

# AQAS

AGENTUR FÜR  
QUALITÄTSSICHERUNG DURCH  
AKKREDITIERUNG VON  
STUDIENGÄNGEN E.V.

ENQA REVIEW 2021

# FOLLOW-UP REPORT

*Version of December 2023*



**Content**

---

<b>1. Introduction.....</b>	<b>3</b>
1.1 Background.....	3
1.2 Preface & purpose of this report .....	3
<b>2. Recommendations overview .....</b>	<b>4</b>
<b>3. Action based on recommendations .....</b>	<b>5</b>
ESG 3.1 Activities, policy, and processes for quality assurance .....	5
ESG 3.4 Thematic analysis.....	8
ESG 3.5 Resources .....	9
ESG 3.6 Internal Quality assurance and professional conduct .....	9
ESG 2.3 Implementing processes .....	10
<b>4. Suggestions overview.....</b>	<b>11</b>
<b>5. Actions based on suggestions .....</b>	<b>12</b>
ESG 3.1 Activities, policy, and processes for quality assurance .....	12
ESG 3.4 Thematic Analysis .....	13
ESG 3.5 Resources .....	14
ESG 3.6 Internal Quality Assurance and professional conduct.....	14
ESG 2.1 Consideration of internal quality assurance .....	14
ESG 2.3 Implementing processes .....	15
ESG 2.4 Peer-review experts .....	15
ESG 2.5 Criteria for outcomes.....	16
ESG 2.6 Reporting.....	16
ESG 2.7 Complaints and appeals.....	17



## 1. Introduction

---

### 1.1 Background

The “Agency for Quality Assurance through the Accreditation of Study Programmes” (AQAS) is a registered association established by universities and academic societies in 2002; it is dedicated to the quality assurance and quality development of learning and teaching at universities. AQAS has been an integral part of the German accreditation system for over 20 years and has accredited or assessed more than 8,000 study programmes and given system accreditation to nearly 20 universities. These figures demonstrate that AQAS not only regularly conducts external quality assurance procedures in Germany (and abroad) but is also one of the most experienced agencies in Germany in several areas (e.g., teacher training and joint programmes).

The main task of AQAS is to assess the quality of study programmes, especially Bachelor’s and Master’s programmes, and quality assurance systems at universities in the context of external assessments. When working on the national level, the assessment procedures are based on national standards, which are defined by the Standing Conference of Ministers (KMK) in an ESG-compliant manner. The international procedures are directly oriented towards the ESG. By far, the largest area of activities of AQAS is programme accreditation in Germany.

AQAS e. V. is a comprehensive agency whose work extends across disciplines and types of HEIs. Over 90 member universities currently support the Agency and sees itself as an organisation of universities with which AQAS cooperates in a spirit of trust.

The association has grown continuously since its foundation. The international business field of AQAS is also growing. Two foreign universities also expressed an interest in becoming members of the association in 2023, resulting out of this, one Turkish and three Indonesian Universities are members of AQAS.

### 1.2 Preface & purpose of this report

In December 2021, AQAS received confirmation of its continued membership in “The European Association for Quality Assurance in Higher Education” (ENQA). This affirmation came after an evaluation by an external panel in September of the same year and issuing a corresponding report. This constituted AQAS' third successful external review, providing further evidence of its adherence to the Standards and Guidelines for Quality Assurance in the European Higher Education Area, as per the latest version (ESG 2015).

Throughout the review process, the external panel and the ENQA board offered AQAS valuable suggestions for improvement. Over the past two years, these recommendations have been thoroughly examined and integrated. Since then, AQAS has actively engaged in introspection and analysis with a special focus on the ENQA report. As specified by the ENQA board, this report outlines the present status of the actions taken to align with the recommendations received in the two years post-2021. To substantiate the findings, the report features hyperlinks in the text, guiding to documents or the AQAS homepage, where the relevant materials can be accessed. AQAS reaffirms its commitment to continue operating in accordance with European guidelines, a commitment evident in its ongoing advancement as an agency and its position within the German higher education sector and beyond.

AQAS acknowledges the significance of this follow-up process as a snapshot capturing a specific moment in the ongoing developmental journey as an agency. The interval since the last site visit has witnessed various transformations in our operational processes, all of which underscore our dedication to the continuous enhancement of the agency's quality standards.

This report serves as a comprehensive documentation of the developments that have unfolded within our organisation. It sheds light on the efforts made to refine and fortify our processes. However, some of the recommendations given during the review process cannot be addressed in a single action but are seen as an ongoing process of improvement which will also be continued in the year 2024 and beyond.

Within this report, AQAS aims to illuminate not only the steps we have taken but also the path that lies ahead. It is an acknowledgment that progress is a perpetual journey, and our commitment to quality is an enduring commitment, reflective of an agile and responsive agency.

## 2. Recommendations overview

### ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

1. The panel recommends the agency strengthen its strategic planning and consolidate the annual planning and reporting by linking and aligning all these instruments with the strategic objectives for the agency's development so the agency is clear about what services they will develop or enhance in order to better fulfil its mission and secure their sustainability.
2. The panel recommends the agency identify ways to involve students and representatives of the business sector in the agency's governance.
3. Separation of activities between AQAS e.V. and AQAS ARCH GmbH should be clearly communicated through their respective websites.

### ESG 3.4 THEMATIC ANALYSIS

4. The panel recommends the agency widen its approach to thematic analysis by using the general findings of its external quality assurance processes more as a basis for analyses on good practice and trends of the higher education system in Germany, which is the primary market where AQAS operates. In this attempt, the agency should enhance the analytical part of its publications instead of simply discussing its own experiences.
5. The panel suggests that the development of future thematic publications could be part of the strategic planning or annual monitoring process to ensure that the production of such publications each year is covered in terms of staff workload and that there is a strategic approach to the selection of topics relevant to higher education institutions.
6. The panel recommends the agency ensure the thematic analyses they publish are available to all stakeholders, or at least to member organisations of AQAS, and not restricted by a paywall.

### ESG 3.5 RESOURCES

7. The panel recommends the agency develop a clear plan to ensure financial stability with diversified sources of income.

**ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT**

8. The agency is recommended to develop a more holistic approach to quality management and produce a Quality Manual which would extend beyond the goal of monitoring of AQAS compliance to the ESG only to also include the general processes of the agency and establish quality goals/benchmarks supported by the proper mechanism of implementation, monitoring, and performance improvement.

**ESG 2.3 IMPLEMENTING PROCESSES**

9. The panel recommends the agency define and implement a consistent follow-up for recommendations as part of the current assessment rather than consider recommendations for the next review cycle.

**3. Action based on recommendations**

---

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

1. The panel recommends the agency strengthen its strategic planning and consolidate the annual planning and reporting by linking and aligning all these instruments with the strategic objectives for the agency's development so the agency is clear about what services they will develop or enhance in order to better fulfil its mission and secure their sustainability.

AQAS agrees with the expert's panel concerning this remark. From the agency's perspective, this matter has to be focused from two different angles, internally and externally, to have a balanced consideration of both perspectives that provides a well-rounded foundation for developing and implementing effective strategic plans.

The AQAS strategy plan 2026 defines two key areas that need to be considered in AQAS' operations, which envisages the potential to further enhance its services, namely national and international services and business areas, and the improvement of internal activities.

Internally, AQAS has improved its services in many ways. It has to be recalled that these actions are always in line with the mission statement of the agency, namely AQAS as a learning organisation, and its commitment to be an agency that uses resources efficiently. In the light of this, several actions have taken place in the last two years. One important aspect of AQAS' commitment is reflected in its continuous efforts to stay up to date of technological advancements. By investing in state-of-the-art technology, AQAS ensures that its internal processes are not only efficient but also aligned with the latest standards.

Furthermore, AQAS acknowledges the evolving landscape of education and accreditation. To this end, the agency is actively engaged in updating its guidelines for programme and institutional accreditation. Anticipating the future needs and challenges of the academic landscape and based on the experiences in the procedures, AQAS is committed to revising its guidelines to ensure they remain relevant and robust. While the guidelines for the programme accreditation have been already updated, the guidelines for institutional accreditation are scheduled for 2024. In addition and to contribute to environmental sustainability and streamline its operations, AQAS intensified its commitment towards a paper-free office environment. Looking beyond national borders, AQAS has intensified its global outlook and commitment to fostering international collaboration by organising an workshop focusing on the European Approach in June 2023 and an international accreditation conference in Indonesia in July 2023. This supports AQAS' strategy to create transparency of higher education areas.



Despite all actions taken, it has to be acknowledged that the start of annual reporting had to be postponed to 2024. It is recalled that AQAS had a staff turnover in 2021/2022 and due to the fact that AQAS has to fulfil its contracts with the universities and the high workload of all staff members, the report for the year 2023 will be drafted in the first month of 2024. Starting next year, AQAS strives to implement this as a regular instrument of reporting in the upcoming years.

From an external point of the view, the SWOT analysis submitted to the panel in 2021 already pointed out that this will become a matter for German accreditation agencies given the strong tendency towards System accreditation in Germany, which causes a smaller market for agencies. AQAS agrees with the expert panel that there is still room for improvement concerning alternative instruments to make AQAS' work more sustainable in the future. The German higher education system has had a dynamic development in terms of programme accreditation procedures, and it is to be anticipated that a further reduction in their numbers will take place in the future, based on the evolving nature of the regulatory framework. In light of this forecast, it is clear that AQAS should strategically turn towards alternative models that not only ensure compliance but also foster stronger customer loyalty. However, AQAS decided to implement framework agreements with partner universities that have decided to stay in programme accreditation. From the agency's perspective, this will ensure long-term incomes over a longer period of time than before. This agreements present a compelling solution in the face of diminishing accreditation procedures. Moreover, framework agreements facilitate a more agile response to the changing needs of both clients and the business itself.

In the light of this, it is imperative that AQAS must emphasize more strongly the added value of the evaluation process that goes beyond the actual administrative act. In 2023 our agency started to prepare a conference for national and the increasing number of international higher education institutions which is combined with the general assembly. This forum will expand on current topics that are relevant to the members of AQAS. Beyond the administrative act, the forum can delve into how evaluation contributes to continuous improvement, quality enhancement, and innovation in educational practices. Representatives can share best practices and success stories, challenges faced, and lessons learned, creating a knowledge-sharing platform that enriches the understanding of the broader impact of evaluations. In addition, a larger membership forum facilitates open dialogue and the exchange of ideas. This exchange can lead to the development of best practices and the identification of areas for improvement in the evaluation process. In conclusion, it is expected that a larger membership forum will strengthen the exchange between national and international HEIs, will intensify discussion on service needs by AQAS members, and consequently will lead to the development of new services.

The improvements of internal procedures are clearly visible in all business area since the landscape of contemporary professional environments is ever evolving. Consequently, the optimization of internal work procedures stands as an important factor in enhancing organizational efficiency and service quality of AQAS. Within the context of AQAS, the integration of mobile work methodologies emerges as a transformative factor. From the agency's perspective, AQAS has fully embraced the potential of mobile work by improving its digital technologies. All AQAS consultants can work remotely wherever they are with full access to all documents that are available in the internal AQAS structure. This digital environment also allows a clear structure in the provision of procedure-related materials, which strengthens the quality, reliability and comparability of all AQAS procedures. In total, this translates into a heightened ability to adapt to changing circumstances, respond promptly to stakeholder needs, and uphold the highest standards in accreditation and quality assurance services, e.g., by the ability to fully switch to digital services in case needed.

2. The panel recommends the agency identify ways to involve students and representatives of the business sector in the agency's governance.

AQAS wants to thank the ENQA panel for bringing up this matter because AQAS strongly believes in an enriching and diversified perspective when including other stakeholders in the governing structure at AQAS. However, it is recalled that due to the legislation for membership organisations in Germany, AQAS cannot include external stakeholders as full-participating members in its commissions and boards. In the membership meetings, members are free to elect candidates for the AQAS board. This independence of elections may not be biased. In addition, it has to be stated that the executive board of AQAS is liable within the scope of its activities both to the association itself and to third parties with its private assets. Consequently, the principle of overall responsibility of the Executive Board applies according to German law. While AQAS completely understands the point of view that led to the recommendation in the first place, and this feedback has led to internal discussions in postprocessing the ENQA review at the end of 2021, it has to be stated that AQAS due to these law regulations cannot involve external stakeholders outside of their core membership characteristics.

Despite these legal matters, AQAS is committed to strengthen its activities between the organisation, the board and student representatives and/or labour market representatives. One of our staff members, Ms. Fischer, is now in charge for our stakeholder exchange and will develop formats of exchange with different groups on different levels (meetings, trainings etc). Another staff member, Dr. Kroschel, has been nominated by the German agencies as the central person to exchange with the student organisation ("Studentischer Akkreditierungspool"). She also joined meetings with students representatives online to exchange experiences and discuss how to improve cooperation. Moreover, a jointly organized seminar between the Pool and AQAS took place in May 2023. In the past months, AQAS has undergone several activities including a meeting between the chairwoman of the Standing Commission and the AQAS Board to discuss operational matters and improve the collaboration and exchange of experiences between the AQAS' bodies.

3. Separation of activities between AQAS e.V. and AQAS ARCH GmbH should be clearly communicated through their respective websites.

Based on the feedback given by the panel, AQAS continued to update the content of the main homepage concerning the subsidiary AQAS ARCH GmbH. Externals may now find a clearly established link between the two entities, while the aim of the subsidiary is now clearer. The homepage for AQAS ARCH GmbH clearly differentiates in the section "What is AQAS ARCH GmbH" ("Was ist AQAS ARCH") by stating the following:

"The AQAS ARCH GmbH sees itself in this context as a partner to German universities in promoting their efforts towards internationalization. These efforts are often associated with activities within European projects, such as TEMPUS and Twinning projects, or consulting projects of the DAAD and HRK." (Translation from AQAS ARCH GmbH homepage).

In the past, only very few projects were carried out by the subsidiary. It was mainly implemented as a unit to carry out trainings and not to actively seek projects for the subsidiary.

The evidence can be found on the homepages [Zertifizierung, Beratung, Workshops – AQAS e.V.](#) and [AQAS ARCH \(aqas-arch.de\)](#).

### ESG 3.4 Thematic analysis

4. The panel recommends the agency widen its approach to thematic analysis by using the general findings of its external quality assurance processes more as a basis for analyses on good practice and trends of the higher education system in Germany, which is the primary market where AQAS operates. In this attempt, the agency should enhance the analytical part of its publications instead of simply discussing its own experiences.

AQAS believes that thematic analyses conducted solely by our agency has a too limited focus because there are 10 agencies working in Germany plus the German Accreditation Council (GAC) which has the overall responsibility and overview. Therefore, one agency cannot fully meet the goal of reporting developments across the entire QA sector in Germany. In response to these concerns, AQAS has taken a proactive step by collaborating with the German Accreditation Council to enhance the comprehensiveness of their analyses. AQAS anticipates that this collaboration signifies a strategic move towards a more holistic approach to thematic analysis. By joining forces with the German Accreditation Council, AQAS aims to broaden the spectrum, ensuring a more comprehensive and in-depth understanding of the dynamics within the QA sector. The target is that GAC and the German agencies will reflect the developments in the German accreditation system, best-practice as well as challenges. In 2023 a working group organized by GAC was implemented. The decision to undertake joint thematic analyses reflects AQAS's commitment to continuous improvement and a dedication to providing stakeholders with a more thorough and meaningful assessment of the QA landscape in Germany. Still, first results are anticipated in 2024. AQAS also plans to publish a thematic analysis on its experiences with the international programme accreditation procedures in Indonesia in 2024. As explained above, the conference on "lessons learned" in cooperation with our Indonesian partners in July 2023 was a first step to summarize experiences made with international accreditation in South-East-Asia.

5. The panel suggests that the development of future thematic publications could be part of the strategic planning or annual monitoring process to ensure that the production of such publications each year is covered in terms of staff workload and that there is a strategic approach to the selection of topics relevant to higher education institutions.

AQAS acknowledges that the matter raised by the panel regarding the development of future thematic publications is a valid comment on the agency's actions. Based on this feedback, AQAS discussed internally on how to address this issue without having a too narrowed view and with relevant content for the public, as stated above. The production of such publications involves establishing a strategic framework which detect current topics for the sector that are relevant to externals and where AQAS is experienced in. Consequently, it has to be differentiated between thematic analyses on the national and international level. While on the national level, discussion began to cooperate with the German Accreditation Council to publish jointly on overarching themes for the German Higher Education System, AQAS' current activities on the international level will bring an in-depth view in specific global areas, e.g., 1. the Indonesian higher education system, 2. the African Centre of Excellence framework, and 3. the implementation of the European Approach for European Universities Alliances. These three areas of activities are part of the strategic decisions taken by AQAS. Continuously, AQAS encourages its staff to closely follow current trends of the QA sector, which enables them to detect common themes in accreditation procedures.



6. The panel recommends the agency ensure the thematic analyses they publish are available to all stakeholders, or at least to member organisations of AQAS, and not restricted by a paywall.

In alignment with our commitment to fostering knowledge dissemination and accessibility, all analyses published by AQAS are made available to the public without any financial barriers. This open access policy reflects our dedication to the principles of inclusivity and the belief that valuable insights should be freely accessible to a broader audience.

### ESG 3.5 Resources

7. The panel recommends the agency develop a clear plan to ensure financial stability with diversified sources of income.

As a membership organisation, AQAS' activities need to be attuned with its members, which might lead to certain limitations when it comes to diversifying income sources. However, given that structure, the diverse needs and interests of the members need to be represented and served. Consequently, the input and engagement of members is important when AQAS plans to devise and diversify their income sources. Still, there are also advantages from the agency's perspective. By seeking input from AQAS' members during the general assembly, AQAS ensures that its strategic plan is truly representative of the varied perspectives within its membership base. Their diverse experiences enrich the decision-making process, contributing insights that may not be apparent from an internal leadership perspective alone. Moreover, the presentation of the business plan at the general assembly in combination with involving the members in strategic decisions cultivates a sense of ownership and commitment. From AQAS' perspective, the current approach includes also another critical element which is seen as beneficial for the membership structure: Transparency. Involving members in the decision-making process for alternative income sources fosters transparency, as it demonstrates a commitment to open communication and accountability. AQAS evaluates this approach as a trust-building instrument, reinforcing AQAS' credibility and integrity.

The representation in various committees and board on the European level enables AQAS to be active in several key developments for the sector (e.g., upcoming need of European Approach procedures) and enables AQAS to remain responsive to evolving needs of HEIs (e.g., QA of European Universities Alliance or certification of further education/micro credentials).

Beside the instruments presented during the site visit to the ENQA panel, AQAS also introduced an Excel table which allows to compare the numbers of procedures needed in the national and international area as well as the number of staff members involved. This instrument allows us to forecast how many accreditation procedures are needed to reach the business target of AQAS ("non-profit = black zero") and how many staff resources have to be involved. Beside this new instrument we still rely on the instruments needed as a membership organisation to demonstrate its accountability ("Wirtschaftsplan" and monthly reports for the Board members provided by our tax consultant).

### ESG 3.6 Internal Quality assurance and professional conduct

8. The agency is recommended to develop a more holistic approach to quality management and produce a Quality Manual which would extend beyond the goal of monitoring of AQAS compliance to the ESG

only to also include the general processes of the agency and establish quality goals/benchmarks supported by the proper mechanism of implementation, monitoring, and performance improvement.

AQAS agrees with the observation made by the panel of experts. However, it is recalled that due to the staff turnover and the consequent major focus on completing projects of staff that had left the agency, this matter was only partially addressed in 2023. Our regular mechanisms of internal QA took place as scheduled. These are: surveys on satisfaction for panels and universities send by a research institute, feedback meetings with our commission, exchange with student bodies and internal Jour Fixes and working groups. In 2023, AQAS members attended several seminars for aspects which are relevant for the update of the internal quality handbook, e.g., data protection/data security aspects and process management. It is planned to integrate those aspects in a broader update of the quality handbook in 2024.

### ESG 2.3 Implementing processes

9. The panel recommends the agency define and implement a consistent follow-up for recommendations as part of the current assessment rather than consider recommendations for the next review cycle.

This is a very valid point that had been brought up by the panel. In fact, it must be differentiated between the international activities and the activities within the national higher education area. Procedures carried out under the Specimen Decree (Musterrechtsverordnung) officially end when submitting the accreditation report to the higher education institutions, which then has to apply for accreditation at the German Accreditation Council (GAC). From AQAS' perspective, we cannot include a consistent follow-up for recommendations because the conditions are given by GAC. Up till now, there were several cases where either conditions or recommendations have been added by the GAC or findings suggested by the agency's report have been erased by GAC. Another factor that comes into play here is the length in the decision-making process by GAC. In some cases, it might take up to more than one year until the final decision will be made, which makes it extremely difficult for AQAS to implement a consistent follow-up and reactivate panel members.

Concerning the international procedures outside the EHEA, the point raised by the experts fits very good to some internal discussions we already have had since 2020. From our perspective, the continuous enhancement of educational standards and practices in higher education institutions is a vital aspect of ensuring quality education. AQAS fully agrees that one critical aspect of this process lies in the effective handling of recommendations arising from assessments. But based on our experience, it is already a common practice for many higher education institutions outside the EHEA to address not only the conditions within 12 month but also the recommendations. Both are documented by the majority of universities and are consequently also checked by the panel members. Thus, implicitly there is already a follow-up process for recommendations implemented. Anyhow, AQAS will offer another service for the universities from 2024 onwards – a voluntary intermediate evaluation after 3 years. This would allow universities to reflect on what has reached since the fulfilment of the conditions on one hand but also allow to prepare the upcoming re-accreditation properly. This intermediate assessment can serve as a valuable tool for HEIs to proactively address specific areas and matters that require attention. It offers an opportunity for a kind of targeted reviews, allowing institutions to delve deeper into particular aspects of their educational delivery.

#### 4. Suggestions overview

---

##### ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

1. The panel suggests the agency produce annual reports and use them to better monitor the achievement of the objectives set in its strategy.

2. The panel suggests the agency consider international participation in its bodies (Management Board, Standing Commission, Complaints Commission), as well as improving their balance in terms of gender.

3. While the agency is well supported by voluntary service of members on the agency bodies, to assure continuity of expertise and influx of fresh approaches, rotation and maximum number of service terms could be established.

##### ESG 3.4 THEMATIC ANALYSIS

4. As the international activity of the agency expands, the panel suggests the agency consider more thematic publications and dissemination in English, as this would align with the agency's ambition to actively contribute to the development of the EHEA.

##### ESG 3.5 RESOURCES

5. The panel encourages the agency to pursue its efforts for implementing its ideas for a paper-less office.

##### ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

6. The panel suggests the agency clearly define and communicate logistical arrangements to experts.

##### ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

7. AQAS should use the opportunity, together with other stakeholders in the German accreditation system, to review the publicly provided information on the alignment between ESG Part I and relevant articles of MRVO.

8. AQAS is encouraged to explore how it could contribute to the cooperation within the triangle of higher education institutions, the German ENIC-NARIC, and other organisations addressing fair recognition and admission, as expected by the guidelines of ESG I.4.

##### ESG 2.3 IMPLEMENTING PROCESSES

9. The panel suggests the agency consider publishing on the website general information/guidance to institutions on procedures conducted online.

##### ESG 2.4 PEER-REVIEW EXPERTS

10. The panel suggests the agency consider including more international experts in national procedures, which could bring in new ideas and increase the level of openness in the external quality assurance system, which is particularly important considering new developments, such as the European Universities initiative, and intensifying international cooperation.

11. The panel suggests the agency strive for a better gender balance when setting up the expert groups.

ESG 2.5 CRITERIA FOR OUTCOMES	12. The panel suggests that principles and procedure on international expert appointments could be reconsidered.
ESG 2.6 REPORTING	13. The panel suggests the agency might communicate information on expert selection via its website.  14. The panel suggests the agency amend the Rules of Procedures of the Standing Commission to provide more guidance on the four types of possible decision.  15. The panel suggests the agency features good practice prominently in the external review reports.
ESG 2.7 COMPLAINTS AND APPEALS	16. The agency is encouraged to revisit the (re)appointment of the Complaints Commission members and their rotation.  17. The agency may take an opportunity to define the Rules of Procedure of the Complaints Commission in greater detail.

## 5. Actions based on suggestions

---

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

1. The panel suggests the agency produce annual reports and use them to better monitor the achievement of the objectives set in its strategy.

While AQAS presents their annual activities at every general assembly to its members, AQAS acknowledges that producing annual reports would allow the agency a thorough documentation of activities, providing a detailed account of achievements, challenges, and key milestones throughout the year. An annual report will serve as a point of reference in the future for accountability, planning, and decision-making processes. Therefore, AQAS strives to publish annual reports from 2024.

2. The panel suggests the agency consider international participation in its bodies (Management Board, Standing Commission, Complaints Commission), as well as improving their balance in terms of gender.

During the last two years, there has been a turnover in nearly all bodies at AQAS, including new appointments in the Management Board, the Complaints Commissions, and the Standing Commission.

An overview of newly appointed members can be seen here:

#### Management board:

- Ms. Prof. Dr. Doris Fischer (Julian Maximilians University of Würzburg, Vice-President for Internationalisation and Alumni)
- Ms. Prof. Dr. Kornelia Freitag (Ruhr University of Bochum, Pro-Rector for Teaching and Internationalisation)

**Complaints Commission:**

- Mr. Prof. Dr. Heiner Schanz (Albert-Ludwigs University of Freiburg, Dean at Faculty of Environment and Natural Resources)
- Mr. Dr. Klaus Walpert, Lawyer (Representative the labour market)
- Ms. Katharina Gächter, Student at University of Innsbruck (Austria) (Student representative)

**Standing Commission:**

- Ms. Eva Juhl (Munster Technological University (MTU) Cork (Ireland), Institutional Review Facilitator)

3. While the agency is well supported by voluntary service of members on the agency bodies, to assure continuity of expertise and influx of fresh approaches, rotation and maximum number of service terms could be established.

According to AQAS' articles of association all members in all boards will be appointed for three years (following §§ 7-9). Two more members will be appointed to the Standing Commission in 2024. As stated above, the bodies have seen a new influx in the past two years with a high number of newly appointed members in all bodies. From the agency's perspective, there should be a continuous change of members in the commissions without fostering a high turnover which would be a challenge for the sustainability of the agency which depends highly on the long-term experiences with accreditation in its bodies. Based on our experience, new members need time to understand, plan, and execute initiatives effectively.

**ESG 3.4 Thematic Analysis**

4. As the international activity of the agency expands, the panel suggests the agency consider more thematic publications and dissemination in English, as this would align with the agency's ambition to actively contribute to the development of the EHEA.

AQAS' ambition is to produce thematic analysis which are primarily in English or German (with an executive summary or a translation in English). As a German accreditation agency, the decision to publish thematic analyses in both English and German is strategically significant, offering benefits that extend beyond the national boundaries. By disseminating thematic analyses in English, AQAS strives to ensure that its findings reach a broad international audience. This international visibility is instrumental in fostering collaboration and knowledge exchange with accreditation bodies and institutions worldwide. We will publish the next thematic analysis in English in 2024.

Simultaneously, publishing thematic analyses in German acknowledges the importance of catering to local stakeholders and maintaining communication in the agency's native language. This dual-language approach ensures that the agency's insights are accessible to both the local German community and the wider international audience. It reflects an understanding of the significance of cross-cultural communication and facilitates a more inclusive dissemination of information.

As explained in our SAR, AQAS strongly believes in the approach of "reporting back". This includes all formats of exchange: participation in international conferences, workshops, and forums. By providing presentations and papers in English-language we try to foster the ideal of "learning from each other". The resulting exchange of ideas enriches the agency's practices and contributes to the continuous improvement of accreditation standards.

### ESG 3.5 Resources

5. The panel encourages the agency to pursue its efforts for implementing its ideas for a paper-less office.

In the past two years AQAS has implemented a number of technical updates, which allows to work completely paper-less office. These implementations include a complete shift towards a Microsoft Office based platform, which enables the AQAS staff to work from home and while on site visits abroad without any loss of quality. Due to the fact that the latest technical requirements were implemented, our exchange with the universities and panels of experts, the preparation of the site visits and the finalization of the procedures take place paper-less

### ESG 3.6 Internal Quality Assurance and professional conduct

6. The panel suggests the agency clearly define and communicate logistical arrangements to experts.

The AQAS Board has adopted a travel expenses policy that defines the travel arrangements for national and international procedures. While for international procedures AQAS organises the travel of all experts itself in consultation with all experts, for national procedures the processes and guidelines defined in the travel expenses guideline apply. For both national and international procedures, this is communicated as soon as the procedure has been scheduled. The organisational assistant or the secretariat therefore usually sends the document on the travel expenses policy to the experts around eight weeks before the site visit date.

### ESG 2.1 Consideration of internal quality assurance

7. AQAS should use the opportunity, together with other stakeholders in the German accreditation system, to review the publicly provided information on the alignment between ESG Part I and relevant articles of MRVO.

AQAS has always been actively involved in the processes of the Accreditation Council through the agency representation (represented by Dr Kloeters). In addition, AQAS, like all other agencies operating in Germany, are involved in the statement on the revision of the Specimen Decree (MRVO) in 2023/24. The revised version of the MRVO is expected in 2024.

8. AQAS is encouraged to explore how it could contribute to the cooperation within the triangle of higher education institutions, the German ENIC-NARIC, and other organisations addressing fair recognition and admission, as expected by the guidelines of ESG 1.4.

The process of recognition lies in the responsibilities of the individual Higher Education Institutions in Germany. They are supported by a database provided by the Standing Conferences of Ministers (KMK), called ANABIN. KMK contacted AQAS to asked about further information on an international procedure. This can be seen as a starting point of exchange but there is no regular or systematic meeting of the the ENIC-NARIC and the accreditation agencies operating in Germany scheduled, yet.

### ESG 2.3 Implementing processes

9. The panel suggests the agency consider publishing on the website general information/guidance to institutions on procedures conducted online.

In 2023, AQAS carried out their last online procedure and operates now fully on-site again.

### ESG 2.4 Peer-review experts

10. The panel suggests the agency consider including more international experts in national procedures, which could bring in new ideas and increase the level of openness in the external quality assurance system, which is particularly important considering new developments, such as the European Universities initiative, and intensifying international cooperation.

Wherever appropriate, AQAS endeavours to take the international perspective into account in its procedures. In all international procedures (including procedures according to the European Approach) at least one position in the expert group is filled internationally. In national procedures, inclusion is more difficult due to a language barrier. Nevertheless, past experience shows that the involvement of international experts from neighbouring countries is particularly useful if the subject matter of the review makes such involvement appear sensible (e.g. in double degree programmes. The following snapshot shows the latest data on international experts involved in AQAS' procedures.

AQAS

## DATA ON INTERNATIONAL EXPERTS

- About 360 experts were/are involved in the review of the programmes

Germany	Indonesia
Malaysia	India
Singapore	Austria
Philippines	Australia
Netherlands	Greece
Turkey	Belgium
Qatar	Switzerland
Northern Cyprus	tbc

7

11. The panel suggests the agency strive for a better gender balance when setting up the expert groups.

In all procedures AQAS endeavours to have an equal distribution in the expert groups. As an agency headed by a female management, AQAS is very well aware of the necessity to pay attention to the aspect of gender balance. Imbalances usually occur in disciplines in which the number of male professors is very high (e.g. engineering or computer science). It is precisely in these disciplines that female professors are increasingly



turning down invitations, as the time burden on female professors is often higher due to the gender balance on university committees and therefore additional activities such as AQAS procedures cannot be realised in terms of time.

12. The panel suggests that principles and procedure on international expert appointments could be reconsidered.

From an AQAS perspective, the ECA Consortium Principles (2005) for the appointment of international expert groups have proven their worth in practice. From the AQAS point of view, these principles prioritise expertise and competence, ensuring that appointed experts possess the necessary knowledge. The principles emphasise transparency, accountability, and diversity. All aspects that enrich the decision-making with varied perspectives in the accreditation procedures. In addition, the principles advocate for the avoidance of conflicts of interest, promoting the integrity of the group's work. These considerations are an integral part of AQAS' work which support the continuous improvement of all procedures and provide a framework for the appointment and operation of expert groups with international perspectives.

13. The panel suggests the agency might communicate information on expert selection via its website.

The HRK Guidelines on the Appointment of Experts which serve as the basis documents for AQAS for the appointment of experts, can be found under the following link.

[Systemakkreditierung – AQAS e.V.](#)

[Microsoft Word - MV 24 - TOP 5 Anlage 2 Gremienformat Verfahrenleitfaden gem. Akkreditierungsstaatsvertrag\\_20180315-1.docx \(hrk.de\)](#)

### ESG 2.5 Criteria for outcomes

14. The panel suggests the agency amend the Rules of Procedures of the Standing Commission to provide more guidance on the four types of possible decision.

In August 2021, the Standing Committee adopted a document on adjudication practice for programme accreditation decisions in international procedures. These include unconditional accreditations, accreditations with conditions, postponements, and denials of accreditations. Through this document, the AQAS office has codified the decision-making practice that has always been applied. AQAS prepares a document for Higher Education Institutions to inform them better about the possible results of accreditation procedures. The document will be available in February 2024.

### ESG 2.6 Reporting

15. The panel suggests the agency features good practice prominently in the external review reports.

AQAS fully agrees with this recommendation. In national procedures this has already been common practice since the introduction of the Specimen Decree. In addition to naming the monita, the procedure summaries



also explicitly target areas that have been identified as best practice by the reviewers. This procedure was also introduced for international procedures, meaning that a short summary of the best practice of the programmes/universities is now part of every report published.

### ESG 2.7 Complaints and appeals

16. The agency is encouraged to revisit the (re)appointment of the Complaints Commission members and their rotation.

The Complaints Commission was completely restaffed in 2022. The body's Rules of Procedure stipulate that appointed members are appointed for a term of three years. AQAS has set a target that the entire panel should not be replaced after these three years so that there is no loss of valuable experience. Nevertheless, AQAS assumes that there will certainly be changes after three years (e.g. due to graduation of the student member).

17. The agency may take an opportunity to define the Rules of Procedure of the Complaints Commission in greater detail.

In 2020, the Standing Committee decided on the latest update to the appeals and complaints procedure. These define the following aspects:

- Appeal procedure with regard to the conduct of procedures (with regard to the organisation of procedures, indications of legal errors)
- Appeal procedures with regard to decisions of the Standing Committee in national assessment procedures in preparation for programme and/or system accreditation (with regard to the appointment of experts and the composition of the expert group, review report)
- Appeal procedures with reference to decisions of the Standing Commission in international accreditation procedures (with regard to initialisation, nomination of experts and the composition of the expert group and accreditation decision/conditions)
- Appeal procedures with regard to decisions of the Standing Committee in certification procedures (with regard to the appointment of experts and the composition of the expert group and certification decision/conditions)

A link to the document published on the website can be found here:

- [EinspruchBeschwerdeverfahren.pdf \(aqas.de\)](#)