



ENQA Review 2023

Self-Assessment Report of AKAST

**(Agency for Quality Assurance and Accreditation of
Canonical Study Programmes in Germany e.V.)**

21 April 2023

**Agency for Quality Assurance and Accreditation of Canonical Study Programmes
in Germany (AKAST)**

AKAST Office:

Auf der Schanz 49
D-85049 Ingolstadt

Tel.: +49 (0) 841 37 92 96 59

Fax: +49 (0) 8421 93 211 280

Mail: sekretariat@akast.info

Internet: www.akast.info

Executive Board:

Prof. Dr Rafael M. Rieger OFM, Eichstätt, Chairperson

Prof. Dr Sandra Huebenthal, Passau, First Vice Chairperson

Prof. Dr Jochen Sautermeister, Bonn, Second Vice Chairperson

Administrator:

Barbara Reitmeier, M.A.

Register of associations

Bonn Local Court

VR no. 8946

Contents

- 1. Introduction..... 4
- 2. Development of the self-assessment report (SAR) 5
- 3. Higher Education and Quality Assurance of higher education in the context of the agency..... 6
- 4. History, profile and activities of the agency 9
- 5. Profile, functioning and (EQA) activities of the agency (compliance with Part 3 of the ESG)10
 - 5.1 ESG Standard 3.1: Activities, policy and procedures for quality assurance 10
 - 5.2 ESG Standard 3.2: Official status 17
 - 5.3 ESG Standard 3.3: Independence 17
 - 5.4 ESG Standard 3.4: Thematic analysis21
 - 5.5 ESG Standard 3.5: Resources 24
 - 5.6 ESG Standard 3.6: Internal quality assurance and professional conduct25
 - 5.7 ESG Standard 3.7: Cyclical external review of agencies28
- 6. Design and implementation of the agency’s EQA activities (compliance with Part 2 of the ESG)29
 - 6.1 ESG Standard 2.1: Consideration of internal quality assurance29
 - 6.2 ESG Standard 2.2: Designing methodologies fit for purpose31
 - 6.3 ESG Standard 2.3: Implementing processes 33
 - 6.4 ESG Standard 2.4: Peer-review experts35
 - 6.5 ESG Standard 2.5: Criteria for outcomes.....37
 - 6.6 ESG Standard 2.6: Reporting.....39
 - 6.7 ESG Standard 2.7: Complaints and appeals.....40
- 7. Opinions of stakeholders41
- 8. Recommendations and main findings from previous review(s) and agency’s resulting follow-up.....43
- 9. SWOT analysis.....44
- 10. Key challenges and areas for future development48
- 11. List of Annexes50
- 12. List of Abbreviation51

1. Introduction

This self-assessment report (SAR) was prepared for the fourth external evaluation of the *Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany e.V. (AKAST)*.

AKAST was accredited for the first time in 2008 by the German Accreditation Council (GAC) and was authorised to operate in Germany for five furthermore years in 2013 and 2018 in accordance with the “Rules for the Accreditation of Agencies” of the GAC in the respective valid version. AKAST was thereby granted the authority to accredit canonical study programmes by awarding the seal of the Accreditation Council Foundation. On the 17 June 2019, AKAST submitted its first application for registration on the European Quality Assurance Register for Higher Education (EQAR). The application was based on the external review report of the GAC¹, on the basis of which the renewed reaccreditation and approval (pursuant to Section 24 para. 1 sentence 2, Specimen decree) of AKAST in Germany until 31 December 2023 was successfully completed by the GAC and compliance with all standards of the Standards and guidelines for quality assurance in the European Higher Education Area (ESG) was fully or substantially established.² By decision of the Register Committee on 22 June 2020 the application was rejected and the right was granted to AKAST to undergo a so-called Focused Review, in which especially standard 3.3 can be reviewed again, as the non-compliance certified here precludes an inclusion in EQAR.³

On the basis of amended Statutes and further revised documents, AKAST underwent a Focused Review coordinated by the GAC⁴ and again applied for registration on EQAR. In the Terms of Reference, it was agreed to assess standards 3.4 (Thematic Analysis) and 2.7 (Complaints and appeals) in addition to standard 3.3 (Independence).

By decision of 13 December 2021, the application for registration on EQAR was approved by the Register Committee.⁵

¹ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/2018_AKAST_report_reaccreditation_website.pdf

² https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/GAC_resolution_of_reaccreditation_AKAST_20180612_PM%2096-2018.pdf

³ https://backend.deqar.eu/reports/EQAR/2020-06_A91_Rejection_Decision_AKAST.pdf

⁴ https://backend.deqar.eu/reports/EQAR/04_AKAST_External_Review_Report_Acreditation_Council_MEWbBLO.pdf

⁵ https://backend.deqar.eu/reports/EQAR/2021-12_A110_Approval_Decision_AKAST.pdf

The SAR is the basis for the review of AKAST by the European Association for Quality Assurance in Higher Education (ENQA) with the aim of renewing the Agency's registration on EQAR, which is the prerequisite for authorisation in Germany by the GAC.

As agreed in the Terms of Reference, the SAR includes all external evaluation procedures performed by AKAST within the framework of the Standards and guidelines for quality assurance in the European Higher Education Area (ESG):

- Programme accreditation of canonical study programmes and non-canonical study programmes with Catholic Theology/Religion according to the Interstate Treaty^{6/7}
- Peer review of other study programmes with canonical effect that are not covered by the Interstate Treaty⁸

2. Development of the self-assessment report (SAR)

The concrete preparations for the process of renewing the registration on EQAR began in the middle of 2022. In the run-up, there were considerations about the procedure that would be appropriate for a small, specialised and not internationally active agency such as AKAST or which coordinator AKAST should use for this process. In the fourth quarter of 2022, ENQA was finally commissioned with the peer review of AKAST with the aim of renewing the Agency's registration on EQAR. As AKAST is not seeking membership to ENQA at this stage, the peer review will be carried out in consultation with ENQA without the objective of membership on ENQA.

At the beginning of November 2022, a working group was commissioned to prepare the SWOT analysis. The working group included two members of the Advisory Board and the Administrator. The result was presented to the AKAST Executive Board for discussion and confirmed by the board on 19 January 2023.

The draft of the SAR was prepared by the Administrator in the first quarter of 2023. The Office and a student assistant who was hired especially for this purpose provided important assistance in the form of, for example, compiling and reviewing the necessary annexes, proofreading or supporting the editorial work.

A draft of the SAR was submitted to the Executive Board on 7 March 2023, and to the Accreditation Committee and the Advisory Board on 16 March 2023 for discussion and

⁶ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/161208_Studienakkreditierungsstaatsvertrag_mit%20Begrueundung_Englisch.pdf

⁷ Programme accreditation in Germany – as named on the profile of AKAST on EQAR's homepage.

⁸ Programme accreditation (AKAST quality seal) – as named on the profile of AKAST on EQAR's homepage.

consent. The standardised participation of a representative appointed by the Commission for Science and Arts (Commission VIII) of the German Bishops' Conference (DBK) with an advisory vote in the meetings ensured the participation of AKAST's main founder and hence key stakeholder.

Members of AKAST (higher education institutions and other stakeholders outside the bodies of AKAST) were not involved in the preparation of the SAR.

The structure of the SAR follows the Guidelines for ENQA Agency Reviews in the 2021 version according to the outline given in the Guide of Content SAR and the SAR documents AKAST's implementation of the ESG. Relevant annexes documenting the described structures and procedures are attached to the SAR.

3. Higher Education and Quality Assurance of higher education in the context of the agency

3.1 Higher Education System

The German higher education system is subject to the federal system in Germany, therefore the individual federal states are primarily responsible for education. The federal states are responsible for funding, legislation and the organisation of higher education and higher education institutions. Each of the sixteen federal states has its own laws governing higher education, and the actual structure and organisation of the various higher education systems may differ from state to state, including administrative structures. AKAST has been working mainly in those federal states where there are universities with faculties of Catholic Theology and/or Theological Universities. This applies to the following federal states: Baden-Württemberg, Bavaria, Hesse, North Rhine-Westphalia, Rhineland-Palatinate and Thuringia. In order to facilitate mobility between the federal states and to ensure equal treatment of students and quality and comparability of qualifications, the Standing Conference of the Ministers of Education and Cultural Affairs of the Federal States in the Federal Republic of Germany (KMK) has agreed on principles and regulations, for the last time for example, within the framework of the State Treaty on Higher Education and the Specimen decree (cf. Section 8.3 Diploma Supplement of the German Rectors' Conference (HRK)⁹).

The German higher education system includes both public and state-recognised higher education institutions, which also include the ecclesiastical higher education institutions.

⁹ https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-11-Mitglieder/Diploma_Supplement_englisch_2018.pdf

Higher education institutions are categorised as follows (cf. Section 8.1 Diploma Supplement of the HRK¹⁰):

- Universities and equivalent higher education institutions (technical universities, pedagogical higher education institutions, theological colleges, etc.)
- Universities of fine arts and music
- Fachhochschulen (universities of applied sciences/research).

There are currently 423 higher education institutions in Germany with a total of around 2.9 million students. 120 of them are universities, 246 are universities of applied sciences, 57 are universities of fine arts/music. 150 of the higher education institutions are state-recognised institutions, including 120 private and 38 ecclesiastical state-recognised higher education institutions (as of summer semester 2022, cf. HRK statistics¹¹). In a system of consecutive degrees, the Bachelor's degree is the first higher education degree qualifying for a profession and the standard qualification for a consecutive Master's degree as a second cycle of studies. Finally, students are able to incorporate postgraduate doctoral studies as a third cycle of studies.

3.2 Quality Assurance

The German accreditation system is based on the "Interstate Treaty on the Organization of a joint accreditation system to ensure the quality of teaching and learning at German higher education institutions"¹² (Interstate Treaty) and the "Specimen decree pursuant to Article 4 Paragraphs 1 - 4 of the Interstate Treaty, resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of December 7, 2017"¹³ (Specimen decree).

With the entry into force of the Interstate Treaty on 1 January 2018, a fundamental reform took place in the German accreditation system. The overall responsibility for quality assurance in teaching and learning at German higher education institutions has been transferred to the Accreditation Council Foundation, a joint institution of the federal states. As an essential innovation, the GAC as the central decision-making body was assigned the task to give the accreditation decision on the basis of review reports on the accreditation of study programmes (programme accreditation) and the accreditation of quality management systems (system

¹⁰ *ibid.*

¹¹ https://www.hochschulkompass.de/fileadmin/user_upload/editors/Dokumente/Hochschulen/HRK_Statistikfaltblatt_DE_2022_WEB.pdf

¹² https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/161208_Studienakkreditierungsstaatsvertrag_mit%20Begruendung_Englisch.pdf

¹³ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207_Musterrechtsverordnung_Englisch.pdf

accreditation). The responsibility for carrying out the peer review processes (programme and system accreditation) and preparing the review reports is located with the accreditation agencies authorised for this purpose. As a prerequisite for approval, the agency must prove that it is reliably able to perform the tasks of peer review and preparation of the review report; this is rebuttably assumed for agencies listed on EQAR. In the renewed accreditation system, the agencies carry out the peer review process and prepare an accreditation report based on a binding template, a so called grid¹⁴, which is handed over to the higher education institution for application for accreditation to the GAC.

Until 31 December 2017, the German accreditation system was organised in a decentralised manner. The accreditation of study programmes respectively of internal quality assurance systems was carried out by accreditation agencies, who in turn were periodically accredited by the GAC. The GAC defined the basic requirements of the process and insured that any accreditation was carried out on the basis of reliable and transparent criteria. A contract between each agency and the GAC defined the rights and obligations of the agency and the GAC. As part of their contract agreements, the agencies committed themselves to the deployment of the resolutions of the GAC as well as to taking the Common Structural Guidelines of the federal states into consideration, which were the legal basis for the accreditation of study programmes. The GAC monitored the accreditations granted by the agencies.

At the time of application, a total of eleven agencies are authorised by the GAC to operate in Germany. Among them are so-called “comprehensive agencies”, which offer peer review of study programmes in all subject areas and quality assurance systems, and so-called “specialised agencies”, which operate exclusively in a specific subject area. The higher education institutions, in turn, must use an accreditation agency approved for this purpose in Germany to carry out the peer review processes. AKAST is a specialised agency. For the peer review process for Catholic theological study programmes qualifying for the priesthood and the profession of pastoral assistant, the higher education institutions in Germany must use AKAST.

More detailed information on principles, standards, procedures, formal and academic criteria is regulated at the level of the Specimen decree (cf. part 2 and part 3) as well as federal state-specific legal decrees. Within these ordinances, the churches’ rights of participation and approval in the accreditation of study programmes and quality assurance systems are also guaranteed (e.g. requirements for the composition of the review panels).

Details on the activities and procedures of AKAST can be found in the following section.

¹⁴ <https://www.akkreditierungsrat.de/de/antragstellung/antragstellung>

4. History, profile and activities of the agency

4.1 Founding as an ecclesiastical agency

The founding of AKAST as an ecclesiastical agency was a consequence of the resolution of the KMK “Key Points for the Structure of Studies in Study Programmes with Catholic or Protestant Theology/Religion” of 13 December 2007 (KMK Key Points, Annex 3). This resolution provides, with the consent of the Holy See, that study programmes qualifying for the pastorate, the priesthood and the profession of pastoral assistant (“full study programme”) shall be accredited by an ecclesiastical accreditation agency.

In consultation with the Holy See, AKAST was established in 2008 by representatives of the Association of Faculties of Catholic Theology (KThF) and the Association of the workgroups of Catholic Theology and ten faculties of Theology and philosophical-theological colleges as the “Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany e. V.”, entered in the Register of associations at the Bonn Local Court and established by the DBK as a public association under ecclesiastical law with legal capacity. AKAST thus has almost fifteen years of experience in the field of assuring and developing the quality of study and teaching of canonical study programmes, which can be described as a unique characteristic in the German accreditation system.

For the administrative support of AKAST, cooperation agreements have existed with the Catholic University of Eichstätt-Ingolstadt (KUE) (Annex 11) and the "Accreditation, Certification and Quality Assurance Institute" (ACQUIN) (Annex 12) since the Agency was founded. Further information on this can be found in Chapter 5.5 (ESG Standard 3.5: Resources).

4.2 Quality Assurance activities

AKAST’s main area of operation is the programme accreditation of canonical study programmes, especially the study programmes Catholic Theology (full study programmes), which are covered by the Interstate Treaty. As a result of the legal circumstances that have been in force for five years, the range of activities could also be extended to programme accreditation for non-canonical study programmes with Catholic Theology, which are covered by the Interstate Treaty. The business area also includes peer review processes for further canonical study programmes which are not covered by the Interstate Treaty. Furthermore, the promotion of higher education didactics and the exchange of information on current developments in study reform is a concern of AKAST. AKAST works together with the GAC on the one hand and with the “Agenzia della Santa Sede per la Valutazione e la Promozione della Qualità delle Facoltà Ecclesiastiche” (AVEPRO) and the Holy See on the other.

To ensure compliance with the requirements of canon law, AVEPRO is regularly informed via the minutes of the agency's meetings. In addition, a member of the AVEPRO Scientific Advisory Board is a member of the AKAST Advisory Board.

4.3 Outlook

With the initiation of the renewal of the agency's registration on EQAR, the requirements for the national work base and the activities of the agency in Germany are to be renewed or further strengthened for the time after 31 December 2023, while an expansion of the activities outside of Germany is not intended.

An ongoing challenge is to ensure the church's rights of participation and approval within the framework of accreditation and peer review of canonical and non-canonical study programmes with Catholic Theology, which in part must also be demanded from the responsible ecclesiastical authorities by the agencies and the GAC.

5. Profile, functioning and (EQA) activities of the agency (compliance with Part 3 of the ESG)

5.1 ESG Standard 3.1: Activities, policy and procedures for quality assurance

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.

Tasks and objectives:

The "Agency for Quality Assurance and Accreditation of Canonical Study Programmes in Germany e.V." (AKAST) is established as a public association with legal capacity under ecclesiastical law and has been part of the German accreditation system for fifteen years. AKAST is dedicated to the quality assurance of canonical and non-canonical study programmes with Catholic Theology in the sense of the Universal Church Higher Education Law¹⁵ in its currently valid version and thereby contributes to the development of the European Higher Education Area.

¹⁵ The amended ecclesiastical higher education law of the Apostolic Constitution "*Veritatis Gaudium*" published on 29 January 2018 concerns ecclesiastical universities and faculties as well as degrees with canonical effect. Due to the coordination between state and church in Germany required under state-church law, the "Accommodation Decree on Faculties of Catholic Theology in the State Faculties in the Area of the German Bishops' Conference" of 1 January 1983 on the adoption of the provisions of the Apostolic Constitution "*Sapientia Christiana*" and the "*Ordinationes*" annexed to it remains in force until it is revised in cooperation with the Bishops' Conference (accompanying letter of the Congregation for Education).

The tasks and objectives of AKAST are regulated in the Statutes (Annex 1) and determine the daily work of the Agency. In the field of external quality assurance in higher education, they focus primarily:

- on the promotion of faculties and other institutes of Catholic Theology,
- on the quality assurance of canonical and non-canonical study programmes with Catholic Theology/Religion in the sense of the Universal Church Higher Education Law in its currently valid version,
- on the implementation of peer review processes of canonical study programmes and non-canonical study programmes with Catholic Theology/Religion covered by the Interstate Treaty,
- on the implementation of quality assurance and quality development procedures, including peer review and evaluation of canonical study programmes not covered by the Interstate Treaty.

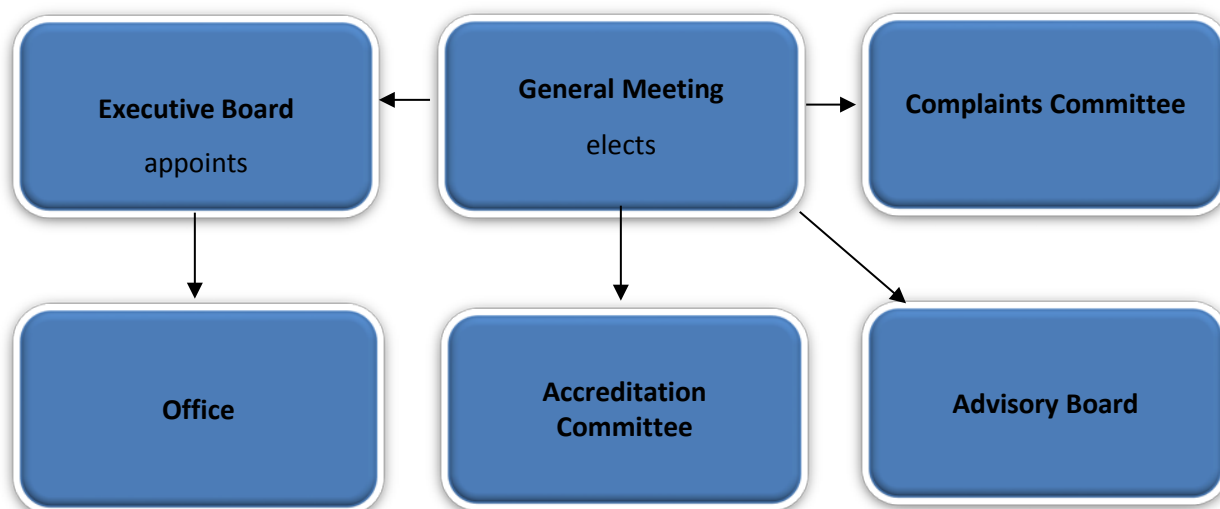
AKAST's understanding of quality is publicly documented on its homepage and is expressed in particular in the Mission Statement¹⁶, according to which "accreditation is designed to facilitate the national, international and ecclesiastical recognition of canonical study programmes and degrees and provides at the same time reliable orientation for universities, students, employers and the responsible ecclesiastical authorities towards the quality of study programmes, their compatibility with the ESG agreed at European level and their conformity with the relevant ecclesiastical requirements in accordance with the KMK Key Points"(Annex 3).

Structural organisation:

The organs and organisational structure of AKAST are laid down in the Statutes (Annex 1). The Executive Board and the General Meeting are the organs of the Association. There are relationships between the clearly defined and delimited organisational units of AKAST, which are reciprocal but also hierarchical in nature.

¹⁶ <https://www.akast.info/wp-content/uploads/2020/08/Mission-Statement-englisch-2019.pdf>

(cf. organigram)



Executive Board (Section 5 of the Statutes): The Executive Board consists of the Chairperson, the First Vice Chairperson and the Second Vice Chairperson. The Chairperson must be a professor or retired professor of a faculty of Catholic Theology. The Chairperson also chairs the Accreditation Committee and the Advisory Board. According to c. 317 § 1 Codex Iuris Canonici (CIC), the Chairperson¹⁷ requires the confirmation of the DBK. The Executive Board is elected by the General Meeting for a term of five years. It remains in office until a new election is held. The Executive Board conducts the day-to-day business of the registered Association within the framework of the resolutions of the General Meeting. The Executive Board reports to the General Meeting and presents the budget draft and the annual accounts. A representative appointed by the Commission VIII of the DBK attends its meetings in an advisory capacity. The composition of the Executive Board can be found on the Agency's homepage¹⁸.

General Meeting (Sections 3 and 6 of the Statutes): The General Meeting shall consist of the following members

- natural persons who are members of the Catholic Church,
- legal entities, in particular theological colleges and institutions, applying for admission,
- the KThF (six representatives): Chairperson, Vice Chairperson and the four members of the Advisory Board of the KThF for the duration of their term of office,

¹⁷ The confirmation of the election of the Chairperson by the DBK at the General Meeting on 19 January 2023, as required by the Statutes (Section 5 para. 1), was requested.

¹⁸ <https://www.akast.info/executive-board/?lang=en>

- the Chairperson of the Association of the workgroups of Catholic Theology for the duration of the term of office,
- two representatives from the German (arch-)dioceses appointed by the DBK.

All relevant interest groups are represented in the General Meeting, which has now grown to almost 25 members.¹⁹ The General Meeting decides, among other matters, on amendments to the Statutes, on the dissolution of the Agency and on guidelines for the implementation of the Association's purpose. It passes resolutions on the budget and adopts the annual accounts. Elections of the Executive Board, of those members of the Accreditation Committee who are not members ex officio, of the Advisory Board and of the Complaints Committee are further key tasks of the General Meeting. Receipt of the annual audit report, discharge of the Executive Board and receipt of the report of the Executive Board and the Administrator are also part of their tasks. Resolutions on procedural guidelines require its consent.

Accreditation Committee (Section 7 of the Statutes): The central decision-making body of AKAST is the Accreditation Committee. In particular, this expert body makes accreditation decisions, adopts resolutions on procedural guidelines and appoints the review panels. The members are elected for five years by the General Meeting in consultation with the KThF, the Association of the workgroups of Catholic Theology, the German Seminary Rectors' Conference and the Association of Theology Students (AGT). The result of the election shall be submitted in writing to the DBK. Re-election is possible. The Accreditation Committee shall consist of the following 10 elected and born members and substitute members in accordance with the Statutes:

- the Chairperson,
- four professors (one of whom should be from abroad),
- for the event of unavailability two professors as substitute members,
- one expert in quality assurance and accreditation matters,
- two persons of professional practice, of whom one is rector of a seminary,
- one student member,
- for the event of unavailability, one substitute student member
- the episcopal commissioner of the DBK (advisory).

The participation of students, representatives of the academic community and of professional practice is guaranteed. The student member and the student substitute member are elected for two years, all other members for five years.

¹⁹ <https://www.akast.info/general-meeting/?lang=en>

The Accreditation Committee is quorate if more than half of the members, including the Chairperson or, if the Chairperson is unable to attend, the Vice Chairperson of the Accreditation Committee, are present. Resolutions shall be passed by a majority of those present and a majority of the professorial members. In the event of a tie, the vote of the Chairperson or, if the Chairperson is unable to attend, the vote of the Vice Chairperson of the Accreditation Committee, has the casting vote. In peer review processes according to the Interstate Treaty the determination of the review result and the consent to the accreditation report and the resolution and evaluation recommendation to the GAC contained therein require the consent of the episcopal commissioner of the DBK.

The current Accreditation Committee has international expertise. The composition can be found on the Agency's homepage.²⁰

Complaints Committee (Section 8 of the Statutes): The Complaints Committee ensures an orderly and independent complaints procedure. Contractual partners of AKAST can raise objections and complaints. The Complaints Committee consists of two academics representing different types of theological higher education institutions, one representative of professional practice, one student member and one representative of an accreditation agency.

The composition of the Complaints Committee can be found on the Agency's homepage.²¹

Advisory Board (Section 9 of the Statutes): The Advisory Board reviews the quality of AKAST's work in an advisory capacity and provides suggestions. The Advisory Board consists of the Chairperson and four experts in quality assurance and accreditation matters. Recommendation 2 of the previous re-accreditation procedure regarding the fulfilment of the function of internal quality assurance of the Advisory Board beyond the participation in the meetings of the Accreditation Committee and the documentation of its work. Taking up this recommendation, the Advisory Board holds meetings as an independent body, in rotation with the proven and appreciated practice of joint meetings with the Accreditation Committee. The members of the Advisory Board report regularly in the meetings, e.g. on current international developments in the accreditation system. They are involved in the conception and implementation of workshop discussions. The Advisory Board has international expertise. The composition can be found on the Agency's homepage.²²

The members are elected for five years. Re-election is possible. The Advisory Board is quorate if more than half of the members, including the Chairperson or, if the Chairperson is prevented

²⁰ <https://www.akast.info/accreditation-committee/?lang=en>

²¹ <https://www.akast.info/complaints-committee/?lang=en>

²² <https://www.akast.info/advisory-board/?lang=en>

from attending, the Vice Chairperson, are present. Resolutions shall be passed by a majority of those present. In the event of a tie, the Chairperson has the casting vote.

Office (Section 9 of the Statutes): The AKAST Office is staffed according to the staffing plan. The Administrator runs the Office and conducts the day-to-day business in consultation with and according to the specifications of the Executive Board. The Administrator is responsible for the technical processing of the peer review procedure. The Administrator accompanies and supports the work of all the decision-making bodies, in particular prepares their meetings and resolutions. The Administrator keeps the decision-making bodies continuously informed about national, international and ecclesiastical developments relevant to the work of the Agency.

Implementation of external quality assurance procedures:

The purpose of the Association is clearly defined in the Statutes and aims at the quality assurance of canonical study programmes and non-canonical study programmes with Catholic Theology/Religion and is realised through their programme accreditation according to the Interstate Treaty.

In addition, AKAST carries out quality assurance and quality development procedures, including peer review and evaluation of canonical study programmes not covered by the Interstate Treaty.

Programme accreditation of canonical study programmes and non-canonical study programmes with Catholic Theology/Religion according to the Interstate Treaty: The discipline-specific focus of AKAST is largely defined by the “KMK Key Points” of the KMK. AKAST carries out the peer review with the aim of programme accreditation by the GAC of undergraduate theological study programmes which are completed with an academic or an ecclesiastical examination after a normal duration of five years and which have ecclesiastical law (“canonical”) effects, as well as other canonical study programmes.²³ These include philosophical and ecclesiastical music Bachelor’s and Master’s degree programmes, insofar as they have ecclesiastical law quality. With the entry into force of the Interstate Treaty, AKAST is also able to carry out peer review processes for non-canonical study programmes with Catholic Theology/Religion.

Requirements, essential points and the peer review process are compiled and published in a “Guidance programme accreditation”.²⁴

Peer review process for canonical study programmes not covered by the Interstate Treaty: In individual cases, AKAST conducts peer review processes for canonical study programmes

²³ cf. Art. 51, 56 and 60 Apostolic Constitution “Sapientia Christiana” or Appendix II “Ordinationes”

²⁴ https://www.akast.info/wp-content/uploads/2021/08/AKAST_Hinweise_Selbstbericht_Programmakkreditierung_final_August2021.pdf

which are not covered by the Interstate Treaty, including, for example, canonical study programmes which conclude with a licentiate examination. In the peer review of this type of study programme, the review result is determined by AKAST.

Requirements, essential points and the peer review process are compiled and published in the “Guidance of the peer review of further canonical study programmes”.²⁵

Since its foundation, AKAST has conducted 52 peer reviews and accreditation procedures; mostly as single procedures, some also as clustered procedures. Two of these procedures were review processes for canonical study programmes not covered by the Interstate Treaty. The Accreditation Committee made 61 accreditation decisions (as of February 2023), excluding findings on the fulfilment of conditions and notifications of change. The review reports of the study programmes accredited and peer reviewed by AKAST can be found on the Agency’s homepage.²⁶

The following table shows the number of accreditation procedures carried out by AKAST in the last five years

| year | programme accreditation (acc. law valid until 2017) | programme accreditation (acc. law valid since 2018) | peer review process (not acc. Interstate Treaty) |
|-------------|--|--|---|
| 2018 | 3 | - | - |
| 2019 | - | 3 | - |
| 2020 | - | 3 | - |
| 2021 | - | 4 | 1 |
| 2022 | - | 1 | - |

Evaluation of faculties of Catholic Theology and philosophical-theological colleges: When it was founded, AKAST developed a peer-review institutional evaluation procedure that can be carried out at the request of faculties of Catholic Theology or philosophical-theological colleges in the area of the DBK. As this option was not taken up by the faculties of Catholic Theology or philosophical-theological colleges, this evaluation procedure was removed from the portfolio (Executive Board resolution, October 2022). This amendment was communicated to EQAR in the form of a Substantive Change Report. With the decision of the Register Committee of 15 February 2023, the substantive amendment was taken note of.²⁷

²⁵ https://www.akast.info/wp-content/uploads/2023/02/Besonderheit_Begutachtung-weiterer-kanonischer-SG.pdf

²⁶ <https://www.akast.info/programmakkreditierung/akkreditierte-studiengaenge/>

²⁷ https://backend.degar.eu/reports/EQAR/C90_AKAST_ChangeReport_Decision.pdf

5.2 ESG Standard 3.2: Official status

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

AKAST has a secure legal basis under civil and canon law. In order to be able to exercise sovereign rights of the Roman Catholic Church for the area of the DBK in the sense of the Universal Church Higher Education Law in its currently valid version, AKAST was established in agreement with the Holy See as the “Agency for Quality assurance and Accreditation of Canonical Study Programmes in Germany e. V.” by resolution of the autumn plenary meeting of the DBK on 22 to 25 September 2008 as a public association with legal capacity under ecclesiastical law in accordance with cc. 116, 301 § 3 and 312 CIC. The seat of the Association is Bonn (Annex 2).

AKAST was first accredited by the GAC in 2008 for a period of five years and authorised to accredit canonical study programmes covered by the "KMK Key Points" (Annex 3) and to award them the seal of the GAC. To date AKAST has been reaccredited two times by the GAC. By the last decision of the GAC of 06 December 2018, AKAST was reaccredited and authorised by the Accreditation Council until 31 December 2023 in Germany pursuant to Section 24 para. 1 sentence 2 of the Specimen decree.²⁸

AKAST is registered on EQAR until 30 November 2023.²⁹

By letter of 9 August 2013, AKAST was recognised by the Congregation for Catholic Education³⁰ as an “articolazione territoriale” of AVEPRO (Annex 4).

5.3 ESG Standard 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.

Organisational independence:

As an institution of higher education founded by faculties of Theology, colleges of Philosophy and Theology, representatives of the KThF and the Association of the workgroups of Catholic Theology, AKAST is free from state influence.

According to the “KMK Key Points”, AKAST exercises ecclesiastical sovereign rights and is subject to the supervision of the DBK in accordance with canon law (cc. 305, 312-320 CIC).

²⁸ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/GAC_resolution_of_reaccreditation_AKAST_20180612_PM%2096-2018.pdf

²⁹ https://backend.deqar.eu/reports/EQAR/2021-12_A110_Approval_Decision_AKAST.pdf

³⁰ The Congregation for Catholic Education was merged into the Dicastery for Culture and Education as part of the reform of the Curia in June 2022.

By its very nature, AKAST's field of business is subject to ecclesiastical authority – without prejudice to university freedom and academic autonomy.

The autonomy and individual independence from instructions, the independence and impartiality of the members of the decision-making bodies are not affected by the structural consequences in the legal form and composition of the decision-making bodies; this also applies to the independence and impartiality of the members, in particular of the Accreditation Committee and the review panels. When designing the structure of AKAST, care was taken to ensure that the members can have a say in the strategic orientation of the Agency, but have no influence on the implementation of the individual procedures. The Executive Board, the Advisory Board as well as the Accreditation Committee are free of instructions and independent. The members of the committees declare their impartiality to AKAST.

In the course of the admission procedure of AKAST to EQAR, the Register Committee acknowledged (decision of 22 June 2020³¹) that the DBK is involved in the Agency as the main founder and main actor, that AKAST is subject to the supervision of the DBK according to canon law and that it is financed by an annual subsidy from the Association of German Dioceses (VDD), the legal entity of the DBK. Furthermore, the Register Committee – on the basis of the Statutes in the version valid at the time – stated that the possibilities of influence also extend to the admission of members of the Association, the election of members of the Accreditation Committee and the election of the Chairperson of the Association. The Register Committee in particular found the requirement that each accreditation decision requires the consent of the representative of the DBK (member of the Accreditation Committee) to be in contrast with the requirement of the ESG that the responsibility for the final outcomes of the quality assurance processes remain the responsibility of the quality assurance agency.

The Register Committee added that the accreditation decision by AKAST and the ecclesiastical approval required under canon law are the purview of two different entities and can therefore be considered independently of each other. Due to this interlinkage, the Register Committee finds that AKAST does not comply with ESG 3.3. In particular, the fact that every accreditation decision requires the consent of the representative of the DBK in the Accreditation Committee does not comply with ESG 3.3.

With regard to this standard to be reviewed in the Focused Review, changes were made in the Statutes of AKAST which manifest the independence of the Agency and the responsibility for its own quality assurance procedures. Firstly, the role of the representative sent by Commission VIII of the DBK was changed from a full member to an advisory member without voting rights. The ecclesiastical approval requirement is now also explicitly decoupled from the

³¹ https://backend.degar.eu/reports/EQAR/2020-06_A91_Rejection_Decision_AKAST.pdf

accreditation decision and makes clear – as demanded by EQAR – also for the public that there are two different responsibilities, which are considered independently of each other. Also, in the opinion of the review panel in the Focused Review procedure, the separation of ecclesiastical consent by the advisory member of the Accreditation Committee on the one hand and the accreditation decision on the other hand now ensures that the full responsibility for the results of its own quality assurance procedures lies with AKAST, with the exception of programme accreditation after the amended accreditation law in Germany came into force. Since 1 January 2018 – in accordance with the Interstate Treaty – the GAC makes the decisions; this applies not only to AKAST but to all agencies operating in Germany. In these procedures – as already mentioned – the determination of the review result and the expert evaluation recommendation to the GAC require the consent of the episcopal commissioner of the DBK.

In addition, according to Section 3 para. 1 of the Statutes, decisions on the admission of members to the Association AKAST are only to be notified to the DBK and finally, according to Section 7 para. 3 of the Statutes, the election of the members of the Accreditation Committee is no longer subject to consultation with the DBK, but only the result is notified in writing. With the decision of 13 December 2021, the compliance with ESG 3.3. was determined.³²

Operational independence:

The central, independent decision-making body of AKAST is the Accreditation Committee. The composition of the decision-making bodies as well as the criteria for the selection of the members of the Accreditation Committee are regulated in the Statutes (Annex 1) and guarantee the participation of recognised experts in the field. The procedure for the nomination and appointment of reviewers is laid down and published on the Agency's homepage.³³ The review panel includes the relevant stakeholders, in particular students and representatives from academia and professional practice. All reviewers are obliged to sign a statement of impartiality. The higher education institutions have the right to object to reviewer appointed by AKAST in justified cases, e.g. due to bias.

In the Accreditation Committee as well as in the review panels appointed by it, the participation of students, representatives from academia and professional practice is guaranteed.

³² https://backend.deqar.eu/reports/EQAR/2021-12_A110_Approval_Decision_AKAST.pdf

³³ <https://www.akast.info/wp-content/uploads/2022/10/AKAST-Verfahren-und-Kriterien-Gutachterbenennung-ab-2019-Beschluss-AK-07.10.2022.pdf> (English version cf. Annex 15)

Procedural rules and evaluation criteria for programme accreditation of canonical study programmes and non-canonical study programmes with Catholic Theology covered by the Interstate Treaty are defined in the Interstate Treaty³⁴ and the Specimen decree³⁵.

Procedural rules and evaluation criteria for peer review processes for canonical study programmes not covered by the Interstate Treaty are procedurally based on the procedures and essentially on the criteria that apply to peer reviews of study programmes covered by the Interstate Treaty in Germany.

Both the Accreditation Committee and the review panels it appoints are bound by this legal framework.

In their decisions and assessments, the Accreditation Committee and the respective review panels are independent and are not subject to any external instructions.

Independence of results:

The independence of the decisions is guaranteed by the multi-stage assessment procedure at AKAST^{36/37}, which strictly separates assessment and decision. The discipline-specific focus of AKAST's Accreditation Committee ensures consistency of the (accreditation) decisions. The Accreditation Committee appoints the respective review panels. They carry out the assessment of the study programmes and write a review report with an expert accreditation recommendation to the GAC or the Accreditation Committee. The rapporteur appointed by the Accreditation Committee reviews the proper conduct of the procedure and comments on the procedure, taking into account the statement of the higher education institution. The sole decision-making body is the Accreditation Committee of AKAST, which makes the accreditation decision on the basis of the available documents (reviewer report with expert accreditation recommendation, statement of the higher education institution on the review report, statement of the rapporteur). Members of the Accreditation Committee do not participate in consultations and resolutions concerning their own organisation. This is noted in the minutes.

All members of the Accreditation Committee and the review panels are aware that they perform the task of external quality assurance on the basis of their personal competence and not as representatives of their organisation, even if they have been proposed for the task by them.

³⁴ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/161208_Studienakkreditierungsstaatsvertrag_mit%20Begrueundung_Englisch.pdf

³⁵ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207_Musterrechtsverordnung_Englisch.pdf

³⁶ https://www.akast.info/wp-content/uploads/2021/08/Ablauf-Programmakkreditierung-ab01012018_1.pdf

³⁷ https://www.akast.info/wp-content/uploads/2021/08/Ablauf-Begutachtung-weitere-SG_NEU.pdf

5.4 ESG Standard 3.4: Thematic analysis

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

AKAST's high level of professional competence resulting from its specific construction and special position serves as a basis for structured analyses for the further development of the study quality of the canonical study programmes in the national context. AKAST dedicates itself to this task in various ways.

In its decision of 22 June 2020, the Register Committee acknowledges that AKAST presents analyses of its own work within the framework of conferences, working groups and other event formats and further notes that these formats do not fully meet the standard requirement of regular publication of reports or thematic analyses. Due to a lack of regular activities that can be considered as thematic analysis, the Register Committee, in its decision of 13 December 2021, concludes partial compliance with ESG 3.4.³⁸

The following should be mentioned with regard to the activities related to this standard during the reporting period and the implementation of the recommendation made in the Focused Review to additionally develop smaller report formats such as "spotlights" or current problems related to the study programmes in Catholic Theology:

As part of the Federal General Meeting of the AGT, AKAST conducted a survey of participating students in the summer semester of 2021 on their experiences with online teaching during the pandemic or the past three semesters of study. The results can be viewed on the Agency's homepage.³⁹ In the following summer semester 2022, a collection of guiding questions for (not only student) reviewers in accreditation procedures in the times of digital teaching was developed on this basis, which is also available on the Agency's homepage.⁴⁰

Since March 2022, AKAST has published annual reports on the Agency's activities on its own homepage. The reports are available in retrospect up to 2017 for viewing on the Agency's homepage.⁴¹

During the winter semester 2022/23, all peer review and accreditation procedures carried out by AKAST to date were reviewed to determine the extent to which the review panels appointed

³⁸ https://backend.deqar.eu/reports/EQAR/2021-12_A110_Approval_Decision_AKAST.pdf

³⁹ <https://www.akast.info/wp-content/uploads/2021/08/AKAST-Studierendumfrage-SoSe-2021-digitale-Lehre.pdf>

⁴⁰ https://www.akast.info/wp-content/uploads/2022/08/AKAST_Leitfragensammlung_052022.pdf

⁴¹ <https://www.akast.info/akast/ueber-akast/#taetigkeitsberichte>

by AKAST's Accreditation Committee meet the criteria set for the review panels.⁴² The result is available on the Agency's homepage.⁴³

In the course of the winter semester 2022/23, an evaluation of the peer review processes carried out by AKAST since the Interstate Treaty came into force was initiated. No results are available yet.

With regard to the focused business field of AKAST, the feedback of experiences and results continues to be carried out discursively to a large extent, since experience shows that the discursive approach to feedback of experiences and results is appropriate and purposeful. AKAST's experiences are presented in various forms: e.g. through participation in working groups, offering workshop discussions, through information talks and presentations, and through regular reports. The feedback pays particular attention to the aspect of quality assurance and quality development of the Catholic Theological Studies programme.

Participation in working groups:

For the regular and comprehensive feedback of its own experiences from its own quality assurance procedures, reference should be made to the active participation in the regular (5-year) evaluation of the "KMK Key Points", for the third time in 2021. In preparation for these periodic discussions between the KMK and the catholic and protestant churches, the experiences in the implementation of the study reform are bundled in a report. At the invitation of the vice Chairperson of Commission VIII of the DBK, the report produced within the framework of this evaluation was presented at a large national video conference with the participation of the KThF, the Conference for University and University Pastoral Care, the German Seminary Rectors' Conference, the Federal Conference of Mentors and Study Guides, the Federal Conference of Academic Assistants and Staff, the AGT and the Congregation for Catholic Education as well as with the participation of AKAST were presented and discussed (Annex 7).

In its meeting of 8 September 2022, the KMK appreciates the progress made in the further development of the study programmes in Catholic and Protestant Theology. Furthermore, the KMK notes that the "KMK Key Points" have proven their worth as a basis and orientation aid for the further development of study programmes with Catholic or Protestant Theology/Religion and, among other things, incorporates an editorial adjustment with regard to AKAST under point 8 (Annex 8). Under these point of the "KMK Key Points" in the revised version of 8 September 2022 (Annex 9), the responsibility for peer review of study programmes qualifying

⁴² <https://www.akast.info/wp-content/uploads/2022/10/AKAST-Verfahren-und-Kriterien-Gutachterbenennung-ab-2019-Beschluss-AK-07.10.2022.pdf> (English version cf. Annex 15)

⁴³ <https://www.akast.info/wp-content/uploads/2023/03/TOP-5.2.1-Zusammenfassung-Gutachtendenanalyse.pdf>

for the pastorate, the priesthood and the profession of pastoral assistant (full theological study programme) is now explicitly assigned to AKAST.

Workshop discussions:

Since its foundation, AKAST has regularly held one-day information events and workshop discussions on the topic of study reform in Catholic Theology. The events are generally designed for specific target groups and in different event formats for potential reviewers, for students or for faculty and university administrators or persons responsible for study programme and quality development at the faculties of Catholic Theology and ecclesiastical colleges. On the one hand, with the help of these events, AKAST's multiplier role in the area of quality assurance of canonical study programmes in Germany is to be further expanded and, on the other hand, an additional forum for exchange on questions of theological studies and the implementation of study reform is to be formed. The aim of these events is therefore not primarily to draw up instructions for action, for example in the implementation of the study reform. In the reporting period, which was subject to certain restrictions in terms of the organisation and implementation of events due to the pandemic, AKAST conceived seven "workshop discussions for students". This half-day event format usually includes two workshops, the topics of which are developed anew each time with the board of the AGT. The topics can be found on the Agency's homepage.⁴⁴ These workshops are either designed as general information events for potential new student reviewers or have specific topics.

Reporting:

The Chairperson reports annually to the General Meeting of AKAST and to the KThF at its annual meeting on the work and experiences of AKAST.

The DBK, in particular the Commission VIII, is regularly informed about the work and experiences of AKAST.

AKAST reports semi-annually to the Dicastery for Education and Culture and AVEPRO on the work and experiences of AKAST gathered in the accreditation procedures.

⁴⁴ <https://www.akast.info/akast/ueber-akast/veranstaltungen-archiv/>

5.5 ESG Standard 3.5: Resources

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

Financial resources:

AKAST has sufficient and appropriate financial resources. AKAST generates income primarily from the grant from the VDD and the costs of the proceedings. The amount of the grant is defined and accounts for approximately 75% of the total annual income. With this income, the Agency covers its annual expenses. The annual budget is planned by the Executive Board and the Administrator. At the end of the financial year, an audit is carried out by the auditing company Freudenhammer, Maas und Partner mbB. The audit report is submitted annually to the General Meeting for exoneration of the Executive Board. At the same time, the General Meeting adopts the draft budget for the coming financial year (Annex 5), which is forwarded to the VDD in a grant application.

In Germany, the accreditation system is organised on a non-profit basis. Therefore, AKAST e.V. was founded as a non-profit association. The non-profit status of the Agency is reviewed by the tax office every three years, for the last time on 15 February 2023 (Annex 6). Therefore, the members of the Executive Board, the Accreditation Committee, the Advisory Board and the Complaints Committee are volunteers.

Human resources:

AKAST has sustainable and adequate personnel resources. The KUE Foundation serves as employer for the staff of the Agency's Office. The Office is staffed by an administrator (currently pay grade TV-LE 14) and a secretary (50% part time, pay grade TV-LE 6).

The cooperation agreement with ACQUIN (Annex 12) ensures that temporary workloads at AKAST can be absorbed and administrative support can be provided for the conduct of accreditation. The cooperation agreement is concluded for five years and is evaluated before renewal for a further five years. Each accreditation agreement that AKAST concludes with a higher education institution contains an obligatory clause stating that ACQUIN can be commissioned by AKAST to carry out individual procedural steps, with the exception of reviewer nomination and the preparation of the accreditation report with decision and evaluation recommendation. At staff level, regular working discussions take place between both agencies, in which the AKAST Administrator and the ACQUIN representative responsible for AKAST participate. As a rule, an exchange of information and experience takes place once a year at management level, in which the appointed representative of the DBK participate if necessary.

Material resources:

The Office has adequate and sufficient material resources to guarantee that the Agency can function properly.

The Agency maintains an office at the KUE, which is supported administratively by the KUE in accordance with the AKAST/KUE cooperation agreement (Annex 11). The KUE Foundation provides the necessary material and spatial requirements for the maintenance of the Office. KUE bills AKAST for the operating costs incurred (rent, cleaning, post, telephone, etc.). The cooperation agreement is concluded for a period of five years and is evaluated before renewal for a further five years. The staff members have an office room at their disposal at the Ingolstadt location for joint use; necessary work meetings, which serve to coordinate and regulate the workflow, can thus be handled very flexibly. The short official channels to Ingolstadt School of Management of the KUE promote a smooth flow of business processes. Additional conference and meeting rooms can be used in the premises of the KUE through the cooperation with the KUE. Data is regularly backed up. All relevant documents are archived and stored – also on data carriers.

The server of the AKAST homepage is located on the “prohost networks GmbH, Berlin”. Consultation, planning, development and installation are carried out by “Feuerpfeil Werbeagentur GmbH & Co. KG” based in Bayreuth.

The Agency’s homepage is maintained by the Office.

5.6 ESG Standard 3.6: Internal quality assurance and professional conduct

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

Definition, assurance and improvement of the quality of the Agency’s activities:

AKAST’s internal quality requirements and quality measures focus on the fundamental task of the Agency in the field of external quality assurance in higher education. AKAST’s understanding of quality, formulated in the Mission Statement⁴⁵, is based on the principles of academic freedom and university autonomy and thus on the responsibility of the universities and faculties for the quality of the study programmes and the measurement and validation of the universities’ objectives. AKAST’s understanding of quality is thereby bound to the requirements of national state higher education law, and to the requirements of state-church law, including the relevant church regulations mentioned in the concordats or state-church treaties, and aims at

⁴⁵ <https://www.akast.info/wp-content/uploads/2020/08/Mission-Statement-englisch-2019.pdf>

- ensuring the establishment of AKAST as a discipline-specific and competent quality assurance agency in the national context,
- ensuring and further developing the high quality of the quality assurance procedures carried out by AKAST,
- promoting the faculties of Catholic Theology and educational institutions through the high professional competence of AKAST resulting from its unique structure and special status,
- ensuring adequate and sustainable personnel and material resources in all areas.

To achieve these goals, AKAST continuously uses a formalised system of internal quality assurance of AKAST's activities. The basic principles are summarised in the document "*Das System der internen Qualitätssicherung von AKAST e.V.*" (AKAST e.V. internal quality assurance system). This concept was adopted by the Executive Board on 26 May 2014 after prior consultation of the Accreditation Committee and was editorially revised for the last time in February 2023. The system of internal quality assurance of AKAST is suitable for assessing the effectiveness of the internal control processes and refers to the definition, assurance and continuous improvement of the quality and integrity of the Agency's work. The system takes the specific nature of AKAST as a small Agency with two employees (Office), a comparatively low number of procedures and short information and administrative channels into account. It defines the overarching quality goals and quality requirements of AKAST's activities. It is publicly accessible and includes systematic internal and external feedback processes.⁴⁶

Professionalism and integrity:

AKAST's peer review process involves the Accreditation Committee, the review panel and AKAST's Office. The members of the Advisory Board participate in an advisory capacity.

Criteria for the appointment of the Accreditation Committee members are, according to the Statutes: Academic qualification, representation of the four sub-fields of Theology, representation of faculties maintained by the State and by the church, experience with the Bologna Process, competence also for teacher training (cf. Section 7 para. 4 Statutes, Annex 1). The requirement to involve the four sub-fields of Theology enables the Accreditation Committee to incorporate Theology in its diversity of subjects and consequently to undertake in-depth content analysis and feedback.

⁴⁶ https://www.akast.info/wp-content/uploads/2023/02/iQM_AKAST_Version2.0_Stand-0152022_final.pdf (English version cf. Annex 16)

The criteria and procedure for appointing reviewer are clearly defined and regulated and publicly documented.⁴⁷ The review panels are appointed in accordance with the guidelines for the appointment of reviewers of the HRK.⁴⁸ The composition of the review panel ensures the peer review of all areas relevant to the review process (e.g. subject-related aspects, study structure and formal aspects, social aspects). The members have both relevant subject expertise and reviewer competence in accreditation and/or evaluation procedures.

The elected Committee members and the members of the review panels declare their impartiality to AKAST and sign a declaration regarding impartiality and confidentiality.

The competences of the full-time staff are promoted through further training measures, literature and conference attendance. The focus is on the expansion and renewal of competence within the Office also in the area of internal quality assurance in higher education institutions. As employees of the KUE, the entire range of further education offered by the university is also available to the staff. The offers of the computer centre and the language centre are examples of this.

Internal and external feedback:

Internal and external feedback provide valuable information for the further development of the Agency. After the peer review processes have been completed, they are regularly evaluated. Results of the evaluation initiated in the course of the winter semester 2022/23 are still pending. Feedback from the meetings of the Accreditation Committee and the Advisory Board is discussed in the Executive Board and contributes to the further development of the quality of the AKAST's work. As already mentioned, AKAST took Recommendation 2 from the previous reaccreditation as an opportunity to also hold meetings of the Advisory Board as a separate body. This takes place in rotation, while maintaining the proven and appreciated practice of joint meetings with the Accreditation Committee.

Intolerance and discrimination:

According to Article 10 (4) of the KUE Foundation Charter, all employees of the KUE are obliged to recognise and observe the ecclesiastical mission and the catholic character of the KUE and to prevent or eliminate intolerance and discrimination. Since from 2023 onwards the VDD will require the application of the applicable diocesan prevention regulations of the respective local diocese as a prerequisite for the recognition of eligibility, corresponding regulations were anchored in the Statutes of AKAST in 2022 (cf. Section 2 Statutes, Annex 1).

⁴⁷ <https://www.akast.info/wp-content/uploads/2022/10/AKAST-Verfahren-und-Kriterien-Gutachterbenennung-ab-2019-Beschluss-AK-07.10.2022.pdf> (English version cf. Annex 15)

⁴⁸ <https://www.hrk.de/positionen/beschluss/detail/leitlinien-zu-der-benennung-von-gutachterinnen-und-gutachtern-und-der-zusammenstellung-von-gutachter/>

Ensuring compliance with the ESG:

AKAST also ensures compliance with the ESG in cases where parts of the review are carried out by third parties on behalf of AKAST. Sourcing out parts of the review process is only possible in cooperation with ACQUIN. According to the cooperation agreement with ACQUIN (Annex 12), certain parts of the assessment procedure can be carried out by ACQUIN. ACQUIN's authorisation by the GAC is based on ACQUIN's registration on EQAR and ensures compliance with the ESG.

5.7 ESG Standard 3.7: Cyclical external review of agencies

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

According to the requirements for agencies accredited in Germany, AKAST is obliged to undergo an external peer review every five years. Since the foundation of AKAST, the Agency has been three times externally reviewed on a regular basis by the GAC. AKAST was accredited as an accreditation agency for the first time in October 2008. In 2013 and 2018, AKAST was reaccredited by the GAC for five years in accordance with the "Rules for the Accreditation of Agencies" of the GAC in the respective valid version and authorised to operate in Germany. During the last review, AKAST was explicitly reviewed for compliance with the European Standards and Guidelines (ESG). Pursuant to para. 5 of the "Transitional Regulation for Agencies Accredited under Previous Law" (resolution of the GAC of 20 February 2018)⁴⁹, AKAST was authorised by the GAC until the end of the accreditation period (i.e. 31 December 2023) and thus authorised to conduct accreditation procedures under previous law and to conduct peer review procedures under the law applicable as of 1 January 2018. With the entry into force of the Interstate Treaty the authorisation of the agencies by the GAC is the necessary prerequisite for an activity in Germany. The authorisation is based on the registration of an agency on EQAR.

AKAST has been listed on EQAR since 13 December 2021.

AKAST is striving for renewal of the registration by means of an agency assessment coordinated by ENQA. The procedure was initiated in due time.

⁴⁹ <https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Transitional%20regulation%20for%20agencies.pdf>

6. Design and implementation of the agency's EQA activities (compliance with Part 2 of the ESG)

6.1 ESG Standard 2.1: Consideration of internal quality assurance

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

As formulated in the Mission Statement⁵⁰, AKAST's understanding of quality is based on the principles of academic freedom and university autonomy and thus on the responsibility of the universities and the faculties for the quality of the study programmes and the measurement and validation of the objectives of the higher education institutions.

The procedural rules and review criteria applied by AKAST in the programme accreditation of canonical study programmes and non-canonical study programmes with Catholic Theology/Religion according to the Interstate Treaty are presented in the "Guidance for Programme Accreditation"⁵¹ and legally laid down in the Interstate Treaty and the Specimen decree. A guiding principle in the Interstate Treaty is compliance with the ESG. The regulations of the Specimen decree are based on the ESG. Via this legal framework, the consideration of the ESG in the procedures of AKAST is ensured for the implementation of the procedures of programme accreditation.

The GAC, as decision-making body for accreditations within this legal framework has made a mapping (as of July 2018) between the standards of the Specimen decree and the ESG part 1 (Annex 10).

The following table⁵² shows a comparison between part 1 of ESG 2015 and the German accreditation rules and criteria, mainly determined in parts 2 and 3 of the specimen decree pursuant to Article 4, paragraphs 1 – 4 of the interstate study accreditation treaty.

⁵⁰ <https://www.akast.info/wp-content/uploads/2020/08/Mission-Statement-englisch-2019.pdf>

⁵¹ https://www.akast.info/wp-content/uploads/2021/08/AKAST_Hinweise_Selbstbericht_Programmakkreditierung_final_August2021.pdf

⁵² Source: GAC, c.f Annex 10

| ESG 2015 | Programme accreditation | System accreditation |
|---|--|---|
| 1.1 Policy for quality assurance | § 14 Academic success | § 17 Concept of the quality management system (goals, processes, instruments) |
| 1.2 Design and approval of programmes | § 11 Qualification goals and qualification level; § 12 Coherent study programme concept and adequate implementation; § 13 Subject-content organisation of the study programmes | § 17 Concept of the quality management system (goals, processes, instruments) |
| 1.3 Student-centered learning, teaching and assessment | § 12 Coherent study programme concept and adequate implementation (paragraph 1); § 15 Gender equality and compensation of disadvantages | § 17 Concept of the quality management system (goals, processes, instruments) |
| 1.4 Student admission, progression, recognition and certification | § 5 Admission requirements and transitions between different courses; § 6 Qualifications and qualification designations; § 12 Coherent study programme concept and adequate implementation (paragraph 1); § 14 Academic success | § 17 Concept of the quality management system (goals, processes, instruments) |
| 1.5 Teaching staff | § 12 Coherent study programme concept and adequate implementation (paragraph 2) | § 17 Concept of the quality management system (goals, processes, instruments) |
| 1.6 Learning resources and student support | § 12 Coherent study programme concept and adequate implementation (paragraph 3) | § 17 Concept of the quality management system (goals, processes, instruments) |
| 1.7 Information management | § 14 Academic success | § 18 Measures to implement the quality management concept, see paragraph 3 |
| 1.8 Public information | Publication of examination regulations which contain information on study programmes is obligatory according to the higher education acts of the German states | § 18 (paragraph 4); Publication of examination regulations which contain information on study programmes is obligatory according to the higher education acts of the German states |
| 1.9 On-going monitoring and periodic review of programme | § 14 Academic success | § 18 Measures to implement the quality management concept |
| 1.10 Cyclical external quality assurance | § 26 Period of validity for the accreditation; extension | § 26 Period of validity for the accreditation; extension |

Agencies who are authorised by the GAC to conduct assessment procedures according to the German regulations have no authority on the legal framework and the criteria, which have to be applied.

The procedural rules and review criteria applied by AKAST for peer review processes for canonical study programmes not covered by the Interstate Treaty are presented in the “Guidance of the peer review of further canonical study programmes”⁵³ and are procedurally based on the procedures and essentially on the criteria that apply to peer reviews of study programmes covered by the Interstate Treaty in Germany. Thus, ESG Part 1 is adequately taken into account.

6.2 ESG Standard 2.2: Designing methodologies fit for purpose

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.

Objective of the procedures:

The object of the programme accreditation procedures or peer review processes carried out by AKAST are canonical study programmes and non-canonical study programmes with Catholic Theology/Religion covered by the Interstate Treaty, as well as other study programmes with canonical effect not covered by the Interstate Treaty. The objective of the programme accreditation procedures carried out by AKAST is publicly documented on the Agency’s homepage and explicitly defined in the Mission Statement. The programme accreditation and peer review procedures achieve their objectives and follow the relevant legal and state-church requirements. In assessing the quality of the study programmes, AKAST is guided

- to the goals set by the higher education institution within the framework of an overarching strategy,
- on the national and international and universal church standards to be met at the same time,
- by the validity of the study objective and study concept in connection with the possibility of fulfilling the objective.

This concept of quality is realised through

- an expert-centred procedure
- the university lecturers, representatives from professional experience and students, who participate in an independent manner and free of instructions.

⁵³ https://www.akast.info/wp-content/uploads/2023/02/Besonderheit_Begutachtung-weiterer-kanonischer-SG.pdf

The review criteria to be applied for the evaluation to obtain both the seal of the GAC and the AKAST seal are based, in addition to the ESG, on the Interstate Treaty and the Specimen decree as well as the relevant church specifications according to the “KMK Key Points”.

Involvement of stakeholders:

The composition of the Accreditation Committee is regulated in the Statutes (Annex 1) and ensures the participation of all stakeholder groups (higher education institutions, students, professional experience). The participation of all stakeholder groups is guaranteed in the review panels appointed by the Accreditation Committee.⁵⁴ Through regular surveys of the higher education institutions and review panels, AKAST receives feedback on the procedures' fitness for purpose and for their improvement.

Support for higher education institutions:

The Administrator is available to the applicant higher education institutions or faculties as a contact person in preparation for the procedure and throughout the entire procedure.

At the request of a faculty or higher education institution, AKAST offers information meetings on the contents, rules, criteria and procedure of a peer review process of canonical study programmes and non-canonical study programmes with Catholic Theology/Religion, which are covered by the Interstate Treaty, or of further study programmes with canonical effect, which are not covered by the Interstate Treaty. The assessment criteria in these peer review processes for (re-)accreditation are based on the respective valid state and church guidelines. The criteria are transparent and can be viewed in a suitable manner. Upon request, these documents as well as other documents relevant for a peer review process are made available to the faculties or higher education institutions free of charge or are publicly accessible on the homepages of AKAST and the GAC.

As the need arises the Office informs the responsible persons at the higher education institutions about important developments in the accreditation system by means of circular letters.

⁵⁴ <https://www.akast.info/wp-content/uploads/2022/10/AKAST-Verfahren-und-Kriterien-Gutachterbenennung-ab-2019-Beschluss-AK-07.10.2022.pdf> (English version cf. Annex 15)

6.3 ESG Standard 2.3: Implementing processes

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

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

The programme accreditations and peer reviews of study programmes carried out by AKAST are based on the relevant legal and state-church requirements and are thus expedient and useful. The underlying evaluation criteria and procedural rules are defined in advance and can be viewed on the Agency's homepage.

All procedures carried out by AKAST include

- a review of the self-assessment or self-documentation submitted to AKAST, in which the higher education institution describes its compliance with the pre-defined and published assessment criteria;
- a site visit (time duration usually 1.5 days) in the peer review procedure by a panel of experts, based in particular on the examination of the submitted documents and separate interviews with programme managers, university lecturers, students and the institution's management and administrators;
- a report – including an expert decision recommendation – on the external peer review, which, together with the statement of the higher education institution, forms the basis for the decision by the GAC or the Accreditation Committee of AKAST;
- consistent follow-up measures after the final decision.

Self-assessment report (SAR):

Higher education institutions applying to AKAST for a peer review process are informed about the procedure, the individual steps of the process, the time duration and fees as well as the evaluation criteria and the possible results. The Administrator offers continuous feedback to the higher education institutions during the preparation and writing of the SAR. The higher education institution's SAR is checked for completeness and formal correctness after receipt by AKAST. The SAR should not exceed 20 pages for the description of a study programme and 50 pages for the description of a study programme bundle.

Site visit:

The members of the review panel usually receive the SAR at least four weeks before the site visit. At the same time, the review panel receives further documents explaining the tasks and the role of the reviewers as well as the context of the accreditation procedures and the

evaluation criteria. The site visit includes discussions with teaching staff and those responsible for the programme, students, the institution's administration and, if necessary, a tour of the location. The preparation of the various rounds of talks takes place between the meetings. The conversations are recorded by the Administrator. These meeting notes serve to prepare and structure the various discussions and the final discussion and are also made available to the reviewers as support for the preparation of the review report. In the final internal meeting, the reviewer panel agrees on a recommendation for a decision.

Before the start of the site visit, an obligatory internal peer review meeting takes place, in which the Administrator prepares the reviewer panel for its role and task in the specific procedure and discusses open questions about the study programme to be reviewed.

Report on the external peer review:

The review report, which is structured according to the grid type Programme Accreditation Single⁵⁵ set up by the GAC, is prepared by the reviewers and edited and finalised by the Administrator. The report contains the evaluation of the binding criteria and a reviewer's decision recommendation. The higher education institution has the opportunity to comment on the review reports and to make corrections.

In peer review processes according to the Interstate Treaty, the reviewer's decision recommendation is determined by the Accreditation Committee, taking into account the statement of the higher education institution. Subsequently, the approval of the relevant church offices required for the accreditation decision is obtained. Both processes are documented in the accreditation report and the accreditation report is handed over to the higher education institution for application for accreditation to the GAC.

In the case of peer review processes of study programmes not covered by the Interstate Treaty, the Accreditation Committee of AKAST makes the decision on the assessment result on the basis of the final report and the statement of the higher education institution. Deviations from the review report's decision recommendation must be comprehensibly justified by the Accreditation Committee. Since these procedures are not accreditation procedures according to the Interstate Treaty and lead not to a formal decision, the consent of the approval of the relevant church office does not have to be obtained.

Consistent follow-up measures:

In peer review processes according to the Interstate Treaty, the accreditation decision is made by the GAC, which is thus responsible for the follow-up carried out in the context of the peer review of the fulfilment of the conditions. For the peer review of the fulfilment of the conditions

⁵⁵ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Raster%2001%20Programm%20Einzel%20Fassung%2002.3_0.pdf

in the peer review processes carried out by AKAST, the approval of the relevant church office must be obtained also for the decision “fulfilment of the conditions” of the GAC – by the higher education institution via AKAST. The Accreditation Committee of AKAST determines the fulfilment of the conditions on the basis of the evidence provided by the higher education institution and obtains the approval of the relevant church office required for this decision of the GAC. The result is handed over to the higher education institution to apply to the GAC for fulfilment of the conditions.

In peer review processes of study programmes not covered by the Interstate Treaty, AKAST informs the higher education institution of the review result. In cases where an assessment result with deficiencies was determined, there is an obligatory follow-up. A deadline of 12 months is set for remedying the deficiency – analogous to the deadlines in peer review processes according to the Interstate Treaty. The Accreditation Committee of AKAST decides on the rectification of the deficiency.

The detailed schedules for programme accreditation procedures are published at the Agency’s homepage.^{56/57} The procedural rules and evaluation criteria are described in guidance handouts and are discussed with the higher education institutions and faculties in information meetings and workshop discussions.^{58/59}

The review reports including (accreditation) decisions and, if applicable, follow-up measures are published.⁶⁰

6.4 ESG Standard 2.4: Peer-review experts

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

Selection, appointment and composition:

The review panel is appointed by the AKAST Accreditation Committee in accordance with the guidelines for the appointment of reviewers of the HRK. The criteria and procedure for the appointment of reviewers by AKAST are clearly defined, regulated and publicly documented.⁶¹ The review panel includes representatives of the relevant stakeholder groups, in particular

⁵⁶ https://www.akast.info/wp-content/uploads/2021/08/Ablauf-Programmakkreditierung-ab01012018_1.pdf

⁵⁷ https://www.akast.info/wp-content/uploads/2021/08/Ablauf-Begutachtung-weitere-SG_NEU.pdf

⁵⁸ https://www.akast.info/wp-content/uploads/2021/08/AKAST_Hinweise_Selbstbericht_Programmakkreditierung_final_August2021.pdf

⁵⁹ https://www.akast.info/wp-content/uploads/2023/02/Besonderheit_Begutachtung-weiterer-kanonischer-SG.pdf

⁶⁰ <https://www.akast.info/programmakkreditierung/akkreditierte-studiengaenge/>

⁶¹ <https://www.akast.info/wp-content/uploads/2022/10/AKAST-Verfahren-und-Kriterien-Gutachterbenennung-ab-2019-Beschluss-AK-07.10.2022.pdf> (English version cf. Annex 15)

students and representatives from academia and professional experience. The review panel for the peer review of the study programmes in Catholic Theology (full study programme) generally comprises four professorial representatives from the four sub-fields of Theology, plus one student representative and two persons from professional experience, including a rector of a seminary. The requirement to involve the four sub-fields of Theology enables the reviewer panel – as well as the Accreditation Committee – to incorporate Theology in its diversity of subjects and consequently to undertake in-depth content analysis and feedback.

For the peer review or accreditation of other study programmes with canonical effect, the review panel shall comprise at least two professorial representatives, one student representative and one person of professional experience. Their members are independent and free of instructions. The reviewers have relevant professional expertise. AKAST ensures that the reviewers from the higher education sector have, in addition to the relevant professional expertise, reviewer competence in accreditation and/or evaluation procedures (in particular knowledge of the procedure and the church and state regulations, knowledge of the German higher education system and the Bologna Process) and competence in the areas of study programme development and quality assurance. AKAST ensures that representatives from the academic community belong to different higher education institutions. In re-accreditation procedures, AKAST strives to involve at least one member from the reviewer group from the initial accreditation.

The Office informs the higher education institution about the composition of the respective review panel. Within a certain period of time, justified objections against members of the review panel can be submitted by the higher education institution. The higher education institution has no right of proposal and/or veto.

Preparation:

The selection procedure defined by AKAST guarantees the experience-based and research-based expertise of the reviewers. The Administrator prepares the reviewers intensively for their work and for the specific peer review process. For this purpose, the Administrator offers special information events⁶² or allows sufficient time for a comprehensive and detailed preliminary discussion for the procedure-related preparation of the review panel in the context of concrete site visits. These measures ensure that the reviewers have comprehensive knowledge of the evaluation criteria and procedural rules as well as a clear understanding of their role in the peer review process. In addition, each review panel receives separate instructions in advance (Annex 13) and the relevant documents given by church and state.

Independence:

⁶² https://www.akast.info/wp-content/uploads/2022/10/AKAST_2022_Online-Seminare-neue-Termine.pdf

If reviewers are appointed for an accreditation procedure, AKAST guarantees the impartiality and confidentiality of these persons. The reviewers are obliged to sign a statement of impartiality before the start of a concrete procedure.

Pool of reviewers:

AKAST's pool of reviewers currently has 221 members, divided as follows: 129 professorial representatives, 52 professional experience representatives, including 15 rectors of seminary, and 40 student representatives. Since its founding, AKAST has recorded 353 review assignments, which were carried out by a total of 221 reviewers, including 53 female reviewers (in some cases multiple assignments). Twenty-one reviewers with foreign expertise have been deployed (as of February 2023).

The pool of experts who can be considered as reviewers is managed by the Office. It is generated and renewed by proposals from the Association of the workgroups of Catholic Theology, the KThF, the German Seminary Rectors' Conference and the AGT, which are regularly requested by the Office. The cooperation with the AGT is based on the special (pre-) conditions that are necessary for an expert to work within the scope of AKAST's business (among other things, denomination, study of a canonical study programme or teaching degree in Catholic Theology, competencies, experience and structural as well as content-related knowledge regarding canonical study programmes). Increasingly, there are unsolicited applications, proposals by reviewers already working for AKAST and the use of persons from professional experience who, for example, worked as students reviewer, while they studied.

6.5 ESG Standard 2.5: Criteria for outcomes

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.

The procedures, which AKAST carries out for the peer review of canonical study programmes and non-canonical study programmes with Catholic Theology/Religion which are covered by the Interstate Treaty or of further study programmes with canonical effect which are not covered by the Interstate Treaty, follow the standard procedure prescribed by law; this is described in sufficient detail and transparency and is available for review on the Agency's homepage.^{63/64} The assessment criteria are based on the respectively valid state and church specifications; these are clear, transparent and can be viewed in an appropriate manner on

⁶³ https://www.akast.info/wp-content/uploads/2021/08/Ablauf-Programmakkreditierung-ab01012018_1.pdf

⁶⁴ https://www.akast.info/wp-content/uploads/2021/08/Ablauf-Begutachtung-weitere-SG_NEU.pdf

the Agency's homepage.^{65/66} The (accreditation) decisions in the procedures for the peer review of canonical study programmes and non-canonical study programmes with Catholic Theology/Religion covered by the Interstate Treaty or of further study programmes with canonical effect not covered by the Interstate Treaty apply the respectively valid state and ecclesiastical assessment criteria. The decisions are appropriate, correct and comprehensible. Amendments to the law are taken into account without delay.

To increase the consistency of the Accreditation Committee's peer reviews and decisions, AKAST uses various instruments. The consistent application of the criteria is ensured in particular by the multi-stage procedure, which separates peer review by the review panel and resolution or proposal for the determination of compliance with the relevant criteria by the Accreditation Committee of AKAST, and the discipline-specific focus of the Accreditation Committee. The complete and consistent evaluation of the formal and academic criteria is ensured by the grid for the accreditation report specified by the GAC.⁶⁷ The established practice of AKAST to involve members of the Accreditation Committee or the Advisory Board as rapporteurs in the sense of internal quality assurance and the four eyes principle in the monitoring of the procedures also serves a consistent application of the criteria. Another special feature is the fact that the Administrator has organisationally supervised all of AKAST's peer review processes to date since its foundation.

The very low number of appeals against decisions can be seen as an indicator of consistent application of the criteria. Since AKAST was founded, there has been one complaint that was resolved by the Accreditation Committee.

Decisions in programme accreditation procedures according to the Interstate Treaty lead to a formal decision (accreditation or non-accreditation) by the GAC. Accreditation can be linked to conditions, the fulfilment of which must be proven within a certain period of time.

Decisions in peer reviews of canonical study programmes not covered by the Interstate Treaty do not have a legal basis or do not result in a formal decision. The conduct of accreditation and the criteria to be assessed are – in consultation with the applying higher education institution – essentially based on the requirements prescribed by law in the Interstate Treaty and the Specimen decree and are consequently described in sufficient detail and transparency.

⁶⁵ https://www.akast.info/wp-content/uploads/2021/08/AKAST_Hinweise_Selbstbericht_Programmakkreditierung_final_August2021.pdf

⁶⁶ https://www.akast.info/wp-content/uploads/2023/02/Besonderheit_Begutachtung-weiterer-kanonischer-SG.pdf

⁶⁷ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/Raster%2001%20Programm%20Einzel%20Fassung%2002.3_0.pdf

6.6 ESG Standard 2.6: Reporting

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.

Since Interstate Treaty came into force, all accreditation decisions and the associated accreditation reports are published centrally in the Electronic Information and Application System (ELIAS database⁶⁸) of the GAC. This also concerns negative decisions. The accreditation reports prepared by AKAST are published on the AKAST homepage⁶⁹ after publication by the GAC and are also posted on DEQAR (Database of External Quality Assurance Results⁷⁰).

In peer review processes of study programmes not covered by the Interstate Treaty, the full expert reports are published on the Agency's homepage⁷¹ and also posted on DEQAR⁷².

In all programme accreditation procedures carried out by AKAST before the Interstate Treaty came into force, the complete expert reports are published on the Agency's homepage. When publishing, individual text sections may have to be excluded due to data protection guidelines (e.g. personal data).

In the German accreditation system (cf. Section 24 Specimen decree), the accreditation reports (consisting of the formal report and the reviewer report) must be prepared in the structure specified by the GAC. The GAC has adopted a total of four different templates for the different procedure models in the German system: type Programme Accreditation Single, type Programme Accreditation Bundle, type Programme Accreditation Combined Study Programme, type System Accreditation⁷³. The use of these grids is binding for all agencies accredited in Germany for programme and/or system accreditation.

The outlines of the templates contain all criteria specified in the Specimen decree. Deviations or additions are only possible in justified cases and are to be explained in the specially provided chapter 3.1. There are no specifications for the length of the expert reports. The chapters on the individual criteria each contain a descriptive part and an evaluative part. AKAST pays attention to plausibility and to the fact that the respective expert report is so meaningful that

⁶⁸ <https://antrag.akkreditierungsrat.de/>

⁶⁹ <https://www.akast.info/programmakkreditierung/akkreditierte-studiengaenge/>

⁷⁰ https://www.eqar.eu/qa-results/search/by-institution/?limit=20&ordering=name_sort&agency=AKAST&offset=0

⁷¹ <https://www.akast.info/programmakkreditierung/akkreditierte-studiengaenge/>

⁷² https://www.eqar.eu/qa-results/search/by-institution/?limit=20&ordering=name_sort&agency=AKAST&offset=0

⁷³ <https://www.akkreditierungsrat.de/de/antragstellung/antragstellung>

the persons responsible for the programme, the higher education institution's administration and the GAC can understand the recommendations of the review panel without further background information. A clear distinction must be made between recommendations that can contribute to an optimisation of the study programmes offered and conditions on whose timely fulfilment the accreditation status is based. The fact that the GAC has not yet referred any accreditation reports prepared by AKAST and handed over to the higher education institutions back to the higher education institutions due to deficiencies in content is an indication that the accreditation reports prepared by AKAST are clearly formulated.

In peer review processes according to the Interstate Treaty, AKAST has so far used the grids for the type Programme Accreditation Single and type Programme Accreditation Bundle.

In peer review processes of study programmes not covered by the Interstate Treaty, AKAST has so far used the review report based on the grid type Programme Accreditation Single.

6.7 ESG Standard 2.7: Complaints and appeals

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

AKAST has a complaints and appeals procedure, which is regulated in a Complaints and Appeals Regulations. The Complaints and Appeals Regulations are publicly documented on the Agency's homepage⁷⁴. The complaint and objection procedure is transparent and comprehensible.

The higher education institutions have the right to lodge a complaint in writing against measures, resolutions and decisions of the Accreditation Committee or the review panel within two weeks of becoming aware of them.

In accreditation procedures pursuant to the Interstate Treaty, objections to the accreditation decision must be lodged with the GAC.

The complaints are examined and decided on a case-by-case basis by the Executive Board or the Accreditation Committee. If the complaint is well-founded, it will be dealt with. If the complaint is not admissible or not substantiated, the Executive Board or the Accreditation Committee rejects it.

If the higher education institution or the faculty does not agree with the decision, it has the right to file an appeal against this decision within one month. In this case, the objection and the relevant facts are handed over to the AKAST Complaints Committee.

⁷⁴ https://www.akast.info/wp-content/uploads/2021/11/AKAST_Beschwerdeordnung_eng_2021_final.pdf

In the course of AKAST's admission process to EQAR, the Register Committee noted (decision of 22 June 2020) that AKAST's complaint rules in force at the time did not define separate processes for complaints and appeals, that AKAST's complaint rules did not cover all business areas and that the current rules did not ensure an impartial process in AKAST's handling of appeals, and that AKAST only partially complied with ESG 2.7. In relation to this standard to be assessed in the Focused Review, appropriate changes were made in AKAST's complaint rules and the deficiencies identified were eliminated.

In section 1 of the revised "Complaints and Appeals Regulations", the terms "complaint" and "appeals" are defined, whereby the "complaint refers to the procedure at AKAST and the "appeal" to the accreditation decision, in the new system by the Accreditation Council. Likewise, § 1 states that the order refers to all quality assurance procedures of the agency, i.e. also those which are not covered by the Interstate Treaty.

To guarantee an orderly and independent complaint procedure for objections of the contractual partners of AKAST and against decisions of the Accreditation Committee, AKAST established a Complaints Committee (cf. Section 8 Statutes).

The Complaints Committee was established by the General Meeting of AKAST on 28 January 2021. The Complaints Committee constituted itself at its first meeting on 10 March 2021. The Rules of Procedure of the Complaints Committee adopted (Annex 14) by the Complaints Committee were approved by the Executive Board on 9 June 2021. By resolution of 13 December 2021, the Register Committee determined the fulfilment of ESG 2.7.

7. Opinions of stakeholders

Due to the specific construction of AKAST resulting from the state-church law requirements, there is probably the most direct relationship between the members of AKAST and the Agency compared to the other agencies approved in Germany. Short and direct paths enable the feedback of experiences or the passing on of information directly and discursively. AKAST's experience so far shows that this approach is appropriate and purposeful and is highly valued by the stakeholders. For example, the AKAST Association consists mainly of (the representatives of) the faculties of Catholic Theology and universities. This is a major reason why AKAST is perceived and accepted by these higher educational institutions as "their" very own agency and thus represents an additional forum for exchange on issues of quality assurance and quality development of the theological studies. As mentioned in informal feedback, the activity of the agency is appreciated and recognised as a key contribution to 'keeping the great potential of academic Theology productive for University, Church and society'.

The aspect of “stakeholders’ opinions” is dealt with as a cross-cutting issue in several ESG standards, in particular in 3.1, 3.4, 3.6 and 2.2. In these chapters of the SAR, further formats practised by AKAST for the provision of information and the opinions of stakeholders have been described.

At the annual General Meeting, where, as explained, the relevant stakeholders are represented, the Chairperson and the Administrator look back on the previous year and present the strategic developments for the coming year. The General Meeting provides a forum for a regular exchange of information on strategic issues, new regulations in the system, procedural experiences of the higher education institutions as well as critical feedback.

All relevant stakeholder groups are represented in the Accreditation Committee, the Complaints Committee and the review panels of AKAST. The Chairperson and the Administrator report regularly in the committee meetings and there is room for further exchange of information on, for example, new developments in the accreditation system or on process-related questions.

In Chapters 5.4 (ESG Standard 3.4) and 5.6 (ESG Standard 3.6) of this SAR, it is already pointed out, that an evaluation of the peer review processes carried out by AKAST since the Interstate Treaty came into force was initiated in the course of the winter semester 2022/23. For the last time, a procedure evaluation was conducted in the form of guideline-based interviews in the period from summer semester 2014 to summer semester 2016. In the said period, a total of eight programme accreditation procedures were evaluated, including four procedures that were carried out at state faculties and four procedures that were carried out at ecclesiastical colleges or theological faculties. The results showed a high level of satisfaction with the work and cooperation with AKAST. One result is taken as an example and outlined in key points: The size of the review panel (7 persons) is a special feature of AKAST and is highly appreciated by all participants and is even regarded as a unique characteristic. The composition of the review panel (e.g. reviewers from first-time accreditation, reviewers working for the first time, reviewers who have already worked several times, national and international reviewers) is considered balanced and appropriate and unreservedly positive⁷⁵.

The currently initiated evaluation covers the period from winter semester 2017/18 to winter semester 2022/23; eight procedures, all of which have been or will be carried out according to the accreditation law in force since 1 January 2018, are to be evaluated. It must be kept in mind that the specific characteristics of the Agency with two members of staff and a limited area of activities not only places high requirements on the data protection to be ensured, but

⁷⁵ https://www.akast.info/wp-content/uploads/2021/06/Zusammenfassung_Auswertung-SoSe2014-SoSe2016.pdf

also that it cannot be consistently guaranteed that meaningful results can be derived from a sufficiently broad data basis.

Reference was also made in Chapter 5.4 (ESG Standard 3.4) to the evaluation of the review panels appointed by AKAST in the course of the winter semester 2022/23 with regard to their compliance with the criteria set for the appointment and composition of the review panels. Among other things, the evaluation showed that 85 people from the current pool of 221 reviewers have fortunately been recruited several times as reviewers and have been reviewing for AKAST for several years. This can be seen as an indicator of great satisfaction with the work for and cooperation with AKAST.

8. Recommendations and main findings from previous review(s) and agency's resulting follow-up

The GAC accredited AKAST on 6 December 2018 in accordance with the “Rules for the Accreditation of Agencies” of the GAC in the respective valid version and thus granted AKAST the right to accredit study programmes by awarding the seal of the Foundation, insofar as the procedures are in accordance with the law valid until 31 December 2017. The accreditation shall be valid until 31 December 2023.

Furthermore, the GAC has authorised AKAST in Germany until 31 December 2023 according to Section 24 para. 1 Sentence 2 of the Specimen decree.⁷⁶

The accreditation was granted without conditions. The review panel made the following recommendations:

Recommendation 1: AKAST should publish more findings from analyses of its own work in future. At the same time, the neutral observer viewpoint should be preserved in tried and tested manner in order to avoid pre-empting university policy bodies such as the Association of Faculties of Catholic Theology. (ESG 3.4).

- Information on the implementation of this recommendation, which was also made by the review panel of the Focused Review, and which advises the development of smaller report formats such as “spotlights”, can be found in Chapter 5.4 (ESG Standard 3.4) of the SAR.

⁷⁶ https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/GAC_resolution_of_reaccreditation_AKAST_20180612_PM%2096-2018.pdf

Recommendation 2: In the forthcoming revision of the Agency's basic documents, either the Statutes should be brought into line with the Advisory Board's working practices or the Advisory Board should also hold meetings as a separate body. (ESG 3.6).

- As stated in Chapter 5.6 (ESG Standard 3.6), this recommendation has been implemented.

Recommendation 3: AKAST should commence the process of revising the relevant documents in line with the new statutory and canon law framework as soon as possible and should combine this with the revision of the website. (ESG 2.2).

- The revision and updating of the relevant documents were completed in January 2019 (presentation and resolution by the General Meeting on 31 January 2019). The revision of the Agency's homepage was completed on 23 December 2019.

Recommendation 4: When nominating the second representative from professional practice, AKAST should include theologians from a greater variety of non-ecclesiastical professions. (ESG 2.4).

- AKAST continually strives to take into account the diversity of extra-church professional fields when appointing the second person from professional experience. The spectrum of professional fields ranges from adult education, journalism, publishing, radio, television, library to associations and organisations. This recommendation has been implemented and is kept under constant review by the Accreditation Committee.

With its decision of 13 December 2021, the Register Committee determined that AKAST essentially fulfils the ESG as a whole and approved the application for registration on EQAR. The registration is valid until 30 November 2023.

The measures taken by AKAST to meet the standards to be assessed in the Focused Review (ESG Standard 3.3 Independence, ESG Standard 3.4 Thematic Analysis, ESG Standard 2.7 Complaints and appeals) have been described in the relevant chapters of the SAR.

9. SWOT analysis

Internal feedback and analysis to identify opportunities for improvement are a regular part of the Agency's internal quality management. After the first experiences in dealing with the national accreditation law in force since 1 January 2018 and after the Covid 19 pandemic had subsided and also in preparation for the assessment of the Agency, members of the Advisory Board and the Administrator met for several SWOT meetings in the period from the end of

2022 to the beginning of 2023. The result was presented to the Executive Board for discussion and confirmed by the board on 19 January 2023. The Executive Board is thereby enabled to extract appropriate actions from the result if needed.

The SWOT analysis below lists the strengths, weaknesses, opportunities and threats:

Strengths:

- Now almost fifteen years of experience in the field of assuring and developing the quality of study and teaching of canonical study programmes, especially study programmes in Catholic Theology (full study programme), which can be described as a unique characteristic in the German accreditation system.
 - In 2008, the Agency was established by the DBK as a public association with legal capacity under ecclesiastical law and was accredited for the first time by the GAC and approved for accreditation activities in Germany.
 - In 2013 and 2018, AKAST was successfully reaccredited and its compliance with the ESG was confirmed.
 - In 2021, the first registration on EQAR took place.
- A high level of professional competence due to the specific construction resulting from the state-church law requirements, so that AKAST is perceived as a pertinent qualified agency and pertinent qualified service provider.
 - According to the Statutes, the Accreditation Committee consists of ten members, including five professors from the four sub-fields of Catholic Theology, to name an example.
 - According to the AKAST criteria for the reviewer nomination, the reviewer panel for the assessment of the study programme in Catholic Theology (full study programme) generally comprises four academic members from the four sub-fields of Theology, as well as one student and two persons from professional practice, including a rector of seminary.
 - In all accreditation procedures, members of the Accreditation Committee or the Advisory Board are additionally involved as rapporteurs for internal quality assurance via four eyes principle. For monitoring the procedures, the rapporteurs also participate in the site visit.
- Transparent and efficient structuring of all procedural steps and consistent implementation of the evaluation and assessment process.
 - Since AKAST was established, the Accreditation Committee has only received one complaint.

- Since the new accreditation law came into force, no accreditation report prepared by AKAST has yet been returned by the GAC with the request to have it revised by the Agency.
- An Office that is certified by all stakeholders as having a high level of professionalism and informal and substantive competence.
 - Feedback attests to the Office's consistent and clear process control; from the point of view of the evaluators, this represents an important catalyst for the process flows.
 - Accessibility, fast and binding scheduling and reliability of information are highly appreciated.
- Stable market.
 - The increasing number of system-accredited universities does not have a negative effect on the number of conducts of accreditation for canonical study programmes, as these are not subject to system accreditation.
 - The restriction of the business field to the peer review processes for canonical study programmes, which has been removed since 1 January 2018, can compensate for the declining number of peer review processes caused by the extension of the accreditation term.

Weaknesses:

- Scarce staffing of the Office.
 - Due to the cooperation with ACQUIN, only plannable and short-term replacements of the Administrator and the secretariat can be guaranteed.
 - Through the cooperation with the KUE, tasks (job advertisements, personnel administration) can be partially delegated.
- Funding dependent on procedural income and in particular on an annual grant from the VDD.
 - The grant must be applied for and approved every year.
 - Only as long as AKAST is an institution requested by the DBK, the funding by VDD can be considered sustainable.
- There is room for improvement in the documentation and communication of the results obtained from the analyses of its own work.
 - Measurements for improvement are already conducted.
 - In future, efforts should be made to pay even more attention to the documentation of such results for the public.

Opportunities:

- Further promotion of proof regarding the “competence for qualified employment” of the study programme in Catholic Theology (full study programme) for both traditionally church/pastoral and non-church professions which contributes to increasing the attractiveness of the study programme in Catholic Theology (full study programme).
 - Decreasing numbers of students in the study programme Catholic Theology (full study programme), but with a tendency towards more “unattached” students who do not intend to take a pastoral profession.
 - Through the consistent dual appointment of persons of professional experience in the review panel (one person for the traditionally church/pastoral professions and one person for extra-church/extra-pastoral professions), the professional breadth achieved with the study programme is highlighted.
 - In nominating the second reviewer of professional experience, the diversity of extra-church professions should be taken into increased account in the future.
- Further establishing, as a competent partner for non-system-accredited and system-accredited universities with faculties or institutes of Catholic Theology, in implementation of (partly bundled) peer review processes for non-canonical study programmes with Catholic Theology.

Threats:

- Possible tensions in the relationship with ecclesiastical institutions.
 - Due to the internal structure (public association under ecclesiastical law), a rising tensions in the relationship with ecclesiastical institutions could endanger the independence of the Agency (e.g. questioning the peer review resolutions or exerting influence in the reviewer’s appointment).
 - Good cooperation and relationship between the different stakeholders are achieved through the Office and only guaranteed if there is no tension, e.g. between ecclesiastic and non-ecclesiastic stakeholders or stakeholders from different sub-fields of Catholic Theology.
- Overall decreasing total number of students in study programmes in Catholic Theology.
- Human resources in the Office.
 - Retirement of the Administrator (due to poaching or age), succession must be planned, and successor must be long-term trained.
 - Unexpected and long-term absence of the Administrator (e.g. in case of illness) cause problems.

10. Key challenges and areas for future development

The reorganisation of the German accreditation system also had far-reaching consequences for AKAST and significantly influenced the work of the Agency in recent years. With the new accreditation law coming into force, the Agency's procedural processes were revised, and the corresponding procedural materials and document templates were adapted or newly created. Since procedures of the old legal framework also had to be completed, work was done in both legal systems at the same time. The conversion process was largely completed by 2019 and the corresponding processes and procedures were successfully established. The most far-reaching consequence of the reorganisation for AKAST was the registration on EQAR in 2021. The amendments to the Statutes made in the course of the focused review by means of which all links between the DBK and AKAST – which were not prescribed by internal church law – were severed, made it possible to represent the operational independence of the Agency in a legally transparent manner. In particular, the explicit separation of ecclesiastical consent by the advisory member of the Accreditation Committee on the one hand and the accreditation decision on the other ensures the full responsibility of AKAST for the results of its own quality assurance procedures.

As a result of the legal relations that have been in force for five years, the range of activities of AKAST could also be extended to programme accreditation for non-canonical study programmes with Catholic Theology, which are covered by the Interstate Treaty.

For most German agencies, the reorganisation of the German accreditation system was also associated with extensive internal restructuring, up to and including the dissolution of decision-making bodies. This did not apply to AKAST due to the specific construction resulting from the state-church legal requirements. The Accreditation Committee continues to be the central decision-making body of the Agency. AKAST, as an Agency with great experience in the area of quality assurance of canonical and non-canonical study programmes with Catholic Theology, can further expand its multiplier role.

Digitalisation is a complex of topics that brings both opportunities and challenges. The digitalisation that took place in the wake of the Covid 19 pandemic has also strengthened AKAST's digital competence. In AKAST's view, the switch to online teaching at universities and online visits in external quality assurance have considerable potential to change both areas in the long term, even after the pandemic:

- In the area of programme accreditation, a diversification of study programme models can be observed, especially also in the direction of online study programmes, which leads to other requirements for the expertise of the agencies.

- The agencies can increasingly offer online training for higher education institutions and expert committees. AKAST has been offering regular online seminars to inform and qualify potential or future reviewers since winter semester 2021/22.
- Hybrid site visits have become conceivable. AKAST, for example, has had good experience with separating the time and place of the procedure-specific reviewer preparation within the framework of the site visit and conducting it online a few days before the site visit. On the one hand, this shortens the reviewers' absences from their respective places of work and, on the other hand, offers more time to clarify any questions the reviewers may have with the higher education institution during the preliminary discussion.

A constant challenge is to ensure the church's rights of participation and approval in the accreditation and peer review of canonical and non-canonical study programmes with Catholic Theology without endangering the operational independence of the Agency.

Overall, AKAST sees itself well equipped to take advantage of the newly opened opportunity in the German accreditation system to expand its range of activities in order to further establish itself as a competent partner or service provider for non-system-accredited and system-accredited universities with faculties or institutes of Catholic Theology.

11. List of Annexes

1. AKAST Satzung (Statutes) as amended 27 January 2022
2. Entry in register of associations – only in German language available
3. Eckpunkte für die Studienstruktur in Studiengängen mit Katholischer oder Evangelischer Theologie/Religion (“Key Points for the Structure of Studies in Study Courses Involving Catholic and Protestant Theology/Religion”), resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder (KMK) of 13 December 2007 – only in German language available
4. Letter from the Congregation for Catholic Education of 9 August 2013 – recognition as articolazione territoriale – only in German language available
5. AKAST Financial year 2024 budget and financial plan
6. Proof of non-profit status – only in German language available
7. Conference “Report of the Study Reform”, invitation letter dated 7 January 2021 – only in German language available
8. Findings of the third evaluation of the KMK ‘Key Points’ resolution: KMK resolution of 8 September 2022
9. Eckpunkte für die Studienstruktur in Studiengängen mit Katholischer oder Evangelischer Theologie/Religion (“Key Points for the Structure of Studies in Study Courses Involving Catholic and Protestant Theology/Religion”), resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder (KMK) of 13 December 2007, as amended 8 September 2022
10. Comparison between ESG 2015 and rules and criteria of German Accreditation System
11. AKAST-KUE cooperation agreement (2018)
12. AKAST-ACQUIN cooperation agreement (2018)
13. AKAST Instructions for reviewers (2019)
14. AKAST Rules of Procedure of the Complaints Committee (2021)
15. AKAST Procedure and criteria of the appointment of reviewers (2019)
16. AKAST Internal quality assurance system (2014)

12. List of Abbreviation

ACQUIN Akkreditierungs-, Zertifizierungs- und Qualitätssicherungsinstitut (Accreditation, Certification and Quality Assurance Institute)

AGT Arbeitsgemeinschaft der Theologiestudierenden (Association of Theology Students)

AKAST Agentur für Qualitätssicherung und Akkreditierung kanonischer Studiengänge in Deutschland (Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany)

AVEPRO Agenzia della Santa Sede per la Valutazione e la Promozione della Qualità delle Università e Facoltà Ecclesiastiche (Holy See's Agency for the Evaluation and Promotion of Quality in Ecclesiastical Universities and Faculties)

CIC Codex Iuris Canonici (Code of Canon Law)

Commission VIII Kommission für Wissenschaft und Kultur (Kommission VIII) (Commission for Science and Arts)

DBK Deutsche Bischofskonferenz (German Bishops' Conference)

ELIAS Elektronisches Informations- und Antragssystem (Electronic Information and Application System)

ENQA European Association for Quality Assurance

EQAR European Quality Assurance Register for Higher Education

ESG Standards and guidelines for quality assurance in the European Higher Education Area

GAC Stiftung Akkreditierungsrat (German Accreditation Council)

HRK Hochschulrektorenkonferenz (German Rectors' Conference)

KMK Kultusministerkonferenz (Standing Conference of the Ministers of Education and Cultural Affairs of the Federal States in the Federal Republic of Germany)

KMK Key Points Key Points for the Study Structure in Study Programmes with Catholic or Protestant Theology/Religion Resolution of the Conference of Ministers of Education and Cultural Affairs of 13 December 2007

KThF Katholisch-Theologischer Fakultätentag (Association of Faculties of Catholic Theology)

KUE Katholische Universität Eichstätt-Ingolstadt (Catholic University of Eichstätt-Ingolstadt)

SAR Self Assessment Report

TV-L Tarifvertrag für den Öffentlichen Dienst der Länder (public service pay agreement of the federal states)

VDD Verband der Diözesen Deutschlands (Association of German Dioceses)