⁴ EU. Commission Recommendation of 03 October 2023 on critical technology areas for the EU's economic security for further risk assessment with Member States

¹⁶⁵ EU. Communication from the Commission to the European Parliament and the Council on advancing European economic security, COM(2024) 22 final.

investments to ensure that European companies do not build up dangerous abilities in other countries.

A fourth section consists of a proposal for a Council recommendation on knowledge security.¹⁶⁶ The Council recommendation was preceded by an open consultation that closed on 3 January 2024. The Government assignment produced background documentation as a response from the participating agencies, but each agency was responsible for its own response. These responses and those of other European stakeholders are available on the European Commission's website.¹⁶⁷ In February 2024, the Government published a fact memorandum with the Swedish positions on the proposed Council recommendation.¹⁶⁸

A fifth and final section consisted of a white paper on whether dual-use research shall be integrated fully in the framework programme for research.¹⁶⁹

Partnerships with other countries apply primarily to those that share the EU's basic views and values. Within the partnerships, a geopolitical toolbox can be developed, but it is still unclear whether this also includes research collaboration.

The EU's strategy for HEIs

On 18 January 2022, the Commission presented a communication on a European university strategy.¹⁷⁰ The communication focuses on higher education, but the strategy also affects part of the international work at the HEIs that are relevant for responsible internationalisation. It particularly emphasises the importance of mobility for researchers, employees, and students, and international collaboration in general. It also underlines the importance of working on implementing measures against foreign interference.

Against the background of the proposed strategy, the EU's ministers for research adopted Council conclusions in April the same year, on an EU strategy to strengthen HEIs for Europe's future.¹⁷¹ The need and value of international collaboration is underlined, in relation to both higher education and research.

¹⁶⁶ See Proposal for a Council recommendation on enhancing research security, 2024/0012, and *Regeringskansliet, Faktapromemoria 2023/24:FPM43, Rådsrekommendation om ökad forskningssäkerhet.*

¹⁶⁷ The European Commission's website. <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14056-Boosting-research-security-in-the-EU-guidance-en>

¹⁶⁸ *Faktapromemoria 2023/24:FPM43. Rådsrekommendation om ökad forskningssäkerhet.*

¹⁶⁹ EU. White Paper On options for enhancing support for research and development involving technologies with dual-use potential. COM(2024) 27 final

¹⁷⁰ EU. Communication From the Commission to the European Parliament, the Council, the European Economic And Social Committee and the Committee of the Regions on a European strategy for universities. COM(2024) 16 final

¹⁷¹ EU. Council conclusions on a European strategy empowering higher education institutions for the future of Europe dated 6 April 2022. 7936/22.

At the same time, the role of HEIs in democratic societies and as protection against disinformation is underlined, as well as the importance of understanding counterparts in third countries.

The Bologna Process and the European Council for Higher Education

The Bologna Process¹⁷² began with the Bologna Declaration, which was formulated following a meeting between ministers for education in Bologna in 1999. The Declaration aimed to create greater uniformity between Europe's education systems, and to facilitate mobility for students and employees.

An expressed goal of the Bologna Declaration was that Europe should form a united area for higher education no later than 2010. This was to be achieved by means such as further promoting mobility, making higher education more accessible and inclusive, and making higher education in Europe more competitive and attractive.

As part of the European Higher Education Area, the countries taking part undertook to introduce an educational system with three levels, to ensure the recognition of qualifications and periods of study carried out at universities in other countries, and to implement a quality assurance system to improve quality in learning and teaching.

The degree to which the member countries have implemented the goals of the Bologna Process varies. In some countries, development is instead going backwards, and in recent years ever greater emphasis has for this reason been placed on issues relating to academic freedom and institutional autonomy. The Rome Ministerial Communiqué¹⁷³ from 2020 describes these, besides responsibility **for** higher education and the responsibility **of** higher education, as fundamental values.

The Bologna Process and the European Higher Education Area are crucial preconditions, both for mobility and academic recognition and for successful international education collaboration. The process provides opportunities for dialogue with countries outside the area in relation to areas such as reform of the higher education sector, responsibility, academic freedom, and the independence of HEIs.

Toolbox for managing foreign interference

The Commission has for some time worked on issues relating to foreign interference. In 2022, the Commission presented a working document with a tool for managing foreign interference.¹⁷⁴

¹⁷² EU. The Bologna Process and the European Council for Higher Education

¹⁷³ European Higher Education Area. Rome Ministerial Communiqué, 2020

¹⁷⁴ European Commission, Directorate-General for Research and Innovation, *Tackling R&I foreign interference – Staff working document*, Publications Office of the European Union, 2022, <https://data.europa.eu/doi/10.2777/513746>

Unauthorised foreign interference then became one of the concrete activities within Action 6 of the political agenda for 2022–2024 of the European Research Area (ERA) (see later sections). Here, mutual learning has been ongoing until recently within the framework of the EU instrument Mutual Learning Exercise (MLE), where member states can learn from each other on a voluntary basis. Sweden took part in this MLE, both with a national representative (via SUHF/HEI) and via STINT, which supported the Commission directly in the work.

The Commission has also produced an archive for resources relating to foreign interference that may become a unified information portal (known as ‘one-stop-shop’), which is expected to be launched during 2024. It will also be able to include an AI version.

Responsible internationalisation within the European Research Area

In the implementation of the pact for the European Research Area (ERA) for the period 2022–2024, there is one section that links directly to responsible internationalisation. This is within the action for academic freedom (Action 6), where work on mutual learning about unauthorised foreign interference is in progress. Within the action relating to international collaboration (Action 9), there are also parts that relate to responsible internationalisation.

The political agenda for 2025–2027 also proposes an action on knowledge security, on the initiative of the Netherlands, while an action for international collaboration is proposed to continue.

The EU has agreements with individual countries

For certain countries and regions, there is a special focus on collaboration. It has separate Science and Technology Agreements with certain countries, but also regional dialogues to strengthen the partnerships in research and innovation.

For the countries associated with the framework programme, particularly advantageous collaboration terms and conditions apply; for example, it is possible to get funding on the same terms as for EU countries. The associated countries and self-determining areas are currently (January 2024) Albania, Armenia, Bosnia & Hercegovina, Faroes, Georgia, Iceland, Israel, Kosovo, Moldova, Montenegro, New Zealand, North Macedonia, Norway, Serbia, Tunisia, Turkey, Ukraine and United Kingdom.

Within the framework of the European Research Area, a pilot for collaboration with China and Africa (Action 9) is being run during 2022–2024.

Collaboration with China has for a long time been a particular focus for the EU. In recent years, it has become more problematical, and as from

the top meeting in 2020, China was designated as a partner, competitor, and systemic rival (approximately a challenger to geopolitical stability). Research and innovation are among the central features of the collaboration between the EU and China. An agreement on research and technology has been in existence since 1998. Chinese researchers have been able to take part in the EU's framework programme, but has not been an associated country in Horizon 2020, nor is it one in Horizon Europe. In 2020, an informal network for research collaboration with China (EU R&I Knowledge Network on China, EU-KNOC) and a forum, China Core Group (CCG) for this was started within the EU (within the framework of SFIC within ERA), where China coordinators from the Swedish Research Council and Vinnova are participating. Within EU-KNOC, a survey was sent out to European HEIs in 2023 about their experiences of collaboration with China.

Collaboration with Latin America/Caribbean will be a particular focus during the Spanish presidency of the EU in spring 2024.

Research and innovation are also important parts of the EU's neighbourhood policy.¹⁷⁵

Responsible internationalisation within the G7, the OECD, and the Council of Europe

Responsible internationalisation is an issue for collaboration within the G7 group of countries, the OECD, and the Council of Europe.

G7

A collaboration on research (Research Compact) was established within the G7 in 2021.¹⁷⁶ Within the framework for the collaboration, there is a work team for research security and research integrity (Security and Integrity of the Global Research Ecosystem, SIGRE). The work team has produced common values and principles for research security and research integrity¹⁷⁷ and 'best practices' for research security and open science.¹⁷⁸

Organisation for Economic Cooperation and Development (OECD)

In 2022, the OECD published a report on research integrity and research security in the global research ecosystem.¹⁷⁹

¹⁷⁵ See the EU's neighbourhood policy. https://commission.europa.eu/strategy-and-policy/policies/european-neighbourhood-policy_sv

¹⁷⁶ G7. Research Compact. <https://www.gov.uk/government/publications/g7-2021-research-compact/g7-2021-research-compact>

¹⁷⁷ G7. Common Values and Principles on Research Security and Research Integrity

¹⁷⁸ G7. Best practices for secure & open research

¹⁷⁹ OECD. Integrity and security in the global research ecosystem

The report describes initiatives and strategies for protecting national and economic security, at the same time as guaranteeing academic freedom, research, and openness. It establishes that responsibility for these rest on several actors, such as governments, research funding bodies, universities, research institutes, and inter-state organisations. For this reason, the report includes proposed measures that should be taken to prevent foreign interference, manage risks, and safeguard trust in research and science in the future. The report also makes recommendations for how countries can build up capacity to strengthen research security within the framework for wider consideration of research ethics.

Council of Europe

The Council of Europe's ETINED platform (Ethics, Transparency and Integrity in Education)¹⁸⁰ was launched in 2015 and aims to share information and good examples of ethics deliberations, transparency, and integrity in education. It particularly highlights the importance of counteracting corruption, but also deals with issues relating to integrity, plagiarism, and other forms of cheating, and to increasing awareness of the importance of ethics principles for creating a democratic and inclusive culture in education. The starting point for the platform and the Council's activities is that lack of ethics, corruption and cheating in education are a threat against both trustworthiness and quality, and in the longer term also against trust in education. In 2022, the Council published recommendations¹⁸¹ for the strategic work of the member countries in this area, and the platform provides support that the member countries can access.

¹⁸⁰ The Council of Europe's website on ETINED Council of Europe Platform on Ethics, Transparency and Integrity in Education. <https://www.coe.int/en/web/ethics-transparency-integrity-in-education>

¹⁸¹ Council of Europe. Countering education fraud. Recommendation CM/Rec(2022)18 and explanatory memorandum

Plan for forms of support for responsible internationalisation

The assignment to the agencies states that the interim report shall also include a plan for the work on proposing further forms of support for responsible internationalisation. The proposal itself shall be described in a final report on 15 December 2024.

A need for support structures has been identified

The agencies involved in the assignment have identified a need for support structures at national and HEI levels. The need of support to implement the guidelines has been raised in the dialogue meetings the agencies involved in the assignment have held with other agencies and with HEIs.

It relates to requests for better contact routes between the security agencies and HEIs, different forms of knowledge and experience exchanges, and support during difficult goal conflicts. Guidelines are not sufficient for providing support when difficult balances have to be struck, or when there are conflicting goals.

The agencies involved in the assignment also see a risk in that the great number of aspects raised in the guidelines can act more as a deterrent than as a support. The agencies therefore believe that a support structure is very important for implementing the guidelines, and to support HEIs in their work on responsible internationalisation.

A support structure will also play a role in creating a unified picture of problems and goals. When it comes to responsible internationalisation, many interests need to be considered. Public agencies, with differing areas of responsibility and perspectives, and HEIs must be able to collaborate. To all pull in the same direction in this type of collaboration, it is necessary that all those involved actively strive to understand perspectives other than their own. Pulling in the same direction is a joint responsibility for all those involved.

A support structure will also become an important precondition for further developing and updating the guidelines.

Use the work in progress as the starting point

In the work on producing proposals for forms of support for responsible internationalisation, the agencies will use what has been raised in the dialogue meetings, the work in progress within the EU, and the proposals made in the memorandum *Ökad kompetens i säkerhetsfrågor vid universitet och högskolor* (“Increased competence in security issues at higher education institutions”) ¹⁸² as starting points.

As mentioned previously in the report, work is in progress within the EU on responsible internationalisation. The agencies will need to take this into account in their continued work. For example, the European Commission has made a proposal for a Council recommendation on improved research security, where one of the proposals is that the member states establish support functions to support researchers.¹⁸³ The Government recently published a fact memorandum on the issue, where the preliminary position expresses that Sweden and the EU in the first instance should strive to establish uniform recommendations and relevant guidelines and support structures at the right level. The Government also writes that the definition of research security clearly should include responsible internationalisation, with focus on risk assessment, ethics, and academic freedom.¹⁸⁴

The memorandum *Ökad kompetens i säkerhetsfrågor vid universitet och högskolor* proposes that “the Government should order an investigation into how a support function for security issues can be established for higher education institutions. The purpose of such a support function should be to assist higher education institutions, but also individual researchers, with support on issues relating to security aspects of international collaborations.”¹⁸⁵ It also proposes that “the Government should task the Swedish Defence University, in collaboration with relevant agencies, to develop and implement competence-enhancing initiatives for higher education institutions for security issues.”¹⁸⁶

In the report *Informationssäkerhet vid universitet och högskolor – hanteringen av skyddsvärda forskningsdata* (“Information security at higher education institutions – management of protected research data”) the Swedish National Audit Office recommends that the Government “task higher education institutions to interact to establish a joint support function for information security”.¹⁸⁷

¹⁸² U2024/00153 *Ökad kompetens i säkerhetsfrågor vid universitet och högskolor*.

¹⁸³ EU. Proposal for a Council recommendation on enhancing research security, 2024/0012 (NLE).

¹⁸⁴ *Faktapromemoria 2023/24:FPM43, Rådsrekommendation om ökad forskningssäkerhet*.

¹⁸⁵ U2024/00153 *Ökad kompetens i säkerhetsfrågor vid universitet och högskolor*, p 46.

¹⁸⁶ U2024/00153 *Ökad kompetens i säkerhetsfrågor vid universitet och högskolor*, p 43.

¹⁸⁷ *Riksrevisionen. Informationssäkerhet vid universitet och högskolor – hanteringen av skyddsvärda forskningsdata, RiR 2023:20*, p 76.

In the introductory work, the agencies involved in the assignment have learnt about the types of support functions other countries have established. This work will be continued. Some of the interesting support functions that can contribute inspiration are those of Netherlands, United Kingdom, and Germany. These, and others, will be studied further.

The issue of a support function also received great attention when the agencies discussed the assignment with the HEIs during SUHF's dialogue seminar in January 2024.

Vinnova is working on an ongoing national project named DUVA, aimed at creating support for innovation companies and start-ups on issues relating to dual use. The Committee for Technological Innovation and Ethics (KOMET), which submitted its final report to the Government in January 2023, has developed an internet-based tool¹⁸⁸ for self-evaluation of responsible technology development. This aims to give robust support that helps people to help themselves. The agencies involved in the assignment will take KOMET's work and internet tool into account in their continued work.

Although much has been done, and a lot of work is in progress in many places, there is a general need for increased knowledge and experience exchange. Responsible internationalisation raises many difficult questions. More research is needed in this area. To deepen the understanding of responsible internationalisation in a Swedish context, the researchers Tommy Shih and Sylvia Schwaag Serger are conducting a research project on this subject, and the result is expected to be published during the second half of 2024. The agencies involved in the Government assignment have collaborated with them, and their result will contribute to the ongoing work on the assignment.

The way forward

In their continued work, the agencies involved in the assignment will investigate in greater detail what the needs for support are. Furthermore, it will define a possible format for the support function; what it is to include and what preconditions exist at public agencies and HEIs to contribute to a support function. A support function needs to involve different actors. It is important to interact on the issue, as no public agency or HEI can do it alone.

To be able to make a proposal for a support structure, the agencies will investigate the contents of the support function, competence and resource needs, what competences should be included in a support

¹⁸⁸ More information on KOMET's website: <https://www.kometinfo.se/vart-arbete/ansvarsfull-teknikutveckling/verktuget-ansvarsfullteknik-se/>

function, a possible host for the support function, the design of an assignment, legal and financial aspects, and so on. The work entails continued wide-ranging dialogues with HEIs and other agencies.

The agencies involved in the assignment will also review how the national guidelines can best be disseminated and made accessible.

References

ALLEA - All European Academies. The European Codex for research integrity.

https://www.vr.se/download/18.7f26360d16642e3af99e94/1540219023679/SW_ALLEA_Den_europeiska_kodexen_f%C3%B6r_forskningens_integritet_digital_FINAL.pdf

Council of Europe. Countering education fraud. Recommendation CM/Rec(2022)18 and explanatory memorandum <https://rm.coe.int/ok-prems-137222-gbr-2512-cmrec-2022-18-et-expose-motifs-a5-web-1-/1680a96147>

European Higher Education Area (EHEA). Rome Ministerial Communique 2020.

https://www.ehea.info/Upload/Rome_Ministerial_Communique.pdf

European University Association (EUA). University Autonomy in Europe IV.

<https://www.eua.eu/downloads/publications/eua%20autonomy%20scorecard.pdf>

European Union (EU)

- Commission Recommendation of 3 October 2023 on critical technology areas for the EU's economic security for further risk assessment with Member States. C(2023) 6689 final.
- Communication from the Commission on the Global Approach to Research and Innovation 8929/1/21 REV 1
- Communication from the Commission to the European Parliament and the Council on advancing European economic security: an introduction to five new initiatives COM(2024) 22 final.
- Communication From the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on a European strategy for universities. COM(2024) 16 final
- Council recommendation on enhancing research security, 2024/0012
- European Research Area (ERA). Bonn Declaration on Freedom of Scientific Research.
- Regulation (EU) 2019/452 of the European Parliament and of the Council of 19 March 2019 establishing a framework for the screening of foreign direct investments into the Union.
- Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the

Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013.

- Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021 setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items (recast).
- Joint Communication to the European Parliament, the Council of Europe, and the Council on “European Economic Security Strategy” JOIN(2023) 20 final
- Horizon Europe (Horizon) Programme HE Programme Guide.
- The Competitiveness Council. Swedish presidency 23 May 2023. Video recording:
<https://video.consilium.europa.eu/event/en/26846>
- [https://commission.europa.eu/system/files/2024-01/Communication on European economic security.pdf](https://commission.europa.eu/system/files/2024-01/Communication_on_European_economic_security.pdf)<https://eur-lex.europa.eu/legal-content/SV/TXT/PDF/?uri=CELEX:52023JC0020>https://research-and-innovation.ec.europa.eu/document/download/e82a2fd9-ac12-488a-a948-87639eef10d4_enProposal for a Council recommendation on enhancing research security, 2024/0012 (NLE).
- Council conclusions. Global approach to Research and Innovation - Europe's strategy for international cooperation in a changing world 12301/21.
- Council conclusions on a European strategy empowering higher education institutions for the future of Europe dated 6 April 2022. 7936/22.
- Tackling R&I foreign interference – Staff working document, Publications Office of the European Union, 2022.
- White Paper On options for enhancing support for research and development involving technologies with dual-use potential. COM(2024) 27 final

United Nations (UN) Report of the World Commission on Environment and Development: Our Common Future.

<https://sustainabledevelopment.un.org/content/documents/5987our-common-future.pdf>

Försvarsmakten, Militära underrättelsetjänsten (MUST)

- Årsöversikt 2022 MUST
<https://www.forsvarsmakten.se/siteassets/2-om-forsvarsmakten/dokument/musts-arsoversikter/must-arsoversikt-2022.pdf>
- Årsöversikt 2023 MUST
<https://www.forsvarsmakten.se/siteassets/2-om->

forsvarsmakten/dokument/musts-arsoversikter/must-arsoversikt-2023.pdf

Global Research Council. Statement of Principles and Practices for Research.

https://globalresearchcouncil.org/fileadmin/documents/GRC_Publications/SoP_Research_Ethics_May_2022.pdf

Myndigheten för samhällsskydd och beredskap (MSB)

- Cyberangrepp mot samhällsviktiga informationssystem: 25 rekommendationer för stärkt skydd mot cyberangrepp.
<https://www.msb.se/sv/publikationer/cyberangrepp-mot-samhallsviktiga-informationssystem--25-rekommendationer-for-starkt-skydd-mot-cyberangrepp/>
- Föreskrifter om informationssäkerhet för statliga myndigheter (MSBFS 2020:6)

Munich Security Conference. Munich Security Report 2024.

<https://securityconference.org/en/publications/munich-security-report-2024/>

OECD. Integrity and security in the global research ecosystem.

<https://www.oecd.org/publications/integrity-and-security-in-the-global-research-ecosystem-1c416f43-en.htm>

Regeringen/Regeringskansliet

- Förordning (1992:1303) om krigsmateriel (med bilaga)
- Förordning (2000:1217) om kontroll av produkter med dubbla användningsområden och av tekniskt bistånd
- Förordning (2007:1115) med instruktion för Rymdstyrelsen
- Förordning (2009:975) med instruktion till Vetenskapsrådet
- Försvarsberedningens säkerhetspolitiska rapport "Allvarstid" (Ds 2023:19)
- Globaliseringsrådets rapport "Sverige i världen" (Ds 2008:82)
- Promemoria: Ökad kompetens i säkerhetsfrågor vid universitet och högskolor U2024/00153
- Proposition (2008/09:50) Ett lyft för forskning och innovation
- Proposition (2020/21:30) Totalförsvaret 2021-2025
- Proposition (2020/21:60) Forskning, frihet, framtid – kunskap och innovation för Sverige
- Regeringsformen 2 kap 18§
- Regeringskansliet Faktapromemoria 2022/23:FPM115. En europeisk strategi för ekonomisk säkerhet
- Regeringskansliet Faktapromemoria. Halvledarakten 2021/22:FPM67
- Regeringskansliet Faktapromemoria 2023/24:FPM43 Rådsrekommendation om ökad forskningssäkerhet

- Regleringsbrev för budgetåret 2024 avseende universitet och högskolor U2023/03645 (delvis), U2023/03658
- Remiss av promemoria: Ökad kompetens i säkerhetsfrågor vid universitet och högskolor U2024/00153
- Säkerhetsskyddsförordningen (2021:955)
- Strategisk inriktning för försvarsinnovation
- Strategi för Sveriges utrikeshandel, investeringar och globala konkurrenskraft, (UD2023/01758)
- Utrikesdeklarationen 2024

Riksdagen

- Högskolelag (1992:1434)
- Lag (1992:1300) om krigsmateriel
- Lag (2000:1064) om kontroll av produkter med dubbla användningsområden och av tekniskt bistånd
- Lag (2019:504) om ansvar för god forskningssed och prövning av oredlighet i forskning
- Lag (2022:818) om den offentliga sektorns tillgängliggörande av data
- Lag (2023:560) om granskning av utländska direktinvesteringar
- Offentlighets- och sekretesslag (2009:400)
- Säkerhetsskyddslagen (2018:585)

Riksrevisionen. Informationssäkerhet vid universitet och högskolor – hanteringen av skyddsvärda forskningsdata, Riksrevisionen (RiR 2023:20)

<https://www.riksrevisionen.se/rapporter/granskningsrapporter/2023/informationssakerhet-vid-universitet-och-hogskolor---hanteringen-av-skyddsvarda-forskningsdata.html>

Statens offentliga utredningar (SOU)

- En strategisk agenda för internationalisering, SOU 2018:3
- God sed i forskningen, SOU 1999:4
- Nya regler om cybersäkerhet, SOU 2024:18
- Ny myndighetsstruktur för finansiering av forskning och innovation, SOU 2023:59
- Utrikesförvaltning i världsklass, SOU 2011:11
- Ökad attraktionskraft för kunskapsnationen Sverige, SOU 2018:78

Stiftelsen för internationalisering av högre utbildning och forskning (STINT)

- Recommendations to higher education institutions on how to work with responsible internationalisation, R22:05, 2022
<https://www.stint.se/wp->

[content/uploads/2022/09/STINT_Ansvarsfull-internationalisation_web.pdf](https://www.stint.se/wp-content/uploads/2022/09/STINT_Ansvarsfull-internationalisation_web.pdf)

- Responsible internationalisation: Guidelines for reflection on international academic collaboration, R20:01, 2020
https://www.stint.se/wp-content/uploads/2020/02/STINT_Responsible_Internationalisation.pdf
- Science Diplomacy in and for Sweden, R22:01
https://www.stint.se/wp-content/uploads/2022/02/STINT_Science_Diplomacy.pdf

Sveriges universitets- och högskoleförbund (SUHF)

- Ekberg, T. (2023) Akademisk frihet och institutionell autonomi
<https://suhf.se/app/uploads/2023/06/Akademisk-frihet-och-institutionell-autonomi-Tim-Ekberg-2023.pdf>
- Global Responsible Engagement: Checklist, RECOMMENDATION 2023:4 (REVISED)
<https://suhf.se/app/uploads/2023/04/SUHF-Checklist-Global-Responsible-Engagement-REC.-2023-4-230411-REVISED.pdf>
- Reviderad rekommendation för datahanteringsplan, REK 2018:1 REV, 2019, Dnr. 0005-17.
<https://suhf.se/app/uploads/2019/10/REK-2018-1-REVIDERAD-rekommendation-f%C3%B6r-datahanteringsplan.pdf>
- Vägledning för lärosätens arbete med att förebygga, hantera och följa upp misstankar om avvikelser från god forskningssed REK. 2020:3 REVIDERAD Dnr SU-850-0057-18
<https://suhf.se/app/uploads/2023/09/REK-2020-3-REV-Vagledning-for-larosatens-arbete-med-att-forebygga-hantera-och-folja-upp-misstankar-om-avvikelse-fran-god-forskningssed-REVIDERAD-2023.pdf>

Shih, T. (2024) Points of departure and developing good practices for responsible internationalization in a rapidly changing world. Accountability in Research: Policies and Quality Assurance. Advance online publication. <https://doi.org/10.1080/08989621.2024.2318789>

Shih, T. (2023) Responsible Internationalization - Why, What and How?

Shih, T. (2024) The role of research funders in providing directions for managing responsible internationalization and research security. Technological Forecasting and Social Change Volume 201
<https://www.sciencedirect.com/science/article/pii/S0040162524000490>

Shih, T. (2024) Utländsk påverkan i forskning – Behov och förutsättningar för riskhantering inom den svenska akademiska sektorn.

Shih, T. & Garvi, M. (2022). Recommendations for the promotion of responsible internationalisation at Swedish higher education institutions. Recommendations to higher education institutions on how to work with responsible internationalisation, R22:05.

Sveriges universitetslärarförbund (SULF). Ny SULF-skrift: Om akademisk frihet. <https://sulf.se/rapport/ny-sulf-skrift-om-akademisk-frihet/>

Säkerhetspolisen (SÄPO)

- Säkerhetspolisen 2022-2023
https://www.sakerhetspolisen.se/download/18.36cda2851868025da5b2b/1677241538918/SP_A%CC%8Arsbok_2022_Anpassad.pdf
- Säkerhetspolisen 2023-2024
<https://sakerhetspolisen.se/download/18.5cb30b118d1e95affe37/1708502268494/L%C3%A4gesbild%202023-2024.pdf>
- Säkerhetspolisens föreskrifter om säkerhetsskydd (PMFS 2022:1)

Universitets- och högskolerådet, Vetenskapsrådet och Vinnova. En plattform för internationalisering (2021)
<https://www.uhr.se/globalassets/uhr.se/publikationer/2021/uhr-en-plattform-for-internationalisering.pdf>

Swedish Research Council

- God forskningssed. Rapport 2017.
<https://www.vr.se/analys/rapporter/vara-rapporter/2017-08-29-god-forskningssed.html>
- Riktlinjer för jämställdhet i processen finansiera forskning
<https://www.vr.se/download/18.623169da1877956c4152427/1681464380924/Riktlinjer%20f%C3%B6r%20j%C3%A4mst%C3%A4lldhet%20i%20processen%20finansiera%20forskning.pdf>
- Svenskt publiceringssamarbete i ett globalt perspektiv, VR 2016
https://www.vr.se/download/18.2412c5311624176023d25bb4/1555337596325/Svenskt-publiceringssamarbete-i-ett-globalt-perspektiv_VR_2016pdf.pdf
- Vetenskapsrådet: Inga nya bidrag inom utvecklingsforskning,
<https://www.vr.se/aktuellt/nyheter/nyhetsarkiv/2023-06-27-inga-nya-bidrag-inom-utvecklingsforskning.html>
- Vetenskapsrådets generella villkor för beviljade medel till forskning och forskningsstödjande verksamhet, fastställda den 19 december 2022. . <https://www.vr.se/soka-finansiering/krav-och-villkor/vara-bidragsvillkor.html>

- Öppen tillgång till forskningsdata – en kartläggning, analys och bedömning 2023, Rapport VR2322, <https://www.vr.se/analys/rapporter/vara-rapporter/2023-06-30-oppen-tillgang-till-forskningsdata---en-kartlaggning-analys-och-bedomning-2023.html>

News articles and internet resources

Academic Collaboration Chile Sweden (ACCESS) website.

<https://accesschilesweden.org/>

Academic Freedom Index. <https://academic-freedom-index.net/>

Australian Strategic Policy Institute (ASPI)

- ASPI's Critical Technology Tracker - Sensors & Biotech updates <https://www.aspi.org.au/index.php/report/critical-technology-tracker>
- China Defence Universities Tracker. <https://unitracker.aspi.org.au/about/>

CBC. CSIS chief opens up about China's interest in Canadian universities <https://www.cbc.ca/news/politics/csis-director-five-eyes-research-1.6998874>

CIA's website. <https://www.cia.gov/the-world-factbook/>

Dagens Nyheter. Kinas hemliga avtal med studenter i Sverige – kräver lojalitet med regimen <https://www.dn.se/sverige/kinas-hemliga-avtal-med-studenter-i-sverige-kraver-lojalitet-med-regimen/>

ENIC-NARIC's website. <https://www.enic-naric.net/page-about-ENIC-NARIC-Networks>

EOSOC's website. <https://eosc-portal.eu/>

Council of Europe's website on ETINED. Council of Europe Platform on Ethics, Transparency and Integrity in Education.

<https://www.coe.int/en/web/ethics-transparency-integrity-in-education>

European Union's (EU) website.

- The Bologna Process and the European Council for Higher Education <https://education.ec.europa.eu/sv/education-levels/higher-education/inclusive-and-connected-higher-education/bologna-process>
- Boosting Research Security in the EU (guidance). <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14056-Boosting-research-security-in-the-EU-guidance-en>

- Erasmus+. <https://erasmus-plus.ec.europa.eu/sv> European Universities. <https://education.ec.europa.eu/education-levels/higher-education/european-universities-initiative>
- EU's neighbourhood policy. https://commission.europa.eu/strategy-and-policy/policies/european-neighbourhood-policy_sv
- International cooperation. https://research-and-innovation.ec.europa.eu/strategy/strategy-2020-2024/europe-world/international-cooperation_en
- Gender equality strategy for 2020–2025. https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/gender-equality/gender-equality-strategy_sv
- Ownership and Control assessment Funding Tenders Opportunities <https://webgate.ec.europa.eu/funding-tenders-opportunities/display/IT/Ownership+and+Control+assessment#OwnershipandControlassessment-OwnershipandControlAssessment>

United Nations' (UN) website. THE 17 GOALS. <https://sdgs.un.org/goals>

Globala målen. <https://www.globalamalen.se/om-globala-malen/>

Government of Canada's website. Sensitive Technology Research Areas <https://science.gc.ca/site/science/en/safeguarding-your-research/guidelines-and-tools-implement-research-security/sensitive-technology-research-areas>

National Inspectorate of Strategic Products' (ISP) website.

- Produkter med dubbla användningsområden. <https://isp.se/pda/>
- Utländska direktinvesteringar. <https://isp.se/utlandskadirektinvesteringar/>

Committee for Technological Innovation and Ethics' (KOMET) website. <https://www.kometinfo.se/vart-arbete/ansvarsfullteknikutveckling/verktyget-ansvarsfullteknik-se/>

MIRAI's website. <https://www.mirai.nu/> Swedish Civil Contingencies Agency's (MSB) website.

- Arbeta systematiskt med informations säkerhet och cybersäkerhet
- www.msb.se

National Protective Security Authority's (NPSA) website. Trusted Research Countries and Conferences <https://www.npsa.gov.uk/trusted-research-countries-and-conferences>

Observatory Magna Charta Universitatum, Magna Charta Universitatum 2020. <https://www.magna-charta.org/magna-charta-universitatum/mcu2020>

Swedish Patent and Registration Office's website, <https://www.prv.se/sv/>

Platform for internationalisation's (PLINT) website. <https://www.uhr.se/internationella-mojligheter/Plattform-for-internationalisering/>

Swedish Government's website.

- Regeringens innovations- och forskningsråd i utlandet <https://www.regeringen.se/regeringens-politik/innovation/regeringens-innovations--och-forskningsrad-i-utlandet/>
- Sanktioner. <https://regeringen.se/regeringens-politik/utrikes--och-sakerhetspolitik/sanktioner/>
- Rapporter om mänskliga rättigheter, demokrati och rättsstatens principer i världen. <https://www.regeringen.se/regeringens-politik/demokrati-och-manskliga-rattigheter/rapporter-om-manskliga-rattigheter-i-varlden/>

Royal Society's website. Research culture. <https://royalsociety.org/topics-policy/projects/research-culture/>

SFS, SUHF and SULF: Gemensamt uttalande för grundlagsskydd av högre utbildning och lärosätenas autonomi. <https://sulf.se/nyhet/sulf-sfs-och-suhf-gemensamt-uttalande-for-grundlagsskydd-av-hogre-utbildning-och-larosatenas-autonomi/>

Shanghai ranking. <https://www.shanghairanking.com/>

SIREUS' website. www.sireus.org

Stockholm University's website Säkerhetsskyddsanalys 2021. <https://www.su.se/medarbetare/organisation-styrning/styrdokument-regelboken/s%C3%A4kerhet-och-f%C3%B6rtroendeskadligt-agerande/s%C3%A4kerhetsskyddsanalys-2021-1.608128>

SUNET's website. Datahanteringsplan. <https://www.sunet.se/services/molnbaserade-tjanster/sunet-datahanteringsplan>

Association of Swedish Higher Education Institution's' (SUHF) website. www.suhf.se

Association of Swedish Higher Education Institutions (SUHF). Expert committee on ethics issues' website. <https://suhf.se/arbetsgrupper/expertgruppen-for-etikfragor/>

SVT Nyheter. Misstänkt rysk spion beskrivs som nyfiken.
<https://www.svt.se/nyheter/utrikes/misstankt-rysk-spion-beskrivs-som-nyfiken>

National Board of Health and Welfare's website. Riktlinjer.
<https://roi.socialstyrelsen.se/riktlinjer>

The Guild. The risks of international collaboration must be balanced with the risks of non-collaboration. www.the-guild.eu/publications/statements/the-risks-of-international-collaboration-must-be-balanced-with-the-risks-of-non-collaboration.html

South Africa-Sweden University Forum's (SASUF) website.
<https://www.sasuf.org/>

University of Manchester's website:
<https://www.manchester.ac.uk/discover/news/cyber-incident-statement/>

Times Higher Education. World University Rankings.
<https://www.timeshighereducation.com/world-university-rankings>

Transparency International's website.
<https://www.transparency.org/en/>

UNESCO's website.

- Global Democracy Index. <https://www.unesco.org/en/world-media-trends/global-democracy-index>
- UNESCO Recommendation on Open Science.
<https://www.unesco.org/en/open-science/about>

The Swedish Council for Higher Education's (UHR) website.
Europauniversiteten.
<https://www.utbyten.se/program/europauniversiteten/>

Uppsala University's website.

- Uppsala universitet. CODEX regler och riktlinjer för forskning
<https://www.codex.uu.se/>
- International Science Programme. <https://www.isp.uu.se/>

U.S. Department of Commerce. Consolidated Screening List.
<https://www.trade.gov/consolidated-screening-list>

Swedish Institute of International Affairs' website.
<https://www.ui.se/landguiden/>

World Bank's website. Worldwide governance indicators.
<https://www.worldbank.org/en/publication/worldwide-governance-indicators>

V-Dem's website: <https://www.v-dem.net/>

Wikipedia's website. Policy. <https://sv.wikipedia.org/wiki/Policy>

Wikipedia's website. Seven sons.

https://en.wikipedia.org/wiki/Seven_Sons_of_National_Defence

Wiktionary's website. Riktlinje.

<https://sv.wiktionary.org/w/index.php?title=riktlinje&oldid=3815108>

[World Higher Education Database website.](#)

<https://www.whed.net/home.php>

Guidelines in other countries

Association of Research Managers and Administrators (ARMA) Complex Collaborations Efficiency, Equity, Quality and Security in International Research. https://arma.ac.uk/wp-content/uploads/2023/03/Trusted-Report_Booklet_v7.pdf

Australian Government, Department of Education

- Australian Strategy for International Education 2021-2030
<https://www.education.gov.au/australian-strategy-international-education-2021-2030/resources/australian-strategy-international-education-2021-2030>
- Guidelines to Counter Foreign Interference in the Australian University Sector. <https://www.education.gov.au/guidelines-counter-foreign-interference-australian-university-sector/resources/guidelines-counter-foreign-interference-australian-university-sector>

Direktoratet for høyere utdanning og kompetanse (HK-dir).

Retningslinjer og verktøy for ansvarlig internasjonalt kunnskapssamarbeid. <https://hkdir.no/retningslinjer-og-verktoy-for-ansvarlig-internasjonalt-kunnskapssamarbeid>

European Union (EU). Tackling R&I foreign interference. Staff Working Document. Directorate-General for Research and Innovation, Publications Office of the European Union, 2022, <https://data.europa.eu/doi/10.2777/513746>

G7

- G7 Best practices for secure & open research. <https://ised-isde.canada.ca/site/science/sites/default/files/documents/1136-g7-best-practices-for-secure-and-open-research-february-2024.pdf>
- G7 Common Values and Principles on Research Security and Research Integrity.

https://www.bmbf.de/SharedDocs/Downloads/de/2022/220812-g7-sigre-paper.pdf?__blob=publicationFile&v=2

- G7 2021 Research Compact.
<https://www.gov.uk/government/publications/g7-2021-research-compact/g7-2021-research-compact>

Government of Canada.

- Named Research Organizations.
<https://science.gc.ca/site/science/en/safeguarding-your-research/guidelines-and-tools-implement-research-security/named-research-organizations>
- Sensitive Technology Research Areas
<https://science.gc.ca/site/science/en/safeguarding-your-research/guidelines-and-tools-implement-research-security/sensitive-technology-research-areas>

Government of Netherlands.

- National knowledge security guidelines
<https://open.overheid.nl/documenten/ronl-5379d1b4f8b9784bf518251032507a965be9c92d/pdf>
Knowledge security in higher education and research
<https://www.nwo.nl/en/knowledge-security>

Hochschulrektorskonferenz (HRK)

- Resolution of the Executive Board on 6 April 2020 Guidelines and standards in international university cooperation.
https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-07-Internationales/02-07-01-Internationale-Strategie/HRK_Resolution_Guidelines_and_standards_in_international_university_cooperation.pdf
- Resolution of the Executive Board on 9 April 2020. Guiding questions on university cooperation with the People's Republic of China. <https://www.hrk.de/resolutions-publications/resolutions/beschluss/detail/guiding-questions-on-university-cooperation-with-the-peoples-republic-of-china/>

National Protective Security Authority (NPSA), UK Research and Innovation (UKRI), Universities UK. Managing Risks in International Research and Innovation

https://www.universitiesuk.ac.uk/sites/default/files/field/downloads/2022-06/managing-risks-in-international-research-and-innovation-uuk-cpni-ukri_1.pdf

National Protective Security Authority (NPSA)

- Trusted Research Guidance for Academics.
<https://www.npsa.gov.uk/system/files/trusted-research-guidance-for-academia-digital-compressed-1.pdf>
- Trusted Research Guidance for Senior Leaders.
https://www.npsa.gov.uk/system/files/npsa-trusted-research-guidance-for-senior-leaders_0.pdf

New Zealand Government. Trusted Research Guidance for Institutions and Researchers.

<https://protectivesecurity.govt.nz/assets/Campaigns/PSR-ResearchGuidancespreads-17Mar21.pdf>

Swiss Universities. Towards Responsible International Collaborations: A Guide for Swiss Higher Educations Institutions.

https://www.swissuniversities.ch/fileadmin/swissuniversities/Dokumente/Internationales/Guide_Towards_responsible_international_collaborations2.pdf

Uddannelses- og Forskningsministeriet

- Afrapportering - Udvalg om retningslinjer for internationalt forsknings- og innovationssamarbejde, 2022
<https://ufm.dk/publikationer/2022/afrapportering-udvalg-om-retningslinjer-for-internationalt-forsknings-og-innovationssamarbejde>
- Retningslinjer for internationalt forsknings- og innovationssamarbejde.
<https://ufm.dk/publikationer/2022/filer/uris-retningslinjer.pdf>

Universities UK. Managing Risks in Internationalisation: Security related issues <https://www.universitiesuk.ac.uk/what-we-do/policy-and-research/publications/managing-risks-internationalisation>

UK Research and Innovation (UKRI) Trusted Research and Innovation Principles. <https://www.ukri.org/wp-content/uploads/2021/08/UKRI-170821-TrustedResearchandInnovationPrinciples.pdf>

Vereining van universiteiten (VSNU). Framework knowledge security for Dutch universities

Appendix 1: The Government assignment, U2023/02127

An assignment to promote responsible internationalisation in education, research, and innovation collaborations.

The Government's decision

The Government tasks the Swedish Council for Higher Education (UHR), the Swedish Research Council, and the Swedish Governmental Agency for Innovation Systems (Vinnova) to propose how to work on responsible internationalisation in higher education, research and innovation at Swedish higher education institutions, governmental research funding bodies, and other public agencies can be promoted. The assignment includes proposing national guidelines, and also proposing how further forms of support for knowledge and experience exchange between higher education institutions, governmental research funding bodies and other public agencies and organisations can be developed and designed.

The agencies shall submit a joint written interim report of the part of the assignment that includes proposing national guidelines and a plan for the work of proposing further forms of support for responsible internationalisation to the Government Offices (Ministry of Education and Research) no later than 31 March 2024. A joint written final report on the assignment shall be submitted to the Government Offices (Ministry of Education and Research) no later than 15 December 2024. The final report shall include proposals for how the guidelines can be followed up and developed over time. The assignment and the reports shall be coordinated by the Swedish Council for Higher Education.

The assignment in more detail

The national guidelines and the proposed support shall contribute to promoting responsible internationalisation, where international collaborations are conducted in as open a way as possible and as securely as necessary, and where openness and security are understood to be complementary and mutually reinforcing aspects. They shall also contribute to strengthening the protection of both fundamental

academic values and of personnel, students, research results and other assets.

The guidelines shall provide guidance for the international collaborations of higher education institutions and the agencies involved, and be a help in making assessments of ongoing and potential international educational and research collaborations. The proposal made for forms of support shall be able to contribute to implementing the guidelines, including increased knowledge and awareness of risks in international collaboration and increased ability to assess and manage these risks.

The Swedish Council for Higher Education, the Swedish Research Council and Vinnova shall implement the assignment in close collaboration with governmental research funding bodies and higher education institutions. International collaborations in education, research, and innovation also involve many other actors, who are important for a well-functioning and secure research and innovation system. The agencies shall therefore, when implementing the assignment, maintain a dialogue with other public agencies, organisations, and actors that can contribute competence and experience, both nationally and internationally, in particular the Swedish Armed Forces, the Swedish Security Service, and the National Inspectorate of Strategic Products. Consideration shall also be given to how the guidelines and the proposed support can contribute to, and affect, interactions between public and private actors in education, research, and innovation. The agencies should, for example, identify the need for and opportunities to make accessible the proposed support to other actors than public agencies and higher education institutions.

The work shall be coordinated with the agency collaboration that occurs via the Platform for Internationalisation (PLINT). The agencies shall also consider other national initiatives relating to responsible internationalisation, in particular the work done within the Association of Swedish Higher Education Institutions, and the Swedish Foundation for International Cooperation in Research and Higher Education.

Reasons for the Government's decision

International collaboration in higher education and research is in many cases crucial for excellent research and innovation. The Government wants to create good preconditions for utilising research results both in the public sector and in the business sector, and contribute to Swedish competitiveness and resilience in a secure way. In an ever more uncertain and polarised world, there are geopolitical challenges where openness and collaboration are at risk of being abused by foreign powers. Openness should form the basis for international collaboration,

at the same time as there must be an awareness of the need to protect national interests, knowledge, and technology.

Higher education and research must be characterised by academic freedom, openness, and of researchers' opportunities to freely share results, for example with researchers in other countries. These values must be safeguarded and protected. Many other countries have already implemented measures for responsible internationalisation, for example in the form of national guidelines or support structures, focusing on strengthening security within research activities at the same time as international collaboration can continue to be stimulated. It is important that Sweden develops in step with the world around us in this respect.

Swedish higher education institutions, research funding bodies and other actors work actively on responsible internationalisation, and protective security work has intensified in recent years. The work with responsible internationalisation and protection of Swedish education, research, and innovation is a joint responsibility for higher education institutions, research funding bodies, and the Government. National guidelines and support for exchanges of knowledge and experiences can contribute to promoting and developing the work, so that international collaborations can be conducted in a long-term secure and sustainable way.

Against this background, the Swedish Council for Higher Education, the Swedish Research Council, and Vinnova should be tasked to propose how the work with responsible internationalisation in higher education, research and innovation, carried out at higher education institutions, at governmental research funding bodies and other public agencies can be promoted.

On behalf of the Government

Mats Persson

Erik Kyhlberg

Appendix 2: Guidelines in other countries

Australia

Australian universities were active early in internationalisation of higher education, in particular in transnational education, where Australian universities collaborated with universities in various Asian countries. COVID-19 affected higher education globally, but had tangible effects on Australian universities. The number of students and researchers from abroad fell, as did international collaborations. To counteract the negative effects and give the university sector in the country the opportunity to recover, the Australian government worked out a strategy for internationalisation of higher education, the Australian Strategy for International Education 2021–2030.¹⁸⁹ There were, of course, also other considerations than mobility and collaborations of importance for the strategy. Among these was that the government saw skills supply, economic growth, and innovation as also dependent on successful internationalisation of higher education. The pandemic had also clearly shown that internationalisation that was too under-dimensioned entailed risks to long-term sustainability in higher education, and for Australia's position as a knowledge nation.

The strategy focuses on four priority areas, namely Diversification, Meeting Australia's skills needs, Students at the centre, and Growth and global competitiveness. The strategy was complemented with a number of measures for each area, which are seen as preconditions for fulfilling the goals.

The concept of responsible internationalisation is not explicitly expressed in the strategy, but considerations of this type are included in the descriptions of the priority areas. This is most clearly expressed in the section on skills supply, where it is emphasised that research is one of the drivers behind the development of new skills. Research conducted in a secure and reliable way within the framework for international collaborations are said to represent and safeguard Australia's national interests and to address global challenges. The international collaborations also increase Australia's access to sources of funding and international expertise, and provides the country with an important resource in the form of international students.

¹⁸⁹ Australian Government, Department of Education. Australian Strategy for International Education 2021–2030

It is, however, clear to the Australian government and the universities that international collaborations entail risks of foreign interference. There were already guidelines in place to counteract this, produced by the University Foreign Interference Taskforce. These guidelines were updated in conjunction with the implementation of the new strategy, and were published at the same time as this, in November 2021.¹⁹⁰

The guidelines are a response to an increased threat in the form of foreign interference, and are intended to give universities and their employees and students better protection against risks associated with such interference. This is done by providing both resources and fundamental principles to enable the universities to manage and proactively counteract possible foreign interference in research, teaching, and work. The guidelines complement Australia's overarching strategy against foreign interference, aimed at giving foreign powers as little as possible at the greatest cost possible.

Just like the strategy, the guidelines divide up into four parts: Governance and risk frameworks, Communication, education and knowledge-sharing, Due diligence, risk assessment and management, and finally Cybersecurity. For each part, there are a number of concrete guidelines that the universities are encouraged to comply with to the extent they are applicable. For example, there should be action plans to minimise the risk of foreign interference, and a clear allocation of responsibility for the work. The universities are also expected to have communication plans and educational programmes for increasing awareness of foreign interference, and how to reduce the risk. Employees and students in international collaborations should receive targeted training, and the universities should take part in joint sector work on counteracting foreign interference by sharing knowledge and experiences. Collaboration between the universities in this respect increases the resilience of the entire sector. It is also emphasised that the government plays an important role in disseminating information and increasing awareness of the problem.

Denmark

National guidelines for responsible internationalisation were published in Denmark in May 2022.¹⁹¹ The guidelines were produced by a committee led by the Ministry of Education and Research in Denmark, *Udvalg om retningslinjer for internationalt forsknings- og innovationssamarbejde*, (URIS). The committee consisted of nine university representatives and the three publicly funded research

¹⁹⁰ Australian Government, Department of Education. Guidelines to Counter Foreign Interference in the Australian University Sector

¹⁹¹ *Uddannelses- og Forskningsministeriet. Retningslinjer for internationalt forsknings- og innovationssamarbejde*

councils, the Independent Research Fund Denmark, the Innovation Fund Denmark, and the Danish National Research Foundation. Together with the guidelines, the committee published a report describing the work.¹⁹²

The Committee's focus

The starting point was that the Committee's proposal shall not obstruct or make international collaboration more difficult, but instead support a nuanced approach, increased awareness of risks, and common understanding of precautionary measures and responsibilities.

Decisions on any new measures should be in proportion to the potential risks, and be balanced against any negative effects. New measures must not limit the independence of the research institutions, or the freedom of research.

The committee had four focus areas to consider:

- The risk of breaches against the principles of research integrity and responsible research practices, including responsible management of research data and protection of intellectual property rights.
- The risk of unethical use of technology, including military use or use in breach of human rights.
- The risk of foreign interference and security infringement, also in relation to foreign students/employees at Danish universities and Danish students/employees abroad.
- The risk of contributing to strengthening and building research and innovation capacity in sensitive areas in authoritarian countries.

Using the focus areas above as the starting point, the committee was tasked, as a first step, to:

- Discuss security and ethics challenges and dilemmas in international research and innovation collaborations, based on concrete examples from Danish institutions and relevant international experiences.
- Map international and national, including institution-specific, frameworks and rules for global research and innovation collaborations, with the aim of getting a common overview and identifying any needs for clarification or interpretation.

And as a second step, to:

¹⁹² Uddannelses- og Forskningsministeriet. *Af rapportering - Udvalg om retningslinjer for internationalt forsknings- og innovationssamarbejde*

- Discuss how awareness of risks and pitfalls in international collaborations can increase at Danish research institutions.
- Discuss the allocation of responsibility, for example at public agency level, university management level, and researcher level.

As a third step, to:

- As necessary produce supplementary recommendations/guidelines for Danish researchers and research institutions in the four focus areas.
- Assess the suitability of establishing a permanent committee for international research and innovation collaboration, tasked to follow up and on an ongoing basis discuss relevant issues and experiences.¹⁹³

The committee arranged for national and international frameworks, laws, and ordinances that relate to international research and innovation collaboration to be mapped. The guidelines of a number of other countries were also mapped. The mapping was carried out by EU-KNOC (European R&I Knowledge on China).

The Committee's report and proposals

The committee makes three overarching proposals in its report, and proposals for guidelines. Firstly, the committee recommends that Denmark adopts a new and intensified approach to international research and innovation collaborations. The approach should focus on risk management, promote Danish interests, and support initiatives at three levels:

1. Increased awareness among institutions of ethical, financial, and security risks.
2. Organisational framework and procedures for risk management.
3. A joint national approach and increased knowledge exchange between the public agencies and educational and research environments involved in Denmark.

In parallel with initiatives at the universities, there is a need to build up a new and strengthened common approach between the public agencies, educational and research institutions and the public research funding bodies involved. The committee has supplemented the recommendations with a number of recommendations to public agencies and funding bodies, as responsibility does not just rest with the universities. A new and more focused approach can only have sufficient effect if public agencies, educational and research institutions, and

¹⁹³ Uddannelses- og Forskningsministeriet. *Af rapportering - Udvalg om retningslinjer for internationalt forsknings- og innovationssamarbejde*, Appendix 2.

research funding actors all pull in the same direction, the committee considers.

Secondly, the committee recommends that Denmark seeks a new, joint approach with like-minded countries, so as not to screen off Danish researchers from a broad range of international collaborations that are to Denmark's advantage, and so as to not worsen Denmark's relative competitiveness. Public agencies should work actively for a common EU position, and continuously adapt the Danish approach so that it corresponds to the positions of the EU and like-minded countries.

Thirdly, the committee recommends that a standing committee is established at management level, with the purpose of contributing to continuous knowledge sharing between public agencies, institutions and foundations, continuous reviews of acceptable risk levels and any adaptation of the Danish approach to international collaboration.

The committee proposes nine guidelines under three overarching themes for how Danish institutions can increase awareness and build up structures and procedures that can help employees and students to navigate this complex area. The guidelines are aimed at the managements of education and research institutions. Considering the differing preconditions of the universities, the guidelines are relatively generic, with options of local adaptations. Measures shall also be balanced against the specific risk level. The published guidelines are aimed at universities, but in the final report of the committee's work, there are also several requests to various ministries, public agencies, and organisations linked to the guidelines.

Here follows a review of the specific measures that are expected to be initiated by the institutions, public agencies, and foundations. The guidelines develop all the points further, with more questions:

1. Identify and protect critical research

- 1.1. Evaluate the potential and value of your research
- 1.2. Protect knowledge and results
- 1.3. Familiarise yourself with the export control regulations and the legislation on investment screening

2. Get to know your collaboration partners

- 2.1. Investigate who you are collaborating with
- 2.2. Ask yourself why you are collaborating with them
- 2.3. Limit what you collaborate on with them

3. Protect your institution, employees, and students

- 3.1. Be aware that there might be a threat
- 3.2. Focus on security procedures and systems
- 3.3. Protect your employees and students

The Netherlands

In the discussion of responsible internationalisation in the Netherlands, great weight is attached, as in other countries, to academic freedom, from the starting point that academic freedom is a fundamental human right, and as such necessary for the development of a democratic society and for higher education and research. The right to freely choose the education and research field and to freely publish the results of research are irreplaceable values for individuals, society, and academia. At the same time, it is of crucial importance to the country's universities and for the Netherlands to prevent as far as possible that research results and research data are used for unethical or otherwise undesirable purposes.

To support universities in developing frameworks to protect research, the Dutch equivalent of the Association of Swedish Higher Education Institutions, *Vereiniging van universiteiten (VSNU)* (now *Universiteiten van Nederland*), published guidelines¹⁹⁴ in 2021 for responsible internationalisation with emphasis on protection of research, the *Framework Knowledge Security for Dutch Universities*.

The guidelines aim to help universities to create and maintain international collaborations that are based on well-informed and well-balanced decisions, and are also a response to requests from the Government and society to take responsibility as a sector for the protection of research results and research data. The intention is also to ensure, as far as possible, that the universities comply with relevant legislation in different areas, further develop the framework and the decision-making processes, and ensure the work is established at faculty and department level, as well as in individual research environments. Universities are also expected to include protection of research in the overarching security work, and to create support functions at the individual universities.

The guidelines emphasise that international collaborations are necessary, but also more and more challenging. There are worries relating to academic freedom and other ethics principles in many of the Netherlands' collaboration countries, and worries about how open science and access to this is affected and becoming limited. 'Knowledge security' is described, with a definition taken from the Dutch Ministry of Education as the prevention of transfer of sensitive knowledge and technology that can affect the country's security negatively and damage the capacity for innovation. The concept also covers consideration of foreign interference and (self-)censorship in higher education, and ethical positions in conjunction with research and education collaborations with countries where fundamental human rights are not

¹⁹⁴ VSNU Framework Knowledge Security for Dutch Universities

respected.

The guidelines are divided up into three areas: Opportunities and risks associated with international research and education collaborations, Governance and policies, and Management of risks. They have four target groups: For individual employees, knowledge of the opportunities and risks associated with internationalisation shall increase, and examples mentioned of employee categories affected are researchers, enrolment administrators (in particular those responsible for enrolling foreign applicants), those responsible for employing foreign researchers and teachers, and employees tasked with developing joint programmes and projects.

University managements have to develop internal frameworks for the entire university that place protection of research results first, and then apply these across the operation, for decision-making at various levels, and for communication and professional development strategies. University managements should also ensure that information and experiences are shared with other universities, to enhance preparedness and the opportunities to act quickly in the event of new threats. The university sector in its entirety should make a thorough inventory of opportunities and risks in international collaborations, against the background of increased competition and political polarisation. Together with other actors in higher education, a foundation should also be laid for a structured process for and estimation of the resources required for identifying and managing these opportunities and potential threats. Dutch ministries, finally, who are affected by the need to protect research results and research data should acquire knowledge of what the universities need from the ministries in the form of support and resources to ensure students and employees can study, teach, and conduct research in a secure environment.

The guidelines form the basis for the further developed national guidelines that were published in 2022¹⁹⁵, and were produced in collaboration between the Dutch knowledge sector (including the Dutch equivalents of the Swedish Research Council and the Royal Swedish Academy of Sciences) and the government. The guidelines are country-neutral and leave room for own considerations, and it is up to each university to monitor security risks, and to develop their own methods and tools for international collaborations.

Norway

In 2022, the Research Council of Norway and the Norwegian Directorate for Higher Education and Skills (HK-dir) were tasked by the Ministry of Education to jointly produce national guidelines for responsible

¹⁹⁵ Government of Netherlands. National knowledge security guidelines

international collaboration. The assignment was linked to a review of Norway's overarching strategy for increased collaboration in research, higher education, and innovation with countries outside the EU and the EEA. The strategy, known as *Panoramastrategin* (The Panorama Strategy), runs for the period 2021–2027 and aims to work in the long terms with foreign policy, business policy, and goals together with a number of selected countries. These countries have been selected based on global and regional considerations, but all have in common that they are responsible for a large proportion of the higher education, innovation, and research in the world. Some of the countries have additional common characteristics, for example that they have all been pointed out as high risk countries by various Norwegian public agencies. In the revised strategy, responsibility in international collaborations was therefore added as a principle, besides quality, relevance, mutuality, and a long-term view. Responsibility was defined as “consideration of fundamental academic values and national interests, among them security interests.”

The work on the guidelines began at the end of 2022, in dialogue with the sectors involved. It was stated early on that the work would have differing repercussions for different actors, and therefore close collaboration was needed to lay the foundation for a long-term striving to give the education sector the opportunity to develop resources for planning and implementing international collaborations. The target group for the guidelines are universities, university colleges and research institutes, but also other actors that participate in collaborations in the areas of research, higher education, and innovation. The guidelines are intended as a resource for strengthening areas such as risk evaluation and vulnerability and risk analysis in conjunction with international collaborations, and for ensuring that academic values and research ethics guidelines are taken into account. To this is added considerations relating to national interests, with emphasis on foreign interference, illicit knowledge transfer, and cyber security.

It is emphasised that the guidelines must be seen in a greater context, and are not intended to lead to a reduction in Norway's participation in international collaborations. International collaboration in the knowledge field is part of Norway's national preparedness, in which openness and access to knowledge are preconditions for good teaching and research. When planning collaborations, consideration must be given both to strategic opportunities and to risks. The guidelines were published in 2023¹⁹⁶ and were complemented with references to reports, checklists, goals, and so on. Universities were encouraged to seek answers to their own challenges and questions based on this material. The work requires both a long-term view and resources, but is

¹⁹⁶ Hk-dir. *Retningslinjer og verktøy for ansvarlig internasjonalt kunnskapssamarbeid*

seen as crucial for protecting academic freedom and research integrity. The Norwegian guidelines are divided up into two sets of overarching guidelines, one aimed at the universities' administrative functions, and the other at their academic environments. In both cases, they include advice relating to risk and security analyses in relation to threats against academic freedom and research ethics, compliance with export regulations, and the importance of having an overview over international collaborations as a whole, and the national and international terms and conditions for these. For academia, the importance of delimiting collaborations that are entered into with risk countries is emphasised, and of making it clear in advance in the agreements what may lead to the collaboration being terminated. For the Norwegian universities' administrative sections, setting up support functions with clear mandates within the organisations is recommended, to help academia with issues relating to international collaborations, support functions that in difficult cases can constitute a link between departments and faculties and other public agencies. In addition to the overarching goals, HK-dir's website also has resources linked to issues relating to international research and innovation collaborations, collaboration in higher education, risk and security issues, academic freedom, export control issues, and information security.

New Zealand

A large proportion of the research conducted in New Zealand is a result of international partnerships, and the country's research and innovation sector attracts sources of funding and investors from the entire world. New Zealand safeguards academic freedom, and that research and innovation are based on an open and collaborative approach. The country is actively trying to increase the international dimension in both research and innovation, but at the same time there is clear awareness that there are risks associated with international collaborations; risks that must be identified and managed to minimise the risk of threats against the reputation of universities, intellectual property rights, and New Zealand's national interests.

Trusted Research – Guidance for Institutions and Researchers¹⁹⁷ are guidelines for New Zealand's universities, individual researchers, and other actors in higher education, aimed at giving New Zealand's education and innovation sector preconditions for getting the best possible returns from research collaborations and at the same time protect intellectual property rights, sensitive research, and personal data. The guidelines, which have been produced jointly by bodies such as Science New Zealand and Universities New Zealand, use as a starting point that safeguarding international research collaborations is of

¹⁹⁷ New Zealand Government. Trusted Research – Guidance for Institutions and Researchers

crucial importance for continued successful development of research and innovation in the country.

The guidelines are particularly relevant for researchers in the STEM sector (science, technology, engineering, and mathematics), as well as for researchers active in new technologies, dual-use technology, and commercially sensitive research fields.

The guidelines provide an overview of potential threats against research and innovation in New Zealand, and helps researchers, universities, research centres, and industrial companies to create trust in international collaborations and make well-balanced choices and adopt well-balanced positions on these collaborations in relation to the identified risks.

The guidelines also provide concrete examples of how researchers and research can be protected from possible theft, abuse, or from being utilised in some other way. Among these are examples of where threats against research can come from, and the various ways that a researcher, research team, or university can be affected. The consequences of not protecting research to a sufficient extent are also discussed, such as damage to trust, reduced research funding, and so on. It is particularly emphasised that it is therefore of the utmost importance that New Zealand's universities comply with critical legislation, for example in the export control area, and do not rely just on one or a few sources of research funding.

Switzerland

Higher education in Switzerland is characterised by a relatively high degree of internationalisation. In recent years, this has become ever clearer, with a steady increase not just in the number of educational collaborations, but also in mobility among students and employees. This openness is seen in Switzerland as beneficial for both higher education in the country and also for international collaboration partners.

Swiss universities are active participants in collaboration programmes, but for bilateral programmes there are some prioritised countries, among them Russia, India, and China. During the years 2007–2010, there was a marked increase in the number of research collaborations and publications resulting from these, in particular in relation to China.

Switzerland emphasises that international collaborations are important for finding solutions to global problems and challenges, for sharing knowledge and research results, for gaining new perspectives, coordinating resources, finding funding, and not least creating synergy effects for both institutions and individuals. At the same time, there is awareness that international collaborations bring with them challenges

of different types. These are not just academic, political, or legal; differences in fundamental values and ethics perceptions can also lead to major challenges for successful international collaborations.

However, it is not always entirely clear from the start what the challenges are. The preconditions and terms and conditions can change during the course of the collaboration, and Switzerland therefore regards it as crucial for successful collaborations that the country's universities are aware of all aspects of internationalisation, from contents to results and consequences, both before, during, and after the collaborations. This is crucial for building up the joint responsibility and trust that the collaboration rests on.

Against this background, Swiss Universities, the Swiss equivalent of the Association of Swedish Higher Education Institutions (SUHF) adopted guidelines for responsible internationalisation in 2022, published under the title *Towards Responsible International Collaboration: A Guide for Swiss Higher Education Institutions*¹⁹⁸

A further circumstance of central importance in the drawing up of the guidelines is the increasing threats against academic freedom and institutional autonomy in many parts of the world. Limitations on the freedom of speech, threats against teachers and researchers, and the autonomy of universities constitute real threats to Switzerland's opportunities for responsible and successful internationalisation, and in the longer term to the country as a knowledge nation. Academic freedom is regulated in Article 20 of the Swiss federal constitution, in a single sentence: "Freedom in research and teaching is guaranteed." The guidelines define in greater detail what academic freedom constitutes, from Swiss and European perspectives. They also emphasise more explicitly that even if these academic values can be perceived to have universal acceptance, the reality is different. Academic freedom is both challenged and threatened, and the concept is interpreted differently by different actors. In international collaborations where Swiss universities participate, this must be taken into account.

This applies also to the independence of universities. Institutional autonomy is a cornerstone of the Swiss higher education system. The country's policy in the areas of education, research, and innovation is based on the principle that the design of education, research, and innovation shall not be directed by the state; instead, it falls to the actors in the respective areas to take responsibility for this work.

The guidelines are intended to support Swiss universities in international collaborations by clarifying in advance the importance of

¹⁹⁸ Swiss Universities. *Towards Responsible International Collaborations: A Guide for Swiss Higher Education Institutions*

common values, and are based on four separate dimensions. According to Swiss Universities, all are equally relevant for international collaborations and must be considered together:

- the purpose and form of the collaboration
- academic freedom and institutional autonomy
- ethical and legal aspects
- transfer of knowledge and technology

The descriptions of the four dimensions provide concrete examples of questions, supplemented by case studies to facilitate for the Swiss universities to reflect on responsible internationalisation and discuss this further at university level. It is emphasised that the questions are not in any way exhaustive, and the case studies constitute examples of situations that universities or individual researchers may find themselves in within the framework for an international collaboration.

The purpose of the guidelines is also to support universities in the work of analysing advantages, challenges, and risks of international collaborations, to use existing resources and benefit from previous experiences. The guidelines also aim to work towards greater consensus between universities in Switzerland. On the other hand, they are not binding or regulating, given the extensive autonomy of the Swiss universities, but shall be seen as starting points for discussions about and the formation of sustainable international collaborations, rather than as checklists.

United Kingdom

In the United Kingdom, issues relating to responsible internationalisation have been highlighted by bodies such as the Association of Research Managers and Administrators (ARMA), the National Protective Security Authority (NPSA), Universities UK (UUK), and UK Research and Innovation (UKRI). The concept of trusted research was launched in 2019, and has since then been used to highlight the issues.

Internationalisation of higher education is, of course, nothing new for the United Kingdom, which is a major supplier of 'transnational education', but in recent years the universities' strategies have increasingly been shaped by the international dimension. The majority of the international collaborations are positive for the country, and have entailed considerable economic and social gains. At the same time, the United Kingdom is aware of the risks associated with international educational collaborations, and there is also a realisation that these risks have become ever more dynamic and complex. The risks are not limited to theft of research data and results, for example, or security at

the universities, but also include threats against fundamental values in higher education, such as academic freedom, institutional autonomy, and freedom of speech, and in the longer term also against an open, democratic society.¹⁹⁹

In *Trusted Research Guidance for Academics*²⁰⁰, published in 2019 by the National Protective Security Authority (NPSA), potential risks linked to British research and innovation are described. The guide is intended to help researchers, universities, and industry partners to have trust in international collaborations and to make well-founded decisions about potential risks. In addition, it discusses why research needs to be protected, and how to protect research and personnel from potential theft, abuse, or utilisation. A complementary guide is also *Trusted Research Guidance for Senior Leaders*²⁰¹, which highlights important considerations for university managements.

In 2020, Universities UK published a set of guidelines²⁰² for managing security-related risks in internationalisation. The guidelines provide recommendations for the deliberations and measures universities should make to promote academic freedom and counteract foreign interference. The purpose of the guidelines is to ensure that universities introduce effective measures to protect themselves against threats in internationalisation, to enable universities to enter into secure and sustainable collaborations, and to create preconditions for collaborations between the higher education sector and the government for the purpose of creating awareness about research and innovation, academic freedom and institutional autonomy in relation to security challenges and threats. The guidelines are categorised under four main headings:

1. Protect your reputation and your values – governance, processes, and policies
2. Protect your people – roles and responsibilities for those who work or study at the department, measures for protecting personnel, students, and visitors, and the risks of online contacts
3. Protect your campus – cyber security and British campuses
- 4: Protect your partnerships – research security and transnational education

In August 2021, UK Research and Innovation (UKRI)) published the guide *Trusted Research and Innovation Principles*²⁰³, in which expectations for research projects funded by UKRI were highlighted. Subjects discussed are, for example, the importance of making a

¹⁹⁹ Universities UK. *Managing Risks in Internationalisation: Security related issues*

²⁰⁰ NPSA. *Trusted Research Guidance for Academics*

²⁰¹ NPSA. *Trusted Research Guidance for Senior Leaders*

²⁰² Universities UK. *Managing Risks in Internationalisation: Security related issues*

²⁰³ UKRI. *Trusted Research and Innovation Principles*

suitability review of the partner, management of knowledge and information dissemination, and issues relating to export controls and intellectual property rights.

In June 2022, NPSA, UKRI and Universities UK published joint guidelines under the title *Managing Risks in International Research and Innovation*²⁰⁴, which summarises the three organisations' own guides. The guidelines highlight security threats faced by universities, present proposals for measures for implementing the guidelines, and present case studies from universities relating to their experiences of managing security-related risks.

In spring 2023, the Association of Research Managers and Administrators (ARMA) published the report *Complex Collaborations – Efficiency, Equity, Quality and Security in International Research*²⁰⁵, which includes 16 proposals and recommendations for supporting the sector on issues relating to security and due diligence.

Germany

General guidelines

Germany regards international education and research collaborations as essential for the country's universities. Internationalisation in higher education provides important preconditions and impulses for innovation in studies, education, and research. The need for guidelines for secure and long-term sustainable collaborations has therefore been seen as a necessity, in particular in relation to collaborations with countries with limited freedoms and rights, academic as well as political and social ones. In international collaborations, it is important that German universities maintain certain fundamental values, such as academic freedom and institutional autonomy.

From the starting point that the universities of the future are transnational in character and sustainable in the long term only if they form part of a global academic community, Germany's equivalent of the Association of Swedish Higher Education Institutions, Hochschulrektorskonferenz (HRK), adopted a set of guidelines in April 2022 for international education and research collaborations.²⁰⁶ These focus on the opportunities that internationalisation of higher education offer for German universities, but of course also on the risks associated with international collaborations. The guidelines also touch upon the most important preconditions for successful internationalisation for German universities, and the deliberations that German universities must make in different types of collaborations.

²⁰⁴ NPSA, UKRI and Universities UK. *Managing Risks in International Research and Innovation*

²⁰⁵ ARMA. *Complex Collaborations Efficiency, Equity, Quality and Security in International Research*

²⁰⁶ HRK, German Rector's Conference – Resolution of the Executive Board on 6 April 2020.

Resolution Guidelines and standards in international university cooperation

The guidelines and the standards are also based on what is said to be non-negotiable legal and other principles for German universities, and which therefore also apply in international collaborations. This includes German legislation, but also the universities' Magna Charta, in which freedom of research and education are inalienable preconditions for academic life and the universities. This also includes the search for truth and fundamental factors, and the absence of every form of ideological or religious influence, as well as attempted or direct interference in research and education by external actors.

The guidelines are divided up into four different areas. Strategy and governance, Joint learning and teaching, Joint research, and Universities as transnational arenas. In all areas, HRK has formulated general, non-country-specific fundamental principles and values for all forms of international collaboration in higher education. The guidelines are intended to support universities, individual departments, employees, and students, and offer help and orientation in establishing long-term, equal, and sustainable educational collaborations. Against the background that higher education internationally is constantly changing and developing, and that international collaborations are many-faceted and complex, HRK will be revising the guidelines regularly.

Specific guidelines for educational and research collaborations with China

In addition to the general, non-country-specific guidelines, HRK has also produced specific guidelines for educational and research collaborations with China.²⁰⁷ These guidelines were adopted in September 2020. The need for specific guidelines for collaboration with Chinese partners is based on the fact that more than 1 400 international collaboration agreements between Chinese and German universities have been entered into. For Germany as a nation, educational collaborations with China are highly attractive, and in some areas entirely crucial. Collaborations with China cover all aspects of higher education and research, from individual student mobility to joint programmes and research projects. From the German point of view, the collaborations with China have mostly been positive, but in recent years the country has experienced increased problems from the Chinese side, of both legal and organisational characters. Increased state interference in China on the development of curriculums, limitation of academic freedom and so on has also affected the international collaborations between Germany and China, and has in some cases led to collaborations being seriously hampered, or even ending early. In addition, there is the fact that

²⁰⁷ HRK, German Rector's Conference – Resolution of the Executive Board on 9 September 2020 Guiding questions on university cooperation with the People's Republic of China

Chinese actors have tried to influence scientific discussions and higher education systems abroad, including Germany.

For German universities, it is therefore important to find a balance between the opportunities and risks that educational and research collaborations with China entail. Chinese researchers and students are part of a global academic community and exchanges with China enrich academia and entails considerable advancement in the solution of global challenges.

The specific guidelines for China are based on the same four areas as the general guidelines, but describe in greater detail the specific preconditions and opportunities for German universities of the collaborations with their Chinese partner universities and organisations. As with the general guidelines, they are aimed at the university sector as a whole, as well as at individual employees and students.

Appendix 3: Dialogue meetings held

Association of Research Managers, ARMA (GB)
Coordinated Assessment for Strategic Internationalisation, CASI
Dialogue meeting in research project <i>Hur påverkas lärosäten av en förändrad geopolitisk kontext?</i>
Dialogue meeting, University of Gothenburg
Dialogue meeting, University of Gävle
Dialogue meeting, Karolinska Institutet
Dialogue meeting, Royal Institute of Technology
Dialogue meeting, Luleå University of Technology
Dialogue meeting, Malmö University
Dialogue meeting, Universities in South Sweden pro-vice-chancellor group
Norwegian Directorate for Higher Education and Skills, HK-dir, (NO)
DUVA group, Vinnova
European Commission: DG Education, Youth, Sport and Culture, EAC
European Commission: DG Research and Innovation, RTD
Research Foundation – Flanders, FWO (NL)
Research Council of Norway (NO)
Swedish Defence Materiel Administration, FMV
Swedish Armed Forces
National Inspectorate of Strategic Products, ISP
Swedish Migration Agency
Ministry of Education (NL)
Psychological Defence Agency, MPF
Swedish Civil Contingencies Agency, MSB
National Contact Point for Knowledge (NL)
National Protective Security Authority, NPSA (UK)
Swedish National China Centre, NKK
Swedish Patent and Registration Office, PRV
Platform for Internationalisation, PLINT
Swedish Government's science & innovation counsellors abroad
Government Offices
Russell Group (UK)
Swedish Foundation for International Cooperation in Research and Higher Education, STINT

SUHF's dialogue seminar with research funding bodies
SUHF's expert group on internationalisation
SUHF's office and representatives from the University of Gothenburg and Malmö University
SUHF's presidium
Swedish National Union of Students, SFS
Sweden's Security Service, SÄPO
Swedish Defence Research Agency, FOI
Department of Science, Innovation and Technology, DSIT (UK)
UK Research and Innovation, UKRI (UK)
Universities UK (UK)
Investigator in the assignment to produce proposals for measures to increase the competence on security issues at governmental HEIs

Participation at conference/seminar/workshop

Coordinated Assessment for Strategic Internationalisation, CASI Responsible Internationalisation
Nordic Association of University Administrators, NUAS. Conference on Responsible Internationalisation
Higher Education Export Controls Association, HEECA & the European Export Control Association for Research Organisations, EECARO. Secure Internationalisation Workshop
Academic Cooperation Association, ACA. What's new in Brussels

Appendix 4: What is responsible internationalisation?

Definition of responsible internationalisation produced within PLINT's area of work Responsible internationalisation.

Responsible internationalisation is a term that has become ever more used in the Swedish academic sector since 2020. In 2020, STINT, together with the Royal Institute of Technology KTH, the Karolinska Institute, and Lund University published a booklet on responsible internationalisation to encourage Swedish HEIs and researchers to be more responsible in international collaborations in a complex world²⁰⁸. In 2022, recommendations were published in a report from STINT on how HEIs can work with responsible internationalisation²⁰⁹. To further clarify the meaning of the term, we propose the following definition:

“Responsible internationalisation covers the aspects that a national actor in higher education, research, and innovation needs to consider to be able to set up, keep up, and follow up a relationship with one or several actors in other countries in a responsible way.”

The definition aims to support Swedish actors' work with setting relevant expectations, forming good practices, and identifying realistic approaches to work towards mutual and responsible international exchanges in the long term. The formulation of a definition has been based on the following assumptions:

1. Responsible internationalisation is an **actor-oriented concept**, where a national actor acts (for example a researcher, an HEI, or a research funding body). The starting point as far as Sweden is concerned is the Swedish actor's need for information, knowledge, assessment, approach, and actions.
2. The **relationship** between international actors in itself is necessary to understand the value it creates. This relationship can be multi-faceted and formed in many ways. It can be institutionalised and formalised, for example in a strategic

²⁰⁸STINT. Responsible internationalisation: Guidelines for reflection on international academic collaboration, R20:01, 2020.

²⁰⁹STINT. Recommendations to higher education institutions on how to work with responsible internationalisation, R22:05, 2022.

alliance or other agreement. It can also be more informal, where personal relationships form the core. Relationships can be between two individual actors in two different countries, or in a larger actor network with several participants from several countries, for example in a partnership or a consortium. For responsible internationalisation and relationship-building, national actors are encouraged to consider the following:

- a. A relationship shall be **secure and judicious**. Those involved in outward-facing and relationship-creating international work have a responsibility, but must be informed with the support of organisational procedures. A reasonable analysis is based on:
 - The relationship must be secure, that is, the other actors must not be antagonistic with intentions that jeopardise the security of individuals or organisations, and must not contribute knowledge that can be used for directly dangerous purposes.
 - The relationship must be judicious. For public agencies, this can for example mean that the relationship must be in line with Sweden's foreign policy and must not breach international sanctions. The actors in a relationship should maintain and remain informed about global norms, such as human rights or other central values, such as academic freedom, ethics norms, and open science.
 - b. A relationship must be cared for and must be **trusting and mutual**. The relationship shall respect the actors' respective status and provide preconditions for long-term interaction with mutual exchanges (which do not have to be balanced).
3. A relationship is affected by **contextual circumstances**. Some of these include national goals, geopolitics, and differences in political systems, legislation, or culture between countries.

The aspects that may need to be considered include, but are not limited to, research ethics and ethical technology development, research integrity, open science, sustainability and climate, protective security (including cyber security), gender equality, export controls, and also foreign policy and science diplomacy.

Appendix 5: Academic freedom and institutional autonomy

Academic freedom is a concept that has been interpreted differently at different times and in different cultures, but in a modern European context, it originates in the early research universities in Germany during the early 1800s. In the educational system that the German philosopher Wilhelm von Humboldt founded, the free search for knowledge for both students and teachers was a crucial precondition. Teaching should be based on up-to-date, objective research, free from ideological, political, economic, and religious influences. The German universities' emphasis on *Lernfreiheit* (the freedom to study freely) and *Lehrfreiheit* (the freedom to teach) came to have an enormous impact. During the decades that followed, the emerging universities in USA, as well as those in Europe, got inspiration from Germany.

Today, academic freedom is understood as the freedom for students, teachers, and researchers to freely be able to study, teach, and research subject areas that they have themselves chosen, and based on questions that they have themselves formulated. Academic freedom is an often-discussed concept, and in Sweden the issue has gained renewed topicality in recent years, for example in publications from both the Swedish Association of University Teachers and Researchers (SULF)²¹⁰ and the Association of Swedish Higher Education Institutions (SUHF)²¹¹.

Different actors in higher education have definitions of what academic freedom that differ from each other. In Magna Charta Universitatum²¹², academic freedom is divided up into three parts: research and education must be independent of all forms of economic and political interests; research and education are indivisible, with students participating in the search for knowledge; universities shall be places for free questioning and debate, characterised by openness to dialogue and distancing from intolerance.

The issue of academic freedom has repeatedly been raised within the European Higher Education Area and the Bologna Process, most

²¹⁰ Swedish Association of University Teachers and Researchers (SULF). Ny SULF-skrift: *Om akademisk frihet*.

²¹¹ Association of Swedish Higher Education Institutions (SUHF) Tim Ekberg. 2023. *Akademisk frihet och institutionell autonomi*

²¹² Observatory Magna Charta Universitatum, Magna Charta Universitatum 2020.

recently in the Rome Communiqué²¹³ from 2020. This clarifies that academic freedom and institutional autonomy are common, fundamental values in the Bologna Process, and an inalienable basis for quality in learning, teaching, and research. In the Communiqué, the ministers undertake to maintain the independence of higher education institutions, academic freedom and integrity, and the rights of students and employees. Academic freedom is defined as “[the] freedom of academic staff and students to engage in research, teaching, learning and communication in and with society without interference nor fear of reprisal.”

In the European Research Area, the meaning of academic freedom is expressed clearly in the Bonn Declaration from 2020²¹⁴. This establishes that freedom of research is a universal right and a public good, that covers all organisations that conduct research, and all academic disciplines. It is a necessary precondition for researchers to create, share, and transfer knowledge that benefits society, and is closely associated with freedom of speech, freedom of organisation, freedom of movement, and the right to education. It is based on the right to freely choose research field, choose and develop theories, and apply good scientific practice. The freedom of research also includes the right to share, disseminate, and publish the results of the research, without encumbrances in the form of institutional limitations or censorship. Freedom of research is an essential precondition for social, cultural, political, and economic development and resilience. In the Declaration, the signatories undertake to protect the freedom of research through increased collaboration between the European Research Area and the European Higher Education Area. Academic freedom and institutional autonomy shall be reinforced through continuous and long-term funding.

Academic freedom is closely associated with the concept of institutional autonomy, but the two terms do not mean the same thing. UNESCO defines institutional autonomy as “a degree of self-governance, necessary for effective decision-making by institutes of higher education regarding their academic work standards, management and related activities”. The European University Association (EUA) differentiates between four different dimensions of institutional autonomy: organisational, financial, administrative, and academic.²¹⁵ These make it possible for a higher education institution to independently decide on its internal structure, to make decisions on financial issues, to design the academic content and decide whether to enter into agreements with

²¹³ European Higher Education Area. Rome Ministerial Communiqué, 2020.

²¹⁴ European Research Area. Bonn Declaration on Freedom of Scientific Research, adopted at the Ministerial Conference on the European Research Area on 20 October 2020 in Bonn.

²¹⁵ European University Association. University Autonomy in Europe IV.

foreign higher education institutions, and to independently decide on issues relating to recruitment of personnel and students.

Both academic freedom and institutional autonomy are declining in many countries, and protection of these values is under severe pressure. In Sweden, academic freedom is protected as a fundamental principle in Chapter 2, Section 18 of the Instrument of Government. Chapter 1, Section 6 of higher education legislation (*Högskolelag (1992:1434)*) states that higher education institutions shall promote and safeguard academic freedom in their operations. The Association of Swedish Students, the Swedish Association of University Teachers and Researchers, and the Association of Swedish Higher Education Institutions in a joint statement put forward that this is not sufficient, and consider that institutional autonomy also needs to be protected in the Swedish constitution.²¹⁶

²¹⁶ SFS, SUHF and SULF: *Gemensamt uttalande för grundlagsskydd av högre utbildning och lärosätenas autonomi.*