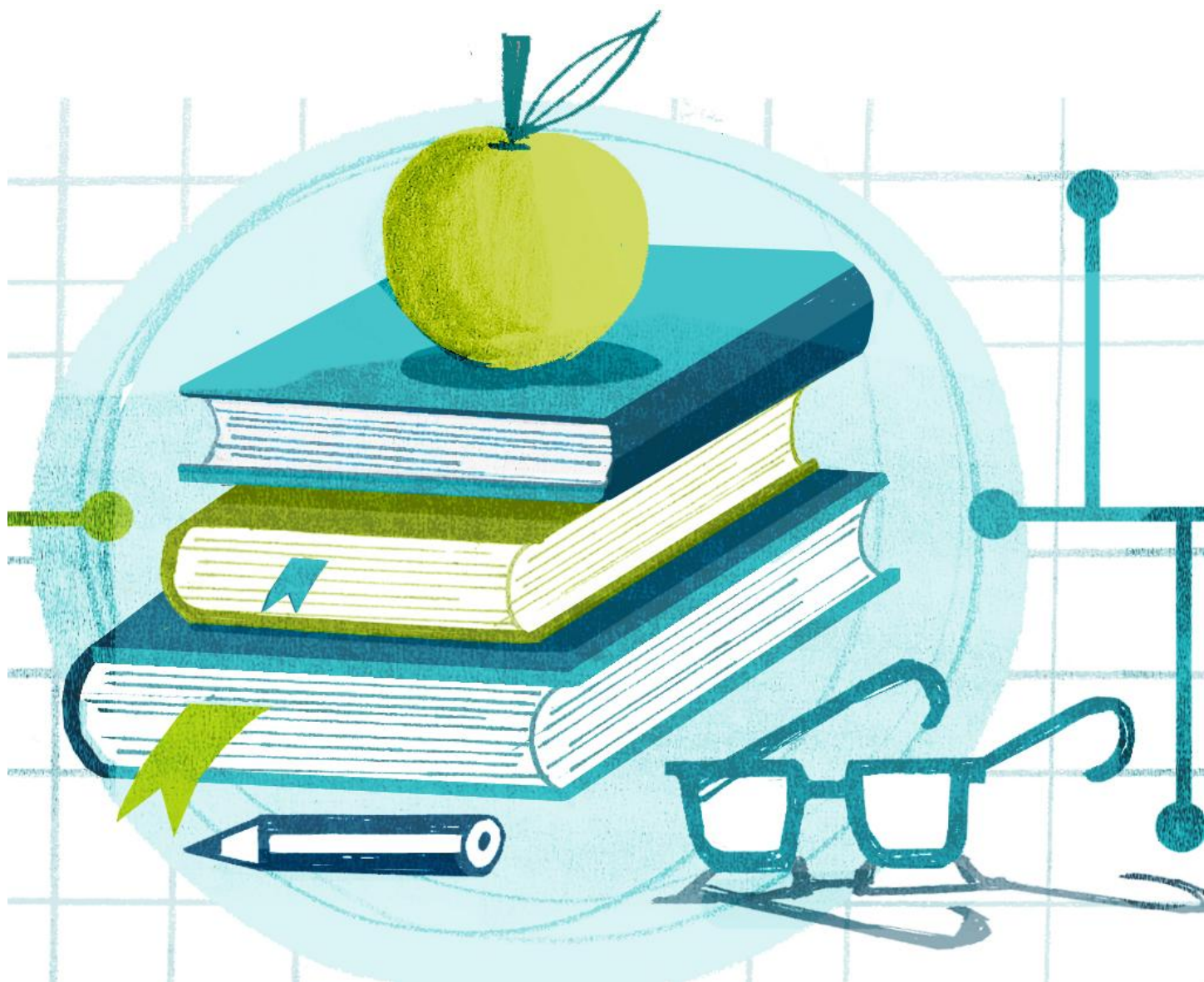




Evaluation of the Students at Risk program

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Evaluation of the Students at Risk program

Commissioned by the Norwegian Directorate for Higher
Education and Skills

Preface

The present report was commissioned by the Norwegian Directorate for Higher Education and Skills (HK-dir). Our evaluation team consists of project leader Jens Plahte, supported by team members Anne May Melsom, Frida Bjørneseth, Hilde Kullerud, Kaja Meeg Valvatne and Vibeke Heidenreich, and with valuable contributions from Kirsten Sandberg Natvik of Scanteam. Quality assurance was provided by Audun Gleinsvik.

We would like to thank the HK-dir team for excellent cooperation and steady support throughout the project period. And not the least we are grateful to all the respondents of the student survey as well as the interviewees among system actors, collaborating civil society organizations as well as current and former students.

Oslo, 26 September 2025

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Executive summary

Background

The Students at Risk program (the StAR program) supports students who, due to their human rights' activism, are «at risk» of being formally or de facto denied educational or other rights in their home country.

It was established on basis of an initiative by the Norwegian Students' and Academics' International Assistance Fund (SAIH) and the National Union of Students in Norway (NSO). The program has been running since 2013 and has awarded scholarships and study places to more than 100 students in total. Funding is provided by the Norwegian Ministry of Foreign Affairs and is managed by the Norwegian Directorate for Higher Education and Skills (HK-dir).

Students that are accepted under the program are enrolled in academic programs at participating Norwegian Higher Education Institutions and are provided with a scholarship during their stay in Norway.

Evaluation questions and methods

HK-dir assigned Proba Research with this evaluation project, which should respond to the following main evaluation questions:

- A. To what extent does the Students at Risk program achieve its goal of enabling students from OECD/DAC countries who are human rights defenders and, for security reasons, cannot continue their studies in their home countries, to complete higher education in Norway?
- B. To what extent – and in what ways – do StAR students become strengthened as human rights defenders through participation in the Students at Risk program?
- C. Does the period of study in Norway have other effects beyond potentially strengthening the students as human rights activists?
- D. To what extent have the recommendations from the 2020 evaluation been followed up?
- E. How effective is the administration of the Students at Risk program?

The mandate of the project included 28 specific sub-questions to the main evaluation questions.

The evaluation methodology includes document studies, a survey directed at current and former students, and interviews with program actors and students.

The program objectives

We identify a total of nine program objectives – more or less explicitly stated in program documents and interviews. The target group definition which is being applied in the practical administration of the Students at Risk program includes an additional objective of geographical distribution of students.

We find that the expectation of students returning to their home country is not interpreted by the program actors to be a program objective. Hence, it should be rephrased as a preambular statement and not as a program objective.

The multitude of objectives implies that the Students at Risk program is characterized by objective profusion. We identify dimensions from the three policy areas higher education, foreign policy and development cooperation.

On the one hand, objective profusion may dilute the focus of the program, but on the other, it may serve to accommodate the interests of the various stakeholders that participate as system actors.

Our assessment is that further clarification and qualification of the different goals would be beneficial, preferentially by organizing the various objectives and measures in a formalized program framework logic. The framework logic could include a goal structure based on a theory of change detailing the objectives on the levels of impact, outcomes and output. Specifying an overarching objective detailing the intended societal impact of the program is particularly important in this respect.

Goal attainment – selection of students

We find that on the program goal for which the Ministry of Foreign Affairs has specified measurable indicators, the Students at Risk program is successful. The program achieves its objective of giving human rights activists a chance to complete their studies in Norway. Most of the students complete their studies, and most of them within the stipulated time. All places have been filled in recent years and there is an even gender balance both among nominated and accepted candidates.

We also find that the program has improved somewhat in achieving its goal of geographical distribution, but that the accepted students are still quite heavily concentrated to a few countries. However, no target values have been set.

Nomination and selection processes

It seems to be an inherent and almost inevitable feature of the program that the candidates face highly diverging risk situations and are assessed differently depending on which country they come from and the entity nominating them. Even though the nominating entities' perception is that the nomination criteria are clear, their application is challenging.

In practice, the at-risk criterion is an inclusion criterion, and not a ranking criterion. This implies that the program subordinates the at-risk objective to the objectives of gender balance and the somewhat understated objective (c.f. the chapter 2 discussion) of geographical distribution. This underscores the need for clarification of program objectives.

The excess of nominated and qualified candidates is a relatively novel challenge for the Students at Risk program. We recommend that HK-dir reconsiders the current selection procedure with the aim of assessing the feasibility of alternative mechanisms, such as introducing a maximum possible number of nominations from each nominating actor, restricting the number of participating countries each year, or introducing the lottery or another attrition mechanism at an earlier stage in the selection process. The reassessment should consider how different mechanisms will affect the nominating entities, the candidates and the HK-dir secretariat itself.

StAR students' as human rights activists

A majority of students (79 percent) report engaging in human rights activism while studying in Norway. Their activism ranges from local involvement to continued work for causes in their home countries. Reports from a few students who have exited the Students at Risk program display varying degrees of activism post participation. One main reason for not engaging is safety concerns.

Most students report that the program motivates continued activism and provides valuable knowledge, skills, and networks. Some of the students do however wish for more assistance in finding and networking with human rights organizations and networks in Norway. We also find that none of the system actors is responsible for connecting students with human rights networks or activism opportunities and the support students receive varies.

We recommend that StAR contacts be assigned with the task of providing written information about activism opportunities, both on the national and local level. We suggest that HK-dir considers organizing online seminars with the same purpose.

The previous evaluation advised HK-dir to collect data on graduates' careers and activism to assess program impact. However, concerns about safety, anonymity, and the high cost of maintaining such a database presents major challenges. As a result, implementing this measure is not recommended.

StAR students need more comprehensive support measures than those currently being provided. In our opinion, a corollary of the program objective of supporting the students as human rights activists is that the system actors have an obligation to support and protect the students in areas that are essential for their psycho-social well-being. This includes several of the topics discussed above – in particular the return issue, dealing with the transnational repression risk, and psycho-social support.

Overall, the academic provision in the Students at Risk program functions well. Most students are satisfied with the academic relevance of their studies in Norway and value the international learning environment. Students are also satisfied with housing and financial support and value the practical and academic assistance provided by the program. Here, the StAR contacts are instrumental. HK-dir could, however, review if the information provided in the initial phase of the program could be more detailed and/or comprehensive.

Students' plans to return home after program exit are highly varied and are influenced by personal safety, family, political conditions, and ongoing assessment of risks in their home countries. They wish for better support in handling decisions of return, as well as handling their situation of being at risk. Many also report a wish for better information on psycho-social services.

We find that there is no systematic support for students in handling risk and return, and that there is a need for better information and training for students, as well as for StAR contacts on risk and return. We recommend introducing the following measures:

- Systematic counselling that includes questions related to mental health, return and risk management for students
- Practical training for students on how to handle risk and return
- Training of StAR contacts on how to advise students in questions of return and risk
- Detailing a centrally defined mandate for the StAR contacts
- Introducing a voluntary safe-exit mechanism by which students confirm safe arrival in their home country
- Extending the scholarship by a two month “grace period” after final exams to allow for exit preparations

Cooperation and information

Generally, both cooperation and information flows work well in the Students at Risk program. There is general satisfaction communicating with HK-dir. System actors report that they get frequent updates, quick answers to questions and that the information provided is accurate and extensive. Experience with HK-dir's facilitating contact between the system actors is also positive.

The cross-cutting issues

We observe that either of the two main system actors – the Ministry of Foreign Affairs and HK-dir – fall somewhat short of their respective obligations with respect to the four

cross-cutting issues – human rights; women’s rights and gender equality; climate change and environment; and anti-corruption. Future policies on the cross-cutting issues in the Students at Risk program should include:

- An assessment of whether any short term “activist drain effects” are offset by the intended long-term effect of strengthening students as human rights defenders
- A brief assessment of possible risks for the issue of women’s rights and gender equality
- A travel policy encompassing an assessment of the environmental impact and risks resulting from the program, while making sure that the objectives of the program are upheld and the welfare of the students is not reduced
- An assessment of how to mitigate inherent risks of transnational repression
- A general risk assessment of the program, including the risk of corruption
- In addition, policy documents should clarify to what extent and how the cross-cutting issues should be included in or encompassed by the program objectives

Main conclusion

Given the objective profusion, and the absence of a specified impact objective and a framework logic, it is not possible to assess the suitability of the design and administration of the program in relation to its objectives to its full extent (sub-question 27). Nevertheless, based on the program objectives listed and discussed in chapter 2 we may draw the following conclusions.

An overall impact objective for the program should be defined, and other objectives and design elements should be formulated so as to support its achievement one in a form of program theory or logical framework. Such a logical framework would clarify whether selection criteria should accord primacy to geographical distribution, academic potential of the student, degree of risk (i.e. need for protection), or potential as human rights defender?

On the program goal for which the Ministry of Foreign Affairs has specified measurable indicators, the Students at Risk program is successful – specifically regarding completion of studies, use of study places, gender balance, and possibly geographical distribution.

The general design of the program – the system actors, their responsibilities, their interaction – appears to be appropriate. We have identified a number of shortcomings that should be addressed, related to StAR students needing more comprehensive support measures than those currently being provided – in particular related to the return issue, dealing with the transnational repression risk, and psycho-social support.

The system actors spend significant administrative resources on the nomination and selection processes, as well on StAR contact follow-up of students during the study phase. Although we have made no efforts at quantifying these costs, our overall impression is one of efficient use of administrative resources. A notable exception is however that excessive resources appear to be spent on evaluating candidates who eventually are not admitted. With that caveat, the current administrative cost level appears to be an inherent feature of the program.

For the most part, the recommendations of the 2020 evaluation have been addressed – the exemption being the issues with program goals and objectives.

Executive summary in Norwegian

Bakgrunn

Students at Risk-programmet (StAR-programmet) har som formål å gi studentaktivister innen menneskerettighetsfeltet muligheten til å fullføre en utdanning i Norge dersom aktivismen har ført til at denne muligheten er stengt i hjemlandet.

Programmet ble – etter initiativ fra Studentenes og akademiskernes internasjonale hjelpefond (SAIH) og Norsk studentorganisasjon (NSO) – etablert i 2013, og har tildelt stipender og studieplasser til mer enn 100 studenter totalt. Finansieringen kommer fra Utenriksdepartementet, og programmet forvaltes av Direktoratet for høyere utdanning og kompetanse (HK-dir).

Studenter som tas opp gjennom ordningen, innrulleres i studieprogrammer ved deltakende norske utdanningsinstitusjoner og mottar stipend under oppholdet i Norge.

Evalueringsspørsmål og metode

HK-dir har gitt Proba samfunnsanalyse oppdraget med å gjennomføre denne evalueringen, som besvarer følgende hovedspørsmål:

- A. I hvilken grad når StAR målet om at studenter fra OECD/DAC-land som er menneskerettighetsforsvarere og av sikkerhetsmessige årsaker ikke kan fortsette studier i hjemlandet kan få fullføre høyere utdanning i Norge?
- B. I hvilken grad – og på hvilke(n) måte(r) blir StAR-studenter styrket som menneskerettighetsforsvarere gjennom deltakelse i Students at Risk?
- C. Har studieoppholdet i Norge andre effekter ut over at studenten eventuelt blir styrket som menneskerettighetsforsvarer?
- D. I hvilken grad er anbefalinger fra evalueringen fra 2020 fulgt opp?
- E. Hvor effektiv er forvaltningen av Students at Risk-ordningen?

Oppdraget omfattet også 28 spesifikke delspørsmål til disse hovedspørsmålene.

Evalueringsmetodikken inkluderer dokumentstudier, en spørreundersøkelse blant nåværende og tidligere studenter, samt intervjuer med programaktører og studenter.

Målene for Students at Risk-programmet

Vi har identifisert totalt ni mål for programmet – mer eller mindre eksplisitt formulert i programdokumenter og intervjuer. Målgruppedefinisjonen som brukes i den praktiske forvaltningen av Students at Risk-programmet inkluderer et tilleggsmål om geografisk spredning av studentene.

Vi finner at forventningen om at studentene skal returnere til hjemlandet ikke tolkes og oppfattes som et mål av aktørene. Dette bør derfor omformuleres til en innledende hensiktserklæring og ikke som et mål.

Det høye antall mål innebærer at Students at Risk-programmet er preget av måltrengsel. Vi oppfatter at dimensjoner fra tre politikkområder er representert i målene: høyere utdanning, utenrikspolitikk og utviklingssamarbeid.

På den ene siden kan måltrengsel svekke programmets fokus, men på den andre siden kan det bidra til å at de ulike aktørene opplever at deres interesser er ivaretatt og representert i programmet.

Vår vurdering er at ytterligere klargjøring og presisering av målene er påkrevet, fortrinnsvis gjennom å framstille målene og tiltakene i en målstruktur basert på en end-

ringsteori som tydeliggjør resultatmål, effektmål og samfunns mål. Det er særlig viktig å fastsette samfunns målet for programmet.

Måloppnåelse – utvalg av studenter

Vi finner at Students at Risk-programmet oppfyller målsetningene som Utenriksdepartementet har fastsatt målbare indikatorer for. Programmet oppnår sitt mål om å gi menneskerettighetsaktivister mulighet til å fullføre studiene i Norge. De fleste studentene fullfører studiene, og de fleste innen normert tid. Alle studieplasser har vært fylt de siste årene, og det er god kjønnsbalanse både blant nominerte kandidater og blant studentene som har kommet til Norge.

Vi ser også at den geografiske spredningen av studentene har blitt bedre, men at de fortsatt i stor grad er konsentrert til relativt få land. Det er imidlertid ikke fastsatt noen konkrete måltall for dette.

Nominasjons- og utvelgelsesprosessene

Det later til å være en iboende og nesten uunngåelig egenskap ved programmet at kandidatene står overfor svært ulike risikosituasjoner og vurderes forskjellig avhengig av hvilket land de kommer fra og hvilken aktør som nominerer dem. Selv om de nominerende aktørene opplever at nominasjonskriteriene er tydelige, er det utfordrende å anvende dem i praksis.

I praksis fungerer risikokriteriet som et inkluderingskriterium, og ikke som et rangeringskriterium. Dette innebærer at programmets mål om å omfatte risikoutsatte personer blir underordnet målene om kjønnsbalanse og geografisk spredning. Dette understreker behovet for klargjøring av programmålene.

Overtalligheten av nominerte og kvalifiserte kandidater er en relativt ny utfordring for programmet. Vi anbefaler at HK-dir vurderer dagens utvelgelsesprosedyre med henblikk på å vurdere tiltak som å innføre et maksimum antall nominasjoner fra hver aktør, å begrense antallet deltakende land hvert år, eller å gjennomføre loddtrekning eller en annen utslingsmekanisme på et tidligere tidspunkt i utvelgelsesprosessen. Vurderingen bør ta hensyn til hvordan ulike tiltak vil påvirke nominerende aktører, kandidater og HK-dir-sekretariatet selv.

StAR-studenter som menneskerettighetsaktivister

Et flertall av studentene (79 prosent) melder at de er engasjert i menneskerettighetsaktivisme mens de studerer i Norge. Aktivismen deres spenner fra lokal deltakelse til fortsatt arbeid for aktuelle saker i hjemlandet. Enkelte tidligere StAR-studenter rapporterer ulike grader av aktivisme etter deltakelse i programmet. Hovedårsaken til ikke å være aktiv er sikkerhetshensyn.

De fleste studentene forteller at programmet motiverer for videre aktivisme og gir verdifull kunnskap, ferdigheter og nettverk. Noen studenter ønsker imidlertid mer bistand til å finne og knytte kontakt med menneskerettighetsorganisasjoner og nettverk i Norge. Vi finner også at ingen av systemaktørene har ansvar for å koble studentene til slike nettverk, og studentene mottar varierende grad av bistand til dette.

Vi anbefaler at StAR-kontaktene får i oppgave å gi skriftlig informasjon om muligheter for aktivisme, både nasjonalt og lokalt. Vi foreslår at HK-dir vurderer å arrangere nettbaserte seminarer med samme formål.

Den forrige evalueringen anbefalte at HK-dir innhenter data om uteksaminerte studenters karrierer og aktivisme for å vurdere programvirkning. Imidlertid gjør hensyn til sikkerhet, anonymitet og kostnader ved å opprettholde en slik database dette til en stor utfordring. Derfor anbefales det ikke å innføre tiltaket.

StAR-studenter har behov for mer omfattende støtte enn det som tilbys i dag. Etter vår mening følger det av programmets mål om å støtte studentene som menneskerettsforkjempere at systemaktørene har et ansvar for å støtte og beskytte studentene på områder som er avgjørende for deres psykososiale forhold. Dette inkluderer flere av temaene over – særlig returspørsmålet, håndtering av risiko for transnasjonal undertrykking og psykososial støtte.

Generelt fungerer det faglige tilbudet i Students at Risk-programmet godt. De fleste studentene er fornøyde med den faglige relevansen av studiene og setter pris på det internasjonale læringsmiljøet. Studentene er også fornøyde med bolig- og økonomiske støtteordninger, og verdsetter den praktiske og faglige støtten fra programmet – her spiller StAR-kontaktene en sentral rolle. HK-dir bør imidlertid vurdere om informasjonen i programstarten kan være mer detaljert og/eller mer omfattende.

Studentene har svært ulike planer knyttet til retur etter endt program, og disse påvirkes av personlig sikkerhet, familie, politiske forhold og løpende risikovurderinger av forholdene i hjemlandet. De ønsker bedre støtte i å håndtere returbeslutninger og sin situasjon som risikoutsatte. Mange etterspør også bedre informasjon om psykososiale tjenester.

Vi finner at det ikke finnes systematisk støtte til studentene i håndtering av risiko og retur, og at det er behov for bedre informasjon og opplæring for både studenter og StAR-kontakter om temaene risiko og retur. Vi anbefaler følgende tiltak:

- Systematisk veiledning som inkluderer spørsmål om psykisk helse, retur og risikohåndtering for studentene
- Praktisk opplæring for studentene i håndtering av risiko og retur
- Opplæring av StAR-kontakter i hvordan de kan veilede studentene i spørsmål om retur og risiko
- Utarbeidelse av et sentralt definert mandat for StAR-kontaktene
- Innføring av en frivillig «safe-exit»-mekanisme der studentene bekrefter trygg ankomst i hjemlandet
- Utvidelse av stipendiet med en to måneders avrundingsperiode etter avsluttende eksamen for å forberede utreise

Samarbeid og informasjonsflyt

Generelt fungerer både samarbeid og informasjonsflyt godt i Students at Risk-programmet. Det er utstrakt tilfredshet med kommunikasjonen med HK-dir blant systemaktørene. Aktørene rapporterer at de får hyppige oppdateringer, raske svar og at informasjonen er nøyaktig og omfattende. Erfaringene med at HK-dir tilrettelegger kontakt mellom aktørene er også positive.

Tverrgående hensyn

Vi observerer at begge hovedaktørene – Utenriksdepartementet og HK-dir – i noen grad unnlater å oppfylle sine forpliktelser knyttet til de fire tverrgående hensynene – menneskerettigheter; kvinners rettigheter og likestilling; klima og miljø; og anti-korrupsjon. Fremtidig politikk for tverrgående hensyn i Students at Risk-programmet bør inkludere:

- En vurdering av hvorvidt eventuelle kortsiktige «activist drain»-effekter blir motvirket av den ønskede langsiktige effekten av å styrke studentene som menneskerettsforkjempere

- En kort vurdering av mulige risiki knyttet til kvinners rettigheter og likestilling
- Retningslinjer for reising som omfatter vurdering av programmets miljøpåvirkning og -risiko, men uten å svekke måloppfyllelse og studentvelferd
- En vurdering av risikohåndtering relatert til transnasjonal undertrykking
- En generell risikovurdering av programmet, inkludert korrupsjonsrisiko
- I tillegg bør policy-dokumentene tydeliggjøre i hvilken grad og hvordan tverrgående hensyn skal inkluderes i eller omfattes av programmålene

Hovedkonklusjon

Gitt måltrengselen og fravær av et spesifisert samfunns mål og en endringsteori, er det ikke mulig å fullt ut vurdere hvorvidt design og administrasjon av programmet er egnet i sett forhold til målene for programmet. Likevel, basert på de programmålene som er listet opp og diskutert i kapittel 2, kan vi trekke følgende konklusjoner.

Et overordnet samfunns mål for programmets bør defineres, og øvrige mål og designelementer bør utformes slik at de støtter opp under dette målet, i form av en programteori. En slik programteori vil klargjøre den relative vektleggingen av de ulike utvelgelseskriteriene: Geografisk fordeling, studentens akademiske potensial, grad av risiko (dvs. behov for beskyttelse), eller potensial som menneskerettighetsforkjemper.

Når det gjelder programmålet som Utenriksdepartementet har spesifisert målbare indikatorer for, er Students at Risk-programmet vellykket – spesielt når det gjelder fullføring av studier, bruk av studieplasser, kjønnsbalanse og trolig også geografisk fordeling.

Den generelle utformingen av programmet – aktørene, deres ansvar og samhandling – fremstår som hensiktsmessig. Vi har identifisert noen mangler som det bør rettes tiltak mot, særlig knyttet til behovet for mer omfattende støtte til StAR-studenter – spesielt relatert til retur, transnasjonal undertrykkelsesrisiko og psykososial støtte.

Systemaktørene bruker betydelige administrative ressurser på nominasjons- og utvelgelsesprosessene, samt på oppfølging av studentene under studietiden. Selv om vi ikke har forsøkt å kvantifisere disse kostnadene, er vårt helhetsinntrykk at ressursbruken er effektiv. Et unntak er imidlertid at det brukes mye ressurser på å vurdere kandidater som til slutt likevel ikke blir tilbudt studieplass og stipend. Med det forbeholdet fremstår dagens ressursbruk som en iboende egenskap ved programmet.

For det meste er anbefalingene fra evalueringen i 2020 fulgt opp – unntaket er utfordringene med programmålene og -struktur.

1 Introduction

1.1 Background

Human rights in Norwegian foreign policy and development aid

Norwegian foreign and development policy is rooted in human rights, and Norway has been a strong advocate for human rights in international politics for a long time. Efforts to strengthen human rights occur on different levels and are directed towards various measures, such as legislation, diplomatic relations, and the conditions of human rights defenders.

Strengthening education and the capacity of human resources is an important part of the Norwegian aid and human rights portfolio. During Norway's most recent period in the UN Security Council, Norwegian diplomats were central in negotiating and adopting a resolution to protect education, schools and universities in conflict zones.

Norwegian higher education development aid

A significant portion of Norwegian aid funds is earmarked for school, education, and research. These funds support both individual projects and larger initiatives, through bi-lateral and multilateral channels. NORHED is the Norwegian flagship program for higher education and research for development. It is now in its second period – NORHED II. A total of 60 projects are financed through NORHED II (2021–2026), connected to various Norwegian universities and colleges in collaboration with partner institutions in the global south (Norad, 2024b).

Supporting human rights on the individual level

Norway extensively supports established human rights organizations and educational institutions. Nevertheless, Norwegian authorities recognize that both education and human rights can also be supported at the individual level.

NORPART (Norwegian Partnership Program for Global Academic cooperation) supports long-term academic collaboration and mutual student mobility between higher education institutions in Norway and selected partner countries in the Global South. In 2023, NORSTIP was established as a scholarship scheme for students from countries outside the EEA and Switzerland.

Students and academics are identified as a group commonly exposed to risks emanating from their human rights work (Ministry of Foreign Affairs, 2023, p. 7). Several threatened researchers have received support through the Scholars at Risk network (SAR) and the Scholar Rescue Fund (SRF) to finance their stays at Norwegian universities and research institutions. While SAR and SRF are international networks, there are also Norwegian schemes. The Students at Risk program (StAR) is one such scheme for threatened students.

Both NORPART, NORSTIP, and the StAR program are financed by the Ministry of Foreign Affairs and managed by the by the Norwegian Directorate for Higher Education and Skills (HK-dir).

1.2 The Students at Risk program

Students at Risk was initiated by the Students and Academics International Assistance Fund (SAIH) and the Norwegian Student Organization (NSO) and established as a pilot

program in 2013. At that time, funding for StAR was set to run until 2016, after which it was renewed annually in subsequent years. In 2020, the program was continued through a delegation agreement between the Ministry of Foreign Affairs (UD) and the Directorate for Higher Education and Skills (HK-dir) and now operates without an expiration date.

Students at Risk is primarily intended as a support scheme for students from countries that can receive official development aid (ODA-countries).¹ On one occasion, it has also granted scholarships to Russian students. The program offers places for up to 20 students annually, depending on the number of qualified students and the number of students who are offered a study place at a higher education institution in Norway. Since the establishment of StAR, 167 human rights defenders from several different countries have been offered support for studies in Norway (HK-dir, n.d.). Potential candidates cannot apply for admission to the program themselves but must be nominated by designated institutions and organizations within governance, higher education or civil society.

Phases in the Students at Risk program

In the program guidelines, HK-dir describes the program as a process with five phases. In the *nominations phase*, the designated institutions find potential candidates and nominate them for the program. In the *validation phase*, HK-dir assesses the candidates and ascertain that they meet the selection criteria and the basic linguistic and academic requirements for commencing higher education in Norway. Candidates who do not qualify for admission to higher education in Norway, are notified by HK-dir. Remaining candidates continue to the *admission phase*, where the participating higher education institutions (HEIs) are asked to consider the candidates for admission to one or more study programs. Candidates who are admitted may receive a scholarship. If they accept, they proceed to the *immigration phase*, where HK-dir assists them in applying for a study permit with the UDI, making travel arrangements, and covering relevant fees. In the *relocation phase*, HK-dir informs the HEIs contact persons about arriving students and transfer scholarship funds. The HEIs are responsible for the reception of the students and for assisting them with accommodation, necessary registration processes and other practicalities.

In recent years, the number of qualified candidates has exceeded the number of available scholarships and HK-dir has developed a selection procedure partly determined by a lottery to choose among the candidates. We describe this process in more detail in Chapter 4 and use the term “*selection process*” to describe both the validation phase, the admission phase, and the final selection procedure employed by HK-dir when there are more qualified candidates than available scholarships.

In the program guidelines, HK-dir primarily describes the process leading up to arrival in Norway. In this evaluation, we also discuss the *study phase*, including how the students’ experience their stay in Norway, the *exit phase* when the scholarship and studies in Norway are concluding and what previous StAR-students do in the *post-exit phase*.

Previous evaluations of the Students at Risk program

The Students at Risk program has undergone two previous reviews: an internal mid-term evaluation conducted in 2017 and an external evaluation conducted by Ideas2evidence in 2020. The mid-term evaluation assessed the pilot period of Students at Risk

¹ ODA recipients: countries, territories, and international organisations. Accessed on 21 August 2025 at <https://www.oecd.org/en/topics/oda-eligibility-and-conditions/dac-list-of-oda-recipients.html#oda-recipients-list>.

(2014–2016) and concluded that the program largely functioned well, with students considering their study period in Norway beneficial for their future careers (SIU, 2017).

The evaluation also identified some weaknesses in the Students at Risk program, including the nomination process, the conditions facing participating students following their stay in Norway, and the overall mandate of the scheme.

The second evaluation (Jones, Nordhagen and Dahle 2020) reviewed the StAR program from its inception in 2014 up to 2020. This evaluation also found positive effects of the scheme, highlighting a well-designed nomination mechanism, an appropriate division of labor among the system actors, and high degree of goal achievement as measured in terms of student progress and continued work as human rights defenders.

On the other hand, the evaluation pointed to several shortcomings. Important critical points include that participating students receive no follow-up in their home country after graduation, and that there is an unclear division of responsibilities in the nomination process. The evaluators also recommended that the program's implicit goals and objectives should be explicated and highlighted a lack of coherence between the program's mandate and Norwegian foreign policy (see, for example, NOU 2008: 14).

1.3 Evaluation questions

HK-dir has mandated an evaluation of the revised Students at Risk program. The main goal of Students at Risk is to give student activists within the human rights field the opportunity to complete an education in Norway if activism has led to this opportunity being closed off in their home country. The scheme is based on the idea that education is a key to achieving relevant positions in their home country and can thus contribute to strengthening the role of student activists as agents of change in the long term.

The evaluation has three overarching goals:

- I. To assess experiences with implemented changes and other aspects related to process and goal achievement
- II. To gather information on whether the Students at Risk program is effective in terms of resource use, organization, and established goals, according to section 7.4 of the Regulations on Financial Management in the State.
- III. To provide advice on how the scheme should be continued.

Hence, in this evaluation report we address the following specific evaluation questions:

A) To what extent does the Students at Risk program achieve its goal of enabling students from OECD/DAC countries who are human rights defenders and, for security reasons, cannot continue their studies in their home countries, to complete higher education in Norway?

- 1) How many candidates are nominated for the program, and how many of those qualify?
- 2) How do the nominating entities identify qualified candidates?
- 3) How does HK-dir assess the candidates' qualifications?
- 4) To what extent do the program's 20 annual scholarship slots get filled?
- 5) What is the geographical distribution of the nominated and the accepted candidates?
- 6) What is the gender distribution of the nominated and the accepted candidates?
- 7) To what extent do the students complete their studies?

- 8) How many students complete their degrees within the stipulated time?
- B) To what extent – and in what ways – do StAR students become strengthened as human rights defenders through participation in the Students at Risk program?
 - 9) Do the students engage in human rights activism, while studying in Norway and after completing their studies?
 - 10) Where do they engage in human rights activism – in their home country, in Norway, or in a third country?
 - 11) Are the program activities – including access to education in Norway, the administration of the scheme, and possibly other activities – designed to effectively contribute to strengthening the students as human rights activists?
 - 12) Do the students expand their network during their time as StAR students?
 - 13) Do the students perceive that the Ministry of Foreign Affairs and/or civil society actors use the opportunity to connect them to their respective human rights networks?
 - 14) What can the program do to follow up graduates to gain knowledge about their human rights activities and career development after completing their education in Norway?
- C) Does the period of study in Norway have other effects beyond potentially strengthening the students as human rights activists?
 - 15) To what extent are the students satisfied with the education? What was positive, and what areas need improvement?
 - 16) To what extent do the students secure relevant employment after completing their education – in their home country, in Norway, or in a third country?
 - 17) To what extent do the students feel that their future opportunities have generally improved?
 - 18) To what extent do the students feel they received sufficient support and/or follow-up during their studies – from HK-dir, from the higher education institutions, and/or from other relevant entities?
 - 19) For students who are in their home country: What are the main reasons for returning to their home country?
 - 20) For students who are in Norway or in a third country: How do they assess the possibility of returning to their home country – in the short term and in the long term? What are the reasons for these assessments?
 - 21) Does the period of study in Norway have other effects, positive or negative, beyond potentially strengthening the student as a human rights activist?
- D) To what extent have the recommendations from the 2020 evaluation been followed up?
 - 22) Which recommendations from the 2020 evaluation have been followed up – and in what way?
 - 23) What experiences have relevant stakeholders had with the changes implemented?
 - 24) Which recommendations have not been followed up – and why?
- E) How effective is the administration of the Students at Risk program?
 - 25) How well do the various actors in the program cooperate and share information?

- 26) How can the information flow be improved?
- 27) How suitable is the design and administration of the program in relation to its objectives?
- 28) How are the cross-cutting issues in Norwegian development cooperation addressed in the Students at Risk program?

Program effectiveness and efficiency

As to the second evaluation goal (goal II above), section 7.4 of the Regulations on Financial Management in the State declared that authorities should ensure that evaluations address whether benefit schemes are effective in adopted objectives, organization, and efficient in terms of resource use (FIN 2021). Effectiveness requires that the right design and measures are selected and relates primarily to the framework logic. Efficiency relates to the implementation of the activities.²

These principles have been operationalized in the Instruction for Official Studies (DFØ 2018),³ from which we have derived the following questions:

- 1) What are the prerequisites for successful implementation of the Students at Risk program?
- 2) Which problems regarding design, organization, administration (resource use) and goal achievement have been identified by the evaluation?
- 3) Which measures could realistically be applied to solve the identified problems?
- 4) What could be the positive and negative effects of the measures, over which time span, and who will be affected by them?

Thus, to fulfill the second overarching goal of this evaluation, these four questions are addressed. The 28 specific evaluation questions represent an operationalization of them. An assessment of the effectiveness and efficiency of the program is carried out in the final chapter of the report (chapter 8), based on analyses and conclusions drawn in preceding chapters.

1.4 Outline of the report

The next chapter discusses the program goals and objectives. Having thus established the program framework, we proceed with an analysis of goal attainment in terms of stated indicators in chapter 3. The next chapter looks into the nomination and selection processes, and the topic of chapter 5 is the students' human rights activism and the support provided through the program. Chapter 6 provides findings on how the Students at Risk program affects the students in other ways than those set forth by the program objectives. Chapter 7 renders an analysis of how the program complies with the four cross-cutting issues of Norwegian development cooperation. The final chapter seeks to draw up some general conclusions based on the preceding findings and analyses.

² *Hva er effektiv ressursbruk?* The Norwegian Agency for Public and Financial Management (DFØ). Accessed 8 August 2025 from <https://dfo.no/fagomrader/effektiv-ressursbruk/hva-er-effektiv-ressursbruk>.

³ In Norwegian: Utredningsinstruksen.

1.5 Methods and data

We have used the following main data sources in the evaluation:

Document review

We have reviewed previous evaluations and relevant policy documents about the program. This comprises the delegation agreement between Ministry of Foreign Affairs and HK-dir, the information the nominating entities receive, including nomination form and program guidelines, the framework agreement between HK-dir and the higher education institutions participating in the program, HK-dir's written procedure for the administration of the program, including the selection procedure used when there is an excess of qualified candidates. We also reviewed minutes from yearly consultation meetings between the Ministry of Foreign Affairs and HK-dir as well as yearly plans and reports from 2021–2025, financial statements and budget proposals.

Survey

During the time period 11 April – 7 May 2025 we conducted a survey directed at current and former StAR-students. The survey software SurveyXact generated e-mails to a total of 91 individuals in the target group. One reminder e-mail was directed at non-responders. A total of 33 respondents completed or partly completed the questionnaire, resulting in a response rate of 37 percent.

Our assessment is that the response rate is satisfactory, and that the survey data serve to provide a truthful picture of StAR students' experiences with and opinions about the program.

Interviews

We conducted a total of 20 qualitative interviews with system actors – representatives of HK-dir, the Ministry of Foreign Affairs (including embassy staff), higher education institutions and civil society organizations. Furthermore, five current and former students were interviewed.

Lastly, we interviewed representatives from the secretariat of the German Hilde Domin program at the German Academic Exchange Service (DAAD).⁴ In that interview it turned out that their experiences with the Hilde Domin Programme are of limited relevance to our evaluation of Students at Risk, not least because the program was founded as late as in 2021, but also because there are also significant differences between the two programs in terms of both objectives, selection criteria and admission processes.

Student data and integrity

We have used data on nominated and accepted candidates, their gender and nationality provided by HK-dir. Great care was exercised in preserving the integrity and security of student informants and respondents.

⁴ DAAD: Deutsche Akademische Austauschdienst.

2 The program goals and objectives

Our report starts out with this brief chapter devoted to a discussion of the program goals and objectives. Clarification of program goals is a prerequisite for responding to the evaluation questions about goal achievement – questions A and B as well as sub-question 27 about the relation between program objectives and its design and administration.

The Students at Risk program has multiple objectives and goals. First, the program guidelines document states:

“1.2 Programme objectives and target group

The overall objective of the Students at Risk-programme (StAR) is to identify students who due to their human rights’ activism, are at risk of being formally or de facto denied educational or other rights in their home country – and to provide these students with an opportunity to complete their education in Norway and strengthening them as change agents, [...].

Candidates accepted under the programme will be enrolled in bachelor’s or master’s degree programmes at the HEIs and receive a scholarship from HK-dir. Upon completion of their studies, students will be expected to return to their home countries.”⁵

In addition, the program should comply with four cross-cutting issues applying to all Norwegian development cooperation programs: Human rights, women’s rights and gender equality, climate change and environment, and anti-corruption.

“All development efforts are to be assessed on the basis of how they affect or are affected by these cross-cutting issues.” (Meld. St. 24, 2016–2017)

Lastly, we find that the program is also designed and implemented to forward an unspoken or implicit goal of contributing to Norway’s diplomatic footprint on the international human rights policy agenda. A government white paper states:

“The Norwegian authorities support human rights defenders and their work through direct contact, economic support, and dialogue with the relevant national authorities, as well as through the work of organisations such as the UN, the Council of Europe and the OSCE. Norway aims to play a leading role and to cooperate with partners in various regions to combat the increased pressure on human rights defenders and to support their work.” (Meld. St. 10, 2014–2015)

Although the text does not explicitly refer to the Students at Risk program, we find that the program should be evaluated in this context. This assumption is supported by statements made in our interviews with representatives of the Ministry of Foreign Affairs.

In our interpretation, from the above sources it is possible to infer that the following objectives may apply to the Students at Risk program:

1. To identify and select individuals in the target group: Students from countries on the DAC list of ODA recipients who are at risk of being denied education and other rights because of their activism as human rights defenders
2. To provide the selected students with an academic degree
3. To strengthen the selected students as change agents

⁵ Students at Risk. PROGRAMME GUIDELINES 2024/25. Norwegian Directorate for Higher Education and Skills.

4. To facilitate the students' return to their home countries
5. The program should have a positive impact on human rights, or should not have a negative impact
6. The program should have a positive impact on women's rights and gender equality, or should not have a negative impact
7. The program should have a positive impact on climate change and environment, or should not have a negative impact
8. The program should have a positive impact on anti-corruption, or should not facilitate corruption
9. The program should contribute to advancing Norway's human rights agenda in international politics

First, there are even two additional implicit goals for this program, formulated as target group criteria. The selected students should reflect a geographical distribution, and there should be a gender balance (thus reflecting objective 6). It should also be mentioned that on the program level the "at risk" goal is applied as an inclusion criterion, but not as a ranking criterion. That is, students are not selected on the basis on who is "most at risk". The same applies to the closely related inclusion criterion of being a human rights defender or activist. It is possible that some of the nominating actors rank prospective nominees based on the "at risk" and "activism" criteria, but this is not the case in the subsequent selection process carried out by HK-dir.

Second, the expectation that students return to their home country appears under the objectives and goals headline in the program guidelines. The evaluation report from 2020 stated that:

"The ultimate consequence of putting considerable weight on the objective of students returning home is that students at great risk should not be selected for the programme, because the likelihood of such students returning home is smaller than for students who are less at risk." (Jones, Nordhagen and Dahle 2020, p 40)

"[...] there lies an inherent conflict in the programme, between the goal of recruiting at-risk students, and the goal of students returning home after graduating. We recommend that the balance between the risk and returnability criteria is clarified at a political level." (Jones, Nordhagen and Dahle 2020, p 6)

Our interviews indicate that the program actors do not interpret and regard this expectation as a program goal that should be attained, and it is not mentioned as giving rise to any significant dilemma. Moreover, neither *Appendix B – Information to nominating parties* or the information leaflet that the nominating parties are requested to distribute to prospective nominees,⁶ mention this expectation. Thus, it appears that somehow the conflict mentioned in the evaluation report has been resolved. Given that the return expectation in practice is not interpreted and regarded as a program objective, we suggest that the return expectation be mentioned in preamble in the guidelines document instead of under the goals and objectives headline.

Third, it may not be self-evident that the four cross-cutting issues are included as program goals. But it is not sufficient to address these issues in the risk management plan only:

«The cross-cutting issues shall as a minimum be included in the risk management of all development efforts. This will reduce the risk that the efforts we support have unintended negative consequences for these issues. The cross-

⁶ *Students at Risk – empowering human rights activists. What is Students at Risk?* Undated classified document. Norwegian Directorate for Higher Education and Skills.

cutting issues shall in addition be actively promoted through concrete goals and objectives in prioritised areas and through political dialogue. (Meld. St. 24, 2016–2017)⁷

In other words, the scope of the cross-cutting issues stretches into the realm of program objectives. Hence, program policy documents should clarify to what extent and how cross-cutting issues should be included or encompassed by the program objectives.

Fourth, the objective of strengthening the students as change agents is not qualified. And its relation to the goal of providing an academic degree is not entirely clear. In the terms of reference for this evaluation, it is stated that

“The program is based on an understanding that education is a key to achieve relevant positions in (the students) home country, and the program will thus strengthen the student activists’ role as agents of change in the future.”⁸

It is not clear how far-reaching ambitions the system actors should have in “strengthening the students’ activist role”, and what should be the appropriate level of resources should be allocated to fulfilling this objective. Further, is the provision of education a separate objective, or just a means to fulfill the change agent objective?

Fifth, the Instruction for Official Studies (DFØ 2018)⁹ and the related guidelines states that for any given intervention or program its measures should address an overall (society level) objective. We find the existing official main objective of supporting selected students to be appropriate as an immediate objective only. The implicit societal goal of advancing Norway’s human rights agenda should thus be made explicit. But it is not evident to us that this is the ultimate program objective.

The previous evaluation of the Students at Risk program suggested that there could be a closer connection between the program and Norway’s foreign policies:

“The programme contributes towards the overall goal of Norwegian foreign policy of providing support for human rights defenders, but its impact could be increased if the relationship between the programme and overall foreign policy was strengthened.” (Jones, Nordhagen and Dahle (2020, p 6).

This assessment led to the following recommendation:

“The programme guidelines are developed to encompass the unspoken objectives and goals of the programme.” (Jones, Nordhagen and Dahle 2020, p. 40).

Hence, apparently this recommendation has not been followed up to a sufficient degree.

Sixth, the multitude of objectives that constitute the above list of goals illustrates that the program exhibits “objective profusion”, meaning that the combined objectives represent an unrealistic level of ambition and/or result in a diluted program focus. Three dimensions – or policy areas – are reflected in the program goals: The focus on students and providing them with a degree belongs in the higher education policy domain. The focus on students from countries on the DAC list, as well as the return expectation, reflect the development assistance dimension. And lastly, the goal of advancing Norway’s human rights agenda reflects the foreign policy domain. One could

⁷ Quoted in Norad (2024, p. 40). Norad’s unofficial translation from the Norwegian version of the white paper.

⁸ Our translation of: “Bakgrunnen for ordningen er en forståelse av at utdanning er en nøkkel for å oppnå relevante posisjoner i hjemlandet, og slik bidra til å styrke studentaktivistenes rolle som endringsagenter på lengre sikt.”

⁹ In Norwegian: Utredningsinstruksen.

even argue that the migration policy domain is present in the Students at Risk program, albeit only on the level of implementation and not on the level of explicitly stated program objectives.

Objective profusion does not necessarily imply that any of the various objectives' conflict with each other. Nevertheless, we see a certain risk that the relative emphasis on the objectives may not be uniform among the various system actors and that it may be difficult to judge how to prioritize program resources. Or in other words, that the high number may dilute the program's focus. On the other hand, a multidimensional program may facilitate that different stakeholders may find it in their interest to support and participate in it.

All in all, our assessment is that further clarification and qualification of the different goals would be beneficial, preferentially by organizing the various objectives and measures in a formalized program framework logic. Specifying an overarching objective detailing the intended societal impact of the program is particularly important in this respect. The framework logic could include a goal structure based on a theory of change detailing the objectives on the levels of impact, outcomes and output.

3 Goal attainment – student selection

In this chapter we address evaluation question A: To what extent does the Students at Risk program achieve its goal of enabling students from OECD/DAC countries who are human rights defenders and, for security reasons, cannot continue their studies in their home countries, to complete higher education in Norway? We provide figures on nominated and qualified students, including gender balance, geographical distribution and degree completion rates.

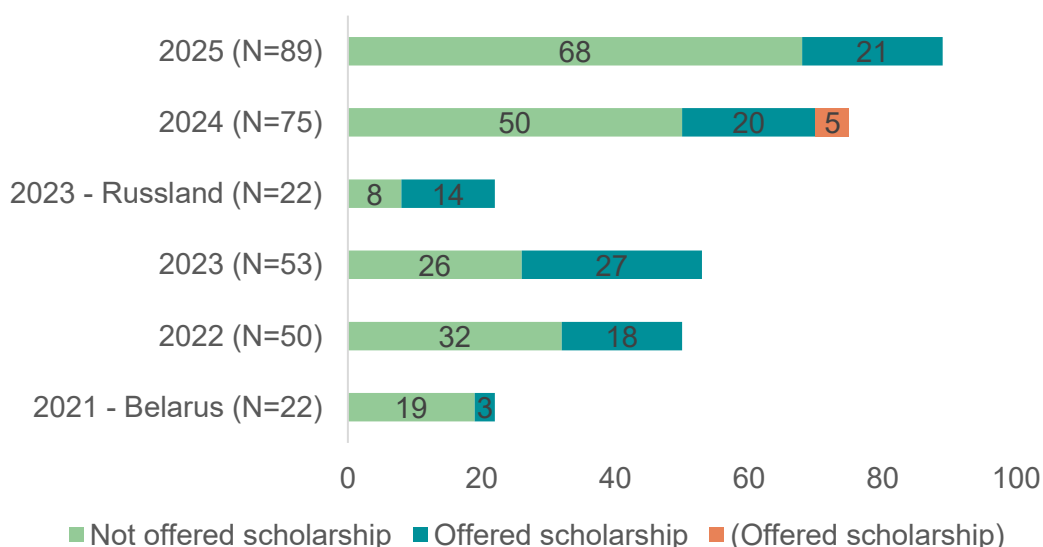
3.1 Nominated and qualified students in the Students at Risk program

Over the last five years (2021–2025) 311 candidates have been nominated for the Students at Risk program. This number includes candidates for extraordinary admissions from Belarus in 2021 and from Russia in 2023. Over the period 2021–2025 HK-dir has offered scholarships to 103 students, but seven candidates have chosen not to accept the offer. A total number of 96 students have accepted a study place and commenced their studies in Norway, or will do so, by august 2025.

In comparison, 248 students were nominated for the StAR program between 2015 and 2019, and 59 of them were accepted, about 25 percent (Jones, Nordhagen and Dahle 2020, p. 19). In consequence, the program did not operate at its full capacity (Jones, Nordhagen and Dahle 2020 p. 21).

Figure 3-1 displays the number of nominated and accepted candidates in the Students at Risk program from 2021 onwards. In 2024 five students from Russia were nominated and found qualified, but the Ministry of Foreign Affairs (UD) could not obtain funding for these candidates, and the admission was cancelled. These candidates appear under the label “(Offered scholarship)” in the figure (in parentheses).

Figure 3-1. Number of nominated candidates and candidates offered a scholarship in the Students at Risk program 2021-2025 by admission year.



The program offers 20 scholarships annually. According to HK-dir program guidelines potential candidates must meet the following selection criteria:

The candidates must

- be between 18 and 35 years of age per 31 December of the nomination year.
- not have completed master's level studies or equivalent.
- have commenced a study program at bachelor's and/or master's level in their home jurisdiction and have not discontinued such studies more than four years from the date of nomination.
- have sufficient English language proficiency to be able to complete a bachelor's/master's degree taught in English (at least level B2, preferably C1).
- be actively involved in activism aimed at improving the conditions for one or more human rights in a country on the DAC List of ODA Recipients, at a level deemed to entail personal risk (e.g. of physical violence, arrest, denial of civil rights, etc.).
- have valid residency (temporary or permanent) in a country on the DAC List of ODA Recipients, or such countries as are specifically included in the relevant admission round.
- hold (or be able to get hold of) valid travel documents (passport and the like) allowing travel to/from their country of residence.

In the early years of the program HK-dir did not manage to fill all its available student enrollment spots. The number of nominated candidates was lower, and less than 20 students each year qualified for the program. In the last two years, however, all spots have been filled, and the number of qualified students now exceeds the number of students that can be admitted to the program.

In the program year 2023/2024 35 candidates qualified for the program in addition to 18 candidates from Russia. In the year 2024/2025 54 candidates qualified for the program and were offered admittance from one or more of the participating higher education institutions. Because of the excess of qualified candidates, HK-dir has developed a selection procedure partly based on lottery. We describe and discuss this procedure more closely in section 4.2.

3.2 Gender balance

HK-dir encourages nominating entities to identify female candidates and states this clearly in the program guidelines. There are no explicit rules or quotas apart from HK-dir simply encouraging nominating parties “to identify as many qualified female candidates as possible”.¹⁰

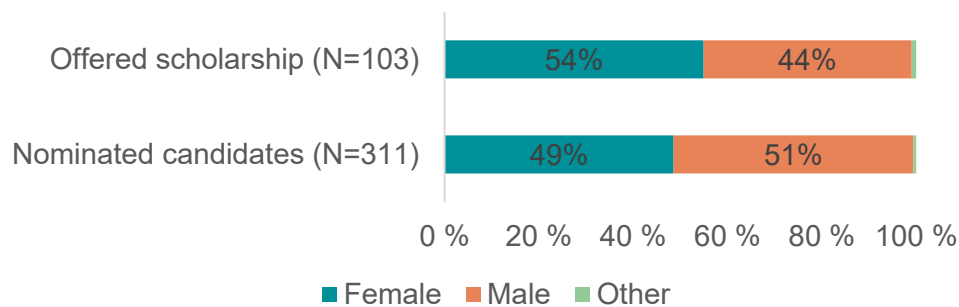
The previous evaluation showed that twice as many men (42) as women (17) had been accepted to the program between 2015 and 2020. This mirrored a significant gender imbalance in nominations as 210 males and 88 females had been nominated (Jones, Nordhagen and Dahle 2020, p. 20). At the same time, the evaluation found that adding the objective of gender balance to the program documents, and encouraging nominators to nominate more female candidates, had had a positive effect. The evaluators argued that a gender quota for women would not serve the program objectives well and therefore refrained from recommending such a quota (Jones, Nordhagen and Dahle 2020, p. 20).

It turns out that the consistent encouragement from HK-dir of nominating women is sufficient to attain gender balance among the nominated candidates. In recent years the

¹⁰ Students at Risk. PROGRAMME GUIDELINES 2024/25. Norwegian Directorate for Higher Education and Skills.

proportion of female candidates has oscillated between 40 and 60 percent. Some years more men than women have been offered a StAR-scholarship, but in total the scholarship has been offered to a slightly higher number of women than men the last five years. Figure 3-2 displays the gender proportion both among the total number of nominated candidates and among candidates who have been offered a scholarship.

Figure 3-2. Gender balance among nominated candidates and candidates who has been offered a scholarship from the Students at Risk program in 2021–2025.



3.3 Geographical distribution of students

In addition to gender balance, a goal – albeit understated – for HK-dir is geographical distribution. The nominated candidates over the last five years come from 29 different countries and the accepted candidates come from 24 different countries. The previous evaluation showed that only 16 nationalities were represented among the StAR students, and that the geographical distribution was uneven as half of the students came from only two countries (Jones, Nordhagen and Dahle 2020, p. 21).

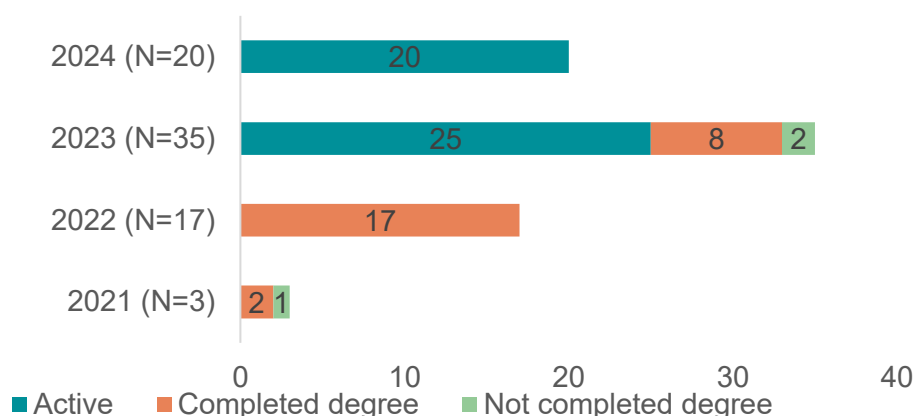
Table 3-1 on page 23 displays the geographical distribution of both nominated and accepted candidates. We observe that even though the accepted students represent 24 countries, they are still rather concentrated. Almost half of the students come from Zimbabwe (n=27), the Russian Federation (n=14) and Belarus (n=10). Fifteen of the countries are represented by one or two students only.

In terms of continents the accepted students are distributed across countries in Africa (n=50), Europe (n=28), Asia/Oceania (n=22) and Latin-America (3).

3.4 Completion of studies and degrees in the Students at Risk program

A total number of 75 students were nominated, offered a scholarship and commenced their studies in Norway in the period 2021–2024. 27 of these students have achieved the degree that they started on in the Students at Risk program. 45 students are still active. Only three students have left the program and failed to complete their degree. Figure 3-3 displays the status of students admitted in 2021–2024 by admission year.

Figure 3-3. Student status in 2024 for StAR students admitted in 2021–2024 by admission year.



Most of the students complete their studies, and most of them within the stipulated time. Only a couple of students are delayed each year and extend their stay with one or two semesters. This result is in accordance with the results from the previous evaluation (Jones, Nordhagen and Dahle 2020, p. 32).

3.5 Summary and conclusion, chapter 3

According to the delegation agreement between the Ministry of Foreign Affairs and HK-dir¹¹ the goal of the Students at Risk-program is to give human rights activists from countries on the OECD/DAC list of official development assistance (ODA) recipients¹² a chance to complete their studies in Norway. The target group is students who may not continue their studies in their home country because of the risks they are facing. The agreement states the following indicators as measures of goal attainment:

- The number of students admitted in relation to the number of available places
- The proportion of students who have completed their education and achieved a degree
- The gender balance among the candidates

The program succeeds in giving human rights activists a chance to complete their studies in Norway. All places have been filled in recent years and there is an even gender balance both among nominated and accepted candidates. Most of the students complete their studies, and most of them within the stipulated time.

We also find a significant degree of geographical distribution of the admitted students in terms of the number of countries represented. However, almost half the students are concentrated to three countries only, of which two are European.

¹¹ Avtale mellom Utenriksdepartementet (UD) og Direktoratet for høyere utdanning og kompetanse (HK-dir) vedrørende delegering av forvaltning av ordningen «Students at Risk» (StAR) til HK-dir, QZA-21/0293 - Students at risk (StAR). 24 May 2022.

¹² ODA recipients: countries, territories, and international organisations. Accessed on 21 August 2025 at <https://www.oecd.org/en/topics/oda-eligibility-and-conditions/dac-list-of-oda-recipients.html#oda-recipients-list>.

Table 3-1. Geographical distribution of nominated and accepted candidates in the Students at Risk program 2021–2025.

Country	Nominated	Offered scholarship
Zimbabwe	71	27
Belarus	42	10
Myanmar	40	8
Russian Federation	34	14
Afghanistan	28	5
Eswatini	14	5
Sudan	9	5
Democratic Republic of Congo	8	
Nigeria	8	2
Indonesia	7	3
Turkey	6	1
Ethiopia	5	2
Zambia	5	2
Colombia	5	1
Azerbaijan	4	4
Nicaragua	4	2
Syria	3	1
Philippines	2	2
Honduras	2	
Morocco	2	1
Kenya	2	2
Libya	2	1
Egypt	2	2
Vietnam	1	
India	1	1
South Africa	1	1
Phillipines	1	1
Thailand	1	
Ukraine	1	
Total	311	103

Our discussion of program objectives in chapter 2 ended somewhat inconclusively on the question of whether geographical distribution is an objective or not. At any rate, it is difficult for us as evaluators to define target figures on what would be acceptable or satisfactory levels of distribution and country representation.

The development since the 2020 evaluation (Jones, Nordhagen and Dahle 2020) has been positive on the parameters presented above: More students are nominated and indeed accepted to the program, which now runs at its capacity. The gender balance is good, and the geographical distribution of candidates has improved.

4 The nomination and selection processes

In this chapter we describe and discuss the nomination and selection process in the Students at Risk program. We specifically address two sub-questions to the evaluation question A about the target group objective:

- 2) How do the nominating entities identify qualified candidates?
- 3) How does HK-dir assess the candidates' qualifications?

4.1 The nomination process

According to the program guidelines potential candidates cannot themselves apply for participation in the Students at Risk program, but must be nominated by one of the following institutions who are officially approved by the Ministry of Foreign Affairs:

- A Royal Norwegian Embassy in charge of diplomatic relations in countries on the DAC List of ODA Recipients
- Norwegian higher education institutions partaking in the program (HEIs)
- The Norwegian Students' and Academics' International Assistance Fund (SAIH)
- The National Union of Students in Norway (NSO)
- The Scholars at Risk Network (SAR)
- Amnesty International (Amnesty)
- The International Cities of Refuge Network (ICORN)
- The Rafto Foundation for Human Rights
- The Norwegian Helsinki Committee (NHC)
- Norwegian Peoples' Aid (NPA)

Ahead of the deadline for nominating candidates all nominating entities receive information from HK-dir about the Students at Risk program, the nomination process, the selection criteria for potential candidate as described in section 3.1 and a nomination form. The information they receive is extensive, but HK-dir has also made a short information leaflet with frequently asked questions giving a quick overview of the program.

All nominating entities distribute information about the Students at Risk program and the nomination process to relevant networks, partners and employees, but the nominators do not follow a uniform procedure in the process of finding qualified candidates. They organize their internal nomination process according to their available resources and capabilities and adjust them to local conditions in the countries in question.

HK-dir has followed up on the recommendation put forward in the previous evaluation that English proficiency should be included in the formal selection criteria (Jones, Nordhagen and Dahle 2020, p. 40). However, this has created a problem in some countries in which this criterion makes it more difficult to find candidates.

“The language here is French; a lot could benefit but they can't be selected because of the language. It was very difficult to find someone who could study in English. Or they don't fit the criteria of age, or there is something else. So, it is difficult, but mainly it is the language. It would be good if we could give them a chance to learn English for one year and then start at the university as part

of the program. That's the main challenge. Unfortunately, the program does not give this opportunity." (Embassy employee)

Others, however, acknowledge English skills as a necessary requirement.

"Is the English requirement an issue?

In [country], yes, it does exclude some potential candidates. But you cannot change that. It is a fact of life that you cannot manage studying in Norway without English skills." (Embassy employee)

The nomination process in SAIH

SAIH is the largest nominating entity measured in the number of nominated candidates. For the study year 2024/2025 HK-dir received 89 nominations, of which 56 were from SAIH. Thus, SAIH nominated about 2/3 of all the candidates.

When SAIH receives information from HK-dir they distribute it to their network of human rights organizations and partner organizations within student activism, but only to countries and organizations they find relevant. They keep in mind that there is a limited number of available slots, and that the nominated candidates need to have sufficient English language proficiency to qualify. They also know that the geographical distribution of the candidates is important for HK-dir.

The program is well known in SAIH, and they receive a high number of potential candidates through their networks, far more than the candidates they end up nominating. To make good assessments of all possible nominees, SAIH has developed a more rigorous internal system than many of the other institutions including an application process where potential candidates submit application forms. SAIH then does a systematic review of all applicants. While only a few people in SAIH have access to the information they submit, at least two people participate in the review of each application. Whenever in doubt they consult trusted contact persons in the applicant's country of residence on the applicant's situation as an activist student at risk. They also consider all the other formal criteria, knowing what it takes to get a candidate qualified for the program.

Informants from SAIH express a concern that due to a high number of applications, nominees coming from them go through a stricter selection process than those coming from other nominating actors. They see a need to improve coordination among the nominating entities in the nomination phase.

The nomination process in embassies and other nominating entities

Other nominating entities may not have the same formal applications system as SAIH, but they all distribute information from HK-dir to their employees and networks and ask them for eligible candidates. They try to do thorough background checks on the candidates, but assessing their risk situation can be challenging, especially for the embassies.

"To assess the threats is a big challenge. We have a lot who can say I have been threatened by this and that, but sometimes you cannot find if it is true or false if there is no report on the case. You ask NGOs if they know the person and they say no, so sometimes it is difficult. You can get candidates from the provinces, sometimes. Then we cannot nominate that person. We need to make sure they are really facing treats. I think this criterion needs to be this way though." (Embassy employee)

The embassies have limited access to this group of students and contacting them directly could increase the risks they are facing. In addition, the turnover in the embassies' personnel and staff is higher than in the other nominating entities which makes the program less known. It varies how much the embassy personnel work with human rights activism and whether they have a designated person in this field. Thus, the embassies usually get nominations from different civil society organizations. The embas-

sies trust and rely on the assessments these organizations make regarding the candidates as students' activists at risk.

The previous evaluation by Ideas2evidence (Jones, Nordhagen and Dahle 2020, p. 6) found that many embassies exhibited excessive caution in nominating students. At that time, in 2020, the program was not operating at full capacity, and a greater number of students could have been admitted each year (Jones, Nordhagen and Dahle 2020, s. 39). To encourage more nominations from the embassies, Ideas2evidence therefore recommended that the assignment of contributing to the program should be included in the annual letter of allocation from the Ministry of Foreign Affairs to relevant embassies (Jones, Nordhagen and Dahle 2020, p. 6; 40).

The Ministry of Foreign Affairs informs that the ministry and HK-dir implemented several important modifications during 2020–2022, after the previous evaluation.¹³

One modification was to highlight and emphasize the role and responsibilities of the nominating actors in the annually distributed information package from HK-dir. An e-mail about the program is sent out in June to all nominating actors. It is accompanied by documents thoroughly describing the program, in appendices A to D.¹⁴ In addition, HK-dir arranged a digital information meeting in English for nominating actors, last August, where 40–50 people participated.¹⁵ The Ministry of Foreign Affairs informs us that their direct dialogue with embassies concerning the Students at Risk program is normally at a minimum,¹⁶ information that leads us to consider that both the quality and the timing of information to nominating actors from HK-dir is good and sufficient.

The embassies have shown increasing interest in the program the last few years, and in the last admission round in 2024 HK-dir received nominations from seven different embassies.

Some nominating entities, including SAIH, consider far more potential candidates than they end up nominating:

“We also have an interest in showing that there are many qualified candidates who need support. It's a balance. Sometimes we get comments that we nominate too many. But there are so many more we could have nominated. We had 130–140 applicants last year. If we had strictly adhered to the criteria – being involved in activism at a level that puts them at risk – there would have been far more than the 56 we nominated. We could have nominated almost all the applicants.” (SAIH)

Other nominating actors, such as Amnesty, would like to have more candidates. They get little response from the information they distribute about the program and must send reminders to their network:

“We are in that part of the nominating group that wishes we could have more candidates. We struggle with little response from the movement to what we send out. Before my time, they tried holding information meetings where no one showed up. [...] There's definitely potential to make the program better known. I've been thinking that I want to work on planting some seeds earlier in the year, not just waiting for the letter from HK-dir in the fall. By then, there's little time to get to know the program, ask us questions, look for relevant candidates, etc. I've been thinking that I want to work on establishing it as more of a year-round thing.” (Amnesty)

¹³ E-mail for circulation for the 10th nomination round.

¹⁴ Interview with the Ministry of Foreign Affairs representatives March 7, 2025 and HK-dir February, 27, 2025

¹⁵ Interview with HK-dir representatives February 27, 2025

¹⁶ E-mail circulated for the 10th nomination round.

4.2 The selection process

The previous evaluation (Jones, Nordhagen and Dahle 2020, p. 6) found that a high proportion of students who are nominated are not formally qualified, and that this could lead to unnecessary work for Diku and relevant personnel in NOKUT (both now in HK-dir), as well as prolonged wait and eventual disappointment for candidates. Ideas2ev-dence therefore recommended that the program guidelines should further specify the responsibility of nominators in the nomination process (Jones, Nordhagen and Dahle 2020, p. 41). As outlined above, nominating actors receive detailed information about their responsibility in the nomination phase. In addition, the program has now run for several years, resulting in the most active nominating actors obtaining more experience in nominating eligible candidates.

HK-dir collects all nominations from the nominating entities. In the following selection process, HK-dir checks the eligibility criteria, and then the academic and linguistic qualifications of nominated candidates. To assess the candidates' work as human rights activists, and the level of personal risks they face, is nevertheless the responsibility of the nominating entities, and HK-dir rely on their assessments in the nomination process.

When HK-dir has received all nominations, they contact the candidates by e-mail with more information about the program and the further process. They schedule initial interviews with all the candidates and use the interviews to ascertain that they meet basic requirements for commencing higher education in Norway. These interviews take a lot of time and resources. On the other hand, they make it possible to notify candidates who clearly do not qualify for admission to higher education in Norway at an early stage in the process. The interview is also used to inform each candidate directly about the next steps in the evaluation process and the timeline, and to help manage their expectations regarding how long it will take to receive a final answer. HK-dir also tries to give each candidate a realistic sense of their chances of receiving a scholarship, based on how many candidates being nominated compared to the number of scholarships available.

After these initial interviews the remaining candidates are asked to supply HK-dir with more detailed information and documentation of their academic and linguistic qualifications.

The 2020 evaluation recommended that higher education institutions should be provided with more information about candidates, that NOKUT should be involved at an earlier stage and/or that the higher education institutions themselves should conduct interviews with candidates themselves (Jones, Nordhagen and Dahle 2020, p. 41). This recommendation certainly seems to have been taken seriously, as the validation team in HK-dir (previously NOKUT) now performs thorough interviews with candidates, checks their proficiency in English as well as their academic qualifications.

HK-dir then sends a list of candidates to the higher education institutions who take part in the program. This list consists of candidates who are considered qualified for admission to higher education, and who are assessed as having either a medium probability of completing a degree or a high probability of completing a degree, based on documentation of education and language skills.

The institutions return a list of candidates whom they wish to offer admission. Candidates who have not been admitted are informed of this and removed from the list. If the final list consists of 20 candidates or less, all of them are offered a scholarship through the Students at Risk program. However, in the last two years more than 20 candidates have been admitted from the education institutions in this final stage of the nomination process, and HK-dir has chosen to draw lots to make their final admission decisions.

The candidates who have been admitted are ranked based on a lottery between candidates from each individual country. If fewer than 20 countries have candidates who have received a study offer, scholarships are awarded to candidates who, after the first lottery, are at the top of their country list. This ensures the best possible geographical distribution among the students. If there are not enough scholarships for all the candidates in second place on their country list, a lottery is held among candidates in second place across countries. HK-dir then reviews the list and adjusts for gender imbalance greater than 40/60 percent. If necessary, they replace some candidates from the overrepresented gender, and this replacement is also based on a lottery.

Scholarship recipients who decline on the offered study place are replaced, as far as possible, by candidates from the same country, and if possible, of the same gender, based on the ranking established in the first lottery.

4.3 Discussion of the nomination and selection process

4.3.1 Assessment of the candidates' human rights activism and risk situation

The nomination process

The previous evaluation (Jones, Nordhagen and Dahle 2020, p. 6), found that not all nominating actors performed their role well. Some of them did not verify students' at-risk status properly, others did not control that the students met the formal nomination criteria. The report therefore recommended that the program documents were developed in order to clarify the responsibility of nominating actors, including embassies.

As mentioned above HK-dir checks the eligibility criteria, and then the academic and linguistic qualifications of nominated candidates, but it is the nominating entities' responsibility to assess the candidates' work as human rights activist and the level of personal risks they are facing.

The nominating entities, however, have different prerequisites and resources at their disposal to assess potential candidates' activism and risk situation. The nomination procedures and the number of nominated candidates also vary greatly between the nominating entities. Some have far more potential candidates than they end up nominating. Others receive only one or two. Thus, the nominating entities may assess their candidates differently and have different thresholds for nomination. Especially the embassies generally are not in a position to perform background checks or otherwise to assess or verify the activism and risk situation of the candidates. Hence, the embassies must trust their partner organizations and their assessments.

The risk situation the candidates face also varies greatly between countries. In addition, the Ministry of Foreign Affairs emphasizes geographic diversity in the program. This makes it more difficult for candidates from countries with many potential nominees to get nominated and hence to get a scholarship.

"The more applicants we get from one country, the stricter we become. We know that geographic diversity has become more important now. It's a balancing act between nominating people to recognize their work and status as activists, acknowledging the risks they face, but at the same time not giving too much hope when we know there are so few spots available." (SAIH)

Informants from SAIH emphasize the need to improve coordination among the nominating entities in the nomination phase, but to achieve a uniform nomination process across all nominating entities is not realistic. In many ways the varying risk situation for

candidates is an inherent part of the program, which the Ministry of Foreign Affairs is also aware of:

“The level of risk varies greatly, and we have requested that the scheme ensures broad geographic diversity. Countries are different, and it’s inherent in the program that participants will face different degrees and types of risk.”
(Ministry of Foreign Affairs)

The selection process

The assessment of the candidates as human rights defenders at risk only takes place in the nomination phase, not in the selection phase. Thus, in a situation with an excess of qualified candidates neither their risk situation nor their work for human rights is considered in the final allocation of scholarships. Some of the system actors point out express that it is unfortunate that the final stage in the selection process is based on a lottery when there is an excess of qualified candidates. They would prefer that HK-dir takes the risk element into account and offers scholarships to candidates who face the most serious risks. Some also mentioned the activism criterion in this regard.

“In the final selection of candidates, one does not take into account which candidates are at the greatest risk or in the most difficult situations. This is not considered, and we see that as a weakness in the program. We believe that the Students at Risk scheme assumes that all nominated candidates are equally at risk. However, we think there are significant differences between the countries candidates are nominated from, and that the situation is much worse in some countries than in others, but this isn’t taken into account. For us, an ideal candidate would be a student who is in real danger – for example, someone at risk of being imprisoned in their home country.” (NLA University College)

“Since there are only a limited number of spots and a lot of applicants who fit the fairly broad criteria, we see a need to improve coordination in the nomination phase and also find a way to emphasize the risk and activism criteria in the final selection of scholarships”. (SAIH)

On the other hand, HK-dir does not have the necessary resources or prerequisites to assess the candidates as human rights activists at risk. In addition, it is virtually impossible to rank the candidates based on their human rights activism and risk situation across countries in a fair and meaningful way.

“We spent a lot of time considering how to make the selection process as fair as possible. Ranking vulnerability is very difficult and could add to risks for the individual if we had to seek additional information. In the end, we decided that academic qualifications should be the final sorting criteria, because this is within HK-dirs competency.” (Ministry of Foreign Affairs)

From information available in program documents, and from interviews, it is clear that the responsibility for assessing the candidates’ activism and risk situation is assigned to the nominating parties. We have no indications that the nominating parties do not take their responsibility seriously. It is also clear that in the selection phase the candidates’ activism and risk situation are inclusion criteria and not criteria for ranking them. To sum up, program guidelines are clear concerning the responsibility of nominating actors concerning activism and risk assessment.

We would like to add that the previous evaluation cautioned against imposing additional measures to assess the candidates’ activism and risk situation, simply for the danger that the communication generated by vetting procedures as such may jeopardize their safety (Jones, Nordhagen and Dahle 2020). We support that assessment. We believe such considerations also apply to the possibility of centralizing the risk assessment procedure to the HK-dir secretariat. Moreover, while a centralized assessment procedure might ensure more consistent application of selection criteria,

the secretariat lacks knowledge of and insights into the local risk situations and the specific socio-political contexts of the human rights activism of the various nominees. It is a separate question whether the local nomination process can be affected by corruption. We address this question in section 7.4.

4.3.2 Excess of nominated candidates

The previous evaluation (Jones, Nordhagen and Dahle 2020) was performed in a period when the program was not utilizing its full capacity. Ideas2evidence therefore recommended that measures should be implemented to raise the number of nominees, particularly with respect to the embassies, to increase their participation (Jones, Nordhagen and Dahle 2020, p. 39).

On the other hand, Ideas2evidence also recommended that nominations of students at bachelor's level should be discouraged, due to excessive administrative costs of evaluation of these candidates, who, to a much lesser degree than master's students, were accepted to the program (Jones, Nordhagen and Dahle 2020, p. 41). This information is now included and emphasized in the information HK-dir. sends to nominating actors.¹⁷

HK-dir received 75 nominated candidates in 2023/2024 and 89 candidates in 2024/2025, but the program has only 20 available slots for students each year. The high number of nominated candidates in recent years has made the administration of the program more costly and challenging. It takes a lot of time and resources to schedule and carry out initial interviews with all nominated candidates. It also requires extensive work to gather and review candidates supplemental academic and linguistic credentials and results.

Many nominations also have negative implications for the nominating entities and for the candidates themselves. The nominating entities invest a lot of work and effort in finding and nominating suitable candidates for the program who in the end are not offered a study place. HK-dir emphasize that involved parties must take care not to create unwarranted expectations of final approval until all verifications, validations and approvals have been duly completed. When the number of nominations is high, many candidates may still get such unwarranted expectations.

Discussion

HK-dir would prefer to have fewer nominated candidates. We see the benefits in reducing the number of nominations, and in the following we discuss various ways to achieve this.

HK-dir has considered imposing restrictions on the number of candidates each of the nominating entities may suggest. However, the number of nominated candidates from each entity is related to their engagement in student activism which varies greatly. Organizations who know the program well and have strong networks within student activism nominate more candidates than entities who are not as deeply engaged. Introducing a maximum possible number of nominations from each entity would thus imply a stronger restriction on entities with the most experience and the most developed internal system in finding potential candidates. Thus, this does not seem to be a viable strategy.

¹⁷ E-mail to nominating actors in the 10th round: "When nominating candidates, please bear in mind that there are around 200 English taught master's degree programmes available in Norway, there are only around 10 English taught bachelor's degree programmes on offer. Candidates who have completed their undergraduate studies are therefore far more likely to be offered a study place than candidates who have not."

One possibility is that HK-dir restricts the number of countries who may participate in the nomination process each year, but this strategy also has disadvantages. The current practice of an annual nomination process in all countries ensures continuity and most likely also ownership among the program partners, which would be difficult to maintain if one should temporarily exclude selected countries. There is a risk that important knowledge about the program would be lost if nominations in any given country were held biannually or at longer intervals, especially in smaller nominating entities with high turnover, such as the embassies.

A third possibility is to use a lottery to choose between candidates at an earlier stage in the process instead of among the last remaining candidates who are found qualified for the program and have been admitted. With a lottery in the initial stage of the selection process, e.g. when HK-dir has received all nominations, one could restrict the nominations to a manageable number. Rejections would come earlier in the nomination process and cause less unwarranted expectations of final approval among the candidates. This solution has not been discussed in the interviews, and we do not have full insight into its pros and cons, but we recommend that it be taken into consideration by HK-dir.

Many of the nominating entities call for information on the result of HK-dir's selection process. HK-dir does not seem to provide systematic feedback about the candidates, and whether they qualified for the program or not. Many of the nominating entities would like to know why candidates they nominated did not qualify to adjust and improve their nomination process and avoid using time and resources on candidates who end up being rejected.

4.4 Summary and conclusion, chapter 4

Overall, the nominating entities find the nomination criteria to be clear and appropriate for the program. However, they identify two key challenges in the nomination and selection process.

First, it is challenging to assess candidates as human rights activists at risk. Assessments and application of nomination criteria vary between the nominating actors and depend on which countries the candidates come from. On the other hand, we do not find it realistic to achieve a uniform assessment of all candidates across countries and nominating actors. In our assessment it is an inherent feature of the program that the candidates represent a diversity of human rights activism and face highly diverging risk situations, and hence are assessed differently depending on which country they come from and the entity nominating them. In practice, the activism and at-risk criteria are inclusion criteria, and not ranking criteria.

As a corollary, the 20 students that are admitted to the program each year might not be the ones most at risk, or the ones being the most active human rights defenders, among the total group of qualified candidates. Rather, the nomination and selection processes are designed to give precedence to the objectives of gender balance and the somewhat understated objective (c.f. the chapter 2 discussion) of geographical distribution. Again, this seems to support our suggestion of clarifying program objectives.

Second, the excess of nominated candidates and qualified candidates gives rise to challenges that are difficult to handle for HK-dir, the nominating actors and the candidates themselves. For HK-dir a high number of nominated candidates make the administration of the program costly and time-consuming. Candidates who have been found qualified and admitted, but who do not get a scholarship because of a lottery may perceive this decision as unfair. And nominating entities spend a lot of time and resources on nominating candidates who are eventually rejected.

There are several ways to reduce the number of candidates, e.g. introducing a maximum possible number of nominations from each nominating actor, restricting the number of participating countries each year, or introducing the lottery or another attrition mechanism at an earlier stage in the selection process. We recommend that HK-dir reconsiders the current practice with the aim of assessing the feasibility of the suggestions discussed above. The reassessment should consider how different strategies will affect both the nominating entities, the candidates and the HK-dir secretariat itself.

5 StAR students as human rights activists

In this chapter we address the role of StAR students as human rights activists, thus responding to evaluation question B: To what extent – and in what ways – do StAR students become strengthened as human rights defenders through participation in the Students at Risk program? Each of the sub-questions (9–14) are also addressed.

In the first part of the chapter, we present results and findings on whether the students engage in human rights activism during and after their participation in the Students at Risk program, as well as what forms of activism they engage in. We also present data on whether the students have expanded their human rights network during their time in the Students at Risk program and whether they find that their degree and participation in the program have strengthened them as human rights defenders.

In the second part of the chapter, we assess the support provided to students to strengthen them as human rights defenders and whether the activities and administration of the Students at Risk program are effectively organized for this purpose.

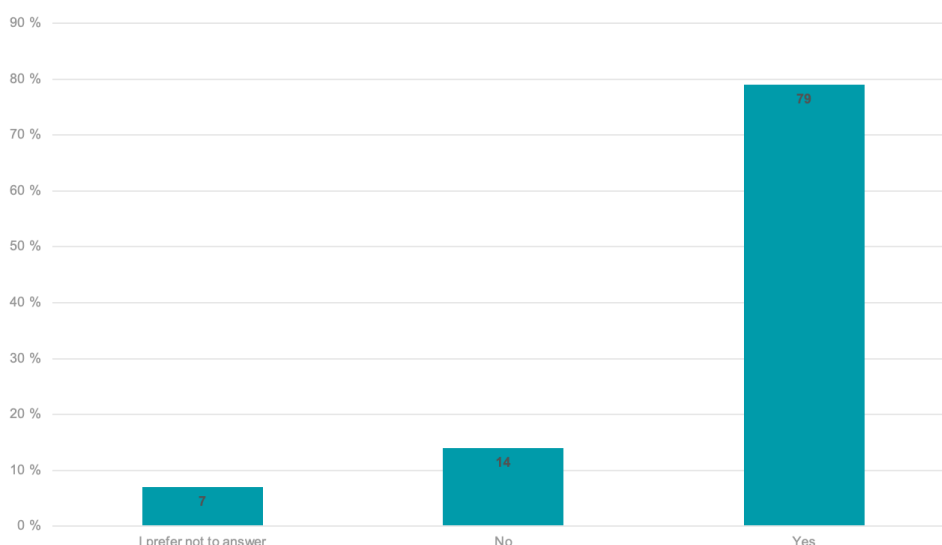
The chapter is based on data from the student survey, as well as interviews with students and system actors.

5.1 Students' human rights activism

5.1.1 Students' human rights activism in Norway

In the survey we asked the students whether they engaged in human rights activism while studying in Norway. 79 percent report that they did engage in activism, while 14 percent did not engage in activism and 7 percent preferred not to answer the question. See Figure 5-1.

Figure 5-1. Have you been engaged in human rights activism while studying in Norway? (N=28)



The extent and forms of activism vary. Some students are occasionally active during their studies, while others are engaged on a more continuous basis. The work they do

for human rights issues in the students' home country as well as other causes in Norway and the rest of the world. Activities include writing for papers in the students' home country, engaging in organizations in Norway, participation in marches and rallies for different causes, and participating as panelist in debates. One student interviewee explains:

"Yes, I'm pretty much active. I still retain my contacts and my network and I'm committed to political work back home, with my activism back home. Writing statements, editing educational material. Research proposals. Here in Norway my most immediate involvement is in [name of organization] locally, events about academic freedom and those things. Been panelist and speaker. Also outside of university I have several engagements."

The students' activism in Norway is both different from and interconnected with the activism they did in their home country. The activism in the students' home country is typically related to community work and political work, and the methods of activism are adapted to a political climate in which dissent is risky. In Norway the activism is more formalized through NGOs and "not as urgent" as one student describes it. Nevertheless, the two lines of work are connected. One student details:

"It is not difficult to see similarities and common patterns in how I was engaged back home and here. Those things can be subsumed in a unified analysis, the struggle for self-determination and Norway's commitment to uphold democratic institutions. It is not difficult to connect those two."

There are complex reasons as to why some of the students are not engaged in human rights activism in Norway. Some report that they struggle with mental health issues while others want to focus on their study program in Norway and take a break from activism. There are also students who keep a low profile for safety reasons and the possibility of returning to their home country:

"I keep a very low profile in Norway, I came to Norway to study and then return back to [country] to check what I can do there. Times in [country] are very difficult in the last years and I didn't want it to be worse, I have a lot of plans outside of going to prison. I came here to study and enhance my situation for when I return."

5.1.2 Students' activism post-exit

It is challenging to reach former StAR students, and we thus have limited information regarding students' human rights work after having exited from the program. Ten of the survey respondents have completed the Students at Risk program. Four of them state in their survey responses that they have been engaged in human rights activism *after* exiting the program, while five students state that they have not engaged in human rights activism after their exit. One student selected "Other".

The four students who have engaged in human rights activism report that they were also activists during their time in Norway. Their activities include political and community work. Two of the students engage in work for human rights remotely from Norway and from abroad, while the other two have returned to their home country. One student reports in a questionnaire open response field:

"I was already fully active in my home country, and I came back to participate fully. I am part of a political movement calling for democratic reforms and respect for human rights in the country. I also subscribe to [name of organization], where I sign and share petitions on human rights violations to amplify them in my network."

In open response fields two students explained their reasons for no longer being involved in activism. They report that it is too dangerous to be active in their home country. One is still active but in a different format:

“Since I began my activism six years ago while studying for my undergraduate degree, advocating for the voices of students at the university has become an essential part of my identity. I have witnessed significant changes and losses during this time. The victories, especially when engaging with governments, have demonstrated the considerable impact that advocacy can have on society. However, after experiencing police brutality, I have been rethinking my active involvement, particularly when there is little to no support for activists. In the last two years, I have focused on online activism and campaigns, but this does not feel the same as my previous efforts of taking to the streets to make our voices heard [...].”

The number of respondents is low, which precludes drawing conclusions for the whole population of students who have participated in the program. The data do however indicate that the level of activism among former StAR students varies.

Discussion of post-exit follow up of students

The previous evaluation recommended that HK-dir systematically gathers information and data on what students do after they graduate, both in terms of career and activism, to be able to assess the impact of the program (Jones, Nordhagen and Dahle 2022, p. 42). Still, there are serious challenges connected to protecting the former students' safety and anonymity (Jones, Nordhagen and Dahle 2022, p. 16).

To gather contact information about all StAR students, and maintaining and updating such a database, would also be a costly and time-consuming task, both for the former students themselves as well as for HK-dir. We do not recommend implementing such a measure.

5.2 Strengthening of students' human rights activism

Almost all students, 96 percent, agree or strongly agree that the program has encouraged them to continue working for change in their home country. A total of 73 percent also agree or strongly agree that their participation in the program has provided them with a network which is useful for their further activism and/or future career. See Figure 5-2.

In the interviews and open questions in the survey, students convey that the education they received has provided new knowledge and skills that are relevant for their human rights activism. It has also provided a more professional take on activism. One example is a student who plans on teaching children who are displaced in the student's home country, and who wants to pass on knowledge from environmental studies to communities of displaced people, such as information about sanitation. Other students believe the degree will open future job opportunities within the human rights advocacy field.

Connecting with other StAR students also strengthens the student capabilities as activists, according to the students. They convey that both their academic program and discussions with other students have challenged and changed their human rights thinking and introduced them to new perspectives. Being safe while studying and being activists is also of great importance. Two students reflect on their experiences:

“For the first time, I have felt a sense of safety that allowed me to study and express my concerns freely. The program has also given me the opportunity to engage in activism without fear of prosecution, and to connect with people from diverse backgrounds and cultures. This has significantly broadened my perspective and at times challenged some of my previous assumptions.”

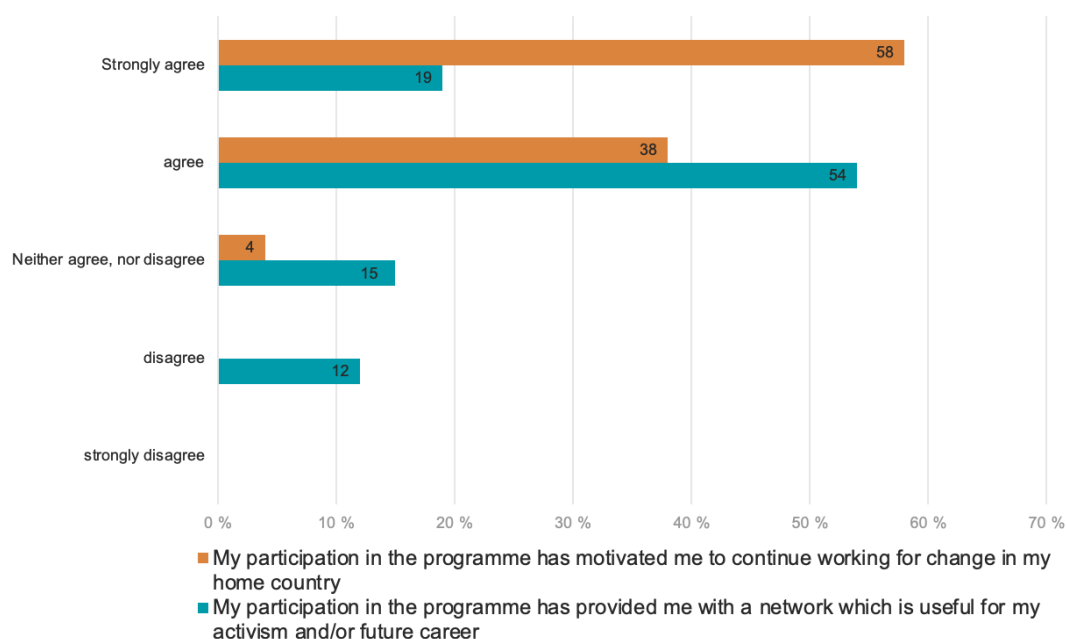
“Students at Risk gave me the opportunity to further my studies and explore the areas I am passionate about. It deepened my understanding of human rights, not only through the formal curriculum, but also through learning from

fellow StAR students and the networks I was introduced to because of the program [...].“

The students also report that the program seminars have provided insights in human rights topics. The opportunity to build a social network with other activists through the seminars has been especially important to the students.

Students however convey a desire for an increased number of seminars organized by the program. They, as well as several system actors, suggest that HK-dir organizes more StAR seminars on human rights topics and that these are available for all active students in the program.

Figure 5-2. Listed below are several statements about your participation in the StAR program. Please indicate to what extent you agree or disagree with each statement. (n=26)



Some of the students also express a need for more assistance in finding and networking with human rights organizations/networks in Norway. In the survey 37 percent of the students convey that they are dissatisfied with the assistance they get regarding this. The same proportion, 37 percent, are neither satisfied nor dissatisfied, and 26 percent are satisfied.

In interviews, students report that for the most part they have found opportunities of activism in Norway by their own means, that is, without any information or assistance from StAR contacts or other Students at Risk program staff. Yet, they find it difficult to navigate the “activism landscape” in Norway as they lack knowledge of how activism is organized here. The students express a need for more and better information and for more learning and networking opportunities within the framework of the Students at Risk program. Two students explain:

“I think strengthening networking opportunities, especially with other human rights organizations and like-minded individuals, would be incredibly valuable. It would help students feel more connected, supported and most importantly seen.”

“I believe it would be beneficial for the Students at Risk program to offer short courses or training sessions for these activists, helping them become more knowledgeable and effective in their work. This knowledge can then be shared

in their home countries, ultimately creating a network of well-trained human rights activists.”

5.2.1 Discussion of program support for students’ human rights activism

In chapter 3 we concluded that most StAR students finish their studies. The program thereby succeeds in one of its main goals of providing students with an academic degree. Both students and system actors report that the provided education strengthens students’ activism, as described in the previous sections.

To strengthen the students as change agents is one of the program objectives, and several system actors share the interpretation that the Students at Risk program should strengthen the participants’ capabilities as activists beyond giving them an academic degree. However, we are aware that the extent of support that realistically can be provided is limited by the available administrative and economic resources among the system actors. Another limiting factor is the fact that the StAR students are scattered across Norwegian higher education institutions, some of which are host to very few StAR students at a time.

As described above, most students find that the program has motivated them in their work for change and provided them with a useful activism network. Yet, a great minority of the students are dissatisfied with assistance provided for networking and report that they mainly find opportunities of activism by their own means.

None of the system actors is responsible for connecting the students with a human rights network while in Norway or providing them with other activities meant to facilitate and encourage activism. Embassies report that they do not provide the students with information on how to engage in human rights activism. SAIH has provided opportunities for students to get involved in their work and has made efforts to reach all StAR participants. They do, however, address the need for a more systematic approach to reach the goal of strengthening all students as human rights activists. Students’ reports reflect a highly variable patterns of information provision by universities, StAR contacts and local organizations.

We suggest that StAR contacts be assigned with the task of providing information about activism opportunities. Simple information measures are an information flyer for the students with an overview of main organizations for human rights activism in Norway, including contact information to SAIH, as well as locally produced material with information about local networking opportunities. Organizing online seminars could also be considered, while taking resource use and secretariat administrative capacity into account.

We do, however, *not* recommend a closer follow-up of students’ activism, such as a check-up on whether they are involved in activism or not. Activism should be kept voluntary and non-pressured as students may have good reasons for not engaging while in Norway.

5.3 Summary and conclusion, chapter 5

A majority of students (79%) report engaging in human rights activism while studying in Norway. Their activism ranges from local involvement to continued work for causes in their home countries. Reports from a few students who have exited the Students at Risk program display varying degrees of activism post participation. One main reason for not engaging is safety concerns.

Most students report that the program motivates continued activism and provides valuable knowledge, skills, and networks. Some of the students do however wish for more assistance in finding and networking with human rights organizations and networks in Norway. We also find that none of the system actors is responsible for connecting students with human rights networks or activism opportunities and the support students receive varies.

We recommend that StAR contacts be assigned with the task of providing written information about activism opportunities, both on the national and local level. We suggest that HK-dir considers organizing online seminars with the same purpose.

The previous evaluation advised HK-dir to collect data on graduates' careers and activism to assess program impact. However, concerns about safety, anonymity, and the high cost of maintaining such a database presents major challenges. As a result, implementing this measure is not recommended.

6 Other effects on the StAR students

This chapter addresses the evaluation question C of whether the study period in Norway has other effects beyond potentially strengthening the student as a human rights activist. We observe that the question and the related sub-questions 15–21 are not directly related to any of the program objectives, with the possible exception of the question about support (question 18), which was partially addressed in the previous chapter.

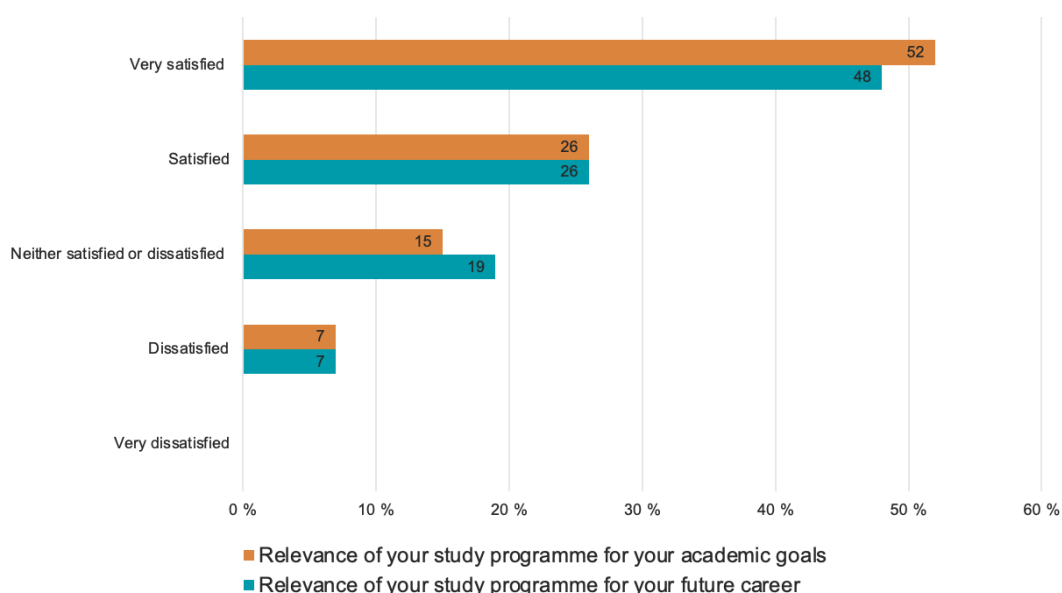
We first address the students' experiences with their academic program and the support they receive while living in Norway, including housing and other logistics. We then address the students' experiences of support related to being an academic at risk and support for return and life after exiting the Students at Risk program. Finally, we address students' experiences with psychosocial services and networking opportunities. At the end of the chapter, we discuss our findings and derive our recommendations.

6.1 Education, employment and future opportunities

In the survey we asked the students how satisfied they are with their studies in Norway, including satisfaction with the academic content and the relevance for future jobs and opportunities.

74 percent of the students report that they are satisfied with the relevance of their study program for their future career. 78 percent report that they are satisfied with the study program's relevance to future academic goals.

Figure 6-1. How satisfied are you with the following concerning your studies in Norway? (n=27)



In interviews most students express that their academic programs match their previous knowledge well. They find that the academic programs provide them with new insights and competence of relevance for future work. Studying in an international environment challenges the students' thinking and provides valuable social contacts. Two students expand on the topic:

"I think it (the academic program) is very relevant. It allows me to have a review and look at new perspectives that I have not learned before. There are a lot of international students. So it is a good way to learn. They offer this exchange of experience and perspectives from studying with international students. I still think my programme is very relevant for my career in the future and also to my academic background in the past."

"The Students at Risk program gave me the opportunity to further my studies and explore the areas I am passionate about. It deepened my understanding of human rights, not only through the formal curriculum, but also through learning from fellow StAR students and the networks I was introduced to because of the program. If it weren't for the Students at Risk program, I wouldn't be pursuing a PhD today or have a masters' since in (name of home country) I was blacklisted by government schools which are actually affordable for some of us who come from humble families."

The transition to a new academic system has been challenging for a few of the students. They are pleased, however, with the academic counselling that they have received at their universities.

In interviews there are a few students who express that they had little knowledge of the content of the program they were delegated, or given the opportunity to choose from, upon semester start. A couple reported that the information on their university's home page was not accurate, and they have found their program of less relevance to their future goals than expected. They have, however, adjusted their future plans accordingly, and they are still pleased that they have been given the opportunity of achieving a degree. A few of the students also report a wish for more information about the Norwegian academic system at the beginning of their program participation.

In conclusion, students are mainly pleased with the academic provision in the Students at Risk program. There are a few students who in interviews report a wish for better information. As this mainly concerns information provided by the universities, and not by the HK-dir secretariat, we find the program's academic provision to work well.

6.2 Student support measures

6.2.1 Logistics

In the survey 81 percent of students report that they are satisfied or highly satisfied with the housing they were offered, and 77 percent are satisfied or highly satisfied with financial support (Figure 6-2).

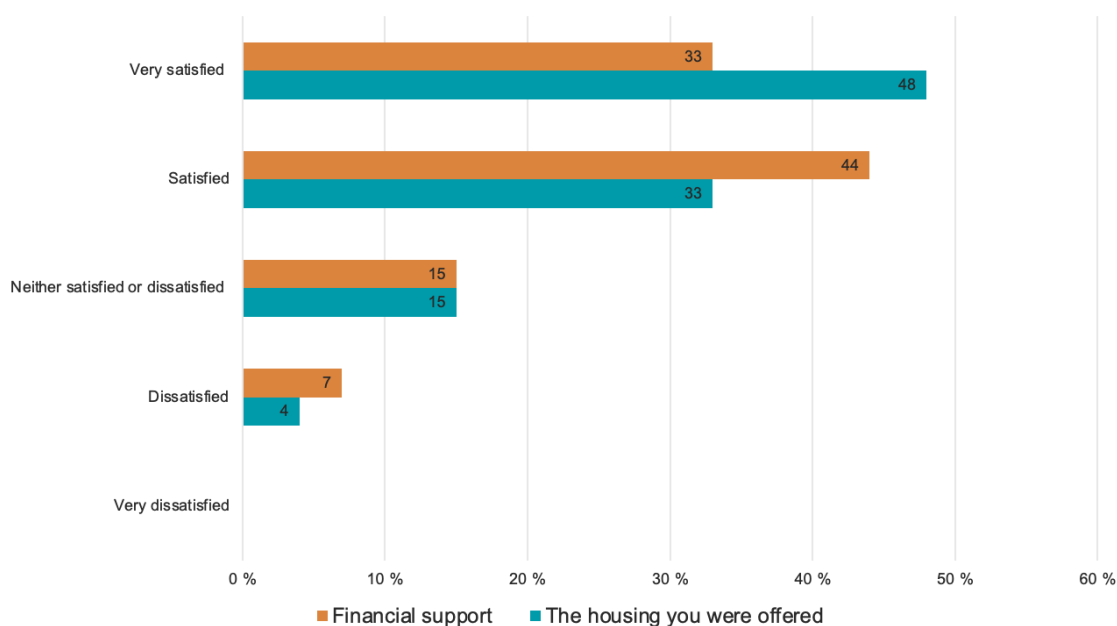
In interviews, students also express a high degree of satisfaction with the Students at Risk program and the support they have received both practically and academically. One student explains:

"There are several services to give us the information we need. Like housing services. I maximize those things, so I am currently having conversations with a student counsellor. Also in other academic questions we have a program adviser and a library assistant. They are readily available when I need them. Most of the time I just found things for myself, but they are there. I'm currently satisfied with how I'm doing."

In interviews, students however report that the information regarding logistics could be improved in the initial phase of the program, upon or shortly after the students' arrival in Norway. Students express different information needs, such as on the process of registering at the police, economical advice (e.g. rent for housing and opening a bank account) and information about life and cultural norms in Norway. Common for students is however a need for more detailed information. There has for example been

some confusion as to whether the scholarship should cover rent for housing or if housing is paid by HK-dir separately. A further confusion has been whether or not students would get a paid visit back home during their participation in the program. Some students do in the interviews also report a wish for someone, for instance a StAR contact or volunteer student, to meet them at the airport or within the first couple of days in Norway.

Figure 6-2. How satisfied are you with the support provided to you while living in Norway? Please state how satisfied you are with the following. (n=27)



Our assessment is that the logistical support for students in the Students at Risk program for the most part works very well. It would be difficult to completely remove uncertainties in the initial phase of StAR. Whether the information provided to students is sufficiently detailed is however a question that could be considered by HK-dir.

6.2.2 Support related to returning to home country

In this section we will first present data on whether students return or are planning on returning to their home country after exiting the Students at Risk program and the main reasons for their choices. We then address what support students wish for related to return.

We then go on looking at support for risk management and psychosocial services and social support. We then discuss support related to these topics together at the end of the chapter and give our recommendations.

Students' return plans

Although the program guidelines statement that students are expected to return to their home countries upon graduation is not interpreted as a program objective, the terms of reference for our evaluation includes questions about how the students assess the prospects of returning to their country of origin (questions 19 and 20).

In the survey, about half of the students chose not to answer questions related to return. This might be due to concerns about safety and caution with whom they share information. There were six students who answered that they are planning on returning, seven who do not know yet and three that are not planning on returning to their home country.

In the survey we also asked former StAR students where they are currently living. Ten students answered this question. Five of the students live in Norway. They are doing a PhD or master (three students), working (one student) or selected “Other” in the survey questionnaire (one student).

Among the ten respondents, two students live in a third country and are studying for a master and PhD. Two students have moved back to their home country,¹⁸ out of which one is working, and one selected “Other”.

In interviews students display the same diversity regarding their plans of return. Those reporting that they are planning on returning explain that this is to be with family, wanting to continue their life at home and to continue activism from home. Students take safety precautions while in Norway to ensure possible return, such as abstaining from activism during their stay. One student explains:

“I’m already planning on how to go home without being detected. I have those things in mind. No one in Norway know the risks better than myself. So I also know the repercussions and the possible steps I need to take. I’m thinking about all of these things. I don’t know what will happen really.”

A couple say they expect imprisonment upon return but are still adamant to go home and continue their activism.

Students report safety concerns as their main reason *not* to return. Some fear they will face repercussions and some express that the situation in their home country has worsened during their stay in Norway. Several students are also unsure of whether they will return or not and report that they are in a continuing process of considering their safety and the option of returning.

Two students reflect on their possible return:

“Getting the scholarship I understand we have to go home. Personally, I want to go home. I wanted to continue my work there, my family is there, my friends, all of the things that matter to me are there. I still feel like being in Norway is a transition thing. But it is not a question of if I want to go home, but can I go home. Because having information about the current threats, I know that they are still very active. My family is still under surveillance (...) They can arrest me as soon as I arrive in the airport. Then the academic gains will all be wasted. So I think about all of these things.”

“I don’t feel safe if I go back. We have a new president and everything is militarized. They take part in everything in [country], including schools. I don’t feel it’s safe. I still want to do activities, like undercover activism. I help translate things and help with cases in my hometown. I don’t know if when I go back it will be good or not. There are a lot of violations against activist in [country].”

Support in handling return issues while participating in the Students at Risk program

As described in the previous section, students face several dilemmas regarding return. According to both the students and system actors, several of the students struggle to handle these situations of uncertainty and potential risk and that they need more support. One student says:

“I’m kind of scared about going back, especially after experiencing a sense of safety here. It can be very difficult to prepare yourself to return to a place that is closely tied to trauma or at least to difficult past experiences. This is why having clearly communicated exit strategies would be so helpful. Knowing

¹⁸ The response alternative in the questionnaire reads: “The same country as when I was accepted to the StAR programme.”

what to expect, and having some guidance or support in place, could make the idea of returning feel less overwhelming and more manageable. It's also important that these exit strategies are designed with this concern in mind, because I know other StAR students share this fear as well."

Several students report a similar wish for better guidance on exit strategies and counselling regarding return. Several say they wish for counselling on other options than return to their home country, such as how to get a work visa or continue studying in Norway or elsewhere.

The system actors inform us that there is no systematic support for students in handling the question of return. The support is thereby mainly dependent on the capacity and competence of the individual StAR contacts. System actors furthermore express that it is important to raise the question of return with students at an early stage to set in motion the mental process of preparing for return, which many find difficult.

A wish for a longer adjustment period after the final academic year ends is also addressed in student and system actor interviews. The student scholarship as well as the student residence permit expires relatively shortly after the students complete their degree. This means that the students need to plan for an immediate return after the completion of their exams, or they need to find other options. Both students and system actors report that this leads to high pressure on students while they are doing their final exams. They address this as problematic for the students' health as well as for their academic achievements. Some of the system actors raise a wish to extend the visa period and scholarship for students for a set time after the academic year finishes. They report that such a measure would greatly alleviate students' mental stress and give time to ensure safe return strategies.

6.2.3 Risk management support

Some student interviewees report being subject to different forms of transnational repression, for instance in the form surveillance directed at their family overseas. One student, who was a journalist in the home country, reports to believe the student's family is at risk, as military has previously exercised violence against the student's family. Other students report that they expect that the government in their home country is paying attention to their actions in Norway. As described in chapter 5 they thereby take precautions in their human rights work in Norway.

Transnational repression

The security of the participating students can be at stake in the nomination phase, in the study phase, in the exit phase and post-exit. In the following paragraphs we explain in general terms how transnational repression can be perpetrated against StAR students.

Transnational repression is the oppression of diaspora groups in Norway, carried out or initiated by foreign powers. The repression may also target Norwegian citizens who have an interest in or exposure to the foreign power in question. Transnational repression includes several different forms of repression and persecution, including physical abuse, threats, harassment and discrediting, infiltration, abuse of consular services, surveillance, and attacks on and abuse of international frameworks. Diaspora in Norway is particularly vulnerable to repressive measures directed at family members that still reside in their country of origin (Proba, 2023, p. 12).

The annual National Threat Assessment for 2025 issued by the Norwegian Police Security Service (PST) states:

"In 2025, several authoritarian states will continue to identify and threaten refugees, dissidents and critics of their regimes who are living in Norway. This

happens physically as well as digitally. Some may also be recruited, through intimidation or cultivation, to disclose information about diaspora communities and opposition activities in Norway.

Authoritarian states use transnational repression in the form of pressure, threats and, ultimately, lethal violence to silence criticism of their regimes. Some states use their diplomatic representations to restrict their critics' freedom of expression here in Norway, for example, by monitoring demonstrations. They also use visiting intelligence officers, criminals or infiltrators in diaspora groups for this purpose." (PST, 2025, p. 27)

Transnational repression may be carried out by individuals acting on behalf of a foreign power – such as an overseas student or employee at a Norwegian higher education institution. This means that students in the Students at Risk program are at risk for being subjects to acts of transnational repression.

Several system actor informants gave accounts of students' experiences – surveillance and threats and harassment of family in their home country appears to be most common. Repressive activities in Norway may be carried out by persons who infiltrate the program, or by students or employees at Norwegian higher education institutions, or other individuals acting on behalf of foreign powers.

So far there have been no reports of infiltration or suspected infiltration of the Students at Risk program itself. Yet, management of the risk of the students participating in the program should be considered against this backdrop of how transnational oppression may be carried out.

Risk management in the Students at Risk program

The students are very much aware of their own situation of being at risk. Accordingly, several take active measures, such as limiting their networking with students from certain factions, weighing whether to participate in marches where photos might be taken, and reducing their use of social media. Some students have experience and training in handling risk, while others report that they struggle with managing it.

Students and system actors report that the students receive some security information from the embassy, universities and from HK-dir. Security has been a topic in the StAR seminar and the students report that the StAR contacts do in many cases provide them with valuable advice and assistance in handling their risk situation. As with the question of return, there is, however, no systematic provision of risk management support for the students. In interviews, there are system actors who report that they are unsure of what institution or service to contact if students are at risk. StAR contacts also report that they can feel inadequate in advising students on the topics of return and risk.

Students have several suggestions for measures that could help them better manage their risk situation. These include continuing to have risk management as a topic in StAR seminars and to have webinars so that students have the option of staying anonymous. Giving students training can build confidence in how to handle being at risk as well as practical tools, according to students. The students also wish for training in the use of social media, safe communication, digital security and strategies if arrested.

Data protection

Protection of student data is a focus point in the Students at Risk program. The program procedures for 2024/2025 state that system actors should be incentivized to preserve students' safety, including confidentiality and consideration of necessary security measures. It also stipulates five steps to ensure safety in communication with students. This includes marking communication so that it is exempt from the right of access under the Freedom of information Act, procedures such as using generic terminology in

emails and that lawyers should be consulted if there are any doubts concerning safety and data protection.

In interviews, system actors emphasize data protection of students. The StAR contacts maintain a general rule of keeping the students' identity anonymous for their protection. The students report that keeping their identity anonymous is vital and, as described above, they also take precautions themselves to protect their data. A couple of students report that they know StAR students who have had their identity revealed to other students by professors at their university. However, these interviewees have not made such experiences themselves.

6.2.4 Support after exiting from the Students at Risk program

Evaluation question 14 addresses what can be done within the program framework to follow up students after they have finished their academic program, with the intention of gaining knowledge of what they do after the participation.

Some system actor interviewees who have kept in contact with students after exiting the program to check that they are doing well, prompted by concerns for their safety, report that some students suddenly drop out of the communication for no evident reason.

In interviews students report varying needs for follow-up after their program exit. They mainly address the need for support and counseling before return, as previously described. There are however students who say they would like program staff to keep in touch, and that this would be an important safety measure for them upon return. Others express that they do not wish for such support as it could put them at greater risk. HK-dir has also expressed that such a follow-up is difficult due to data protection.

In interviews some system actors also suggest establishing an alumni network for former students. The previous evaluation (Jones, Nordhagen and Dahle 2020, p. 6), suggested that there was a "potential for increased impact" on the human rights field if the program implemented activities that could "work to strengthen the Norwegian government's work for human rights". The evaluators suggested that one such activity could be an alumni network for current and previous StAR students.

We are, however, aware that this has been tested by SAIH without success, mainly because the students have not displayed sufficient interest in such a structure. Another important aspect, which HK-dir takes very seriously, is related to protection of personal data. To be able to invite and gather students for alumni, sharing of personal information, in particular contact data, is inevitable. HK-dir is reluctant to take such steps because of data safety concerns.

6.2.5 Psychosocial services and social support

According to *Appendix A Terms and conditions "Students at Risk" scholarship*, students participating in the program have access to the Norwegian health care system and the relevant higher education institutions' insurance scheme on the same terms as ordinary residents. This then includes access to health care provided by student services. Additional insurance cover must be arranged for and paid for by the candidates. HK-dir also informs us that the program may cover expenses for private health care if this is necessary due to waiting lists or unexpected events or urgent needs.

In the survey, 50 percent of students report that they are satisfied with information provided about psychosocial services, out of which 30 percent report to be "satisfied" and 22 percent are "very satisfied". There are, however, 30 percent of students who are dissatisfied with the information, out of which 11 percent are "very dissatisfied" and 19

percent are “dissatisfied”. 19 percent answer that they are neither satisfied nor dissatisfied.

In interviews, students and system actors stress that several students need close follow-up due to experiences of being at risk, and that for those who are struggling the situation can be serious. Adaptation to life and culture in Norway and feelings of isolation are also challenging for some students. Students report that StAR contacts are the main source of information of available services for the students. There are also students who have found information about such services themselves. Other students report that they have not received information regarding mental health services. Two students say:

“I was given no information about the psychologist in students services. I asked the students advisor and the information center. There is a person who handles the StAR students, so I asked her. And she had information and then I also asked other StAR students who had the same problems.”

“Mostly the mental health situation (could be improved). Because since we have been through a lot in our home country and then maybe they could improve the mental health situation sector. Upon arrival in Norway, they could provide some information about mental health. They had a seminar after arrival. It was helpful but it was general about relocating but I think they should make improvements.”

Although the survey shows that the majority of students are satisfied with information on psychosocial services, the above quotes serve to illustrate that there are also students who express need for more information on mental health services. Suggestions from students include that the program could provide a yearly consultation in which questions on mental health are included, and to provide online consultations. One student says:

“Maybe provide online sessions for the students to check how they are doing. Maybe first with the program leaders, those responsible, but I think also to better with psychologist because some of the problems are quite serious. And some (students) are not ok.”

Several system actors address a need for a more systematic provision of information, as in their experience it varies what information students receive. They also suggest students should be provided information about the health services’ obligation to keep client information confidential in Norway, as they experience that some students refrain from contacting mental health services due to a fear of lack of confidentiality. The system actors also address a need to have conversations with students regarding their return from the beginning of their studies, as previously described in this chapter.

Some of the system actors also report that although the students have rights to health provision, this is not always readily available, as for the general population. One interviewee reports:

“The hardest part is for those who need psychological help, it takes an incredibly long time to get a regular doctor, then they have to have a consultation with the doctor, and there’s often a varying degree of compatibility there. After that, they need to be referred further, and then there’s usually a long waiting time. The fact that we have the student welfare organization is a very positive thing, but they are also extremely stretched for resources. And then we have the student chaplain, but that depends on each individual and whether it’s something they’re comfortable with.”

Better networking opportunities for StAR students could provide social and mental support. Several students interviewed report that they want to be connected with other StAR students and international students. Some do however not wish to have contact with other students from the same country for fear of transnational repression. In interviews students give examples of StAR contacts asking them whether they would like to be put in contact with other StAR students, which they report to be a good solution. In

some cases, StAR students have taken on the role as mentors for new students. Providing more StAR seminars can also improve students' networking opportunities.

6.2.6 The role of the StAR contacts

In the survey the students were asked about their satisfaction with support from StAR contacts. The great majority of students, 82 percent, report that they are satisfied with the support from their StAR contact at the academic institution, out of which 52 percent report that they are highly satisfied and 30 percent that they are satisfied. In interviews students report that StAR contacts are a main source of support in Norway. Contacts provide both practical support and academic and welfare advice. The students give examples of StAR contacts, and in some cases other university staff, that have monthly follow-up talks with them regarding mental health, life in Norway and academic progression.

In interviews we also asked the StAR contacts about their experiences of supporting the students. They do in general find their role as advisors as highly rewarding. They do, however, report a need for better support in their role as advisors, particularly on how to advise students on issues of risk and return. A couple of contacts say:

"The idea is that they are supposed to return, so we are not to facilitate them staying here. We can usually answer the questions that come up. But it's difficult to support them in this — we can't just say that this is the condition of the arrangement; we could have needed information to give them."

"I'd like a package of information about what we can ask the students, like here's a link to some things - what can we ask them about? PST [the Police Security Service] came by and talked about threats, so information such as that for example."

There have been some efforts made to create a network amongst the universities. The StAR contacts report that it is necessary to expand and systematize this. One contact says:

"That we, as institutions, collaborate on this. We've talked about putting even more focus on that. When it comes to other things we share in terms of information, some have more experience than others. We still have some way to go there, but it has improved."

They also express that their role as contacts can be unclear, as there is not a centrally defined uniform job description for their role.

6.3 Discussion of student support measures – risk, return and psychosocial services

In general students report a high degree of satisfaction with the Students at Risk program. Questions of mental health, risk and return are, however, highly challenging for students, as well as for the system actors. Based on our analysis we find possible support measures to be:

- Systematic counseling that includes questions related to mental health, return and risk management for students
- Practical training for students on how to handle risk and return
- Training of StAR contacts on how to advise students on issues of return and risk

These measures could consist of efforts of low cost, such as providing more written information on how to handle risk situations and on where students can find mental

health services, providing StAR contacts with a centrally defined mandate, providing students with a list of non-profit organizations that advise academics and activists at risk worldwide, and to ensure risk management is a permanent topic of StAR seminars. They can however also be extended to include regular counseling for students, e.g. by StAR contacts, seminars and teaching sessions on risk management for StAR contacts, and similar training for StAR students.

We recommend that training opportunities in risk and return management for StAR contacts are prioritized, as they are the main source of support for the students. We also recommend the consideration of hosting an additional webinar on risk management for students once a year. This would be a low-cost measure compared to a physical seminar, and could include the topics suggested by students, such as how to mentally and practically handle being at risk and having to return.

One possibility is to also provide counseling on options other than returning to the country of origin, such as applying for a work visa in Norway or abroad or applying for asylum. This could be seen to contradict the guideline expectation of return “to home country”. It would however ensure all students get counseling adapted to the realism of their situation and what they themselves consider viable options.

Above, we also recounted system actors’ and students’ suggestion that the visa period and scholarship be extended for a set time after the end of the last academic year of the program – provided that Norwegian immigration law permits such an extension. This will increase the economic cost of the scholarships by approximately 10 percent.

We recommend extending the period by two months to give the students more time to prepare for their exit after completing their final exams.

In our opinion the responsibility of Norwegian authorities of supporting StAR students in dealing with personal security extends into the exit phase. This implies that one should consider the feasibility of setting up a voluntary mechanism by which the student report back to a Norwegian actor within an agreed and reasonable timeframe after returning to the country of residence to the effect of confirming that he or she has not been arrested or otherwise harmed. Such a mechanism would need to be accompanied by tangible measures, for instance by triggering consular services, diplomatic response or similar action in the event of the student failing to provide the pre-agreed confirmation of safe arrival. In the event that the Ministry of Foreign Affairs concludes that no such tangible measures are feasible, there is a significant risk that a reporting-back mechanism would constitute only illusory safety and, therefore, should not be recommended.

6.4 Summary and conclusion, chapter 6

This chapter discussed whether participation in the Students at Risk program has other effects beyond potentially strengthening the student as a human rights activist. We note in passing that it is not a program objective that the program should have such “ripple effects”. However, our inquiry into the support mechanisms revealed that StAR students need more comprehensive support measures than those currently being provided. In our opinion, a corollary of the program objective of supporting the students as human rights activists is that the system actors have an obligation to support and protect the students in areas that are essential for their psycho-social well-being. This includes several of the topics discussed above – in particular the return issue, dealing with the transnational repression risk, and psycho-social support.

Overall, the academic provision in the Students at Risk program functions well. Most students are satisfied with the academic relevance of their studies in Norway and value the international learning environment. Students are also satisfied with housing and

financial support and value the practical and academic assistance provided by the program. Here, the StAR contacts are instrumental. HK-dir could, however, review if the information provided in the initial phase of the program could be more detailed and/or comprehensive.

Students' plans to return home after program exit are highly varied and are influenced by personal safety, family, political conditions, and ongoing assessment of risks in their home countries. They wish for better support in handling decisions of return, as well as handling their situation of being at risk. Many also report a wish for better information on psycho-social services.

We find that there is no systematic support for students in handling risk and return. We also find that better information and training for students is needed, and so is information and training for StAR contacts on risk and return. We recommend introducing the following measures:

- Systematic counseling that includes questions related to mental health, return and risk management for students
- Practical training for students on how to handle risk and return
- Training of StAR contacts on how to advise students in questions of return and risk
- Elaborate a detailed work instruction policy document based on practical contact and student experience. Such a policy document would encompass the study program phase and the exit phase as well as the transfer phase.
- Introducing a voluntary safe-exit mechanism by which students confirm safe arrival in their home country
- Extending the scholarship by a two month “grace period” after final exams to allow for exit preparations

7 The four cross-cutting issues

In chapter 2 we discussed the relationship between the program objectives and the cross-cutting issues. In this section we examine whether the cross-cutting issues in Norwegian development cooperation are addressed on a more concrete level in the Students at Risk program (evaluation question 28).

A government white paper sets forth four cross-cutting issues for Norwegian development cooperation. All development cooperation efforts are to be assessed based on how they affect these cross-cutting issues – including the Students at Risk program. The four issues are:

- human rights
- women's rights and gender equality
- climate change and environment
- anti-corruption

As a minimum, cross-cutting issues should be part of the risk management of all development efforts, to minimize the risk that supported efforts cause unintended negative consequences in these areas (Meld. St. 24, 2016–2017). However, the white paper does not provide any concrete instructions on how to operationalize the cross-cutting issues in the management of development programs.

The delegation agreement between the Ministry of Foreign Affairs and HK-dir¹⁹ states that:

“HK-dir should identify significant risk factors that may negatively affect the cross-cutting issues, and should analyse and manage these throughout the entire program cycle.” (section 3.2, p. 3)

We find no reference to cross-cutting issues in any of the program documents, save for the quoted agreement and the Terms of Reference for this evaluation. In other words, there are no signs that the Ministry of Foreign Affairs as the funder and sponsor, and HK-dir as the implementing partner, have conducted a risk assessment related to the cross-cutting issues. There is no sign that the Ministry has requested that HK-dir report on their management of the cross-cutting issues, and they are not mentioned in any of the annual reports and program plans.

However, to some extent the women's rights and gender equality issue has been made an integral part of the program by the gender balance requirement.

A recent evaluation of the implementation of the cross-cutting issues in Norwegian development concluded that:

“How to deal with cross-cutting issues is to a large extent outsourced to agreement partners and project implementers, generally without clear guidance, oversight or accountability. There is little evidence of successful implementation of crosscutting issues that result from requirements relating to their management or information and support to partners on commitments or how to implement them. Agreement partners are left to find ways to implement the cross-cutting issues based on their own interests and demands from other donors and actors. Some partners do so successfully while other struggle. Several noted that they would like more support from Norad and Ministry of Foreign Affairs.” (Norad, 2024, p. 124)

¹⁹ *Avtale mellom Utenriksdepartementet (UD) og Direktoratet for høyere utdanning og kompetanse (HK-dir) vedrørende delegering av forvaltning av ordningen «Students at Risk» (StAR) til HK-dir, QZA-21/0293 - Students at risk (StAR). 24 May 2022.*

In the absence of instruction or guidelines on how to implement the cross-cutting issues in the Students at Risk-program we have operationalized the evaluation question by means of two specific sub-questions: For any given cross-cutting issue, 1) does the Students at Risk Program represent a significant risk for negative consequences? And 2) does the Students at Risk Program represent a significant positive contribution?

The absence of guidelines and reporting also sets certain limitations as to how comprehensive considerations and analysis can be provided for each of the four cross-cutting issues. Generally, we find that we cannot draw definitive conclusions. Rather we discuss factors that we find to be of significance for each of the issues, and our recommendations will focus on suggesting how the Students at Risk should manage the cross-cutting issues in their in its future risk assessments.

7.1 Human rights

The very objectives of the program are directly directed towards the human rights issue. The shortcomings in fulfilling the program objectives are discussed elsewhere in this report.

Then, the question remains as to whether the Students at Risk program may pose a significant risk for negative consequences for human rights in Norway or in the students' home countries.

Our assessment is that there is a theoretical risk that relocating human rights defenders from their country of residence may weaken the domestic human rights work in that country in the short to medium term. In the longer term there is a tangible risk that students after graduation choose to remain outside of their home country, be it for fear of reprisals upon return or for being denied entry by their home country's authorities. On the other hand, in the longer term this "brain drain" or "activist drain" effect may be offset by the ultimate intended effect of the program – to strengthen the students as human rights defenders.

In chapter 2 we suggested that the return to home country expectation expressed in the program guidelines document should be moved to a preambular section. We also suggest that the "brain drain" risk be mentioned and discussed in that context or in a general risk assessment document.

7.2 Women's rights and gender equality

We assume that the most important way to address the issue of women's rights and gender equality is to ensure an acceptable gender balance among nominees and the students that are admitted to the program. As stated in section 3.1 HK-dir encourages the nominating parties "to identify as many qualified female candidates as possible" (Program Guidelines 2024/2025), and we found that there is an acceptable gender balance with females constituting 49 percent of nominees and 54 percent of the accepted candidates over the five years 2021–2025. We have no data that could have shed light on the question of to what extent the Students at Risk program admits students who specifically work within the field of women's rights.

We do not see that the Students at Risk program entails any obvious significant risk for negative consequences regarding this cross-cutting issue. Nevertheless, this question should be addressed in a future risk assessment.

7.3 Climate and environment

Theoretically, the Students at Risk program could have a positive impact on climate and environment by admitting students who specifically work within these fields. However, we have no data that could have shed light on this question.

Our assessment is that the program's main risk to climate and environment lies in its footprint in terms of CO₂ emissions resulting from the students' overseas and domestic (inside Norway) traveling activities. It goes without saying that students who are admitted to the program need overseas traveling to participate in the Students at Risk program in Norway and for returning upon completion. The program also provides support for some intermittent traveling while studying in Norway. Moreover, the program encompasses some physical meetings in Norway which for most of the students will require domestic traveling.

Inevitably, the Students at Risk program does leave a footprint in terms of climate gas emission from overseas and domestic travel. It is difficult to imagine an alternative way of fulfilling the program objective in a way that would significantly reduce that footprint. The magnitude of the environmental footprint should also be weighed against the added welfare of the students' intermittent traveling.

Our assessment is that to address this cross-cutting issue the Ministry of Foreign Affairs should formulate a travel policy encompassing an assessment of the environmental impact and risks resulting from the program.

7.4 Anti-corruption

First, hypothetically it is possible that through strengthening human rights defenders the program may have a positive anti-corruption impact. However, it is quite evident that it is almost impossible to assess such indirect effects.

Second, what is the risk for corruption taking place in the operations of the Students at Risk program? And what is the risk that the program encourages corruption practices in the countries from which the students are recruited?

In our view it is obvious that the nomination process is vulnerable to corruption; the main risk being people offering bribes in return for being nominated for the program, or that nepotism is taking place. Risk is the compound product of the two factors likelihood and consequences. We assess the likelihood first, followed by an assessment of possible consequences.

For the most part, The Norwegian parties that formally nominate people to the program, rely on third parties to identify nominees. Most of those third parties are domestic civil society organizations who identify or suggest individuals within the country in which they are operating. The civil society organizations in question and their Norwegian counterparts have established in between them a relationship characterized by a high level of trust. Our informants concur that to a high degree the nomination process is trust based.

HK-dir reports one single case of whistle blowing related to the Students at Risk program. The directorate received a note to the effect that some named nominees from a named country were not at risk. HK-dir responded by following up with the nominating partner organization, and the conclusion was that the allegation could not be substanti-

ated. HK-dir's annual report even discusses the possibility that the note could be a fabrication intended to discredit the program in the country in question.²⁰

The 2020 evaluation report (p. 25–26) discussed the feasibility of implementing further control mechanisms to strengthen the vetting of students prior to admission to the program but found two major downsides. First, administrative costs would likely be excessive. And second, further control measures would imply more contact with potential candidates, which would likely increase their risk.

Hypothetically, one could image that a bribe would be calculated in terms of the economic “value” of being accepted to the program – that is the total pecuniary value of tuition, traveling and stipend, adjusted for the risk of not being admitted. In this light a bribe appears as an insecure investment with only modest yield. Hence, the likelihood of bribery taking place appears to be low or maybe moderate.

Now turning to the issue of consequences of corruption; even though there is a certain level of likelihood that such bribery or nepotism may take place, the effect of any single act of bribery and subsequent false nomination, if resulting in admission to the program, is limited to one person not in need of protection from persecution replacing a person at risk. So, any single act of bribery or nepotism only affects one out of 20 annual student enrollment spots. Beyond that, any ripple effects of bribery and nepotism are limited to undermining trust in the program specifically and in Norwegian authorities generally.

Another more serious possible consequence of bribery is infiltration by authoritarian government intelligence agents motivated by transnational repression (Proba, 2023). Given that infiltration may take place both by means of bribery and by other means, we discuss this issue in connection with other security issues in section 6.2.3.

A final point to be made is that we note that there is no contact form on the Students at Risk program web page at hkdir.no for anonymous submission of reports of misconduct related to the program. Although such a mechanism inevitably may open for unwarranted complaints, it may also yield valuable feedback. Moreover, its mere existence will signal that the misconduct issue is taken seriously by the program administrators.

It is difficult for us to assess the magnitude of the compound risk of corruption taking place in the nomination process. A future risk assessment carried out by the program management should address the dilemmas of this inherent corruption risk of the Students at Risk program.

7.5 Summary and conclusion, chapter 7

Our discussion above highlights some specific risks associated with the four cross-cutting issues.

Our understanding is that the Ministry of Foreign Affairs has been mandated by the Storting (Innst. 440 S, 2016–2017) to carry the ultimate responsibility of ensuring that the cross-cutting issues are addressed in all development cooperation operations – including the Students at Risk program.

However, the responsibility of operationalizing and implementing the issues in the concrete context of the Students at Risk program is a HK-dir responsibility. While the above cited Norad evaluation report describes a practice of relegating implementation of the cross-cutting issues to subordinated actors, in the case of the Students at Risk

²⁰ QZA-21/0293 ÅRSRAPPORT 2023 – *Students at Risk*. Annual report 2023.

program we rather observe that either of the two main system actors fall somewhat short of their respective obligations.

Future policies on the cross-cutting issues in the Students at Risk program should include:

- An assessment of whether any short term “activist drain effects” are offset by the intended long-term effect of strengthening students as human rights defenders
- A brief assessment of possible risks for the issue of women’s rights and gender equality
- A travel policy encompassing an assessment of the environmental impact and risks resulting from the program, while making sure that the objectives of the program are upheld and the welfare of the students is not reduced
- An assessment of how to mitigate inherent risks of transnational repression
- A general risk assessment of the program, including the risk of corruption
- In addition, policy documents should clarify to what extent and how the cross-cutting issues should be included in or encompassed by the program objectives, c.f. our discussion of program objectives in chapter 2.

8 Program design and administration

In this chapter we briefly summarize the overall design and administration of the Students at Risk program. We then assess how effective it is in terms of cooperation and information and how suitable the design and administration of the program is in relation to its objectives. The last section of this chapter draws up the main conclusions of this evaluation report.

E) How effective is the administration of the Students at Risk program?

25) How well does the cooperation and information flow between the various actors in the program function?

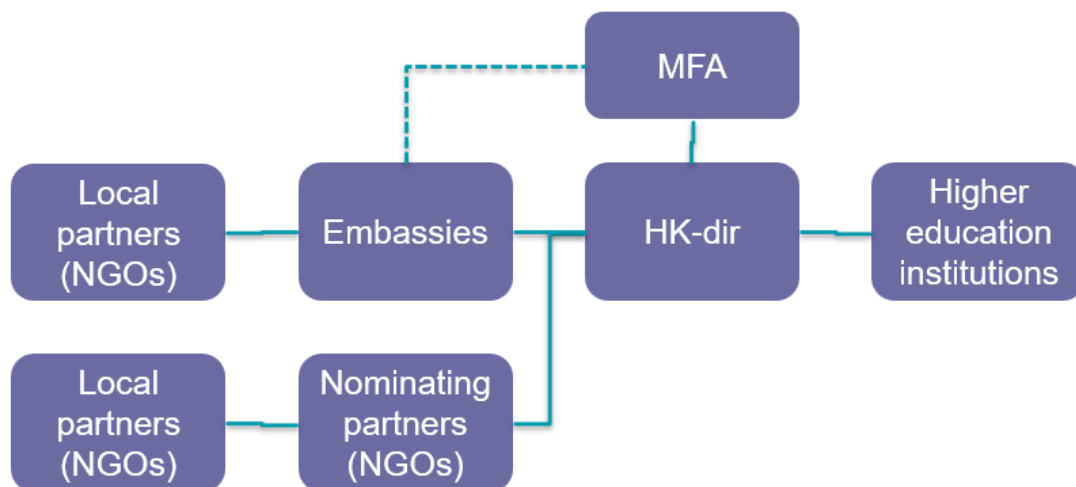
26) How can the information flow be improved?

27) How suitable is the design and administration of the program in relation to its objectives?

8.1 Cooperation and information flows

The Students at Risk program involves system actors from different fields, located in different countries. A system actor map is displayed in Figure 8-1. This somewhat complex setup requires extensive cooperation and information flow to ensure an effective and high-quality program.

Figure 8-1. System actor map.



Apart from the regular bilateral communication between HK-dir and the system actors, the most important forum for sharing of information and experiences is the annual stakeholder meeting hosted by HK-dir, to which StAR contacts, the nominating actors, the Ministry of Foreign Affairs and the Norwegian Directorate of Immigration are invited.

Generally, both cooperation and information flows work well in the Students at Risk program. There is general satisfaction communicating with HK-dir. System actors report that they get frequent updates, quick answers to questions and that the information provided is accurate and extensive. Experience with HK-dir's facilitation of contact between the system actors is also positive. One university representative says:

“I cannot praise HK-dir enough. The administration of the program works incredibly well. They are accommodating and welcoming. There are also good relations with the other StAR coordinators in the university sector, of course. HK-dir has managed to build a community in between us who are involved in the Students at Risk program in different locations. I get good answers and good help.”

Some system actors expressed a need for additional networking opportunities between them. A Teams channel for system actors has been planned by HK-dir, and this is welcomed.

8.2 System actors agreements

Two sets of agreements make up the formal core of the Students at Risk program.

The mandate agreement between the Ministry of foreign affairs and the Directorate for Higher Education and Skills

The Norwegian Directorate for Higher Education and Skills operates the Students at Risk program on behalf of the Ministry of Foreign Affairs, which funds the program by annual budget allowances. This assignment is formalized by a mandate agreement between the two entities, which stipulates the objectives, target group, key performance indicators, responsibilities, and management and reporting procedures pertaining to the Students at Risk Program.

The evaluation from 2020 (Jones, Nordhagen and Dahle 2020, p. 29-30) suggested that funding for the program should be awarded for several rounds at the time. This recommendation was based on several system actors' wishes for more long-term planning of nominations. As a direct consequence, the Ministry of Foreign Affairs adjusted the financing scheme.²¹ The Students at Risk program now runs without a set expiration date.

The framework agreement between the Directorate for Higher Education and Skills the higher education institutions

The Directorate for Higher Education and Skills has entered framework agreements with each of the higher education institutions that participate in the Students at Risk program. These agreements cover the economic aspects of the program. They stipulate the payments to be made by HK-dir to the respective institutions, which in turn pay out scholarships to the attending StAR students. The framework agreement does not regulate administrative aspects such as the selection procedure, communication and collaboration.

8.3 Program design and administration – and objectives

Evaluation goals and questions

In the introductory chapter we stated the three main goals of this evaluation project:

- I. To assess experiences with implemented changes and other aspects related to process and goal achievement

²¹ Interview with Ministry of Foreign Affairs representative, March 7, 2025

- II. To gather information on whether the Students at Risk program is effective in terms of resource use, organization, and established goals, according to the Regulations on Financial Management in the State.
- III. To provide advice on how the scheme should be continued.

For the most part these goals are operationalized by the 28 specific evaluation questions. We also formulated four additional questions that we derived from the Instruction for Official Studies (DFØ 2018),²² with reference to the second evaluation goal (goal II).

- 1) What are the prerequisites for successful implementation of the Student at Risk Program?
- 2) Which problems regarding design, organization, administration (resource use) and goal achievement have been identified by the evaluation?
- 3) Which measures could realistically be applied to solve the identified problems?
- 4) What could be the positive and negative effects of the measures, over which time span, and who will be affected by them?

Our main conclusions aim to respond to these goals and questions.

8.4 Main conclusions

Given the objective profusion, and the absence of a specified impact objective and a framework logic, it is not possible to assess the suitability of the design and administration of the program in relation to its objectives to its full extent (sub-question 27). Nevertheless, based on the program objectives listed and discussed in chapter 2 we may draw the following conclusions.

An overall impact objective for the program should be defined, and other objectives and design elements should be formulated so as to support its achievement one in a form of program theory or logical framework. Such a logical framework would clarify whether selection criteria should accord primacy to geographical distribution, academic potential of the student, degree of risk (i.e. need for protection), or potential as human rights defender?

We observe that there is an implicit program goal, related to Norway's position in human rights promotion. Possible implicit goals should be made explicit (re. recommendation from I2E, 2021).

We find that the program well managed, given the present objective. However, due to the increase in the number of nominations, there is a need to change the selections process to limit the administrative burden related to interviews.

The defined roles and responsibilities of the system actors and their interaction – appears to be appropriate. We have identified a need for the strengthening some program elements related to StAR students needing more comprehensive support measures than those currently being provided, in particular related to the return issue, transnational repression risk, and psycho-social support.

The system actors spend significant administrative resources on the nomination and selection processes, as well on StAR contact follow-up of students during the study phase. Although we have made no efforts at quantifying these costs, our overall impression is one of efficient use of administrative resources. A notable exception is however that excessive resources appear to be spent on evaluating candidates who

²² In Norwegian: Utredningsinstruksen.

eventually are not admitted. With that caveat, the current administrative cost level appears to be an inherent feature of the program.

For the most part, the recommendations of the 2020 evaluation have been addressed – the exemption being the issues with program goals and objectives.

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