



Agency for  
Quality Assurance  
and Accreditation  
Austria

# ENQA Agency Review (ESG) 2019: Follow-Up Report

Vienna, 21. February 2022

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# 1 Introduction

The Agency for Quality Assurance and Accreditation Austria (AQ Austria) has been reviewed against the ESG by ENQA in 2019. The external review took place according to the Guidelines for ENQA Agency Review. It entailed a self-assessment report by AQ Austria, based on a reflection process that had started in 2016, and a three-day site-visit by the Review Panel in February 2019 at AQ Austria's premises in Vienna. The panel's preliminary report was sent for comments to AQ Austria in April 2019; the final report dates from 20 June 2019, when ENQA renewed membership of AQ Austria for another five years.

The Board of AQ Austria discussed the results of the report in its 56<sup>th</sup> meeting on 11 September 2019 and supported the further development of the agency along the recommendations of the panel. A follow-up report had been scheduled for summer 2021 and should have been complemented by a follow-up visit.

On 16 June 2021, AQ Austria requested a postponement of the follow-up report from the ENQA Board due to the impacts of the COVID-pandemic on the operative work and development of the agency. The ENQA Board extended the deadline. AQ Austria also informed ENQA that a follow-up visit might not be reasonable due to COVID-19 restrictions.

## 2 General Comments

Based on the review of AQ Austria by ENQA in 2019 (the second after establishment of the agency in 2012), the ENQA Board confirmed that the agency is in compliance with the Standards and Guidelines for Quality Assurance in the Higher Education (ESG 2015).

The extensive and deliberate report by the panel of four experts comprised highly valuable commendations, recommendations and suggestions for further developments. Nine ESG-standards had been assessed as *fully compliant*, five as *substantially compliant*. The ENQA Board issued a diverging statement regarding ESG 3.6 Internal Quality Assurance and Professional Conduct and noted "sufficient evidence that the agency has processes in place for internal quality assurance regarding defining, assuring and enhancing the quality and integrity of their activities".

Overall, AQ Austria's legal context, organisational structure et al. have been very well understood by the review panel, including the rather broad range of legally regulated, legally stipulated and non-regulated activities of AQ Austria.

The panel named three *commendations*:

- Efforts of AQ Austria to develop and pursue an inter-sectoral dialogue among different parts of the HE system.
- Systematic presence of students and representative of the labour market in the review panels of programme accreditation.
- Systematic use of foreign experts in review procedures.

AQ Austria has continued in pursuing the commended activities and included relevant provisions in the revised methodologies for external QA procedures (including legal decrees).

Overall, the two-and-half years since the review/site-visit took place, AQ Austria has experienced some substantial changes of its working context.

- In mid-2020, an encompassing revision of national legal regulations for Austria's higher education sectors (public universities, universities of applied sciences, private universities, university colleges of teacher education) has been enacted. In parallel, the Federal Act on Quality Assurance in Higher Education (HS-QSG), that regulates the external quality assurance of the higher education sectors and also sets the basic organizational, financial and processual provision for AQ Austria, has been revised. Main changes stipulated by these legal revisions include, among other:
  - the integration of colleges of teacher education in the external quality assurance;
  - substantial changes in the setup of the private HE sector, including a re-labelling and an internal differentiation of the sector;
  - changes in methodological provisions, including enabling of initial programme accreditation with *conditions* and extension of possible changes in accreditation applications during the process;
  - organisational changes in the setup of AQ Austria, e.g. a reduction of the size of the General Meeting (stakeholders).
- In 2018, the legal regulations regarding the Notification of foreign study programmes offered in Austria have been adopted, stipulating a new decree issued by AQ Austria in 2019.
- AQ Austria has been given additional task of providing information and advice in matters related to the recognition of formal, non-formal and informal competences.
- From October 2021, federal higher education laws were – again – revised regarding a reform of continuing education with the goal to streamline access, degrees, and eligibility for entering next cycles etc. in line with the Bologna system.
- A change in internal management took place, with J. Petersen succeeding A. Hopbach as General Manager of AQ Austria. In January 2022 the Board saw substantive change in its membership and also a change in presidency of AQ Austria.

Not least, the COVID-pandemic has had an extensive impact on the operative work of AQ Austria from March 2020 onwards. Early adaptations took place in spring and summer 2020, e.g. introducing virtual and written decision-making by the Board, change from on-site to virtual visits at HEIs, introduction of hybrid modes of work, temporary ease of some regulations for HEIs. During 2020, it became evident that adaptation of virtual/distance modes of work, organisation and quality assurance has put a strain on resources of staff, management and experts of AQ Austria as well as on external panel members, higher education institution and other stakeholders. Yet, while the further internal development of AQ Austria has been partly hampered by these events, most of the ENQA recommendations have been taken up and actions initiated.

### 3 Follow-up of Recommendations

<b>ESG 3.4 Thematic Analysis</b>	
<p><i>Recommendation:</i> The panel recommends that the agency structurally embeds the practice of the publication of thematic analyses in its work programme, providing overview reports which bring together the results of its quality assurance processes, demonstrating their relevance for major quality issues in higher education in order to raise awareness among the HE sector and to better inform society.</p>	<p><i>Actions taken:</i></p> <ul style="list-style-type: none"> <li>• AQ Austria generally has embedded the publication of thematic analyses into its work plan. These analyses are based on substantive analytical work, engaging with the agency’s own documents of quality assurance processes as well as extensive input by stakeholders. Publication of results takes place, except for some specific reports where publication is prevented by law.</li> <li>• The comprehensive report on the development of quality assurance to be published every three year has a specific thematic foci: 2015: “Qualitätssicherung an österreichischen Hochschulen” 2018: “Studierbarkeit” (i.e. feasibility of studies)<sup>1</sup> 2022: “Quality Assurance in Times of Pandemic: Lessons Learned” (in publication)</li> <li>• AQ Austria AQ Austria has established a yearly conference, attended by 200+ participants from the HE institutions and stakeholders. The results are published on the website.<sup>2</sup> However, in 2020 the conference had to be skipped due to COVID; in 2021 it took place in an online-format with limited documentation. <a href="http://www.aq.ac.at/de/veranstaltungen/jahrestagung-2021.php">www.aq.ac.at/de/veranstaltungen/jahrestagung-2021.php</a></li> <li>• The yearly report (“Tätigkeitsbericht”) has been expanded to include chapters on developments in QA, current topics and thematic work of AQ Austria. <a href="https://www.aq.ac.at/de/ueber-uns/publikationen/taetigkeitsberichte.php">https://www.aq.ac.at/de/ueber-uns/publikationen/taetigkeitsberichte.php</a></li> <li>• AQ Austria has been working intensively on the topic of Recognition of prior learning (RPL) for several years, has provided the results of the analyses to administrative/political bodies as recommendations, publishes results and recommendations in national and international journals and has developed a seminar and workshop programme.</li> <li>• Based on its thematic work, AQ Austria is also represented in and contributes to national and international bodies and projects (RPL, Microcredentials, NQF).</li> <li>• AQ Austria is legally in charge of yearly reports to the Ministry of Health on the development in the sector of health education. The agency also monitors yearly reports of universities of applied sciences and private universities. While in both cases, the results are not intended for publication (by law), they induce further thematic studies, e.g. on the development of teaching staff compared across HE sectors.</li> </ul> <p><i>Actions ongoing/planned:</i> <i>All the actions mentioned above are ongoing, but special reference can be made to the following publication:</i></p>

<sup>1</sup> [https://www.aq.ac.at/de/ueber-uns/dokumente-ueber-uns/001\\_3\\_Jahresbericht\\_2018\\_Web\\_final.pdf?m=1558946231&](https://www.aq.ac.at/de/ueber-uns/dokumente-ueber-uns/001_3_Jahresbericht_2018_Web_final.pdf?m=1558946231&)

<sup>2</sup> [https://www.aq.ac.at/de/veranstaltungen/dokumente-jahrestagung\\_2019/Jahrestagung\\_2019\\_Website\\_23\\_03\\_2020.pdf?m=1584976069&](https://www.aq.ac.at/de/veranstaltungen/dokumente-jahrestagung_2019/Jahrestagung_2019_Website_23_03_2020.pdf?m=1584976069&)

	<ul style="list-style-type: none"> <li>The next three-year report on the development of QA is under preparation and will be published in May 2022: "Quality Assurance in Times of Pandemic. Lessons Learned" It is based on analysis of yearly reports by HEIs and workshops with HEIs' representatives from all higher education sectors in Austria.</li> <li>The strategic work plan for 2022 will take up thematic analyses in a structured way.</li> </ul>
<p><i>Recommendation:</i> The panel recommends the agency to develop further its thematic analyses by focusing on QA in a broader sense such as in issues like internationalization, employability, active learning, and pedagogical innovation. This could be done by using specialized software and tools devoted to content and qualitative analysis.</p>	<p><i>Actions taken:</i></p> <ul style="list-style-type: none"> <li>Basically, AQ Austria regards the development of specific thematic analyses of QA as an advantage over a wide focus on "impact" on several issues in terms of analytic depth, stakeholder feedback and use for enhancing QA procedures and services.</li> <li>The 3-year-reports (see above) focus, among other things, on the topics also mentioned in the recommendation. In addition, they deal with current challenges and higher education policy issues, such as digitalisation and distance learning, resilience in times of a pandemic. The upcoming report (May 2022) was prepared by applying qualitative data analysis with the MAXDA programme, among others.</li> <li>The annual conference of AQ Austria represents an additional methodological form of dealing with a topic and typically results in a publication. Here, too, a close connection was made to current topics relevant to higher education policy: Strengthening Personnel - Securing Quality: Future-oriented paths of resilient colleges and universities</li> <li>AQ Austria regularly publishes in journals, handbooks et al on developments in QA. Outlets include, among others: <ul style="list-style-type: none"> <li>Hochschulrecht, Jahrbuch (Higher education law, annals)</li> <li>fteval, special issue on AQ Austria, Dec. 2019<sup>3</sup></li> </ul> </li> </ul> <p><i>Actions ongoing/planned:</i></p> <ul style="list-style-type: none"> <li>Publication of 3-year-report (see above).</li> <li>Staff of AQ Austria is encouraged to produce and publish analyses and articles on their specific area of knowledge (e.g. micro-credentials, higher education law, evaluation)</li> </ul>
<b>ESG 3.6 Internal Quality Assurance and Professional Conduct</b>	
<p><i>Recommendation:*</i> The team considers that internal QA of the agency could be better linked to</p>	<p><i>Actions taken:</i></p> <ul style="list-style-type: none"> <li>A policy for a bi-yearly evaluation of internal QA is in place. The 2020 evaluation used extensive formats (focus groups) to garner input from all members of the secretariat. A substantial report was prepared, which will be</li> </ul>

<sup>3</sup> [https://www.fteval.at/content/home/journal/aktuelles/20\\_12\\_2019\\_ausgabe\\_49/NEU\\_Journal\\_49\\_WEB\\_DOI10.22163-fteval.2019.447.pdf](https://www.fteval.at/content/home/journal/aktuelles/20_12_2019_ausgabe_49/NEU_Journal_49_WEB_DOI10.22163-fteval.2019.447.pdf)

<p>regular analytical work and that the feedback collected from different stakeholders should be analysed in a more systematic way. (*ENQA Board did not adopt this recommendation)</p>	<p>used in 2022 to evaluate and probably revise goals, processes and tools of internal QA.</p> <ul style="list-style-type: none"> <li>• AQ Austria has started an internal development/change process in 2021. First steps have been taken (1.5 day retreat of secretariat and president/vice-president; workshops with specific topics like leadership, strategy etc.)</li> <li>• The General Assembly, i.e. the basic stakeholder’s body of AQ Austria, has been reduced in size by the 2020 legal revision. This reduction in size has made the body more pro-active and has been since included in developing e.g. audit guidelines and standards/methodologies.</li> <li>• Triggered by the extensive legal revisions in 2020, AQ Austria revised the specific decrees and guidelines that govern most of the external QA activities. The legally mandated “public comment procedure” was extensive for each decree and guideline; feedbacks were processed and analysed by the secretariat and Board and had considerable impact on the final setup of the decrees and guidelines.</li> </ul> <p><i>Actions ongoing/planned:</i></p> <ul style="list-style-type: none"> <li>• The process of internal development/change process will continue at least until the end of 2022. During this process, external stakeholders like the different HEI-associations, the national students’ association etc. will be systematically involved.</li> <li>• The Board of AQ Austria will have an exchange of members (8 out of 14) in 2022. The selection of successors took a widened representation of specific stakeholders into account (teacher education, health sciences et al.).</li> </ul>
<p><i>Recommendation:</i> The team considers that the agency should reflect about the impact of external communication tools used by the agency, notably its website.</p>	<p><i>Actions taken:</i></p> <ul style="list-style-type: none"> <li>• A partial revision of AQ Austria’s website has taken place, esp. in regard to consultant and supportive services. <a href="https://www.aq.ac.at/de/beratung/">https://www.aq.ac.at/de/beratung/</a>; <a href="https://www.aq.ac.at/en/consulting/">https://www.aq.ac.at/en/consulting/</a> <a href="https://www.aq.ac.at/de/audit/">https://www.aq.ac.at/de/audit/</a>; <a href="https://www.aq.ac.at/en/audit/">https://www.aq.ac.at/en/audit/</a> <a href="https://www.aq.ac.at/de/evaluation/">https://www.aq.ac.at/de/evaluation/</a>; <a href="https://www.aq.ac.at/en/evaluation/">https://www.aq.ac.at/en/evaluation/</a></li> <li>• A specific site with information about events organised by AQ Austria has been installed (<a href="https://www.aq.ac.at/de/veranstaltungen/">https://www.aq.ac.at/de/veranstaltungen/</a>).</li> <li>• Since March 2020, regular updates on Covid-induced changes in operative work of AQ Austria, adaptations of procedures (virtual site visits etc.) and regulations have been sent to all relevant stakeholders (“AQ Austria Information on COVID”).</li> </ul> <p><i>Actions ongoing/planned:</i></p> <ul style="list-style-type: none"> <li>• The regular information of stakeholders will be continued by using a recognizable format.</li> <li>• In 2022, remaining parts of the website, i.e. on accreditation, will be updated to achieve a consistent external appearance.</li> <li>• AQ Austria will take efforts to set up a database of results of its QA activities.</li> </ul>
<p><b>ESG 2.1 Consideration of Internal Quality Assurance</b></p>	

<p><i>Recommendation:</i> The team considers that the agency should address some of the standards that are not currently covered by some of the procedures, especially as regards audits and international programme accreditation. In particular, attention should be given to the coverage of standards 1.2 and 1.8 in some procedures, as it is recognized by the agency itself.</p>	<p><i>Actions taken:</i></p> <ul style="list-style-type: none"> <li>• In 2019 the “Guideline for international accreditation of bachelor, master and PhD programmes” have been revised in line with the recommendation on ESG 1.2, 1.3 and 1.8. <a href="https://www.aq.ac.at/de/akkreditierung/dokumente-internationale-akkreditierung/AQ_Austria_GL_InternatAcc_20190228.pdf?m=1563546096&amp;">https://www.aq.ac.at/de/akkreditierung/dokumente-internationale-akkreditierung/AQ_Austria_GL_InternatAcc_20190228.pdf?m=1563546096&amp;</a></li> <li>• In 2019 the “Guideline for voluntary accreditation of continuing education study programmes” has been revised in line with the recommendation on ESG 1.2.</li> <li>• The ESG 1.8 is not applicable for QA procedures in Germany.</li> <li>• Regarding audits, Part 1 of ESG is only partially applicable. The audits as stipulated by HS-QSG define assessment areas that go beyond the ESG in scope, including research, research &amp; development, administration and special provisions for colleges of teacher education. A full application of ESG Part 1 is not intended by law – audits should be regarded as complementary to other QA procedures (as already noted by the review panel). Nevertheless, the current AQ Austria’s audit guidelines include standards with regard to quality assurance for studying and teaching the following aspects: <ul style="list-style-type: none"> <li>- development of new study programmes and further development of existing study programmes,</li> <li>- review and assessment of students' competences and performance in all phases of their studies (including access to higher education and possible admission procedures),</li> <li>- further enhancement of teaching and learning processes,</li> <li>- supporting and counselling services for students in all phases of their studies,</li> <li>- support for students in the learning process,</li> <li>- support for teachers in the teaching process,</li> <li>- organisational and administrative tasks in the field of studying and teaching.</li> </ul> </li> </ul> <p><a href="https://www.aq.ac.at/en/audit/dokumente-audit/Audit_Guidelines_for_Universities_10_02_2021_V1.1.pdf?m=1628001858&amp;">https://www.aq.ac.at/en/audit/dokumente-audit/Audit_Guidelines_for_Universities_10_02_2021_V1.1.pdf?m=1628001858&amp;</a></p> <p><i>Actions ongoing/planned:</i></p> <ul style="list-style-type: none"> <li>• Currently enacted legislative reform of the field of continuing education has triggered the need for adapting existing and partly formulating new QA regulations by AQ Austria. The ESG Part 1 will be considered in this process.</li> </ul>
<p><i>Recommendation:</i> Furthermore, it should reflect critically about its understanding of some of those standards and the way these are effectively covered</p>	<p><i>Actions taken:</i></p> <ul style="list-style-type: none"> <li>• see actions taken above</li> </ul> <p><i>Actions ongoing/planned:</i></p> <ul style="list-style-type: none"> <li>• see actions ongoing/planned above</li> </ul>



<p>by the existing procedures. In particular, the coverage of standard 1.3 seems incomplete, especially in international accreditations.</p>	
<p><b>ESG 2.3 Implementing Processes</b></p>	
<p><i>Recommendation:</i> The panel recommends that AQ Austria takes a more proactive role in the dissemination and implementation of follow up of the public universities.</p>	<p><i>Actions taken:</i></p> <ul style="list-style-type: none"> <li>• The role of follow-ups in audits has been considered in the revision of audit guidelines for public universities and for universities of applied sciences. It has been decided to keep follow-ups as a useful, but voluntary step in an full audit cycle.</li> </ul> <p><i>Actions ongoing/planned:</i></p> <ul style="list-style-type: none"> <li>• A follow up is included in the newly devised audit guidelines for colleges of teacher education (to be implemented in 2022). However, follow ups will be kept voluntary.</li> <li>• The follow up will be recommended to all HEIs where audit procedures are applicable.</li> </ul>
<p><b>ESG 2.5 Criteria for Outcomes</b></p>	
<p><i>Recommendation:</i> The panel recommends that the agency develops more explicit criteria in the case of audits, namely in what refers to the way they address ESG requirements more directly.</p>	<p><i>Actions taken:</i></p> <ul style="list-style-type: none"> <li>• The current audit guidelines display more explicit standards than previous versions. This has been achieved by including several fields of action that have to be covered by the quality assurance of an institution (esp. standards 3-5 in the audit guidelines).</li> <li>• see above (ESG 2.1)</li> </ul> <p><i>Actions planned:</i></p> <ul style="list-style-type: none"> <li>• see above (ESG 2.3)</li> </ul>

## 4 Suggestions for Further Development

The suggestions for further development given by the review panel are and will be taken into account as general, valuable support to further develop AQ Austria. The multi-faceted tasks of AQ Austria, including *regulatory and enhancement roles*, and their impact on the values and

self-understanding as an European QA agency, are always part of the ongoing reflection and development. The chances as well as threats emanating from these tensions have to be considered. At the same time, AQ Austria regards quality assurance and quality enhancement as non-separable facets of its activities, at the same time, ensuring a clear *separation of consultancy/support and quality assurance activities*.

In the realm of *audits and voluntary reviews*, *proactive planning* is still difficult to implement, as these are internationally competitive markets, especially with German QA agencies. However, in the current audit cycle AQ Austria has been (more) successful in contracting, especially with public universities.

In 2022, AQ Austria will also enhance its efforts to set up an easy to navigate, transparent *database* of results of its QA activities. This will also support the *dissemination* to students and employers.