



schweizerische agentur
für akkreditierung
und qualitätssicherung

agence suisse
d'accréditation et
d'assurance qualité

agenzia svizzera di
accreditamento e
garanzia della qualità

swiss agency of
accreditation and
quality assurance

ESG Review 2016: follow-up report

13.08.2018





Inhalt

1. Introduction	1
1.1 GAC coordinated review of AAQ	2
1.2 Context: relationship between SAR and AAQ	3
2. Follow-up of recommendations	5
2.1 ESG Part 2	6
2.2 ESG Part 3	12

1. Introduction

1.1 GAC coordinated review of AAQ

In the spring 2016 AAQ underwent a review of its compliance with the ESG coordinated by the GAC, which at the same time reviewed AAQ against its own criteria in order to renew recognition of AAQ in Germany.

At its meeting in September 2016, the Board of ENQA reconfirmed AAQ's full membership for five years and requested to receive within two years a follow-up report on the actions undertaken to implement the recommendations of the review panel mandated to assess AAQ's compliance with the ESG.

The final report published on ENQA's website recognises AAQ to fully comply with 2 ESG standards and to substantially comply with 11 standards.

The recommendations formulated by the review panel cover three main themes:

1. Governance Swiss Accreditation Council - AAQ: Responsibilities, decision making process, composition of SAR, Commission of AAQ and committees, adoption of guidelines and policy papers
2. Representation of the professional world in the review panels and in the SAR / Commission of AAQ or in its subject specific committees
3. Appeals & complaints process

The following tables describes the status of implementation for each recommendation made by the review panel as of August 2018.

In addition to the recommendations, the table also includes good practices (commendations) pointed out by the report because AAQ not only wants to act when there is room for improvement but also to maintain practices judged noteworthy by the review panel.

1.2 Context: relationship between SAR and AAQ

The review was coordinated by the GAC according to its own rules of procedure. The decision taking process of the GAC (recognition of agencies in Germany) includes a position statement by the agency. Accordingly, AAQ submitted a position statement dated 31.05.2016 which was taken into consideration for the decision on recognition of AAQ in Germany. However, the GAC does not adapt the report in the light of the position statement. And in the case of AAQ's review the GAC did not send AAQ's statement with the review report for ENQA's decision on membership.

AAQ's position regarding the relationship with the SAR has an impact on how AAQ will (and can) implement the recommendations from the review report. The following explanations on the relationship between SAR and AAQ, more or less directly taken from the position statement of AAQ, shall provide background to put AAQ's implementation of a number of recommendations into context.

The review panel "defines the AAQ-SAR structure as the unit to be evaluated with respect to compliance with the ESG". Following up on this ENQA Board notes in its letter about the AAQ membership renewal: "Swiss Accreditation Council has a close link operating together in the HE system, and some parts of the decision-making in quality assurance processes are the responsibility of the Council. In this respect, in the future, it may be more useful to evaluate the operations of the AAQ and of the Council in conjunction". It is AAQ's position that the relationship between SAR and AAQ is more complex than that. In fact the relationship manifests itself in two different ways.

The draft of the Higher Education Act (HEdA) – the HEdA being the legal framework for accreditation – submitted to the parliament was based on the assumption, that the Accreditation Agency and Accreditation Council build a unit consisting of strategic, regulatory council and operative agency. In the parliamentary debate accreditation was opened along the lines of the Bucharest communique through allowing the licensing of additional agencies, national or international. But no adjustments were made regarding the relationship between Accreditation Agency and Accreditation Council.

In the context of the preparation of the decrees, particularly the organisational regulations of the Swiss Accreditation Council (OReg-SAR), AAQ advocated for the explicit creation of their own committee structure. But, since no other agencies were licensed at that time, fiscal considerations had much more weight than the hypothetical question of good governance. The policy makers opted for a "lean solution".

Together Accreditation Council and AAQ developed a structure which takes account of both the fiscal politics and good governance: The Accreditation Council acts on the one hand as an accreditation body according to Article 21 of the HEdA (Article 14 OReg-SAR). On the other hand, the Accreditation Council acts as a supervisory body over the AAQ (Article 15 OReg-SAR) and takes responsibility for tasks, which usually are carried out by the board, accreditation commissions or/and programme committees of agencies.

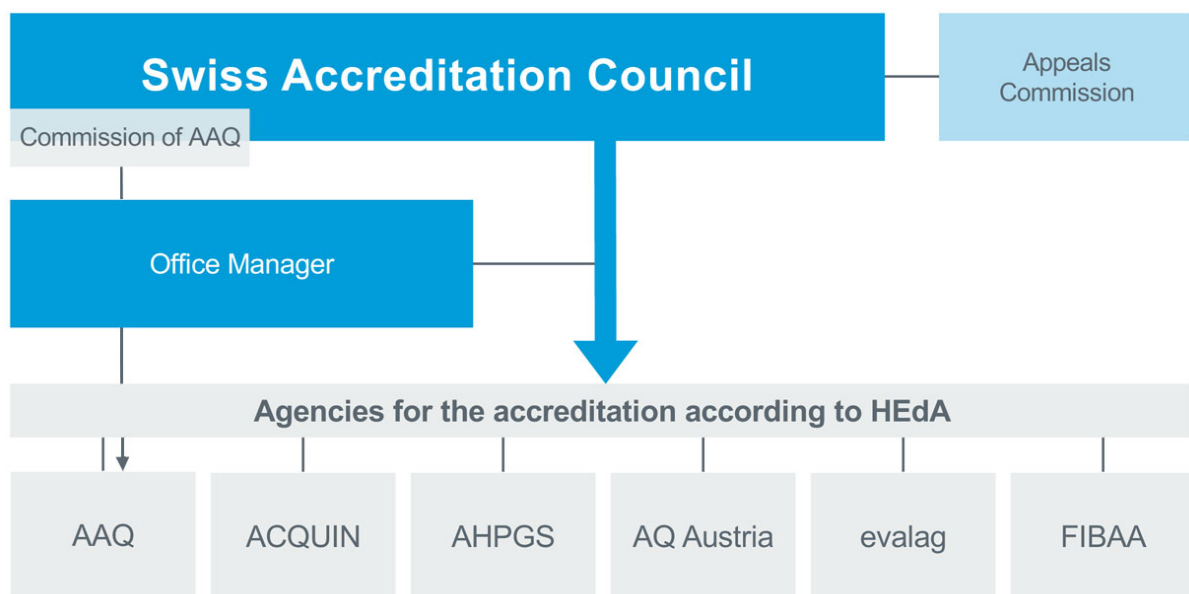
With regard to the premise that the expert group formulated in the introduction ("As a quality assurance agency in the European Higher Education Area, the AAQ is ... only feasible with the SAR as its decision-making committee."), we emphatically state, that:

- The Swiss Accreditation Council is the regulator and decision-making body for procedures according to HEdA. This role clearly separates the SAR from the accreditation agency's role of conducting procedures – be it the AAQ or another licensed agency.

- The Swiss Accreditation Council as the supervisory body over the AAQ shall assume the role of the committees of the AAQ. In this function it is – similarly to the board, the accreditation commission or the programme committees of other agencies – a part of the AAQ: the Swiss Accreditation Council is the committee structure of the AAQ.

Both functions are clearly isolated from one another in the organisational regulations. The organisational regulations allow the Swiss Accreditation Council to delegate the role of the committee structure to an accreditation commission yet to be founded. It has however decided to currently exercise this role itself. However, even if the same people attend to both areas of responsibility, they shall in each case sit at the table in separate capacities.

AAQ in turn is first and foremost accreditation agency within the meaning of Article 22 HEdA. For fiscal reasons it ensures the task of the head office of the Accreditation Council, for which it is compensated at a fixed rate. With regard to good governance, the AAQ has taken organisational and technical measures to distinguish between the accreditation operation and the head office of the SAR.



(source: akkreditierungsrat.ch/en/accreditation-council)

2. Follow-up of recommendations

2.1 ESG Part 2

<p>ESG 2.1 Consideration of internal quality assurance procedures</p> <p>External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.</p>		
<p><i>Panel judgement</i></p> <p>Fulfilled</p>	<p><i>Commendation</i></p> <p>The strategic orientation of AAQ is to increase overall recognition for the ESG in the Swiss higher education area in the coming years.</p>	<p><i>Comment</i></p> <p>AAQ will continue to</p> <ul style="list-style-type: none"> - Include the ESG in all kind of briefings as a matter of routine; - to give the ESG visibility in the programme of its biannual Conference (Institutional Accreditation Day)
<p>ESG 2.2 Designing methodologies fit for purpose</p> <p>External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.</p>		
<p><i>Panel judgement</i></p> <p>Substantially fulfilled</p>	<p><i>Commendation</i></p> <p>The purposes and goals of all formats are described and published in the agency's guides on its website http://aaq.ch/.../leitfaeden-qualitaetsstandards/.</p> <p><i>Recommendations</i></p> <ul style="list-style-type: none"> • It should be communicated with greater force both within the system and to the public that SAR is AAQ's decision-making body. For this, it should be clear from AAQ's guidelines that they are approved and backed by SAR. The same applies to the strategy, the quality paper and other policy documents and reports from AAQ. 	<p><i>Comment</i></p> <p>AAQ will continue to publish any policy document, report or documentation on its website after it has been adopted by the Commission AAQ.</p> <p><i>Actions (completed)</i></p> <ul style="list-style-type: none"> - AAQ adapts the website http://aaq.ch/en/accreditation/guidelines-quality-standards/ - AAQ updates the documentation published for each format in order to show that they were submitted to and approved by SAR respectively the Commission AAQ. <p><i>Actions to come</i></p> <ul style="list-style-type: none"> - AAQ updates the presentation of the strategic orientation and the quality principles in order show that they were submitted to and approved by the SAR in December 2015.

	<ul style="list-style-type: none"> With a view to international collaboration, the selection procedure and criteria used to appoint SAR members should be made more formalised. The aim should be to structurally, and therefore in a way that is not dependent on individual persons, guarantee the necessary skills of those involved in the procedure as well as the involvement of the relevant interest groups over the long term. The professional world/professional practise should be more strongly involved in the composition of subsequent accreditation councils. In order to achieve this, AAQ and SAR should, in general, strengthen their links with the professional world/professional practice. 	<p><i>Comment</i></p> <p>This recommendation addresses the SAR and the Swiss Higher Education Conference SHEC. The latter is by law responsible for the nomination of members of the SAR while implementing the detailed dispositions set out in the law.</p> <p>AAQ considered the recommendation that AAQ and SAR “in general” strengthen the link with the professional world.” AAQ came to the conclusion that this recommendation ignores the politically wanted distinction between the education (Bildung) offered by an university and the formation (Ausbildung) by universities of applied sciences and by universities of teachers education. The criteria for selecting experts vary with the type of HEI, i.e. there is a stronger link with the professional world for the universities of applied sciences and teacher education. For the institutional accreditation according to HEdA AAQ will continue to include the non-academic perspective in function of the type of HEI.</p> <p><i>Action</i></p> <p>AAQ apprised the SAR at its meeting on 14 September 2018 to inform the SHEC about this recommendation.</p>
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ESG 2.3 Implementing processes

External quality assurance processes should be reliable, useful, pro-defined, implemented consistently and published. They include

- a self-assessment or equivalent;
- an external assessment normally including a site visit;
- a report resulting from the external assessment;
- a consistent follow up.

<p><i>Panel judgement</i></p> <p>Substantially fulfilled</p>	<p><i>Commendation</i></p> <p>With the firmly established preliminary meetings with the higher education institutions in all procedure formats, AAQ has a targeted impact on the efficacy of external quality assurance.</p>	<p><i>Actions</i></p> <p>no action needed</p>
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	<i>Recommendations</i>	<i>Actions to come</i>
	<ul style="list-style-type: none"> • With a view to international collaboration, the selection procedure and criteria used to appoint SAR's commission members should be made more formalised. The aim should be to structurally, and therefore in a way that is not dependent on individual persons, guarantee the necessary expertise on those involved in the procedure as well as the involvement of the relevant interest groups over the long term. In addition, it should be made clear in the public presentation of the procedure which role the subject specific commissions play in the individual procedure formats. Professional practice should be better represented in the Commission for Institutional Procedures. • The different roles that AAQ and SAR actually occupy during the individual decision-making process must be presented with greater transparency in the corresponding guidelines. • AAQ and SAR are explicitly encouraged to work on the follow-up processes for all their procedures overall. As part of this, both organisations should also clarify whether experts are to be involved in the follow-up processes and, if so, at which point they should be involved. Finally, the follow-up processes should be described in greater detail in the guidelines in order to better inform higher education institutions about the overall outline of the procedures. 	<ul style="list-style-type: none"> - AAQ will formalise the process of selection of members of the three subject specific committees. - AAQ has updated the guidelines for system-accreditation and is working on the guidelines for Quality Audits. The two cycles of professional accreditation of psychotherapy and postgraduate medical training are finished; AAQ will implement the recommendation for the next cycle - AAQ has updated the guidelines for system-accreditation and is working on the guidelines for Quality Audits and Institutional Accreditation. For the professional accreditation of psychotherapy and postgraduate medical training the follow-up processes are in the responsibility of the Federal Office of Public Health.

ESG 2.4 Peer-review experts

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

Panel judgement

Substantially fulfilled

Commendations

AAQ has been able to reach a degree of professionalism in its peer-review system that has a noticeable impact on the quality of the procedures it carries out.

AAQ now gives the experts detailed information regarding the context of the relevant national quality assurance systems prior to each procedure.

Recommendations

- The agency's internal standards for selecting and preparing experts should be made consistent across the various different procedure formats. There is potential for development in, for example, the involvement of non-academic perspectives in institutional procedures and of active participants in accreditation procedures in the field of medicine and psychology. AAQ should further invest in the basic preparatory briefing of experts. Editorial discrepancies regarding the selection criteria in the guidelines should be rectified at the next available opportunity.
- In order to increase transparency, both the impartiality and independence criteria for experts and the code of conduct should be published consistently. In addition, the "longlist procedure" should be described with the greatest degree of detail in all guidelines so there can be no doubts as to be – established – integrity of the selection of experts.

Action (completed)

- AAQ continues to include the non-academic perspective in function of the type of HEI (see also recommendation and action under ESG 2.2).
- Based on a study (discourse analysis) of the site-visit AAQ has developed a video tool to prepare experts for the specifics of the site-visit.

Actions to come

- AAQ has updated the guidelines for system-accreditation and is working on the guidelines for Quality Audits and Institutional Accreditation. The two cycles of professional accreditation of psychotherapy and postgraduate medical training are finished; AAQ will implement the recommendation for the next cycle.

ESG 2.5 Criteria for outcomes		
<p>Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.</p>		
<p><i>Panel judgement</i></p> <p>Substantially fulfilled</p>	<p><i>Recommendations</i></p> <ul style="list-style-type: none"> As part of their internal quality assurance systems, AAQ and SAR should devote more detailed attention to the question of consistency and should more explicitly represent the consistency requirements from Standard 2.3 in their internal quality assurance systems. Guidelines forming the basis for SAR's option to deviate from the expert-recommended decisions should be published. 	<p><i>Action (completed)</i></p> <ul style="list-style-type: none"> AAQ designed and implemented tools and processes strengthening the consistency of decision making (i.e. table of conditions for the different formats) <p><i>Actions to come</i></p> <ul style="list-style-type: none"> AAQ sets internal rules with respect to a consistent preparation of decision making in its internal quality assurance system see also recommendation on ESG 3.6). AAQ informs the SAR at its meeting on 14 September 2018 about the recommendation on guidelines forming the basis for SAR's option to deviate from the expert-recommended decisions.
ESG 2.6 Reporting		
<p>Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.</p>		
<p><i>Panel judgement</i></p> <p>Substantially fulfilled</p>	<p><i>Recommendations</i></p> <ul style="list-style-type: none"> AAQ and SAR should work together with their clients and partners towards cross-procedure systematisation of their publication practice and therefore towards greater transparency. Above all in procedures that are solely AAQ's and SAR's responsibility, the relevant documents and information, including the decisions concerning the follow-up, should be published in a suitable way, e.g. as updates to the existing accreditation reports, through hyperlinks or similar. 	<p><i>Comment</i></p> <p>AAQ will continue to publish all reports and follow-up reports of positive decisions.</p> <p>The current legal framework leaves no room for the publication of negative decisions, which remains extremely rare because withdrawal from the accreditation procedure is possible at any time prior of the decision.</p>

	<ul style="list-style-type: none"> • The agency is recommended to publish all reports and negative decisions. 	
<p>ESG 2.7 Complaints and appeals</p> <p>Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.</p>		
<p><i>Panel judgement</i></p> <p>Substantially fulfilled</p>	<p><i>Recommendations</i></p> <ul style="list-style-type: none"> • AAQ and SAR should further develop their complaints procedure. In terms of content, formalised complaints procedures should be established for possible errors in the implementation of procedures and the student perspective should be included in the Appeals Commission. In addition, higher education institutions should receive more transparent information about the options for raising complaints and the criteria for the composition of the Appeals Commission should be more formalised, in order to guarantee in the long term through structural measures and therefore independently of individual persons, that those involved in the procedure possess the necessary competencies and that the relevant interest groups are involved. 	<p><i>Action (completed)</i></p> <ul style="list-style-type: none"> - AAQ described all instruments of complaint on its website (http://aaq.ch/en/accreditation/appeals/). <p><i>Actions to come</i></p> <ul style="list-style-type: none"> - AAQ plans to install its own complaints & appeals commission.

2.2 ESG Part 3

<p>ESG 3.1 Use of external quality assurance procedures for higher education</p> <p>Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.</p>		
<p><i>Panel judgement</i></p> <p>Substantially fulfilled</p>	<p><i>Recommendations</i></p> <ul style="list-style-type: none"> • See recommendations regarding Standards 2.1 – 2.7. The agency's mission statement meets the requirements of the standard. 	<p><i>Actions</i></p> <p>See actions proposed for Standards 2.1-2.7</p>
<p>ESG 3.2 Official status</p> <p>Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.</p>		
<p><i>Panel judgement</i></p> <p>Fulfilled.</p>	<p><i>Recommendations</i></p> <p>None</p>	<p><i>Actions</i></p> <p>None</p>

ESG 3.3 Independence

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

<p><i>Panel judgement</i></p> <p>Substantially fulfilled</p>	<p><i>Commendations</i></p> <p>The review panel expressly welcomes the code of conduct developed by AAQ, which is not only directed at the expert group but also the higher education institutions and AAQ's employees. With this code of conduct, AAQ is able to make its standards with regard to independence particularly transparent.</p> <p><i>Recommendations</i></p> <ul style="list-style-type: none">• Selection procedures and criteria for the composition of SAR and its commissions should be specified in a binding document in order to further reinforce the organisational independence of SAR and AAQ.• SAR is advised to set down the principles of conduct applicable to it in its own code of conduct or, for example, to adopt AAQ's existing code of conduct and ultimately publish this.	<p>See comment to Standard 2.2</p> <p><i>Action (completed)</i></p> <p>AAQ informs the SAR at its meeting on 14 September 2018 about these recommendations.</p>
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<p>ESG 3.4 Thematic analysis</p> <p>Standard:</p> <p>Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.</p>		
<p><i>Panel judgement</i></p> <p>Substantially fulfilled</p>	<p><i>Commendations</i></p> <p>AAQ collaboration with external (research) institutions in thematic analysis secures the quality and the thematic breadth of the findings.</p> <p><i>Recommendations</i></p> <ul style="list-style-type: none"> The agency should further develop its thematic analyses and should, in future, deal with the follow-up processes for the individual procedure format more intensively as part of this. International activities should be incorporated into the thematic analyses in a visible way, for example, through planned cross-sectional analyses. 	<p><i>Actions to come</i></p> <ul style="list-style-type: none"> AAQ evaluates its resources for cross-section analyses about Quality Audits conducted in Austria and System Accreditation in Germany, compared with findings from the external quality assurance activities in Switzerland or elsewhere. The paper published by Abele et al. (2016) is a first step. Among its specific objectives for the period 2016-2019, AAQ started to develop transversal thematic analyses of its activities by further analysing the 2013-14 Quality Audit cycle conducted in Swiss universities, namely on difficulties in quality communication in HEIs.
<p>ESG 3.5 Resources</p> <p>Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.</p>		
<p><i>Panel judgement</i></p> <p>Substantially fulfilled</p>	<p><i>Commendation</i></p> <p>In the current composition, the team is distinguished by the employees' broad diversity of academic education as well as their backgrounds from a range of different regions. The three official languages of Switzerland are represented in the team.</p>	<p><i>Action (completed)</i></p> <ul style="list-style-type: none"> A specific strategy to develop the profiles of members of the team is in place; AAQ regularly explores needs and opportunities for training and knowledge through the annual "Personalentwicklungsgespräche" and reviews its HR action plan regularly. AAQ has introduced flexible working hours based on an annual amount of hours to be worked.

	<i>Recommendations</i>	<i>Actions to come</i>
	<ul style="list-style-type: none"> • Attention should be paid to ensuring that SAR's regulatory duties are fully financed. For this purpose, AAQ and SAR should endeavour to establish clearer separate costing and in future budget plans should report, for example, the material and operational costs for SAR head office separately, taking overhead costs into account (e.g. Internal quality assurance, communication etc.) • In order to ensure the greatest possible degree of planning security for AAQ and SAR, the multi-year plan, which forms the basis for the budget for both institutions, and the strategic planning should be continued. The agency should try to establish additional control options that allow AAQ's activities to be planned on a reliable basis. • The path of organisational development taken by the agency should be continued consistently. The support and cross-departmental functions, including the various database solutions, should be better integrated into the working processes and, if necessary, further developed. In the human resources management plan, options for further education and for more flexible working conditions should be better structured. 	<ul style="list-style-type: none"> - AAQ keeps a record of all the human resources invested in managing the office of the SAR and will negotiate the future flat rate based on the logged hours. - Since the HEdA obliges AAQ to conduct accreditation processes if a HEI demands so, AAQ establishes control of planning through active communication with HEIs. - AAQ is working on integrating all processes of managing a procedure as well as the cross-departmental functions into one database.

<p>ESG 3.6 Internal quality assurance and professional conduct</p> <p>Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.</p>		
<p><i>Panel judgement</i></p> <p>Substantially fulfilled</p>	<p><i>Recommendations</i></p> <ul style="list-style-type: none"> • With the involvement of all relevant interest groups, the internal quality assurance system should be further developed into a cross-format quality assurance system. The strategic planning and its implantation should form an integral part of the internal quality assurance system. The responsibility for the quality of decisions, including the follow-up processes, should be described in a more explicit way. Processes should be developed and serve to maintain the consistency of the decisions. • SAR is advised to set down the applicable principles in its own code of conduct or, for example, to adopt AAQ's existing code of conduct and ultimately publish it. (see recommendation on standard 3.3) 	<p><i>Actions (completed)</i></p> <ul style="list-style-type: none"> - Meetings between the responsible people for each format contribute to a cross-format quality assurance system (since 2017). - See action for standard 2.5. on consistency of decision making. - AAQ informs the SAR at its meeting on 14 September 2018 about this recommendation.
<p>ESG 3.7 Cyclical external review of agencies</p> <p>Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.</p>		
<p><i>Panel judgement</i></p> <p>Fulfilled</p>	<p><i>Recommendations</i></p> <ul style="list-style-type: none"> • none 	<p><i>Actions</i></p> <p>none</p>

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