



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

## **External review according to the ESG (Renewal of ENQA membership)**

Follow-up report | 27/04/2023





## Content

1. Introduction .....	1
2. Response to commendations and recommendations .....	1
3. Developments and changes of the agency .....	8
4. Conclusion .....	8

## 1. Introduction

In this follow-up report, AAQ sets out its position on the recommendations as they were presented to the agency in the two letters from the ENQA Board on 2 November 2021. Following a complaint from the agency, the ENQA Board has decided to reword some of the recommendations and to assess the ESG 2.6 standard as fully compliant.

ENQA indicates in a comment to the agency that it considers the follow-up of accreditation decisions regarding standard 2.3 to be particularly important. Details are contained in the two recommendations on standard 2.3. ENQA further recommends AAQ 'to pay further attention to ESG 2.1 Consideration of internal quality assurance to ensure that ESG 1.2 Design and approval of programmes and ESG 1.3 Student-centred learning, teaching and assessment are explicitly considered', as the recommendation on ESG 2.1 sets out. AAQ concurs with both comments made by ENQA and suggests to Swiss Higher Education Conference (SHEC), which adopts the legal framework, to make the relevant changes.

To maintain continuity in our thinking on compliance with ESG standards, we briefly review the SWOT analysis from the 2020 report (SAR, p. 53). At that time, AAQ identified four strengths, four weaknesses, four opportunities and two threats. Most of these are the subject of a recommendation and are therefore dealt with in the following chapter.

The weakness concerning transparent information for the public was addressed through, among other things, a newly designed annual report (see also ESG 2.2). A weakness, opportunity and threat all at the same time were the number of formats and the very irregular demand of a bulk number of procedures per year. AAQ responded to this weakness with a new planning tool that allows transparent resource planning, both for the renewal of the procedural basis (guides, etc.) and for the supply of project managers in the various procedural languages (see ESG 3.5).

## 2. Response to commendations and recommendations

The commendations addressed in this chapters are in accordance with the conclusion of the ENQA Agency Review 2021 dated 21 April 2021. The recommendations are cited from the letter on the Reconfirmation of AAQ membership in ENQA dated 2 November 2021. The suggestions from the ENQA Agency Review 2021 (p. 44f) are considered when the issue is raised. The abbreviations and references to legal bases are the same as in AAQ's SAR of June 2020 (p. 55f).

### ESG 3.1 Activities, policy and processes for quality assurance

*The agency is recommended to extend the representation of the labour market representatives at the governance and expert panels' levels.*

---

#### Context

The Swiss system of higher education is based on the concept of duality: an academic track leads to the baccalaureate and university, structured vocational training in combination with secondary school leads to a professional baccalaureate and the university of applied sciences.

Holders of a baccalaureate are admitted to universities of applied sciences if they have one year of professional experience in the relevant field. The interest of the professional sectors and the labour market are ingrained in the educational system and in the taxonomy of HEIs (university with a broad education mission vs professionally oriented training) and codified in the legal framework.

### **Actions taken**

*Governance:* At the end of 2022, the term of office for the greater part of the members of the Accreditation Council came to an end. The Swiss Higher Education Conference used the renewal of the members at the same time to reduce the number of members from 20 to 15. The new SAC has one member who represents the labour market in the private sector. Many members of the Council hold management positions in higher education institutions in Switzerland and abroad. They therefore represent a range of important employers for graduates.

*The expert panels* are constituted on the basis of specific profiles, which define different representations of the stakeholder groups in the panels depending on the type of higher education institution. In the UAS expert panels, the non-academic perspective is represented because it is also required in the teaching staff. In Germany, a professional representative must be integrated into the panel for system accreditation.

Expert panels in evaluation procedures do reflect the profile of the evaluated HEI or study programme. As is the case with the UAS, the non-academic perspective is represented when it is also requested by the teaching staff.

### **Further actions planned**

As of 2023, the SAC has a new president. AAQ will propose to the newly constituted Council the formation of a separate commission of AAQ, which will not have the same composition as the SAC, as is currently the case. AAQ will consider the recommendation when putting together candidates for the AAQ commission.

*The agency is recommended to strengthen the stakeholders' involvement into its work and activities and take into account the external perspective at all levels.*

---

AAQ has continued and strengthened the involvement of various stakeholder groups. As a result, the AAQ Day 2022 was once again fully booked early on. The day offered a broad forum, namely for public and private HEIs and representatives of the authorities, to take stock of the 2015–2022 accreditation cycle and to shape its continuation. On this topic, an online hearing with a sounding board took place with regard to the revision of the Guide for Institutional Accreditation (see also ESG 2.2).

Since 2022, AAQ is an invited member of the sustainability network of swissuniversities. The network is to be further expanded in order to provide broad support for sustainability considerations at the universities in the sense of HEdA standard 2.4.

International networks will carry out the assessment of the accreditation of study programmes offered for medical and engineering professions in 2022–23, namely the WFME (on behalf of the medical faculties) and a review team of the ENAEE, based on AAQ's request to continue to be able to award the EUR-ACE label. The reports of these observer teams will provide AAQ with a valuable basis for the further development of its procedures.

## ESG 3.5 Resources

*The agency is recommended to hire people, first to fill the existing skills gaps and second to make sure that AAQ will be able to carry out all the activities defined by Law in the future in order to guarantee its sustainability, independently of the number of HEI requests.*

---

### Context

AAQ is an independent organisation of public law. The Federation and the Cantons fund AAQ on a yearly basis following a budget process 18 months before the respective year. AAQ is subject to federal laws, in particular the Federal Personnel Act. Consequently, hiring and firing are heavily regulated and take a long time.

### Action taken

AAQ pointed out in its 2020 report (SAR, p. 28 and 53) that there was no overview of if the necessary knowledge and skills were covered among the staff to fulfil the agency's tasks. There was a lack of consolidation of PEGs.

A series of team workshops took place in 2022 and 2023, the aim of which was to further develop cooperation within the team. Cornerstones for AAQ resource planning were discussed and results were presented. The further professional development of team members is also a topic (suggestion to ESG 3.5).

A new form has been introduced in a participative process for 2023, which records the results of the annual target agreement and promotion discussions between the employee and the respective superior. The background to this is the new competency model that the Confederation introduced for all administrative units in 2021.

### Activities defined by law: OReg-AAQ Art. 4-7

In addition to resource planning to be able to carry out the procedures, the measures for implementing the 2021-24 strategy must also be secured. In this way, AAQ fulfils its task to 'develop(s) accreditation and quality assurance methodology further and foster(s) exchanges with interest groups and the general public' (Art. 4). In the years since the ESG review, the AAQ Director nominated an AAQ team member to act as secretary of the SAC office and has recruited additional staff to run the business (Art. 5 & 7). In 2021, a temporary part-time position (50%) was established in AAQ to replace the team member who became secretary of the SAC.

## ESG 3.6 Internal quality assurance and professional conduct

*The panel commends the Agency for the excellent professional conduct of staff member that leads to high satisfaction of Higher Education Institutions and experts.*

---

AAQ strives to ensure the continued satisfaction of its stakeholders. Project leaders are continuously involved in reflecting on their tasks, which helps to secure their position and resources. Improvements to processes are implemented in a timely manner.

*The agency is recommended to formalise and develop the feedback mechanism and to embed them in its internal quality assurance system as a permanent feature.*

*Diverse feedback channels:* The current effective approaches to implementing AAQ's quality principles contain the following provision on feedback mechanisms: 'Specific criteria are used to collect data on the quality of work done by the AAQ. The agency also gathers feedback from expert groups and from the evaluated institutions.' These rules are to be expanded and specified in 2023 and will then read as follows: 'To record the quality of its procedures, AAQ collects feedback from expert groups and institutions as well as from other stakeholder groups. For this purpose, it sends out questionnaires, organises workshops or focus groups and conducts follow-up discussions with the steering groups of the evaluated institutions.' This shows that collecting feedback after each procedure will continue to be the rule in future, but the form of the survey can be chosen differently.

Reporting on the feedback and what happens with it is also regulated. At the end of a procedure cycle, a synthesis report is drafted in each format (suggestion to ESG 3.4). This report evaluates the feedback from the various stakeholders and documents the effects on the ongoing or upcoming procedures and is publicly available.

### **Further actions planned**

AAQ will explore ways to inform stakeholders about the impact of their feedback more effectively.

## **ESG 2.1 Consideration of internal quality assurance**

*The agency is recommended to work in order to have ESG 1.2 and ESG 1.3 explicitly included into its institutional accreditation and quality audit standards and ensure that both standards are systematically assessed.*

---

An adjustment of the quality standards by the legislative body (SCHE) has not taken place, which has so far not made a stronger orientation towards the ESG possible. AAQ will use the follow-up report to inform the SCHE about the recommendation to change the legal framework.

In Austria, the audit areas on the basis of which the quality audits are carried out were supplemented in 2021. One audit area now forms the framework for quality assurance of teaching, where instruments and procedures are now to be established that evaluate the appropriate distribution of ECTS points in the curricula, especially when they are created. AAQ was subsequently able to adapt its guide accordingly.

### **Further actions planned**

In the synthesis report on the first cycle of the institutional accreditation, AAQ will examine the extent to which the requirements of ESG 1.2 and 1.3 have been included in the assessment. From this it can formulate proposals for the revision of quality standards for the attention of the SCHE.

The new SCHE ordinance on the coordination of education at the Swiss HEIs (SR 414.205.13) regulates the main aspects of the Bologna Declaration and thus ESG 1.2 and 1.3. There is a link between the quality standards in the HEdA Ordinance and the new SCHE regulations. AAQ plans on pointing at this in all communications related to HEdA accreditations (institutional, programme, with MPA and HPA), especially in the procedural guides.

AAQ reviews the compliance of existing quality audit standards in Austria with the new audit areas to assess whether they allow compliance with ESG 1.2 and 1.3.

## **ESG 2.2 Designing methodologies fit for purpose**

*The agency is recommended to reflect on the criteria applied and include additional quality-oriented content when identified as necessary, jointly with stakeholders.*

---

AAQ has considered and discussed with the HEIs (AAQ Day) whether and how additional quality-oriented content can be evaluated and reflected in institutional accreditation. For this purpose, there is now the possibility to address focus topics and formulate recommendations at the on-site visit. Within the framework of the quality audit in Austria, this possibility already exists (deepening) and in the case of system accreditation in Germany, the number of study programmes and the number of features to be assessed can be selected within a given scope.

AAQ is working towards a mandate from the SCHE to revise the quality standards.

### **Further actions planned**

AAQ will make these considerations each time a new assessment cycle is started, as is currently the case with the programme accreditations according to the HEdA and MPA.

*The agency is recommended to develop and extend the stakeholders involvement in the design of methodologies by bringing about more discussion opportunities.*

---

The agency held a very popular discussion forum with the AAQ Day in 2022 as well and involves all stakeholders when revising the guide for institutional accreditation or quality audit by organising online hearings or workshops with the QA staff of the concerned institutions. AAQ is also examining in what form internal QA processes in Swiss HEIs can be recognised and formally confirmed, as is practised in Germany with system accreditation. One example of this is the awarding of EUR-ACE labels to engineering degree programmes on the basis of evaluations carried out by the HES-SO.

The development of new methods in the procedural formats is widely discussed in a more detailed annual report since 2021 and submitted in this form to the various stakeholders.

### **Further actions planned**

The Accreditation Council will increasingly exchange information on questions concerning the design of procedures and accompany the agency in its further development.

AAQ recalls (SAR, 2020, p. 38) that in 2018 it scrutinised the wording of the quality standards at a workshop together with QA officers from Austrian universities and experts. Where comprehensibility could be improved, this has been included in the new guides. An online hearing with a sounding board of experts and QM officers took place at the end of 2022 with regard to the revision of the guide for institutional accreditation (see also ESG 3.1). AAQ will continue to hold such workshops.

*The agency and SAC are recommended to increase the professional world involvement at all levels.*

---

The perspective represented by the professional world when evaluating institutions or programmes is always included in our expert panels by reflecting the profile of the HEI or study programme: some have no representatives of the labour market, some consist only of practitioners.

At the governance level, the further development of the procedural formats is accompanied by close contacts with the professional groups directly concerned. For example, a panel of the WFME has observed the accreditation of medical programmes and will make recommendations to the agency on this procedural activity. AAQ is a member of the 'Quality in Continuing Education' working group, where, under the leadership of the Swiss Association for Continuing Education, stakeholders in the quality assurance of in-house continuing education and public providers discuss quality issues and subject them to public debate at conferences. The results from these contacts flow into the further development of AAQ's procedural formats.

### **Further actions planned**

Further contacts are planned, for example to better anchor the EUR-ACE label in Switzerland with the engineering associations concerned. Contacts with AACSB are also to be continued.

## **ESG 2.3 Implementing processes**

*The panel commends AAQ for the high level of satisfaction of Higher Education Institutions with the Agency's processes (as confirmed during the interviews with HEIs).*

---

AAQ will continue its efforts to keep the dialogue with all stakeholders alive.

*The agency is recommended to include a regular follow-up procedure, not only for decisions of accreditation with conditions, considering the length of the accreditation validity and the lighter second cycle.*

---

A regular follow-up procedure needs to be codified in the ordinance adopted by the SCHE. The latter has been demanding a lighter procedure of institutional accreditation for the past years. Nevertheless, AAQ will inform the SCHE about the recommendation to complement the existing procedure with a 'regular follow-up procedure'.

In the discussion with the institutions, the topic of follow-up was only touched on marginally. On the occasion of the formal contacts (AAQ Day, focus groups), it became apparent that the accreditation process is present throughout the seven years of validity and that the HEIs continue the follow-up autonomously. During reaccreditation, they must then be able to make and justify their choice of focus topics. In AAQ's opinion, this satisfies the wording of ESG 2.3.

The situation is similar for programme accreditations under the HFKG.

After an evaluation, AAQ requires that the evaluated institution submit a follow-up report after two years, which is published by AAQ. The recommendations formulated by the experts during the evaluation are the subject of the report.



*The agency is recommended to detail the follow-up procedures in the accreditation guides.*

---

Following a proposal of AAQ, the SCHE included the follow-up procedure of the review of conditions in the Accreditation Ordinance (Article 15a) in November 2020. The new guide from 1/1/2023 for the procedure of institutional accreditation includes the review of the conditions (i.e. follow-up procedure). For system accreditation in Germany, the Accreditation Council carries out the review of conditions. The implementation of the review of conditions by AAQ within the framework of the quality audit according to HS-QSG (Austria) is described in the version of March 2022. The requirement to submit a follow-up report after an evaluation is described in the guide on evaluations of June 2020.

The programme accreditation guides also contain a description of the condition review, namely in the guide according to HFKG of 24/06/2021, in the guide according to HFKG and MedBG of 23/02/2018 and in the guide according to HFKG and MedBG of February 2020.

### **Further actions planned**

In the upcoming revisions of the guides, AAQ is taking care to describe the procedure for the review of requirements with the useful details. This will next be the case with the guide according to HFKG and MedBG. In particular, the role of the institution, the agency, the experts and the respective decision-making authority will be clearly stated.

## **ESG 2.4 Peer-review experts**

*AAQ is to be commended for attracting and selecting well-qualified peers with an extensive international knowledge that leads to the high satisfaction of stakeholders and particularly HEIs.*

---

Make sure that expert panels can clearly express their findings in the expert report. Particular attention should be paid to this when the experts formulate their assessment together with the self-assessment in an integrated document.

AAQ plans to increase the use of video clips to train reviewer groups. This will lead to a more homogeneous approach, as suggested in the ESG review (briefing and training more consistent, ESG 3.4).

*The panel commends the Agency for its collaboration on selection and training of student experts with the Swiss Student Union (VSS). This should be considered to be good practice and deserves to be highlighted and supported.*

---

The representation of students in the universities as well as in the expert groups can only be ensured with great efforts. It is therefore worthwhile to continue the effort together with the VSS!

*The agency should invest its efforts and continue to include a perspective represented by participants of non-degree programmes (i.e., of programmes that fall within the scope of the ESG) in the evaluation panels for these programmes.*

---

Evaluation procedures for Master of Advanced Study programmes of 60 ECTS or more are open to professionals with or without a formal academic background. They are comparable to the executive programmes of business schools. The perspective represented by participants is

included in our panels by reflecting the profile of the HEI or study programme: some have no representatives of the labour market; some consist only of practitioners.

### **3. Developments and changes of the agency**

Contrary to the expectations expressed in the SAR 2020, no simplification of procedures has been introduced with the start of the second cycle of institutional accreditation from 2023, nor has any adjustment of quality standards been made. The SCHE as the decision-making authority has not approved any of the simplifications proposed by the SAC. On a positive note, the basis for a more precise description of the types of higher education institutions according to the HEdA is now available, which facilitates the assessment of the HEdA standards.

Discussions on the position of private HEIs in the Swiss higher education landscape were held on AAQ Day 2022. It became apparent that institutional accreditation under the HEdA can be a significant challenge, as it requires HEIs to invest in both teaching and research, which tends to exclude teaching schools.

The publication of the expert reports is now assured due to a reinterpretation of the legal provision (HEdA Art. 32) and cannot be refused by the assessed institution. Based on the law, the procedure must comply with international standards.

From 2023 onwards, the reports of the expert groups will be published without the decision, which previously preceded the report. The decision will be published by the respective decision-making authority itself. The detachment of the decision is intended to make the expert report more readable (suggestion on readability, related to ESG 2.6).

According to the SAR report of 2020 (p. 42), AAQ establishes all its expert groups for all formats through a process that it calls the 'long list'. After cleaning up the list with the HEIs, the agency submits the remaining names to the AAQ Commission for adoption (internal quality assurance). From 2023, the long lists will no longer have to be adopted by the Commission. In order to maintain internal quality assurance, the supervising body comments on the long lists, analogous to the procedure for the other agencies approved in Switzerland.

As suggested by the ESG Review Panel, AAQ has reorganised the procedure for complaints (objections) regarding the agency's approach (two suggestions concerning ESG 2.7). The new regulations on the review of AAQ's work have been in force since 1 July 2022.

Outside the scope of application of the ESG, AAQ has agreed with the competent authority of the Confederation, the FOPH, that from 2023 onwards one participant in continuing education must take part in the group of three experts who assess continuing education programmes leading to postgraduate qualifications in the medical professions (suggestion under ESG 2.4).

### **4. Conclusion**

Based on this follow-up report, AAQ concludes that a targeted review can be envisaged for 2025. It should be mentioned that the assessment of the standards at the ESG review now takes place on three levels: fully compliant, partially compliant and non-compliant.

AAQ  
Effingerstrasse 15  
Postfach  
3001 Bern, Switzerland

[www.aaq.ch](http://www.aaq.ch)

