

ENQA AGENCY REVIEW

AGENCY FOR QUALITY ASSURANCE THROUGH ACCREDITATION OF STUDY PROGRAMMES (AQAS)

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EXECUTIVE SUMMARY

This report considers how AQAS (Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen) meets the expectations of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG-2015). In addition to the agency and its stakeholders within Germany, the report is meant to provide information for the ENQA Board's decision on AQAS's continued membership and to EQAR to support the agency's reapplication to the register. This is a fourth review of the agency. AQAS was established in 2002 and has been a member of ENQA since 2008 and of EQAR since 2010. AQAS is a mature and well-established agency.

The aim of AQAS is to contribute to the quality assurance and quality development of the study, teaching, and training by means of external assessment procedures. AQAS is one of the institutions involved in the creation of the European Higher Education Area and contributes to the development of reliable and comparable quality standards and assessment systems in both national and international contexts.

AQAS is a comprehensive agency based in Cologne, Germany. It has specific expertise in external quality assurance of teacher training and joint programmes. Four types of procedures are implemented within Germany, alongside three types of procedures internationally; the scope of this ENQA review covers all seven of these procedures.

AQAS's external review process followed the *Guidelines for ENQA Agency Reviews* and was informed by *Use and Interpretation of the ESG* by the EQAR's Register Committee. The panel for the external review of AQAS was appointed by ENQA and composed of the following members:

- Ms. Aurelija Valeikienė (Chair), Deputy Director, Centre for Quality Assessment in Higher Education, Lithuania - ENQA nominee;
- Prof. Dr. Simona Lache (Secretary), Professor and Vice-rector for Internationalization and Quality Evaluation, Transilvania University of Brasov, Romania - EUA nominee;
- Mr. Alastair Delaney, Director for Scotland, Wales and Northern Ireland. Lead for QAA on European policy and engagement, QAA, UK - ENQA nominee;
- Mr. Joshua Weygant, M.Sc. student in Microsystems Engineering, University of Freiburg, Germany, member of the European Students' Union Quality Assurance Student Experts Pool - ESU nominee.

The panel considered the evidence given in the self-assessment report, additional evidence requested by the panel and provided by the agency, and the video clip introduction to the AQAS facilities and live demonstration of the SharePoint system and performed a remote site by videoconference software where meetings with a wide range of audiences were held. The panel thoroughly analysed and discussed all the evidence and concluded that AQAS complies with the ESG as follows:

- full compliance is achieved with ESG 3.2, 3.3, 3.7, 2.1, 2.2, 2.4, 2.5, 2.6, 2.7
- substantial compliance is achieved with ESG 3.1, 3.4, 3.5, 3.6, and 2.3; corresponding recommendations are added in each case.

At the same time, commendations have been made under the standards 3.1, 3.4, 3.5, 3.6, 2.4, 2.5 and 2.6.

In light of the documentary and oral evidence considered, the ENQA review panel is satisfied that, in the performance of its functions, AQAS is in compliance with ESG.

INTRODUCTION

This report analyses the compliance of AQAS - Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen - with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. It is based on an external review conducted from February 2021 to October 2021. Subsequently, decision-making by the ENQA Board is scheduled for December 2021 or February 2022, and EQAR's Register Committee consideration of AQAS's application is planned in March or June 2022.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review at least once every five years in order to verify that they act in substantial compliance with the ESG as adopted at the Yerevan Ministerial Conference of the Bologna Process in 2015.

As this is AQAS's fourth review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

This review and the findings of the panel are also used towards AQAS's application to extend its listing in the European Quality Assurance Register for Higher Education (EQAR), on which the agency has been registered since its external review in 2010. For the complete terms of reference (ToR), please see Annex 2. For the glossary of terms used, please see Annex 3.

MAIN FINDINGS OF THE 2017 REVIEW

The previous review against ESG took place in 2017 and was carried out by the Accreditation Council of the Foundation for the Accreditation of Study Programmes in Germany (GAC). With respect to the ESG (2015), it found AQAS:

- fully compliant with eight standards as follows: ESG 3.2 (Official status), 3.3 (Independence); 3.5 (Resources), 3.7 (Cyclical external review), 2.1 (Consideration of internal quality assurance), 2.2 (Designing methodologies fit for purpose), 2.3 (Implementing processes), and 2.4 (Peer-review experts);
- substantially compliant with four standards as follows: ESG 3.1 (Activities, policy and processes for quality assurance), 3.6 (Internal quality assurance and professional conduct), 2.6 (Reporting), and 2.7 (Complaints and appeals);
- partially compliant with two standards, namely ESG 3.4 (Thematic analysis) and ESG 2.5 (Criteria for outcomes).

The 2017 review also made seven recommendations to AQAS on specific standards:

- AQAS should, in form of the formal resolution, define the distinction between accreditation and consultation, between ESG and non-ESG activities and between AQAS and AQAS ARCH (ESG 3.1);
- AQAS should develop a concept for future thematic analyses and publish a first contribution on their homepage within a short period of time (ESG 3.4);
- AQAS should expand the existing SharePoint server to the extent that the quality management processes display the requirements of the PDCA cycle (ESG 3.6);
- The criteria for international institutional accreditation should be published (ESG 2.5);

- AQAS should improve the search options on its website for review reports of international procedures (ESG 2.6);
- AQAS should look for solutions together with the Accreditation Council and the personnel responsible for the database in order to resolve the entry problems in the central database. The disputed function restrictions and data losses should be documented (ESG 2.6);
- The terms in the appeals and complaints procedure should be clarified in relation to the ESG on occasion (ESG 2.7).

In 2019, AQAS submitted to ENQA a follow-up report on recommendations in the panel report, which was approved by the ENQA Board (as stated in Annex I.4-a.2 of the SAR).

REVIEW PROCESS

The 2021 external review of AQAS was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. To assure integrity of the process, the panel followed the *ENQA Code of Conduct for Reviewers*. The panel took note of the *Use and Interpretation of the ESG* for the European Register of Quality Assurance Agencies issued by the Register Committee (Ref. RC/12.1, ver. 3.0, dated 04/09/2020), and paid particular attention to matters arising from communication between AQAS and EQAR that took place between the 2017 and the present review.

The panel for the external review of AQAS was appointed by ENQA and composed of the following members:

- Ms. Aurelija Valeikienė (Chair), Deputy Director, Centre for Quality Assessment in Higher Education, Lithuania - ENQA nominee;
- Prof. Dr. Simona Lache (Secretary), Professor and Vice-rector for Internationalization and Quality Evaluation, Transilvania University of Brasov, Romania - EUA nominee;
- Mr. Alastair Delaney, Director for Scotland, Wales and Northern Ireland. Lead for QAA on European policy and engagement, QAA, UK - ENQA nominee;
- Mr. Joshua Weygant, M.Sc. student in Microsystems Engineering, University of Freiburg, Germany, member of the European Students' Union Quality Assurance Student Experts Pool - ESU nominee.

Mr. Goran Dakovic, Reviews Manager at ENQA Secretariat, acted as the review coordinator.

AQAS produced a self-assessment report (SAR) that provided the basis for the panel's work. Panel members received the SAR from AQAS in May 2021 and immediately began to evaluate its contents against the ESG. Beyond the standard debriefing call, which took place in June 2021, the ENQA coordinator facilitated an online meeting at the end of July 2021 where the panel discussed the SAR and other practical aspects of the review, including the schedule of meetings for the site visit and the need for potential additional documentation. Several online meetings, grouped in two days, were organized prior to the site visit in August 2021: review panel's kick-off meeting, pre-visit meeting with the agency's resource person, pre-visit meeting for presentation of AQAS premises and IT infrastructure, pre-visit meeting with the GAC representative, and the review panel's final preparation meeting. The panel conducted an online site visit to AQAS from 1 to 3 September 2021, where it further examined both the claims made in the self-assessment report and cross-checked other evidence as provided by the agency. The panel was also able to clarify any points at issue. During the site visit, the simultaneous translation was provided (when needed) by a professional interpreter ENQA approved in advance. Finally, the review panel produced the external review report based on the following sources: the SAR, additional information provided by the agency upon

the panel's request, information collected during the online site visit, and other evidence (e.g., website, a video on agency's premises, live demonstration of the SharePoint system, and previous external evaluation reports). In doing so, the panel provided an opportunity for AQAS to comment on the factual accuracy of the draft report. The review panel confirms that it was given access to all documents and people it wished to consult throughout the review process.

Self-assessment report

The self-assessment report provided a brief overview on the German higher education system and the quality assurance of higher education in the context of the agency, the AQAS's history, profile and activities, and a description of processes and methodologies used. The report also contained a self-assessment on compliance of AQAS's quality assurance activities against the ESG.

The SAR was prepared by a group of people consisting of AQAS's employees (representatives of management and other staff members with relevant qualifications) and discussed at the agency level so that all staff had good knowledge of the findings. Most of the process was conducted online due to the COVID-19 pandemic.

The review panel found the SAR to be informative and reflective, as the findings allowed the agency to identify its strengths and weaknesses, current challenges, and areas for further development. It also served as a valuable source of information to the panel.

Site visit

Due to the travel restrictions caused by COVID-19 pandemic, the review panel members agreed on having the site visit online. The site visit was conducted from 1 to 3 September 2021, and prior to that several pre-visit meetings took place, as is presented in the visit schedule (Annex I). The visit schedule was agreed upon with the agency. The panel found the visit to be well planned and organised, thus the review panel was able to meet and interview all key internal and external stakeholders of the agency, including the two AQAS's CEOs, the Management Board, staff in charge of external QA activities at the national and international level, administrative staff, representatives of AQAS commissions (Standing Commission and Complaints Commission), heads and QA officers from HEIs – including representatives of the universities which had complaints/appeals cases – members of the experts' pool, students involved in external QA activities, and other stakeholders. The discussions in the meetings were triangulated with the self-assessment report and the documentary evidence as provided by the agency in advance, which altogether allowed the panel to come to conclusions and judgements on the compliance as presented in this report.

The panel wishes to express its thanks to all involved parties that dedicated their time to meet with and help the panel to better understand the activities of AQAS and the context within which it operates.

The staff of the agency demonstrated high professionalism during the entire review process and provided excellent assistance to the panel regarding all matters. At the end of the site visit, the panel held an internal meeting where agreed on the preliminary conclusions on the level of compliance of AQAS on each of the standards of Part 2 and 3 of the ESG. The panel secretary drafted the report in cooperation with the rest of the panel. Panel members discussed the findings and judgments in an additional online meeting held on the 28th of September 2021. The draft report was submitted to AQAS for fact checking in October 2021 and then finalised and sent to ENQA at the beginning of November 2021.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

According to the German legislation, the higher education system is the responsibility of the federal states that form the Federal Republic of Germany, which develop their own law of education. At the state level, the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder* in the Federal Republic of Germany (KMK – Kultusministerkonferenz) ensures the application of as much as possible uniform criteria in all federal states, without having direct competence in legislation.

There are mainly three types of higher education institutions: universities, universities of applied sciences, and universities of art/music. In terms of funding, these are state institutions and state-recognized institutions, and all are subjected to the law of higher education from the state in which they operate. In 2020, the German higher education system had 390 institutions (source: German Rectors' Conference HRK – *Hochschulrektorenkonferenz*): 120 universities, 213 universities of applied sciences, and 57 universities of art/music. The same source presents the total number of students as: 2.9 mil., fairly evenly distributed by gender. From the overall student population, 1.78 mil. are enrolled in universities, 1.08 mil. in universities of applied sciences, and 36.644 in universities of art/music. International students comprise a share of 14.2%. Regarding the university staff, the above-mentioned source states 719,310 persons: 402,152 academic staff holding different academic degrees and 317,158 administrative/technical/other support staff.

The study programmes are organized in agreement with the Bologna process (bachelor's and master's degree programmes) unless the legislation requires otherwise (e.g., state examinations for degrees in law, medicine, and teachers education in some of the federal states). They are based on the European Credit Transfer and Accumulation System (ECTS), and the qualifications are defined according to the Qualifications Framework for German Higher Education Qualifications (HQR – *Qualifikationsrahmen für Deutsche Hochschulabschlüsse*), which correspond to levels 6, 7, and 8 of the European Qualifications Framework for Lifelong Learning (EQF-LLL).

QUALITY ASSURANCE

The quality assurance in the German higher education system has undergone major changes since 2018, when a new regulation came into force – the 'Interstate Treaty on the organization of a joint accreditation system to ensure the quality of teaching and learning at German higher education institutions' (Interstate Study Accreditation Treaty), concluded on the 8th of December 2016 and enacted on the 1st of January 2018. Until 2018, the responsibility for accreditation of study programmes or internal quality assurance systems of higher education institutions had rested with the quality assurance agencies; these organizations used to be accredited by the GAC, for a specified period, to perform that task.

The Interstate Study Accreditation Treaty was concluded in response to the Federal Constitutional Court (decision of February 2016, as stated in the SAR) which stipulated that only the state may make accreditation decisions. It currently represents the legal basis for external quality assurance of the German higher education system. According to the document, the task of accreditation of study programmes and higher education institutions is taken over by the GAC, which grants accreditation based on expert reports produced by the authorized quality assurance agencies.

Since 2018, the activity of the quality assurance agencies with respect to the assessment of German higher education institutions and study programmes has been conducted by strictly following the

regulations of the Interstate Treaty and of the Specimen Decree (MRVO – *Musterrechtsverordnung*) issued by the KMK on the 7th of December 2017. This last document specifies the details regarding the assessment criteria (formal and academic) and the implementation of assessment procedures.

External quality assurance in Germany involves the following levels: i) study programme accreditation, granted for eight years, for programmes of all cycles (bachelor's, master's, PhD); ii) system accreditation, i.e., institutional assessment of the HEI's internal quality assurance system, granted also for eight years, which allows the HEI to accredit its own study programmes; iii) alternative procedures.

The panel learned that, while the decisions on accreditation taken by GAC represent administrative acts, the assessment process carried out by quality assurance agencies are regulated by private law. The German state has deliberately left the system of external quality assurance open so that several agencies can operate on a competitive basis. However, the Interstate Treaty stipulates that only agencies registered with EQAR can be authorized and that an authorization from GAC is also required to operate in Germany.

According to the SAR, page 7, in 2021 there were ten agencies authorized by GAC to operate in Germany: eight German, one Swiss, and one Austrian.

AQAS

AQAS (Agency for Quality Assurance through the Accreditation of Study Programmes) was established in 2002 as an association of universities and academic societies. It is one of the largest generic quality agencies in Germany, with a high share of the German QA market (more than 7,000 study programmes assessed and system accreditation granted to 18 universities). As stipulated in the Mission Statement (Annex I.1.5 of SAR), AQAS aims to contribute to the quality assurance and quality development of study, teaching, and training by means of external assessment procedures. It operates at both the national and international level and conducts assessment procedures for study programmes and institutions, as well as study programmes and institutional accreditation (the latter only abroad). The agency is recognized for its proficiency in reviewing teacher training programmes and joint programmes.

Since its foundation, AQAS has followed German regulations; it was periodically assessed by GAC and granted accreditation (in 2002) and reaccreditation (in 2011 and 2016).

AQAS'S ORGANISATION/STRUCTURE

AQAS e.V. is founded as an association; it is a comprehensive quality assurance agency, which means its assessment services cover all disciplines and quality assurance systems. The association has 93 member universities from Germany and two foreign universities (Istanbul Gelişim University, Turkey since 2018 and Universitas Pendidikan, Bandung, Indonesia since 2020).

The association's registered office is in Cologne, and it considers the financial year the same as the calendar year. The structure and organisation are stated in the official document of the association (Annex I.1.6). The association's bodies are i) the members' General Assembly, ii) the Management Board, iii) the Standing Commission, and iv) the Complaints Commission.

The Management Board consists of five persons: the first and second chairperson, the treasurer, and two other members. The members are elected by the members' General Assembly for a term of office of three years, and re-election is permitted.

The Standing Commission is appointed to make decisions with respect to the implementation of the assessment and accreditation processes at both the national and international level, including the appointment of experts in review panels. Under its scope also falls the adoption of principles and standards related to the procedures implemented by the agency. The composition of the Standing Commission is decided by the Management Board, with the provision that the representatives of academia should always be in the majority. At the moment the SAR was finalised, the Standing Commission of AQAS had 14 members, out of which one was a student, and one was a representative of professional practice. By the time the visit took place, two new members had been appointed: one student and one representative of the labour market. The members are appointed by the Management Board for a period of three years, and multiple extensions are possible.

The Complaints Commission's task is to analyse the higher education institutions' complaints regarding the assessments and decisions of the Standing Commission and to formulate a final decision for AQAS. It consists of seven members with voting rights (four representatives from academia, one from another quality agency, one representative from the professional practice, and one student) and one member of the Standing Commission without voting rights. The members of the Complaint Commission are also appointed by the Management Board for a three-year period with the possibility of multiple extensions.

Members of the Management Board serve in a voluntary capacity but can be granted compensation for expenses. Both the Standing Commission and the Complaint Commission members can receive an attendance fee in return for their work.

The Management Board and the other bodies are supported in their work by a head office. The Management Board appointed two CEOs (managing directors) to run the AQAS business. The head office also has three senior consultants, 10 consultants, three project assistants, three administrative staff, and two student assistants, 23 persons in total with the two CEOs.

Since 2015, AQAS ARCH, a spin-off of AQAS founded by the General Assembly, operates alongside AQAS e.V. for conducting other services in higher education than assessment procedures (for example: consultancy, projects, etc.).

AQAS'S FUNCTIONS, ACTIVITIES, PROCEDURES

The purpose of AQAS e.V., stated in the Articles of Association, Annex I.1.6, is *'to promote education [...] through the implementation of procedures at national and international level. They consist of the assessment of study programmes and quality assurance systems with the involvement of external experts and, where applicable, their accreditation.'*

The activities of AQAS consist of the following (according to the SAR, page 10):

1. Programme review (bachelor's and master's) in Germany, including review of joint programmes involving German universities
2. Institutional (System) review in Germany
3. PhD review in Germany
4. Alternative procedures in Germany
5. Programme accreditation (bachelor's, master's, PhD) at the international level
6. Institutional accreditation at the international level
7. Review of joint programmes based on the European Approach (without involving German universities)

Activities 1 to 4 are conducted strictly following the criteria of MRVO/'Specimen decree,' and they result in an external review report on which the decision for granting the accreditation is made. For

German programme reviews (1), system reviews, (2) and alternative procedures (4), the decision is made by the GAC, while, for PhD reviews (3), the decision is made by AQAS. AQAS is also the one who grants accreditation for joint programmes involving German universities, with the possibility of recognition by GAC.

Activities 5 to 7 are based on procedures and criteria established by AQAS in compliance with ESGs and the European Approach for joint programmes respectively. The agency makes the decision for granting accreditation.

The reviews carried out by AQAS are based on a self-evaluation report. They include a site visit (on site or virtual, as imposed by the COVID-19 pandemic) and are finalized with a report. A follow-up activity is also considered. AQAS supports both the reviewed institutions and the external experts by providing guidelines for the assessment process, including working aids regarding the standards and criteria.

Besides the programme and system review and accreditation, the agency has other activities, which are conducted under AQAS ARCH (Annex II.3.5 of SAR):

- Participation in international projects as partners;
- Organising workshops on specific issues of interest (e.g., joint programmes, dual programmes, ISO certification);
- Offering consultancy in quality assurance;
- Conducting reviews that do not fall under ESG and do not grant accreditation but only certification (e.g., assessment of further education, assessment of vocational training, assessment of research, administration, etc.).

AQAS'S FUNDING

AQAS is a non-profit organization acting as a business under private law. It is self-financed, the income being made up by membership fees and fees charged from its clients, which are higher education institutions that choose AQAS for conducting the external review. A very low amount, approximately 1%, comes from the other services performed under AQAS ARCH, as it was learned in the panel's discussion with the CEOs.

The panel learned from the SAR that the fees are set so they cover the personnel and material costs in AQAS head office (the so called 'basic fee'), as well as the site visit costs ('procedural fee'), including the costs for the expert evaluators.

The overall budget composition has remained relatively stable over the past five years. A significant part of the budget goes, every year, to personnel expenses.

FINDINGS: COMPLIANCE OF [AGENCY] WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

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.

2017 ENQA review recommendation: “AQAS should, in form of the formal resolution, define the distinction between accreditation and consultation, between ESG and non-ESG activities and between AQAS and AQAS ARCH.”

2017 EQAR RC’s conclusion: “AQAS was able to explain that it appropriately separates its different areas of activity, while the details and consequences of this separation are not yet fully publicly documented.”

Evidence

The agency was established in 2002 as an association of universities aimed at promoting education through the implementation of study programmes and quality assurance systems assessment and accreditation where applicable (Annex I.1.6 of the SAR). The agency’s website, under “Our Philosophy / AQAS e.V. Mission statement,” states that the aim of AQAS (as defined in its Statutes) is to contribute to the quality assurance and quality development of study, teaching, and training by means of external assessment procedures. AQAS sees itself as one of the institutions involved in the creation of the European Higher Education Area and contributing to the development of reliable and comparable quality standards and assessment systems in both national and international contexts. Members of AQAS staff are involved in international activities. For instance, Ms. Doris Herrmann, CEO of AQAS, was elected to serve on the Board of ENQA at ENQA’s General Assembly on 22 April 2021. At the same event, Mr. Ronny Heintze, Senior Consultant and Commissioner for International Projects, was appointed to the Agency Review Committee (ARC) of ENQA. He also serves on the organising committee of EQAF. In addition, AQAS contributed to several important international projects, including the recently completed “Facilitating implementation of the European Approach for Quality Assurance of Joint Programmes – ImpEA.” The website contains further information on the *modus operandi* of the agency.

The panel received a separate mission statement (dated 18 March 2021) which cites standards that the agency has set for itself – professionalism, transparency, and responsible implementation of assessment procedures; it also contains clauses on a reliable, respectful, and dialogue-driven way of cooperation with higher education institutions. This document also has commitments towards its own employees, such as creation of a working atmosphere based on collaboration, trust, constructive spirit, and development of competences, alongside efficient deployment of natural, material, and financial resources.

AQAS's core activity is assessment of study programmes and of quality assurance systems of higher education in Germany, as a basis for accreditation decisions made by the German Accreditation Council. Until 2018, when the legal context changed, the agency was also responsible for the decisions on granting accreditation to programmes and higher education institutions in the national context. The external quality assurance in Germany provides for periodic review of programmes and institutions, so AQAS has been performing accreditation/assessment activities on a regular basis since its foundation.

The review panel learned from the SAR that, throughout its period of operation in the German system, AQAS has conducted 2,280 programme accreditation procedures and granted accreditation to 7,006 study programmes, including joint programmes. The panel requested AQAS to provide information on external quality assurance procedures by year, probing to see the regularity and volume of procedures conducted. The following table was provided:

Table I. Statistics on procedures completed by the 1st of August 2021

Type of procedure	Completed procedures					
	2016	2017	2018	2019	2020	2021*
National procedures						
<i>Programme accreditation procedures</i>						
old regulatory framework	144	147	137	107	17	4
new regulatory framework	/	/	-	37	83	61
<i>System accreditation procedures</i>						
old regulatory framework	3	1	4	2	1	1
new regulatory framework	/	/	-	-	-	-
International procedures						
Programme accreditation	10	7	14	8	12	4
Institutional accreditation	1	-	-	1	2	-
European Approach	-	-	3	2	-	2
<i>Total number of procedures in a given year</i>	158	155	158	157	115	72

The SAR also presents the situation on system procedures conducted by AQAS: i) in the old regulation framework: 18 procedures completed as first-time accreditation and one procedure completed as re-accreditation (in May 2021); ii) in the new regulation framework: seven ongoing procedures, out of which four are re-accreditations. By the time of the panel's visit, all procedures under the old regulatory framework had been concluded.

Regarding the alternative procedures as a defined activity of the agency, from the SAR and during the interviews with the managing directors the panel understood that no such procedure had been finalized prior to the site visit, which included AQAS. The only activity carried out in this direction was participation in a pilot project, promoted by GAC, aimed at enabling universities to develop their own assessment procedures. The project involved Pforzheim University (HS PF) and AQAS and was successfully implemented but only under the 'experimentation clause.'

At the international level, the agency conducts study programmes and institutional reviews and is responsible also for the decisions on accreditation. Since the last evaluation in 2017, four institutional accreditation procedures have been conducted, all resulting in positive decisions (in three cases the accreditation was granted with conditions); during the same period, 142 study programmes were reviewed, and all were granted accreditation (102 with conditions and five after being postponed one year).

Beyond external evaluation, AQAS performs several other activities in the form of services for higher education institutions (e.g., training, workshops, consultancy, reviews for certification etc.),

which are organized by AQAS ARCH, as presented in the section ‘AQAS’s *functions, activities, procedures*’ of this report.

As mentioned above, AQAS’s mission is publicly available on the website. However, neither the strategies nor the annual work plans or reports are available through the website. The agency explained these documents could not be published on the website because this would have a negative impact on its operation on a competitive market. Activities and results are disseminated via social media (LinkedIn account).

At the panel’s request, the agency provided the previous strategy (2016–2020) and the current one (2021–2026), which reflects the recent changes in the German quality assurance system. The latter document was issued following approval by the Management Board on 18 March 2021. During the interview with the managing directors, the panel learned that the strategy was drafted by the agency’s staff, discussed with the Board, and decided by it. The panel could not identify any other involvement of stakeholders during its development.

At the same time, both from the SAR and interviews, it was revealed that the involvement of stakeholders in the agency’s activities takes the form of participation in the Standing Commission and Complaints Commission, as well as on the panels of experts. Everyone from these groups that the panel spoke with confirmed their active involvement in their assigned activities. The high quality of the agency’s activities and the professionalism of its staff was constantly pointed out. This was also confirmed in the discussions with the representatives of both German and international HEIs.

AQAS is governed by the General Assembly, which elects the Management Board for carrying out responsibilities stated in the Articles of Association. The Management Board consists of five persons, currently four male and one female, all academics coming from the member universities. Each of the other two bodies operating within AQAS, the Standing Commission (14 members, 11 male and three female) and the Complaints Commission (eight members, seven male and one female), include one student and one representative of the professional practice besides the academics, who form the majority. Members of these bodies serve on a voluntary basis, and their re-election is possible for an unlimited number of terms according to the Articles of Association. All members of the Standing Commission are appointed in their personal capacity and not as representatives of their specific organisation/ institution.

The managing directors submit monthly reports to the Management Board regarding financial performance. No annual reports have been published by the agency so far.

As already mentioned, AQAS e.V., the association, carries out activities related to external quality assurance, while its spin-off, AQAS ARCH GmbH, is in charge of all the other types of activities, including assessments that do not fall under the ESG. This clearly resulted from the additional documentation on AQAS ARCH that the review panel requested and the agency provided. The two structures share the same staff and material resources. The interviewed staff working also for AQAS ARCH were fully aware of the AQAS requirement of not conducting assessment/accreditation procedures and providing consultancy at the same time for the same institution. The panel could not find any statement on the website regarding this policy adopted by the agency. AQAS ARCH has its separate website, which, however, provides very little information and appears incomplete.

One of the managing directors has a specific responsibility for international relations. The panel noted the active involvement of the agency in different international events and projects, some of them conducted on other continents (i.e., Asia, Africa), and understands that this is a way to increase visibility and attract contracts for international accreditation.

Analysis

Based on the evidence from the SAR, annexes, and interviews mentioned above, it was clear to the panel that the external quality assurance activities of AQAS have been taking place on a regular basis since the creation of the agency and remained so during the period covering the present review (2016-2021). While the panel saw a diminishing number of procedures during the last two years (2020-2021), this was explained by the unusual circumstances imposed by the pandemic situation and hesitancy on part of HEIs to engage in evaluation procedures online. The panel understands the uncertainty caused by COVID-19 and took this into account in its evaluation of the agency. The mission statement, recently amended, is reflected in the agency's daily work and is published on the website. The AQAS website is being refreshed, and the panel welcomes the opportunity for increased functionality and transparency and encourages the agency to continue its efforts in this direction.

However, it's the opinion of the panel that both the past and the present strategy until 2026 seem to be focused on strategic thinking rather than describing what is required to achieve these through setting clear targets against concrete deadlines. From this perspective, the panel advises the agency to strengthen its strategic planning and establish annual plans, linking them with the strategic objectives for the agency's services and development. The panel believes that elaboration of annual reports, which include at least basic information on AQAS's activities, would contribute to better monitoring of the achievement of the set objectives.

The panel has repeatedly read in the SAR and heard during interviews that there is significant uncertainty regarding the volume of EQA activities within the German higher education system and external quality assurance agencies market in the future and that HEIs might be inclined to move away from programme accreditation to system accreditation. However, statistics of procedures conducted under the new legal framework to date do not show this as a clear trend. The agency staff noted being able to plan procedures for the next six months but not much further when there is no general framework contract concluded between AQAS and an institution in question and HEIs can choose agencies freely. The managing directors ruled out the possibility of a market survey to learn of HEI preferences in terms of type of procedures. The panel repeatedly heard that the agency is operating in a market situation, however, at the same time, AQAS seems to reject the idea that in order to survive in a market situation, market approaches to finding and retaining clients both domestically and abroad should be applied. In the panel's view, this seems to be a contradiction in itself, and encourages the agency taking more proactive approaches in their relations with HEIs. The panel trusts the agency is best positioned to choose appropriate and ethical communication with institutions; however, it encourages taking a more proactive stance and thinking of additional ways to engage with its members (and beyond) in order to offer its various services and reduce the overall business risk. The potential for international EQA procedures should be carefully assessed and necessary decisions made.

Regarding the 2017 recommendation of GAC that AQAS should formally separate accreditation from consultation, ESG from non-ESG activities, and AQAS e.V. from AQAS ARCH, the agency provided to the panel the explanation in the SAR as well as during the discussions at the site visit. The panel understood and was convinced that the external quality assurance activities falling under ESG are conducted within AQAS e.V., while all other services carried out for HEIs, such as consultancy, training, workshops, projects, and non-ESG activities, are operated by AQAS ARCH. The agency is encouraged to pursue making this separation more transparent by publishing it on the website, alongside the policy of not conducting assessment/accreditation procedures and providing consultancy at the same time for the same institution.

The panel also recognises AQAS's active work in the international context. Involvement in international networks and projects has significantly contributed to better visibility and attracted many contracts of international accreditation from institutions on other continents.

The panel notes that there is an explicit requirement for agencies under ESG 3.1 in the Standard part, to “ensure the involvement of stakeholders in their governance and work”. ESG itself in the „I. Context, Scope, Purpose and Principles” part, under the second footnote, contains a definition who stakeholders are, to quote: „Unless otherwise specified, in the document stakeholders are understood to cover all actors within an institution, including students and staff, as well as external stakeholders such as employers and external partners of an institution.” Looking at stakeholder involvement, the panel learned that no stakeholders, other than the member universities of the association, are involved in the governance of the agency. The panel understands that the association's statute does not allow for formal involvement of different stakeholders, such as students and representatives of the business sector, in the Management Board, but AQAS should think of ways of indirect involvement of stakeholders, for example, as advisers or observers without voting rights.

Overall, the panel notes that students and professional practitioners participate in the agency's activities, as they are represented in the Standing Commission, Complaints Commission, and in the expert panels. Nevertheless, increasing student involvement and international participation in other relevant processes of AQAS – for example, when defining the strategic plan – would provide added value.

Panel commendations

1. The agency seems to benefit from dedicated and high-calibre membership of the Management Board, the Standing Commission, and the Complaints Commission.
2. The panel commends the awareness and appreciation shown by the representatives of HEIs and other stakeholders on the quality and value of the agency's activities.

Panel recommendations

1. The panel recommends the agency strengthen its strategic planning and consolidate its 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.

Panel suggestions for further improvement

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, 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.

Panel conclusion: substantially compliant

ESG 3.2 OFFICIAL STATUS

Standard:

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

2017 ENQA review recommendation: none

Evidence

According to the SAR, AQAS was listed as association no. 8059 in the Bonn Magistrate's Court's Register of Associations until February 2013. After the head office was moved to Cologne, the agency was registered under No. VR 17554 of the Register of Associations of Cologne Local Court (*Amtsgericht Köln*) on 24 January 2013 (Annex I.1.1, I.1.2 of the SAR). Its activity is governed by the "Articles of Association of the Agency for Quality Assurance through Accreditation of Study Programmes (AQAS)" (Annex I.1.6 of the SAR).

AQAS was accredited by the German Accreditation Council on 14 March 2002 and reaccredited by the same institution in 2007, 2012, and 2017, according to the German legislation. As a result, the agency was authorized to conduct all mandatory EQA procedures in Germany (programme and system accreditation since 2008, and alternative procedures). Since the entry into law of the Interstate Study Accreditation Treaty on 1 January 2018, AQAS is authorized to carry out reviews, but the responsibility for granting accreditation lies with the GAC in the national context.

AQAS has been an ENQA member since 2008 and registered on EQAR since 2010. Both ENQA membership and EQAR registration were possible based on the GAC's review report against the ESG.

Since 2018, when legislation changed, the agencies are no longer reviewed by GAC but by ENQA, and their operation in Germany has registration on EQAR as a requirement. AQAS satisfies this.

Regarding its recognition in the countries where it is conducting international accreditation, the agency provided, at the review panel's request, documents to certify its recognition in Austria, Turkey, and Vietnam. In addition, the managing director explained to the panel that there are countries which do not have well-defined procedures for recognition of international quality assurance agencies where AQAS is included in the list of agencies that can be chosen for international accreditation (e.g., in Indonesia, Oman, and the United Arab Emirates). On the other hand, there are countries with no procedures for recognition and no lists of accepted agencies; in these cases, the panel could not identify evidence for recognition of AQAS accreditations aside from the agency's listing on the EQAR.

Analysis

Based on the evidence provided by the agency, it is obvious to the panel that AQAS has a clear legal basis to provide external QA services in Germany and the EHEA.

Throughout its operation, the agency was authorized by the GAC to perform programme and system accreditations in Germany. Since 2018, due to the changes of legislation, AQAS has been recognized, based on its compliance to ESG, for carrying out programme and system reviews as the

basis for GAC's decisions on granting accreditation. International accreditation is recognised, depending on the country, through official documents, inclusion in 'trust lists,' or based on mutual agreement.

Everyone from the international higher education institutions reviewed by AQAS who the panel spoke to stated that the outcomes of the international accreditation process were at least accepted, if not recognized, in their respective countries and jurisdictions.

Panel conclusion: fully compliant

ESG 3.3 INDEPENDENCE

Standard:

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.

2017 ENQA review recommendation: none

Evidence

The SAR describes AQAS as an association of universities organized as a non-profit organization operating under private law. Each member university is represented in the General Assembly and has one vote to express its position with respect to the decisions taken. According to the Articles of Association, the Management Board is elected by the General Assembly and is accountable to it. The GA decides on approval of the Management Board's actions, which fall under the responsibilities given by the above-mentioned document: appointing members of the Standing Commission and Complaints Commission, setting up the budget, adopting resolutions, concluding cooperation agreements with other quality agencies. The Management Board follows its own Rules of Procedure (last updated 07.09.2020, Annex II.1.2 of the SAR).

During the interview with representatives of different bodies of AQAS, the panel learned that the members of the two commissions (the Standing Commission and the Complaints Commission) are appointed based on their expertise by the Management Board and that it does not interact with them in any way after appointment. One person cannot be a Management Board member and sit in the Standing or Complaints Commission concurrently.

The Standing Commission is responsible for appointing experts on the review panels, making decisions related to the implementation of all the assessment/accreditation procedures conducted by AQAS, adopting resolutions on standards and methodologies applied in international procedures (Annex II.1.5 of the SAR), and making accreditation decisions in the cases where GAC is not the decision-making body. The SAR also states that it is not accountable either to the Management Board or the General Assembly, which do not interfere with the commission's decision-making process. The interviews confirmed all these facts. The panel also learned from the discussion with the representatives of the Standing Commission that they do not participate in meetings where issues related to institutions they represent, work for, or are affiliated with are discussed.

According to its Rules of Procedure (Annex II.1.7 of the SAR), the Complaints Commission analyses complaints and appeals of higher education institutions regarding the procedures conducted by AQAS. Its composition includes one representative of the Standing Commission without voting rights. At the same time, a staff member of AQAS takes part in the commission's meetings to give support and advice without any interference in the decision-making process. As reported in the SAR

and the documents the panel saw during the site visit, and as was confirmed during the interviews, the activity and decisions of the Complaints Commission are independent from any other bodies of the association.

AQAS provides guidelines for conducting procedures in Germany (which are bound to MRVO provisions) and internationally (elaborated by the Standing Commission), outlining all the steps involved where all the steps involved are presented. The experts are appointed to the review panel based on their experience in quality assurance and expertise in the field of assessment, according to the national regulations (the SAR mentions the “specifications of the MRVO and the relevant HRK guidelines on the nomination of professors for review panels of 24 April 2018”) or the ECA (European Consortium of Accreditation) principles for international procedures (Annex I.2.c.7 of the SAR). The HEIs involved in the assessment/accreditation procedures can object to the review panel composition prior to the beginning of the assessment when reasonable arguments exist.

There is no formal link between AQAS and the governmental organisations, such as local ministry or HRK, except that the agency must follow the MRVO provisions for national procedures and must nominate the expert panel in accordance with the HRK guidelines.

All experts carrying out activities within the review panels must sign a declaration of impartiality and confidentiality and must confirm their independence with respect to the process.

During the interviews with experts and AQAS staff involved in external quality assurance procedures, the panel learned that the staff support the panel in drafting the review report solely by filling in the factual parts. Writing the findings of the assessment process and making judgements on the compliance with standards is exclusively the task and responsibility of experts, as further described under ESG 2.6.

GAC makes the final decision for granting accreditation in national procedures based on the expert reports. In international procedures, AQAS makes the final decision through its Standing Commission.

Analysis

The **organisational independence** is set out clearly in the relevant regulations for the agency, as mentioned in the evidence section above. During the interviews, the panel did not detect any concerns in relation to this matter.

The **operational independence** from external stakeholders is largely guaranteed through the legislation and the internal procedures of the agency. As indicated above, the Management Board, which is elected by the General Assembly of AQAS member universities, is not involved in the development of the procedures. The Standing Commission has full autonomy for this in the case of international accreditation. For assessment procedures conducted in Germany, AQAS follows the provisions set at the federal level.

The appointment of external experts is the responsibility of the Standing Commission. In the view of the panel, this approach guarantees independence from third parties.

The way expert panels and the Standing Commission are composed contributes to the **independence of outcomes**. The panels consist of experts with different backgrounds in the academic field or the labour market and students, all selected based on transparent procedures. All experts act as independent persons and sign a declaration of impartiality and confidentiality.

Panel conclusion: fully compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

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

2017 ENQA review recommendation: “AQAS should develop a concept for future thematic analyses and publish a first contribution on their homepage within a short period of time.”

Evidence

The SAR presents the agency’s view on thematic analysis as “sharing experiences and feeding them back into the system.” The principle of “reporting back” is also displayed on the AQAS’s website. In this respect, the panel learned from the SAR and its annexes (Annex II.3.3) about the activities carried out by the agency in relation to thematic analysis: conference contributions, lectures, and presentations; provision of training and workshops; participation in interviews and panel discussions; publication of articles on specific contemporary issues; posts on social media; and publications on the website and in *ad hoc* newsletters (SAR, page 32).

AQAS usually publishes articles on different topics every year as thematic analysis. The panel learned from the interviews with the agency’s staff that consultants mainly propose the topics, and the thematic analysis is done at their initiative without having a plan for publication. The panel found that, in 2017, four publications were produced; in 2018, two analyses were made; and, in 2019, one contribution to a book was made, similar to 2021 when one article was included in a larger handbook.

The AQAS’s website contains several published papers, with some being journal articles or book chapters with restricted access. The panel could not identify a regular newsletter of the agency, but it is active on social media (e.g., ‘Linkedin’). AQAS usually presents insights at conferences (e.g., EQAF, INQAAHE, GAC meetings, and conferences in Kenya and Egypt, as mentioned in the AQAS’s follow-up report to ENQA of 2019), and its staff gives lectures and presentations for different stakeholders (e.g., the German student accreditation pool or at HRK events).

Some publications produced to date pertain to issues on the system level (such as on the change of external quality assurance system in Germany or benefits of programme accreditation vs. system accreditation) and others to the European level (such as on the Accreditation of Joint Programmes). The managing director explained during the interview with the panel that AQAS, being only one of the 10 agencies providing assessment services for German HEIs, compared to other countries where national agencies have that task, considers its competence in developing system-wide analyses to be limited. Instead, the agency believes it to be of great importance to its stakeholders to present its results and experiences under the format mentioned above as thematic analysis. Moreover, the main goal is to stay in direct contact with their clients by active participation in conferences and projects and to exchange good practices, which is considered an approach far more beneficial for the agency.

The agency told the review panel of its plans to enrich its thematic analysis in the future by publishing reports on its international activity, e.g., on the accreditation procedures conducted in Indonesia.

Analysis

The agency mentioned in the SAR and the panel was also able to find on AQAS's website the list of publications on its activities and procedures. The panel has reviewed those publications in order to evaluate whether they comply with the interpretation of thematic analyses under ESG 3.4 or rather can be attributed to activities under ESG 3.6 and ESG 2.2. In the panel's opinion, the agency has made clear progress in this area since the previous external review, and the 2017 ENQA recommendation has been broadly addressed.

The panel acknowledges the efforts to inform a broad range of stakeholders about the work of the agency. At the same time, the panel notes that the current thematic publications of AQAS reflect its own experience in conducting reviews and refer to a great extent to analysis about the quality assurance approaches rather than the results of external quality assurance at the institution level and how institutions could learn from these results. Therefore, it encourages the agency to complement its current work with more qualitative analyses of the outcomes of assessment procedures in order to allow programmes and institutions to learn from one another.

To achieve full compliance with this Standard, the panel believes there are two possible avenues for improvement. The first area is to explore the findings of the external reviews as conducted by the AQAS expert panels and thus to analyse trends across the sector, searching for common areas where educational enhancement may occur or where good practice is consistently applied and showing the common challenges for institutions. This could be done on hundreds of procedures conducted in Germany and would provide the most relevant learning opportunity for local HEIs, which comprise AQAS's primary market. The panel believes this is covered by the requirement of the ESG standard stating "analyse the general findings of their external quality assurance activities." The second area to explore is the requirement to "regularly publish reports that describe" these findings. The dissemination activities of AQAS that are already produced should better incorporate the thematic analyses as proposed by the guidelines under this ESG. AQAS could benefit from getting acquainted with effective approaches adopted by other European agencies as discussed in the 2020 ENQA study by Carmen Tomas and Maria Kelo entitled "ESG 2015–2018 ENQA Agency Reports: Thematic Analysis."¹

The panel appreciates that some publications by the agency staff were accepted to the peer reviewed journals, at the same time encourages the agency to think of relevant dissemination channels, so that thematic analyses that are most relevant for institutional learning are not only published in a way protected by a paywall.

Panel commendations

3. The panel commends the agency for immediately attending to the 2017 recommendation and engaging in thematic analysis and its several research publications produced to date.

Panel recommendations

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 the 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

¹ <https://www.enqa.eu/wp-content/uploads/ESG-2015-ENQA-Thematic-Analysis-final.pdf>

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.

Panel suggestions for further improvement

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.

Panel conclusion: substantially compliant

ESG 3.5 RESOURCES

Standard:

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

2017 ENQA review recommendation: none

Evidence

Human resources

The SAR gives an extensive overview on AQAS staff in terms of number, organisation, and training. Additional information was requested by the panel on the job description of staff involved in national and international procedures and of the two managing directors. The agency provided the staff job descriptions, and the panel also learned about the two CEOs' tasks and activities during the interview.

In April 2021, there were 23 employees working for the Head Office of AQAS e.V. Notably, AQAS ARCH, the spin-off of the AQAS association, has no employees of its own. The same human resources are shared by the two structures; their work for AQAS ARCH is formally regulated by a 'subscription agreement' between AQAS e.V. and AQAS ARCH, a document that the panel was able to read during the site visit. As the panel found out from the interviews with staff involved in review procedures, the activity conducted under AQAS ARCH is separately recorded in the administrative documents, while the staff seem to do their job up to the same standard, be it for AQAS e.V. or AQAS ARCH.

Under the coordination of the two managing directors, 13 consultants work in the agency (within which there are three 'senior consultants') in direct relation with the assessment procedures, supported by three assistants (two project assistants and one organisational assistant). Three employees and two student assistants cover the administrative activity.

The Head Office is organised in three divisions covering the main business areas: programme accreditation, system accreditation, and international, each coordinated by a senior consultant. The SAR stated and the interviews with the management and staff confirmed that the workload on procedures is balanced among the consultants, and workload may be distributed between them in a flexible manner throughout the year. The two CEOs are also involved in assessment procedures for 50% of their working time.

The agency has in place well-defined procedures for initial preparation of new staff (Annex II.2.5 of the SAR) and offers opportunity for staff development and training annually (Annex II.2.4 of the SAR). Communication among staff is facilitated by periodic meetings where issues related to assessment procedures are discussed and opportunities for professional exchange is offered (e.g., 'Jour fixe,' 'Annual in-house retreat').

Since 2012, staff members have benefited from the 'reconciliation of work and family life,' which is a flexible work model for employees with children or for those on maternity/paternity leave (Annex II.2.2 of the SAR).

For carrying out the assessment procedures, the agency uses independent experts from its own database. The panel understood, by discussing with several groups (CEOs, staff involved in procedures, HEIs representatives, experts), that the expert pool consists of highly experienced persons. They are given a briefing before each assessment begins, a short training focused on the specific assignment.

Financial resources

As mentioned in the introductory chapter of this report, AQAS is a non-profit organization acting as a business under private law. In addition to what has been already presented in the Introduction about AQAS funding, the panel noted that the budget has been fairly steady during the last five years but diminishing from 2020. The panel was able to clearly see this in the overview table on income and expenditure for the last five years provided by AQAS as additional information. Apart from the membership fees, which are negligible for the overall income (approx. 0.3%), the main source of AQAS's funding are the fees for the assessment procedures commissioned by HEIs (99,7%). The expenses (mostly personnel costs and costs of the procedures) are covered, but it is hard for AQAS to build reserves since they are not allowed to make a profit, which makes the panel concerned about the agency's future sustainability. There are fears of the expansion of system accreditation at the detriment of programme accreditation, and the panel encourages the agency to gather evidence on this and plan their actions accordingly.

The panel also learned from the SAR that the budget plan for AQAS e.V. is annually adopted by the General Assembly based on the Management Board proposal developed in cooperation with the managing directors and the tax advisor. In addition, management submits monthly reports on financial matters to the Management Board, which are very much appreciated by the Board members, as evidenced from the interviews.

The agency is audited by the Tax Office every three years and subjected to other types of audits (e.g., for wage tax, social security contributions for employees). According to the SAR, all these activities were concluded without giving rise to any concerns.

The panel learned that, at its founding, the agency had some operational subsidies from two Länder ; however, this was discontinued after the initial period. By comparison, some other agencies remain subsidised by regional governments. Given the competitive market in which it operates, AQAS is keen on keeping the fees for universities at a minimum acceptable level. In conjunction with this, the Management Board has adopted a policy on economic use of funds, including on travel provisions for staff and experts, which contains few exceptions.

Other resources

The panel was provided with a virtual tour of AQAS premises and noted they were appropriate for the agency's work. The office has suitable access to the internet and is endowed with sufficient equipment (SAR, page 33). The agency developed a virtual working environment (RDS – Remote Desktop Services) which enables the staff to also work outside the premises. This facility helped

AQAS quickly adapt to the working conditions imposed by the COVID-19 pandemic. The panel received a live demonstration about the RDS virtual working environment on the SharePoint system during the preliminary meeting of 31 August 2021 (Day 0). The demonstration on digital tools (RDS and MS Teams channel and the intranet, which is currently being developed and given new functions) confirmed that the agency indeed holds the efficient means for the IT-supported management of its EQA and other processes.

Analysis

Human resources

Based on the evidence presented above and its meetings with different stakeholders, the panel is convinced that the agency has adequate and appropriate human resources to carry out its work. The panel commends the management and the team for the work they have carried out over the past years.

The staff is motivated and well prepared for a complex job, as most of them are involved in at least two types of activities (programme/system/international assessments). Moreover, they are active in developing thematic analyses at a certain level, though struggling to find the time to do it. Nevertheless, dedicated staff time and resources will be necessary if the agency wants to fully exploit its potential and better unlock the results of the individual assessment procedures.

Internal communication seems to work well. The open-door policy adopted at the agency ensures employees have good access to CEOs and middle-level management in reasonable time. However, the panel believes more attention needs to be paid to staff training in terms of consistent and continuous development of management capacities and/or organisation of the joint training events for the agency's entire staff.

Financial resources

While AQAS's budget is closely monitored, the panel could not find evidence about the agency having a strategy to diversify its income, despite their slightly declining trend. While the membership of AQAS is quite stable, membership alone does not guarantee that the agency would be doing procedures for them, as HEIs are free to choose which agency they want to do accreditation procedures. From the discussions with the managing directors, the panel understood there were no initiatives to approach members with unsolicited proposals or surveying members to learn their preferences about programme or system accreditation. The panel understands that operating in a market driven environment makes planning much more difficult but, at the same time, it believes that at least medium-term strategies are necessary for the agency to ensure the sustainability and to develop.

Although the current financial situation enables the agency to run its activities, the panel heard of fears that new legislation is moving HEIs towards system accreditation, and this raises a tension regarding the future levels of income and activities. To further promote sustainability, the agency should have a proactive approach and develop a clear plan to ensure financial stability, considering the current trend in revenue, amid declining orders for assessment procedures combined with the impact of the COVID-19 pandemic. At the same time, it needs to consider alternative funding streams to secure its operations, e.g., from new services provided both domestically and internationally, competitive projects, bids for public tenders, etc.

Other resources

The current premises and infrastructure are adequate for the development of the agency's activities. The panel encourages the agency to continue being mindful of ensuring the adequate working

facilities and technical infrastructure for its external quality assurance activities, considering the challenges brought up by the COVID-19 pandemic.

Panel commendations

4. The panel commends the agency for the efficient and effective use of its human resources, referring here both to its own staff and to the experts involved in the assessment procedures.
5. The panel commends the agency for the resources it has mobilised to play an active role in the international quality assurance community.

6. Panel recommendations

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

Panel suggestions for further improvement

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

Panel conclusion: substantially compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

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

2017 ENQA review recommendation: “AQAS should expand the existing SharePoint server to the extent that the quality management processes display the requirements of the PDCA cycle.”

Evidence

AQAS’s understanding on quality is included in its mission statement (last amended on 18 March 2021 and available on the website, Annex I.1.5 of the SAR). The agency has developed an extensive document about AQAS’s concept of quality assurance (Annex I.3.1 of the SAR), which is based on ESG – Part III and has as its main objectives: i) the long-term positioning of AQAS e.V. as an agency for quality assurance in the education sector; ii) recognition of AQAS e.V. in the national and international context; and iii) safeguarding of the high quality of procedures conducted by AQAS e.V. The document was updated according to the recent changes in legislation regarding the German accreditation system, its last version being adopted by the Management Board on 6 May 2021 and published on the website.

As presented in the SAR, the Quality Assurance division is an independent area within the agency’s organisational structure and acts across all three other operational divisions (programme/system/international). The implementation of the quality assurance concept internally is supported by the SharePoint system – a web-based application where all the agency’s core processes are available with the respective responsibilities, corresponding information, and required submissions. The panel was given a demonstration on how the system worked and learned about some of the functions offered, which overall cover the entire PDCA cycle.

The responsibility to ensure assessment/accreditation procedures and their implementation remain fit for purpose is shared among CEOs, heads of divisions, and all staff members. Needed adjustments are made as and when required, using detailed staff deployment and financial information looking ahead at least six months, rather than after a specific review.

AQAS has created internal and external feedback mechanisms that lead to continuous improvement within the agency. Surveys applied to universities and experts are outsourced via ZEM of University of Bonn in order to gather objective information aimed at enhancing the agency's activities. The agency applies procedures and tools guaranteeing the periodic revision and continuous enhancement of its activities (regular internal meetings and feedback sessions, Jour fixe, One-day retreat, etc.).

AQAS has a highly educated and experienced staff that performs their work in accordance with the roles assigned by the job description and procedural guidelines. The consultants follow the 'self-conception' approach (Annex II.2.6 of the SAR), wherein the principles of their involvement in the assessment/accreditation procedures are clearly stated. Concurrently, according to the document mentioned above, they keep themselves up to date on the German and international higher education sector, in particular on quality assurance issues. The panel learned during the interviews that AQAS creates opportunities for staff development (e.g., participation in internal working groups and attending further training and conferences).

Expert panel members are selected from a database based on their expertise and trained in direct connection to their assignment. To guarantee that everyone involved in the agency's activities acts ethically, everyone is required to sign a declaration of impartiality and confidentiality and to confirm their independence with respect to the process. The SAR states that all panel members – academics, representatives of professional practice and students – are treated equally while implementing procedure, the same rights and obligations being ensured. This was also confirmed to the panel during the interviews with different groups. Discussions with students, though, highlighted unhelpful differences regarding the travel arrangements between academic and student panel members (especially when traveling by train).

AQAS invests in appropriate communication channels and close cooperation with the relevant authorities, especially with GAC and the other quality agencies authorised to operate in Germany.

AQAS informs the national public authorities of the countries in which it operates and promotes a policy of transparency and mutual trust. Therefore, communication with other country authorities is good and even evolving into cooperation projects, as the panel learned during the visit.

At the same time, the agency takes ethical issues seriously. Before accepting a review abroad, internal discussions take place, and the institution is checked in terms of recognition in the ANABIN database of KMK. ANABIN is one of the three central official information sources in Germany on the status of foreign HEIs. For external quality assurance activities that fall under ESG, AQAS does not collaborate with subcontractors.

Analysis

Although the AQAS quality assurance concept is intended to embed internal quality assurance policies and is publicly available on the agency's website, in the panel's view it is more a self-evaluation of AQAS against ESG part 2 and 3 rather than an everyday reference or working document. AQAS as a QA agency certainly has to comply with the ESG, yet it also has to respond to other internal and external stakeholder expectations, just as any organisation would. While the agency defines its assessment processes and has policies in place for assuring and enhancing the quality and integrity of its assessment/accreditation work, clear definition of quality aims/benchmarks of other activities, such as strategic planning and implementation, human resources, public relations, finances, etc., could not be identified. The panel believes that a quality policy containing quality goals

with measurable indicators to be monitored, and responsible persons assigned for this monitoring, would be beneficial for the internal quality assurance of the agency. There needs to be more systematic gathering of management information, in addition to swift monitoring of financial data and data on assessment/accreditation procedures, which currently seem to be the agency's focus.

The panel recognises the efforts by the agency to implement processes for internal quality assurance considering the European Standards and Guidelines. The agency highlighted the recommendation of the previous ENQA review and indicated how it has been implemented. The live demonstration provided to the panel confirmed that AQAS expanded the SharePoint system; at the same time, the panel understood that AQAS wished to implement further changes to it. According to IT, the system is expected to be fully operational next year. Still, as important as the SharePoint system is, the agency needs to remain reminded that this is a tool only and cannot substitute for human work in the implementation of quality management, which has to encompass all aspects of the organisation, have clear management goals/targets for each category (including strategic management; core processes being evaluation/accreditation; supporting processes being HR, PR, financial management, communications; and improvement processes being feedback gathering and acting upon it) and be appropriately monitored and improved as needed.

Based on the evidence presented above, the review panel acknowledges that the agency is very committed to promoting communication and cooperation with stakeholders and is successful in gathering feedback and inputs, especially from experts and HEIs. Nevertheless, requiring responses to too many surveys could lead to a kind of fatigue to those to whom they apply, so the agency might think of carefully balancing its approaches and complementing surveys they already do with other means of gathering feedback (e.g., focus group discussions).

AQAS organises various meetings and workshops at which it presents analyses of findings and its own experiences in implementing different procedures, gives training, and facilitates open discussions and experience exchanges on topics of interest of its stakeholders. It also takes active part in international projects, mainly through its experienced consultants able to offer high-quality training services.

The agency has an open, albeit informal, communication with the GAC and with the other quality assurance agencies operating in Germany. However, agencies have no direct input when the new accreditation system is designed. They only provide feedback to GAC, as decisions are made either by the Constitutional Court or by agreement among Ministries of the Lands and the HRK. Regarding the accreditation procedures conducted abroad, AQAS's policy emphasises building good and trustful relationships with the national authorities.

The panel carefully considered an issue of different logistical arrangements for AQAS expert group members. The agency's wish to control expenses associated with travel is understood, however, there are situations when more convenient travel arrangements might be justified considering the timing of travel and the need to work on the same day, or taking into account long distances, or respecting personal health situations. Thus, the agency is encouraged to better define and uniformly apply its standards to this effect.

Panel commendations

6. The panel commends the agency for its efforts and commitment to providing quality services in assessment/accreditation procedures, which was also confirmed by all interviewees.

Panel recommendations

8. The panel recommends the agency develop a more holistic approach to quality management and produce a Quality Manual which would extend beyond the goal of monitoring 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.

Panel suggestions for further improvement

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

Panel conclusion: substantially compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

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

2017 ENQA review recommendation: none

Evidence

Since its foundation, AQAS has regularly been subject to external review by the German Accreditation Council to retain accredited status. The first reaccreditation was granted in March 2007, the second in February 2012, and the third in March 2017.

In 2019, AQAS submitted to ENQA a follow-up report on recommendations in the panel report from 2017, which was approved by the ENQA Board (Annex I.4.a.2 of the SAR).

The panel learned from the SAR that the current German legislation requires that all agencies must be registered on EQAR to be able to carry out programme or system reviews in Germany.

Analysis

There is no doubt for the panel that AQAS undergoes the periodic external reviews as stipulated by the ESG 3.7. Moreover, the review panel notes that all recommendations from the previous review have been considered and progress has been made in their implementation.

The current German legislation requires the agencies conducting assessments in Germany to be registered on EQAR. AQAS undergoes a cyclical review at least every five years to renew its ENQA and EQAR membership by demonstrating compliance with the ESG and the steps taken to follow up on any recommendations provided.

Panel conclusion: fully compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

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

2017 ENQA review recommendation: none

Evidence

The different external quality assurance activities of AQAS have been described in the introductory part of this report.

The activities conducted in Germany are subject to national regulation; the agency has to strictly follow the *Specimen Decree of the Interstate Study Accreditation Treaty / MRVO* (from December 7, 2017), which states the criteria for study programme and system accreditation together with the methodology for conducting these two types of assessments in Germany. As far as international accreditation procedures are concerned (both for programmes and institutions), AQAS established its own criteria based on ESG (Annexes I.2.c.3, I.2.c.4 and I.2.d.2 of the SAR).

According to the agency, all the activities related to programme assessment (national and international), system assessment (in Germany), and institutional accreditation (abroad) address the 10 standards of ESG Part I.

The assessments under the European approach undoubtedly follow the ESG (Annex I.2.e.1 of the SAR).

Annex I of this Report presents an extract from AQAS's annexes of the SAR (Annex II.3.1 and II.3.6) indicating the alignment of the agency's assessment schemes with the ESG Part I.

From the documents provided by AQAS, the panel learned that all procedures use a self-evaluation report as the first stage of the review process. It also acknowledges the agency's support to HEIs in drafting the self-evaluation report in the form of a "work aid" (i.e., the document "creating a self-evaluation report in preparation for programme accreditation on the basis of the specimen decree (MRVO) of the standing conference of the ministers of education and cultural affairs (KMK)"). There is, though, limited evidence of AQAS supporting institutions directly to develop high quality approaches to self-evaluation, e.g., through AQAS ARCH. According to the agency's policy, this service is, however, offered to institutions that do not choose AQAS for conducting their external assessment.

All external review reports issued under national procedures have a clear structure set by the GAC. International reports are also clearly structured. Institutions noted that this structure, as well as its content, was extremely helpful to them in developing the quality culture based on the evidence-supported enhancement recommendations.

AQAS did not provide any evidence for how it meets the expectation of ESG I.4 to contribute to the cooperation within the triangle of HEIs, the German ENIC-NARIC (represented by KMK), and other organizations addressing fair recognition and admission. After talking to the CEOs, the panel understood the agency regarding a German situation (of having a market of agencies instead of a

single national QA agency) being an exceptional one, making the agency almost exempt from this requirement in the presence of a very active HRK and KMK focusing on recognition.

Analysis

In this section, the panel describes to what extent the external quality assurance procedures used by AQAS assess the effectiveness of HEIs' internal quality assurance processes in relation to ESG Part I. The analysis is based on a reassessment of the consistency of the following procedures conducted by AQAS with these standards: programme and system assessment in Germany under MRVO and international programme accreditation under AQAS criteria. Since the international institutional accreditations and the assessments under European Approach fully embed ESG Part I, they were not considered for reassessment. In addition, the agency demonstrates in the SAR (page 40) that institutional accreditation procedure mandates the assessment of at least one study programme ('programme sample') in order to assess the extent to which the university quality assurance system is effective at the study programme level.

The review panel believes that the references provided by the agency are largely supported by the evidence found in the specific guides, except for ESG I.4 and ESG I.7, as explained below.

1.1 Policy for quality assurance

In the national procedures, MRVO requires the HEI to have mechanisms for continuous monitoring of a study programme; these mechanisms involve internal and external stakeholders (students and graduates). The outcomes of this monitoring process should contribute to setting measures to ensure academic success, which are to be further used for programme development. The standard also states that all persons involved must be informed on the measures taken.

For international procedures, AQAS requires the HEI to have in place a quality assurance policy and procedures which are translated to the study programme level. A quality culture should be in place, which includes gathering regular feedback from internal and external stakeholders. The policies, strategies, and procedures should include the roles of students and other stakeholders. They must have a formal status and be available to all interested parties.

After considering stakeholder feedback, the panel believes that the procedures focus on the presence of processes for internal quality assurance. The strategic perspective on whether the activities form part of the institutions' strategic management is also present.

1.2 Design and approval of programmes

In Germany, study programmes usually require a review before they may be offered by HEIs and then periodic reviews for re-accreditation. This can be done either externally (by a quality assurance agency) or internally (by the HEI itself in the case it is authorized to do so after a successful system accreditation procedure). The MRVO standards cover the provisions of ESG I.2.

International accreditation requires procedures for programme design, approval, monitoring, and review. The AQAS criterion I, 'Quality of the curriculum,' includes requirements on learning outcomes and qualification resulting from the study programme.

1.3 Student-centred learning, teaching, and assessment

This standard focuses on how students are encouraged to take an active role in their learning process. The panel notes in the documents AQAS provided that the concept of student-centred learning, teaching, and assessment is integrated. The MRVO criteria require students to be actively involved "in organising teaching and learning processes" and that the programme "creates freedom for a self-organised study programme." Student assessment should "allow an informative validation

of the learning results that have been achieved. They are module-related and competence-oriented.” Furthermore, the standard demands gender equality and equal opportunities for students in special circumstances that are implemented on the level of the study programme.

Regarding the international procedures, AQAS requires that “the delivery of material encourages students to take an active role in the learning process. Students are assessed using accessible criteria, regulations, and procedures, which are made readily available to all participants, and which are applied consistently. Assessment procedures are designed to measure the achievement of the intended learning outcomes.”

1.4 Student admission, progression, recognition, and certification

This standard is reviewed as part of the assessment criteria for all types of study programmes when assessing the entrance profile required from applicants, the access procedures, and the academic regulations applicable to the programme (both in national and international procedures). However, while requirements on recognition and certification are clearly mentioned by AQAS in its criteria for international accreditation, approaches on recognition are not explicitly covered by the MRVO document. Contrary to the information provided in Annex I of this Report, article 5 of MRVO does not specifically mention the need to base admission of all applicants with foreign qualifications on the Lisbon Recognition Convention (LRC), not only to master’s study programmes but any level study programmes. Moreover, recognition of prior learning is mentioned in article 9 of MRVO, but the alignment table from Annex I does not bear any reference to this provision. It looks rather strange that LRC is explicitly mentioned in article 10 of MRVO, which covers special regulations for joint degree programmes. In the panel’s view, LRC should apply in all cases, not just for joint degrees. The panel understands this issue is, however, not up to AQAS solely to rectify, therefore does not hold it against the agency. As it concerns the agency, the panel is reassured that requirements of the LRC are checked by AQAS and this is reflected in the expert reports.

1.5 Teaching staff

In the context of evaluation of teaching staff, the national procedures ensure that the expert panel checks compliance with the associated MRVO requirements, which include stipulations on sufficient teaching staff with appropriate qualification (specialty and didactic), guarantee of the combination of teaching and research (depending on the type of the institution), and university capacity to select and qualify its staff. AQAS requirements used in international procedures ensure checking the institutional capacity to assure appropriate staff in number and qualification, as well as transparent procedures for its recruitment and development.

1.6 Learning resources and student support

The agency assesses learning resources and student support in all the analysed procedures, national and international. Criteria are the supporting staff and services and the learning resources available for students; they are explicitly mentioned and checked by the expert panel.

1.7 Information management

As provided in the alignment table in the national procedure, this standard is reviewed as part of the “Academic success” (§ 14). However, the panel found this article not directly relevant, as it does not address explicitly the need of the institution to have an effective system of collecting and analysing relevant information and outcomes. Instead, the panel found that MRVO § 18 has the following clause (3): “The data necessary for the implementation of the quality management system is collected regularly throughout the entire higher education institution.” Therefore, the panel concludes that, while expectations of ESG 1.7 are covered in the German legislation, the alignment table given by AQAS provided an incorrect reference to the MRVO.

In the AQAS international procedure, the standard is reviewed under Criterion 2 – “Procedures for quality assurance,” which includes several explicit requirements on data collection, analysis, and relevant use for the development of study programmes.

1.8 Public information

In the alignment table between ESG Part I and MRVO articles, this information was missing. Instead, it was cited that publication is mandatory by German legislation, though regrettably not specified by which. In the panel’s view, this is a legal provision according to MRVO § 17 clause (1)4, which demands publishing for internal stakeholders, and §18 clause (4)2, which refers to the obligation on the HEI to provide the GAC with the necessary information for publication.

Despite this misunderstanding, the panel saw that all assessment procedures conducted by AQAS ensure that institutions publish information on their programmes.

AQAS has this criterion explicitly mentioned for international assessments.

1.9 Ongoing monitoring and periodic review of programmes

The external quality assurance system in the German higher education system is largely oriented to the development of internal quality assurance procedures. The positive impact on the development of those procedures is largely acknowledged by all stakeholders. It has become even more relevant since the legislation changed and system accreditation of universities was possible, impacting the periodic review of their programmes.

In national procedures, the fulfilment of this standard is assessed under the MRVO criterion “Academic success” (§ 14), which provides requirements on continuous monitoring of programmes that involves students and graduates, measures derived from this monitoring to ensure academic success, and information of interested parties of the results and measures taken. In addition, the panel found that MRVO § 17 clause (2)3 demands the internal quality management system operate on the concept of closed loops, and clause (2)4 stipulates that “functionality and efficacy with respect to the quality of the study programme will be checked on a regular basis” and continuously developed.

In the AQAS international procedure, the standard is reviewed under Criterion 2 – “Procedures for quality assurance.” The panel believes there are sufficient explicit requirements under this criterion to ensure ESG 1.9 fulfilment.

1.10 Cyclical external quality assurance

According to German law and as stipulated in MRVO (§ 26), initial accreditation is valid for a period of eight years, and programmes must be regularly assessed for re-accreditation.

This standard is not mentioned in the international procedures, as it is highly dependent on the legal provisions of the country in which AQAS operates.

Summary

The panel is sure that the wide range of AQAS’s external quality assurance activities consider the effectiveness of the internal quality assurance processes in the HEIs under review as described in ESG Part I.

Unfortunately, the information provided by AQAS on alignment between the relevant parts of ESG Part I and the MRVO in a number of places is incomplete and somewhat misleading. From meetings with the agency staff, the panel understood AQAS relied to a great degree on the information supplied by the GAC without a critical re-evaluation of that information. It is vital to rectify this

misunderstanding for the public benefit. Luckily, the panel found no major issues with the alignment itself, except for the scope of the application of the Lisbon Recognition Convention as mentioned above.

While academic recognition is covered by stipulations of MRVO, and provisions of recognition are addressed in external QA procedures run by AQAS, there is more to be done by the agency. Specifically, guidelines under ESG 1.4 call for a multilateral collaboration between HEIs, QA agencies, the ENIC-NARIC centre, and other organisations. As to the latter, in the case of Germany, it is obvious that the HRK is very prominent in the system and is one of these other organisations. ESGs do not provide exceptions for federal systems or countries with more than just one national agency. Therefore, AQAS is not exempt from this expectation and should think creatively how to address it. Several international projects involving ENIC-NARIC centres could provide inspirational examples. As this expectation is included under the guidelines but not the standard itself, the panel has no reason to downgrade the overall AQAS standing in relation to this ESG but instead sees it as an area for improvement.

Based on its meetings with stakeholders, it is clear to the panel that the agency's work has contributed to the development of internal quality assurance in the universities from Germany and abroad, the procedures of which are in line with the ESG.

Panel suggestions for further improvement

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 HEIs, the German ENIC-NARIC, and other organizations addressing fair recognition and admission, as expected by the guidelines of ESG 1.4.

Panel conclusion: fully compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

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.

2017 ENQA review recommendation: none

Evidence

Since 2018, when German legislation transferred the responsibility for the external quality assurance in higher education to the GAC, the QA agencies operating in Germany, including AQAS, are no longer in the position of defining their own quality assurance framework and aims for procedures in the national context. They must follow the national regulations (Interstate Treaty and MRVO) and operate within the defined framework.

However, external assessment procedures as a means “to contribute to the quality assurance and quality development of study, teaching, and training” are explicitly defined in the AQAS mission

statement. In addition, the agency has conceived and published a document based on ESG Part III ('Quality concept') stating the goals regarding the external quality assurance processes it conducts.

The agency's role as provider of services for external quality assurance in higher education is explained in the 'Self-Conception' document: while HEIs are responsible for the quality of their study programmes and for developing the internal quality assurance system, AQAS assesses to which extent the QA system is coherent and the standards are met; in national procedures, the standards are set by GAC (Specimen Decree/MRVO), and in international procedures they are set by AQAS based on the ESG. In achieving its task, AQAS implements assessment procedures developed either by MRVO when reviewing programmes and systems in Germany or by the agency itself when reviewing programmes and institutions abroad.

All the procedures conducted by AQAS and the criteria associated with them are published on the website in the appropriate language: German for national procedures and English for international ones. The guidelines for experts for national assessment procedures are set at the national level and must be followed as such; the panel learned during the interviews that the agency is not allowed to produce its own guidelines, although it would see value in having them. However, AQAS supports experts for national procedures with additional material called 'handouts' (Annex I.2.a.a6), while, for international procedures, they have produced their own guidelines for experts. For national assessments, the guiding documents are complemented with a 'Work aid' for HEIs and experts to help them better understand the standards and produce adequate self-evaluation reports (the HEIs) or external assessment reports (the experts); these documents are not in the public domain but rather available upon request.

The agency's role in designing national procedures is very limited, as it is able only to give feedback to GAC during informal meetings; the panel understood there was no direct formal contact between the Accreditation Council and the QA agencies. On the other hand, the provision to suspend the assessment procedure and allow the institution to rectify the situation is, in the panel's views, very generous, as it could diminish the overall number of negative decisions.

AQAS ensures stakeholders' participation by involving them in the Standing Commission, Complaints Commission, and all the expert panels (SAR, page 41-42). According to the Articles of Association, "the Standing Commission is responsible for all decisions required in connection with the implementation of assessment and accreditation procedures at the national and international level." Besides appointing experts in compliance with the German regulations (issued by HRK), the Standing Commission also approves all the expert panel reports, either for programme or system procedures.

With regard to international procedures, the Standing Commission is responsible for the entire process, from designing the procedures to making the final decision on the accreditation. The 'Self-Conception' document describes the aim of the assessment procedures abroad as "to ensure the quality of study programmes in accordance with the ESG, while preserving the diversity of study programmes," thus ensuring "the comparability of study programmes." The procedures are designed in full compliance with ESG, while the national approach is kept in terms of structure. Stakeholders are involved in designing and improving the international procedure, both by being part of the Standing Commission and through feedback requested by the agency in a systematic way (through ZEM). The representatives of the international HEIs to whom the panel spoke agreed that context is taken into consideration without undermining the standards, which were found to be challenging for institutions.

The HEI's feedback, as an external stakeholder, is considered when setting up the composition of the expert panels (universities are able to object if there are good reasons) or establishing the site-visit schedule.

The SAR states and the interviews with different stakeholders confirmed the efficient way in which AQAS conducts the assessment procedures and the good communication with universities and with the expert panels, which is facilitated by having a dedicated agency staff appointed to each assessment mission. Briefing documents are prepared for experts, and experts reported that, at the start of each procedure, they always discussed criteria and clarified expectations.

The panel learned during interviews that AQAS actively considered value for money, their costs being in line with the QA market in Germany.

Analysis

AQAS performs a wide range of quality assurance procedures at the national and international level. Part of them, i.e., national procedures, are implemented in a highly regulated context. Although their purpose and objectives are defined externally, AQAS has them embedded in its mission and 'Self-Conception' approach. As far as international procedures are concerned, they are designed based on ESG, and the stakeholders confirm their fitness for purpose (e.g., awareness of national context and culture).

AQAS carefully considers feedback and opinions of various stakeholders, as the panel learned during the site visit. The agency incorporates them in its processes but is unable to do so for the methodologies used at the national level. As previously mentioned, methodologies for assessment procedures in Germany are predefined and have to be applied without amendment. As for international procedures, while the panel notes the generally positive feedback from institutions, there were also opinions that the local context could be considered even more (despite the fact that these institutions themselves sought to be evaluated against the ESG).

The panel acknowledges the agency's commitment to involving stakeholders at all levels possible: for national procedures, this is mainly ensured for establishing the expert panel composition and approval of external assessment reports, while, for the international procedures, academics, students, and practitioners also take part in their design (through the Standing Commission). The Standing Commission plays an important role in the definition of quality assurance procedures for international accreditation. As this activity continues to grow, the panel believes that also including international stakeholders would be beneficial to the overall process.

Wherever relevant, the agency invests in providing adequate documentation to ensure the proper implementation of procedures (e.g., guidelines for experts and 'Work aid' for universities and experts). It was clear to the panel from the interviews it held with various stakeholders that, once the procedures are implemented, the agency continues to gather feedback in a systematic way for their further improvement. Although the agency has maintained an enduring cooperation with the German students' pool and involves students in all its key commissions, the panel believes that AQAS would also gain great benefit from involving students in the Management Board.

Panel conclusion: fully compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

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

- a report resulting from the external assessment
- a consistent follow-up

2017 ENQA review recommendation: none

Evidence

External quality assurance procedures conducted in Germany by AQAS follow the framework established in the Interstate Treaty and the MRVO, which is in line with the model established in ESG 2.3's standard. The SAR details the steps followed by each assessment procedure conducted by AQAS. The agency also produced guides and illustrations of the sequence of operations for its procedures to facilitate their understanding by client HEIs. The panel was provided with these documents and was able to see brief information about procedures on the website.

All procedures consist of a self-assessment stage (self-assessment documentation submitted by the institution); a review by an expert panel, which includes a site-visit during which stakeholders are interviewed; and a report with findings about the extent to which the accreditation criteria are met and guidance for the actions to be taken by the institution. In system accreditation procedures, there are two site-visits: one focusing on the quality assurance system and the other on assessment of programme samples. Before the site-visit, the experts are required to write a preliminary statement based on the initial analysis of the documents provided by the institution, which is shared among experts and with the university. AQAS staff drafts the formal part of the external reports, while writing the findings lies entirely with the expert panel members; the institutions are able to comment on the findings. All reports are published on the agency's website, except for the ones related to national assessment procedures conducted under the new system; in these cases, the final reports are included in GAS's database, and links to that database are provided on AQAS website. An AQAS consultant is assigned to each procedure to oversee the proper implementation of the assessment and accreditation procedures. Consultants' roles are clearly defined in AQAS self-conception document, which also states that the assessment of programmes or systems is the sole responsibility of the experts.

Since the COVID-19 pandemic started, assessment procedures have been conducted online. Yet the panel could not find corresponding guidance on remote visiting on the agency's website. Whether working face to face or online, experts can request additional evidence or speak to more/other people in interviews than originally planned. The Standing Committee checks and approves all the reports before they are forwarded to GAC (in national procedures) or to the HEI (in international procedures). GAC makes the final decision in the first case and the AQAS Standing Commission does so in the latter. In national procedures, AQAS limits their follow-up process to the "deficiency rectification loop," which is part of the assessment procedure (see ESG 2.5 for further explanation). In addition, the implementation of any recommendations from the previous review is followed up in the next assessment cycle. In international procedures, the following decisions are considered: a) accreditation without the imposition of conditions, b) accreditation with the imposition of conditions, c) suspension of the procedure, and d) denial of accreditation. HEIs can withdraw from the procedure to fix the issues that would lead to a negative outcome prior to the publication of any report.

From the documents provided by the agency and the interviews, the panel understood that AQAS conducts conditional follow-ups; no follow-up on recommendations occurs, as recommendations are checked in the next assessment cycle.

Analysis

The panel confirms that each assessment procedure performed by AQAS is conducted in a framework that is reliable, publicized, and pre-defined. The evidence collected from the SAR and gathered in the interviews with different stakeholders convinced the panel that these review processes are regarded as useful and implemented in a consistent and transparent way. The preliminary statements that experts have to write and that have to be shared among the expert panel and with the HEI comprise, in the panel's view, another argument for the useful addition to the process, as HEIs underlined.

As described above, the presence of a consultant in each review ensures the consistency in implementation of procedures. At the same time, the AQAS Standing Commission verifies the consistency of the reports produced by the expert panels for all types of procedures: national and international, programme and system/institutional, and assessments and accreditations. This approach is valued for its contribution to consistency in the results of quality assurance processes.

The panel confirms that all the assessment procedures include the first three steps required by the ESG: a self-assessment, a site-visit, and an external review report. Since 2018, when the Interstate Study Accreditation Treaty came into force and became the final decision on accreditation in national procedures has been taken over by GAC, AQAS has been able to carry on follow-up activities only to observe corrections of deficiencies identified during the reviews, which are considered part of the same review cycle. The panel acknowledges this being a limitation imposed by the German legislation. Yet, notwithstanding this fact, the agency is free to define its follow-up process for what is in its powers and is encouraged to do so.

On the other hand, in international procedures, the agency is in charge of the full assessment cycle at the programme and institutional level, which means it also makes the decisions. Those procedures include self-evaluation, external reviews by experts, site-visits, public reports, and follow-up, although the follow-up is focused on conditions rather than on recommendations. The panel believes that this practice alone cannot constitute a reasonable follow-up activity for the international programme and institutional accreditations and recommends AQAS reconsider it.

Panel recommendations

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.

Panel suggestions for further improvement

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

Panel conclusion: substantially compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

2017 ENQA review recommendation: none

Evidence

For national assessment procedures, the expert selection follows the principles defined by the Interstate Treaty and the MRVO, stipulating that representatives of academia are always the majority in the panel. Art. 25 of the Specimen Decree states that the expert panel consists of at least four members, of which at least two are subject-related professors, one is a subject-related representative of professional practice, and one is a subject-related student. In setting up the expert panels for the national procedures, additional requirements of HRK need to be considered. For international procedures, the general composition of the expert panel members is the same, as AQAS follows the ECA principles (of 2 June 2005) for their selection.

The process of nominating the experts is as follows: the Standing Commission decides on the qualification profile of the panel of experts. On this basis AQAS consultants pre-select the expert panel members, which are then checked and nominated by the Standing Commission. In doing this, the agency seeks to ensure adequate background of the persons involved with respect to the programmes to be reviewed, besides their expertise in quality assurance. For system/institutional accreditation procedures, expert experience in higher education management is also considered. All the panels include representatives of academia, professional practice, and students.

Specimen Decree Art. 25, point 6(1) outlines that the higher education institution is entitled to comment on the composition of the review panel within a period of two weeks. HRK guidelines on designation of university teachers for expert groups have flow-charts for both programme accreditation and system accreditation procedures, and they contain a provision that the university may suggest the profile of the expert group. Thus, when submitting the self-evaluation report, the HEI is also able to submit a profile of the expert panel without mentioning names. At the same time, it has the opportunity to object to the panel composition if there are good reasons for this, but the ultimate right and responsibility for selection of reviewers lies solely with the agency.

AQAS has its own pool of experts covering a wide range of subjects and areas of expertise (i.e., programme and system reviews conducted at both the national and international level). For recruiting students in the expert panel, it collaborates with the German 'Student Accreditation Pool.' New experts are gained by recommendation; simultaneously, AQAS uses the option to contact professional networks when specialist skills are needed. For evaluation of teacher training programmes, a staff member from the Ministry always joins a panel as a representative of the stakeholders.

While for international procedures the expert panels always include international members, even those from that region/country who have knowledge about the local higher education system, the international representatives in the expert panels are present in around 10% of the national procedures. These are persons with fluent German language skills who usually come from Austria, Switzerland, the Netherlands, and Spain.

During the interviews, the panel learned that balanced participation regarding genders is not always easy to achieve. On the other hand, the QA managers of HEIs with whom the panel spoke appreciated AQAS for ensuring the balance between experienced experts and newcomers. Representatives of foreign HEIs underscored that they appreciated international panels, but for them professionalism of the team members was most important.

All expert panel members are trained in direct connection to their assignment: besides the written information material received before each procedure, a half-day training focused on the procedure in question is held by the AQAS consultant responsible for the procedure. A briefing on the coming site-visit is also held. Experts mentioned during the interview with the panel that they can always

contact AQAS while conducting the assessment procedure if questions arise. The students receive separate training from the German 'Student Accreditation Pool'; AQAS financially supports this activity once per year. The panel understood that there are no other training sessions provided either to students or in general by AQAS itself.

AQAS has not developed its own documentation but rather follows the German Research Foundation (*Deutsche Forschungsgemeinschaft*, DFG) guidelines when selecting experts to ensure the integrity of expert panels. DFG guidelines seem to be widely accepted within the German higher education system and serve the purpose of ensuring uniform understanding of the concept of ethical behaviour. All experts are required to sign the declaration of willingness, which also includes criteria for impartiality, before their involvement with each procedure.

Analysis

All assessment procedures under ENQA review are carried out by groups of external experts which include academics, students, and employers. AQAS maintains good cooperation with the German 'Student Accreditation Pool' and supports them yearly in conducting their training sessions for students. However, the panel missed information on expert selection principles on the agency's website. While AQAS follows the ECA consortium principles (2005) for appointment of international expert groups, the panel encourages the agency to reconsider if they are still up-to-date and if the agency would not benefit from a more detailed document to that effect.

The students confirmed that they had an equal role in the panel compared to the other members. They usually lead the session with students within the site-visit but also contribute to the other activities during the assessment process.

The quality of the experts involved in AQAS procedures was confirmed by all the groups the panel spoke with. Currently, there are more than 30% female representatives in the expert groups, thus, the agency might consider pursuing additional efforts to ensure a better gender balance. At the same time, ensuring the presence of international experts in each panel for the German assessment procedure is, in the panel's view, extremely relevant both to bring in new ideas and to increase the level of openness in the external quality assurance system, especially with new developments such as the European Universities initiative in mind. The Management Board seems to be open to this possibility.

On the other hand, the panel believes that the agency's efforts to bring together, within the panel of experts, both experienced persons and some with less experience or who were recently recruited have a positive impact on the assessment process itself, as well as on the overall quality of the pool of experts. During the interviews, it became clear that many experts have experience working with several quality assurance agencies in Germany, but they hold AQAS in particular high regard.

The experts interviewed by the review panel were positive about the training and guidance they received from AQAS. The smooth communication with the agency all along the assessment process was highly appreciated.

All experts with whom the review panel spoke were aware of the declaration of impartiality they had to sign and of the need to ensure that there is no conflict of interest in the process.

Panel commendations

7. The panel commends the agency for its efforts to create a balance between experienced experts and newcomers, thus improving the assessment process and the overall quality of the experts' pool.

Panel suggestions for further improvement

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.
12. The panel suggests that principles and procedures on international expert appointments could be reconsidered.
13. The panel suggests the agency might communicate information on expert selection via its website.

Panel conclusion: fully compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

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.

2017 ENQA review recommendation: “The criteria for international institutional accreditation should be published.”

Evidence

Each assessment procedure conducted by AQAS is based on pre-defined, explicit criteria published on the agency’s website, making the recommendation of the 2017 review addressed.

For national procedures, either programme or system assessments, AQAS strictly applies the criteria set by MRVO, thus following the Interstate Treaty and supporting MRVO. Annexes I.2.a.2 and I.2.b.2 of the SAR present these criteria in full. The review panel saw their content and that they overall are aligned to ESG (cf. ESG 2.1). The outcomes of the external quality assurance processes at the national level are used by the HEIs to allow recognition by GAC.

For international procedures (bachelor’s/master’s programme, Ph.D. programme, and institutional accreditation), AQAS applies its own criteria, which are set in full compliance with ESG (Annexes I.2.c.3, I.2.c.4, I.2.d.2 of the SAR). For international joint programme accreditation, the agency follows the European Approach (I.2.e.1 of the SAR). The outcomes of these external quality assurance processes may be used for country or international recognition, depending on each country’s regulations.

To ensure that the aforementioned procedures are applied in a coherent way and the criteria are consistently interpreted and evidence based, the following mechanisms are used:

- Documents to support universities to prepare for procedures and handouts for the orientation and guidance of the experts in the performance of their functions. All these materials share the same structure with regard to criteria. Consequently, the university’s self-evaluation report, the baseline report by AQAS, the statements by the expert panels, and the experts’ report all address the same thematic areas, allowing easy orientation. The indicators provided by AQAS reflect the ESG guidelines and support expert panels in determining whether criteria have been met. The key questions contained in the expert report templates ensure that expert panels fully address the relevant criteria in their assessments.

- Clear procedure for the selection of experts, guaranteeing that the experts meet the required profiles.
- Training sessions for the experts prior to each assessment procedure. These sessions provide training on the procedure to be performed, the items to assess, and the criteria to apply.
- Judgments in expert panels are reached by consensus, but divergent opinions would be indicated in the reports.
- Analysis and review of experts' conclusions and decisions by the Standing Commission, which approves all the external review reports.
- Comparison of the assessment made by different experts to check that the assessment criteria are being applied consistently. In the case of divergence, the Standing Commission takes the necessary action to resolve the inconsistency.
- Assistance of the expert panel by agency staff during the whole process to guarantee that the assessment process fits the established criteria and procedure.

According to the SAR, since the new regulations took effect, the agency has conducted 140 assessment procedures for 354 study programmes, and, by April 2021, GAC had decided on 104 procedures (234 study programmes): for 185 programmes, the GAC's decision followed the experts' opinion and, for 49, GAC decided differently (e.g., by imposing conditions where the experts did not do so or vice-versa). Overall, the final decision was accreditation without conditions for 177 programmes and accreditation with conditions for 57 programmes.

There are four types of possible decisions the SC makes both on the institutional and programme level procedures conducted abroad (described in SAR annexes I.2. c.2 and I.2.d.1), namely: 1) Accreditation, 2) Conditional Accreditation, 3) Postponement of a decision (suspension of the procedure), and 4) Denial of Accreditation.

During the site-visit, AQAS provided, at the panel's request, the situation of procedures from the period under ENQA review and their outcome, which is reported in Table 2. As the agency explained, the table refers to the individual study programmes and not the procedures, since decisions for programmes within one cluster may differ (with and without conditions). This explains the discrepancy between the figures in the SAR in which the procedures were listed. At the national level, postponements were not recorded because only the final decision counts for statistics.

Table 2. Outcome of assessment procedures conducted by AQAS during 2016-2021

Type of procedure	Completed programme/institutional accreditation																							
	2016				2017				2018				2019				2020				2021 (as of August 21)			
	NC	C	D	P	NC	C	D	P	NC	C	D	P	NC	C	D	P	NC	C	D	P	NC	C	D	P
National procedures																								
Programme accreditation procedures																								
old regulatory framework	85	275	1		144	207	1		50	262			99	315			19	22			7	-		
new regulatory framework*	/	/	/	/	/	/	/	/	-	-	-	-	62	30	(70)	(22)	138	37	(181)	(22)	24	17	(179)	(8)
System accreditation procedures																								
old regulatory framework		3				1			2	2			1	1			1				1			
new regulatory framework	/	/	/	/	/	/	/	/	-	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-
International procedures																								
Programme accreditation		10			4	9			6	40		3**	1	13		2**	13	21			11	19		
Institutional accreditation		1			-	-	-	-	-	-	-	-		1			1	1			-	1	-	-
European Approach									3					2							2			

NC – no conditions
 C – with conditions
 D – Denial of accreditation
 P – Postponement of procedure

*The table shows the decisions of GAC in black. The AQAS's votes shall be coloured in orange. In 2020 and 2021, the figures processed by the agency are higher, as GAC has not decided on these cases yet.

** In the cases of five postponements in international procedure, the universities withdrew their application. 10 study programmes were revised following the postponement of the procedure and were then successfully accredited in 2020.

Analysis

During the site-visit, the review panel was able to confirm that the criteria for accreditation and procedures are public and easily accessible to all stakeholders. AQAS procedures and IQA processes ensure that there is sufficient evidence to support judgements. AQAS has rules of procedure for expert panels that assist in ensuring consistency of approach to judgements. The views expressed in the various meetings indicated a positive approach to the consistency and fairness of the different assessment processes, though the institutions expressed concerns regarding cases of discrepancy between the judgments of the panels and the GAC. Overall, AQAS is regarded as being very professional and rigorous in its judgments.

The agency's Standing Commission has an important role in guaranteeing the consistent application of assessment procedures. Based on its discussions with different stakeholders, the panel is convinced that this approach allows a high level of consistency. This is complemented by other measures previously taken, such as expert guidance or challenge within the expert panels, during the elaboration of external review reports.

For national procedures, although formal decisions are the responsibility of GAC, the external review reports contain clear recommendations and suggestions. The overall low number of negative outcomes is explained by the generous provision in the German QA framework to suspend the procedure (suspension up to three months, and then the procedure has to be resumed within 12 months) in order to rectify the situation and then reapply (the so-called "deficiency rectification loop") and by the provision of conditional accreditation. The issue of concern to institutions, however, is when the expert judgments and decisions of the GAC differ. The panel understands this kind of situation is not unique to AQAS procedures; therefore, a more general conversation between agencies in Germany and the GAC is needed.

AQAS offers free consultation concerning the accreditation procedure at the AQAS office in Cologne before starting a procedure, and this measure seems to work well for institutions. In general, all representatives of HEIs confirmed that they felt AQAS procedures were demanding and valuable. For international procedures, recommendations are routinely made and followed up on from one assessment cycle to another.

Panel commendations

8. The agency is commended for producing a variety of tools assisting both institutions and experts in their work.

Panel suggestions for further improvement

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 decisions.

Panel conclusion: fully compliant

ESG 2.6 REPORTING

Standard:

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.

2017 ENQA review recommendation: “AQAS should improve the search options on its website for review reports of international procedures”; “AQAS should look for solutions together with the Accreditation Council and the personnel responsible for the database in order to resolve the entry problems in the central database. The disputed function restrictions and data losses should be documented.”

Evidence

The external review reports are prepared by the expert panels, who are assisted in this process by the AQAS consultants assigned for each assessment procedure. During the interviews with AQAS staff and then with the experts, the panel learned that the consultants fill in the formal part of the reports, while the experts have full authority on the findings and on the overall content of the reports. This is in agreement with the AQAS ‘Self-conception’ document, which states that the “assessment of the quality of study programmes or quality assurance systems (in the sense of the technical and content-related criteria) is the sole responsibility of the experts. The consultants should therefore refrain from making statements on quality assessment.” All reports are checked and approved by the Standing Commission.

The structure of the reports follows the guides, templates, procedures, and criteria established in advance. The MRVO stipulates that the expert report should not exceed 20 pages for programme accreditation or 100 pages for the system and cluster accreditation. For national procedures, AQAS must use the template (raster) provided by GAC. For international procedures, AQAS uses its own template, which has a clear structure; it includes a summary at the beginning of the report stating the decision of the Standing Commission on conditions and suggestions. The expert reports are always issued as common documents (based on a consensus between all members of the competent Standing Commission) and must provide clear justifications for their conclusions. HEIs can fact check the reports and submit their comments before the reports are finalized.

The agency ensures all review reports are accessible to the academic community, external collaborators, and other stakeholders. All review reports regarding implemented study programmes and institutions are published online. For national procedures, AQAS either uploads the external review reports on its website (for those related to the old procedures) or provides the link to GAC’s database from where the accreditation reports can be retrieved (in the case of procedures conducted under the new regulations in place since 2018). A high number of reports, from both national and international procedures (including the ones using the European Approach), are uploaded to the EQAR database (DEQAR).

As already mentioned, the panel has heard that HEIs appreciate an internal summary on the "initial situation" outlining the key aspects of the accreditation application produced by AQAS. This seems to be a particular feature of AQAS procedures.

Analysis

Based on the presented evidence, the panel concludes that the ENQA recommendations to AQAS from the previous review in 2017 were considered and fully addressed. Presently, all reports are published regardless of the accreditation outcome and are easily accessible on the website.

Before the final report is issued, the HEI has a chance to point out factual errors. The Standing Commission is responsible for processing those comments and then issuing the final report. As indicated under ESG 2.7, appeals procedures are in place after the publication of the final report.

Following the discussions with different interviewees, the panel is convinced that the content of the reports is the result of the independent work of the expert panel members, further analysed and approved by the Standing Commission.

The panel analysed the reports of the different assessment procedures and concluded they were adequate in terms of clearness and conciseness and thus understandable to interested parties (prospective students and other stakeholders). While AQAS must use the GAC templates for national procedures, the agency uses its own templates for international ones. In both cases, the focus lies on the extent to which the assessment criteria are met, and the features of good practice demonstrated by the assessed institution are less considered. The panel understands AQAS has to follow the GAC template; this does not, however, prevent it from adding additional information in reports, e.g., a specific section that would feature examples of excellent practices in one place rather than them being occasionally mentioned throughout the report. This development would be conducive to the agency gathering information for thematic analysis on trends and developments within HEIs, in the end allowing them to learn effective practices from each other.

Panel commendations

9. The agency is commended for uploading its external quality assurance reports (both historic and present) on the DEQAR, which is the designated pan-European transparency tool for external quality assurance in the EHEA.

Panel suggestions for further improvement

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

Panel conclusion: fully compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

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

2017 ENQA review recommendation: “The terms in the appeals and complaints procedure should be clarified in relation to the ESG on occasion.”

Evidence

AQAS has had in place a Complaints Commission since 2013; it is mentioned in the Articles of Association as one of the organization’s governance bodies. The same document clearly defines the

Complaints Commission's tasks and composition. The commission consists of four representatives of academia, one external representative from another quality assurance agency, one representative of professional practice, one student, and one representative of the Standing Commission – the latter without voting rights. Its members are appointed by the Management Board for a period of three years with the possibility of multiple extensions. They are all from outside the agency.

The Rules of procedures of the Complaints Commission were issued at its creation in May 2013 and revised in 2021 (Annex II.1.7 of the SAR). The scope of the appeals and complaints procedure is not only complaints but includes evaluation decisions made by the Standing Commission in national and international procedures, as the SAR explains. During the interviews, the panel understood the apparent lack of distinction between the terms 'complaints' and 'appeals' in the German language, as both these terms are translated to the German word 'Beschwerde.'

The possibility for an HEI to complain about the implementation of a procedure or regarding the experts of the review panel is part of the assessment procedure and made public on the website, both for assessments in the German system and for international accreditations. The SAR mentions that the university forwards the complaint to AQAS management. In a first instance, an informal solution to the raised problem is sought through direct discussions with the university representatives. If this attempt is unsuccessful, the matter is referred to the Management Board. If the resolution of the Board is not accepted by the university, the Complaints Commission is asked to deal with the complaint (SAR, page 74). From interviews, the panel learned that most of the problems raised by institutions are solved in informal ways, by discussions either with the university or within the Standing Commission. Therefore, the number of complaints the Commission had to deal with over the years is very low.

Appeals against decisions of the Standing Committee concerning the formal report, the appointment of experts, and the composition of the expert panel must be submitted in writing within two weeks of receipt of notification (unless otherwise stated). Appeals against decisions for accreditation/conditions must be submitted in writing within four weeks of receipt of notification (unless otherwise stated). The university submits the appeal to the AQAS Head Office, which forwards it to the Standing Commission. The Standing Commission analyses the appeal and makes a decision. If the university is unhappy with this decision, the Complaints Commission deals with the appeal and makes the final decision. The whole process is also described in the SAR (page 74) and in Annex II.3.2.

Analysis

In the view of ESG, complaints are about the conduct of the external quality assurance process or those carrying it out, while appeals occur when the institution questions the formal outcomes of the external review process.

In 2017, the external review against the ESG recommended AQAS to clarify the terms in its complaints and appeals procedure in relation to the ESG. The panel confirms this recommendation has been fully addressed, and the lack of distinction between the terms 'complaints' and 'appeals' in the German language is no longer an issue. The agency has developed clear complaints and appeals processes. In all procedures conducted by AQAS, the appeals procedure is mentioned. The interviews with representatives of HEIs, from Germany and abroad, confirmed that they know about the possibility of submitting complaints and appeals to AQAS. The universities which had appeals in the past asserted to the panel that the procedure was clear and the timeline adequate.

Overall, stakeholders indicate they appreciate the way the agency considers their feedback. Due to the good communication between AQAS and its clients, this feedback is easily gathered, both in formal fora and through informal contacts. The positive interaction seems to some extent to

prevent institutions from submitting formal complaints. Most issues are dealt with much earlier in the process through clear engagement between AQAS and institutions.

The panel thinks that defining the maximum number of terms that the Complaints Commission members could serve and their rotation would be healthy, both for the agency and the members themselves.

By its appointment and composition, the Complaints Commission is independent in decisions; the discussions with its members made the panel sure about this conclusion. They spoke highly about AQAS's professionalism in conducting assessment procedures, which is also reflected in the low number of cases the Commission has had to deal with since 2013 (only seven, and only one has ever gone to court). The panel met with the representatives of two such institutions, and, although the complaints were too long ago to be considered directly as part of the review, it was interesting to learn that both institutions still maintained a good relationship with AQAS and continued to choose the agency for future assessments.

While the Rules of Procedure of the Complaints Commission defines the way business in general is conducted and clear criteria when the case is admissible, when the objection is fully or partially justified seems to be lacking from the document. Despite this fact, there seem to be no major issues of concern, but the panel still encourages AQAS to develop more specific guidelines regarding these aspects.

Panel suggestions for further improvement

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.

Panel conclusion: fully compliant

ADDITIONAL OBSERVATIONS (optional section)

STAKEHOLDER INVOLVEMENT

In the panel's view, the fact that the quality assurance agencies were not directly consulted when the current German framework was established represents a gap which might be considered when the entire German framework will be reviewed in 2022–2023 or otherwise. The panel understands that, in the post-Constitutional Court arrangements, QA agencies are no longer trusted with final accreditation decisions, as this power was transferred to the GAC following its changed mandate. Nevertheless, agencies operating in a market situation gain substantive knowledge of how the accreditation system works and on the quality of education provision itself, thus likely being able to valuably contribute to the discussion on the overall legal arrangements and whether they are fit-for-purpose.

IMPLEMENTATION OF ESG I.4

When the opportunity comes to review the effectiveness of the current external quality assurance framework, it would be very useful to also review the MRVO to make sure that the Lisbon Recognition Convention is applied not only in the case of joint degree programmes but in relation to admission to all levels of study programmes if qualifying applicants present foreign-origin qualifications and in relation to all credit mobility, not just under joint programmes. Having acquainted itself with information on Germany's accession to the LRC at the Council of Europe Office of Treaties designated website, the panel has no reason to believe LRC's application is limited to joint programmes only. Therefore, the wording of the MRVO shall benefit from clarification in this respect.

In addition, QA agencies, HEIs, the German ENIC-NARIC centre, and other stakeholder organisations could have a joint discussion on how to commonly address expectations under ESG I.4 to enhance inter-institutional collaboration for the cause of fair recognition and promotion of best practices. While other organisations may be active and realising their potential, the QA agencies seem to be less involved, and some opportunities for improvement are currently missed.

REPORTS

The GAC template for expert reports – used by all agencies operating in Germany – could be amended so that examples of excellence and effectiveness found in institutions could be presented more prominently alongside recommendations for improvement. This would then be helpful for the agencies to conduct thematic analysis not only on areas of persistent difficulty by more readily supplying information on the ways for enhancement and providing public recognition of excellence.

CONCLUSION

SUMMARY OF COMMENDATIONS

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE	<ol style="list-style-type: none">1. The agency seems to benefit from dedicated and high calibre membership of the Management Board, the Standing Commission, and the Complaints Commission.2. The panel commends the awareness and appreciation shown by the representatives of HEIs and other stakeholders on the quality and value of the agency's activities.
ESG 3.4 THEMATIC ANALYSIS	<ol style="list-style-type: none">3. The panel commends the agency for immediately attending to the 2017 recommendation and engaging in thematic analysis and its several research publications produced to date.
ESG 3.5 RESOURCES	<ol style="list-style-type: none">4. The panel commends the agency for the efficient and effective use of its human resources, referring here both to its own staff and to the experts involved in the assessment procedures.5. The panel commends the agency for the resources it has mobilized to play an active role in the international quality assurance community.
ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT	<ol style="list-style-type: none">6. The panel commends the agency for its efforts and commitment to providing quality services in assessment/accreditation procedures, which was also confirmed by all interviewees.
ESG 2.4 PEER-REVIEW EXPERTS	<ol style="list-style-type: none">7. The panel commends the agency for its efforts to create a balance between experienced experts and newcomers, thus improving the assessment process and the overall quality of the experts' pool.
ESG 2.5 CRITERIA FOR OUTCOMES	<ol style="list-style-type: none">8. The agency is commended for producing a variety of tools assisting both institutions and experts in their work.
ESG 2.6 REPORTING	<ol style="list-style-type: none">9. The agency is commended for uploading its external quality assurance reports (both historic and present) on the DEQAR, which is the designated pan-European transparency tool for external quality assurance in the EHEA.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE	<ol style="list-style-type: none">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
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	<p>agency is clear about what services they will develop or enhance in order to better fulfil its mission and secure their sustainability.</p> <p>2. The panel recommends the agency identify ways to involve students and representatives of the business sector in the agency's governance.</p> <p>3. Separation of activities between AQAS e.V. and AQAS ARCH GmbH should be clearly communicated through their respective websites.</p>
ESG 3.4 THEMATIC ANALYSIS	<p>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.</p> <p>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.</p> <p>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.</p>
ESG 3.5 RESOURCES	<p>7. The panel recommends the agency develop a clear plan to ensure financial stability with diversified sources of income.</p>
ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT	<p>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.</p>
ESG 2.3 IMPLEMENTING PROCESSES	<p>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.</p>

In light of the documentary and oral evidence considered, the review panel is satisfied that, in the performance of its functions, AQAS is in compliance with the ESG.

SUGGESTIONS FOR FURTHER DEVELOPMENT

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE	<ol style="list-style-type: none"> 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	<ol style="list-style-type: none"> 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	<ol style="list-style-type: none"> 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	<ol style="list-style-type: none"> 6. The panel suggests the agency clearly define and communicate logistical arrangements to experts.
ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE	<ol style="list-style-type: none"> 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	<ol style="list-style-type: none"> 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	<ol style="list-style-type: none"> 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.

	<p>12. The panel suggests that principles and procedure on international expert appointments could be reconsidered.</p> <p>13. The panel suggests the agency might communicate information on expert selection via its website.</p>
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.
ESG 2.6 REPORTING	15. The panel suggests the agency features good practice prominently in the external review reports.
ESG 2.7 COMPLAINTS AND APPEALS	<p>16. The agency is encouraged to revisit the (re)appointment of the Complaints Commission members and their rotation.</p> <p>17. The agency may take an opportunity to define the Rules of Procedure of the Complaints Commission in greater detail.</p>

ANNEXES

ANNEX I: COMPLIANCE OF MRVO AND AQAS CRITERIA FOR PROGRAMME ASSESSMENT WITH ESG PART I

ESG Standard	Specimen decree (MRVO) (national procedure)	AQAS Standard (international procedure)
I.1 Policy for Quality Assurance	§ 14 Academic success	2 Procedures for quality assurance
I.2 Design and approval of programmes	§ 11 Qualification goals and qualification level	1 Quality of the curriculum
	§ 12 Coherent study programme concept and adequate implementation (Section 1, Sentences 1 to 3; Section 5 Academic feasibility)	
	§ 13 Subject-content organisation of the study programme	
I.3 Student-centred learning, teaching and assessment	§ 12 Coherent study programme concept and adequate implementation (Section 1; Paragraph 4)	3 Learning, teaching and assessment of students
	§ 15 Gender Equality and compensation of disadvantages	
I.4 Student admission, progression, recognition, and certification	§ 5 Admission requirements and transition between different courses	4 Student admission, progression, recognition, and certification
	§ 6 Qualifications and qualification designations	
	§ 12 Coherent study programme concept and adequate implementation (Section 1, Sentence 4)	
	§ 14 Academic success	
I.5 Teaching Staff	§ 12 Coherent study programme concept and adequate implementation (Section 2)	5 Teaching Staff
I.6 Learning resources and student support	§ 12 Coherent study programme concept and adequate implementation (Section 3)	6 Learning resources and student support
I.7 Information management	§ 14 Academic Success	2 Procedures for quality assurance
I.8 Public Information	<i>Publication of examination regulations which contain information on study programmes is mandatory by German legislation</i>	7 Public Information
I.9 On-going monitoring and periodic review of programmes	§ 14 Academic Success	2 Procedures for quality assurance
I.10 Cyclical external quality assurance	§ 26 Period of validity for the accreditation; extension	N/A

ANNEX 2: PROGRAMME OF THE SITE VISIT FOR AQAS REVIEW

MONDAY, AUGUST 23RD, 2021

<https://us02web.zoom.us/j/88456180061>

SESSION NO.	TIMING (CET)	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED	LEAD PANEL MEMBER
	15 min	<i>Checking the stability of internet connection (review coordinator and the agency's contact person)</i>	Goran Dakovic and AQAS designated person		
1	12.00 – 13.30 (90 min)	Review panel's kick-off meeting and preparations for day I	Review Panel: <ul style="list-style-type: none"> Ms. Aurelija Valeikienė, Deputy Director, Centre for Quality Assessment in Higher Education, Lithuania (Chair, QA professional, ENQA nominee) Dr. Simona Lache, Professor and Vice-rector for Internationalization and Quality Evaluation, Transilvania University of Brasov, Romania (Secretary, QA professional and academic, EUA nominee) Mr. Alastair Delaney, Director for Scotland, Wales and Northern Ireland. Lead for QAA on European policy and engagement, QAA, UK (Panel Member, QA professional, ENQA nominee) Mr. Joshua Weygant, M.Sc. student in Microsystems Engineering, University Freiburg, Germany (Panel Member, ESU nominee, member of the European Students' Union Quality Assurance Student Experts' Pool) 	Reflection on SAR of AQAS and any other additional documentation, preparations for upcoming meetings in terms of issues to be explored, division of responsibilities over leading the sessions.	Aurelija Valeikienė
	13.30-13.45 (15 min)	<i>Break + Connection set-up</i>			
2	13.45 – 15.00 (75 min)	A pre-visit meeting with the agency's resource person to clarify any remaining questions	Ms. Doris Herrmann, Managing Director	Learning about the agency's context, factual check exercise, updates from the submission of the SER. Learning of the AQAS infrastructure (in replacement of the physical visit re ESG 3.5)	Aurelija Valeikienė
	15.00-15.30 (30 min)	<i>Break</i>			
3	15.30 – 17.00 (90 min)	Review panel's kick-off meeting and preparations for day I (continued)	Review panel		Aurelija Valeikienė

TUESDAY, AUGUST 31ST, 2021

<https://us02web.zoom.us/j/83806689057>

SESSION No.	TIMING (CET)	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED	LEAD PANEL MEMBER
4	14:00 – 14:15 (15 min)	Internal panel meeting	Review panel	Preparation for the Day 1	Aurelija Valeikienė
5	14:15 – 14:45 (30 min)	Presentation of AQAS premises and IT infrastructure : RDS system and sharepoint functions	Mr. Simon Lau (IT infrastructure) Ms. Doris Herrmann, Managing Director		Aurelija Valeikienė
	14.45-15.00 (15 min)	<i>Break + Connection set-up</i>			
6	15.00 – 15.45 (45 min)	A pre-visit meeting with the GAC representative	Dr. Olaf Bartz, CEO German Accreditation Council	Mapping of the GAC criteria against ESG Part 1. ESG 3.3; ESG 3.7	Aurelija Valeikienė
7	15:45 – 16:30 (45 min)	Internal panel meeting	Review panel	Preparation for the Day 1	Aurelija Valeikienė

WEDNESDAY, SEPTEMBER 1ST, 2021

<https://us02web.zoom.us/j/83134399385?pwd=Z043SS80cFFQeWx1N1BIUDdPcW14UT09>

SESSION No.	TIMING (CET)	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED	LEAD PANEL MEMBER
	8.45 – 9.00 (15 min)	<i>Connection set-up</i>			
	9.00 – 9.15 (15 min)	Review panel's private meeting			Aurelija Valeikienė
	5 min	<i>Connection set-up</i>			
8	9.20 – 10.15 (55 min)	Meeting with the CEOs	Ms. Doris Herrmann, Managing Director Dr. Verena Kloeters, Managing Director	Context of AQAS operations; all aspects of compliance towards ESG Part 2 and Part 3	Aurelija Valeikienė
	10.15 – 10.45 (30 min)	Review panel's private discussion			Aurelija Valeikienė
	5 min	<i>Connection set-up</i>			

9	10.50 – 11.35 (45 min)	Meeting with the team responsible for preparation of the self-assessment report	Ms. Doris Herrmann, Managing Director Dr. Verena Kloeters, Managing Director Mr. Patrick Heinzer, Consultant Ms. Annette Büning, Project Assistant International	ESG Part 2 and Part 3, ESG 3.4; ESG 3.6	Joshua Weygant
	11.35 – 12.05 (30 min)	Review panel's private discussion			Aurelija Valeikienė
	5 min	Connection set-up			
10	12.10 – 13.00 (50 min)	Meeting with the Management Board	Mr. Professor Dr. Eberhard Menzel, Ruhr-West University of Applied Sciences, President of the Board Mr. Professor Dr. Jens Hermsdorf, Hochschule Worms, Deputy Chair Mr. Professor Dr. Adriaan Dorr esteijn, Justus Liebig University Giessen, Board Member Mr. Professor Dr. Stefan Herzig, Technische Hochschule Köln – University of Applied Sciences, Board Member Ms. Professor Dr. Kornelia Freitag, Ruhr-Universität Bochum, Board Member	To discuss the legal, institutional, academic and other contexts pertaining to operations of AQAS; compliance to ESG 3.1, ESG 3.2, ESG 3.3, ESG 3.5, ESG 3.6, ESG 3.7, ESG 2.2	Aurelija Valeikienė
	13.00 – 13.50 (50 min)	Lunch break Connection set-up			
	13.50 – 14.20 (30 min)	Review panel's private discussion			Aurelija Valeikienė
	5 min	Connection set-up			
11	14.25 – 15.15 (50 min)	Meeting with key staff of the agency/staff in charge of external QA activities at national level	Ms. Dr. Simone Kroschel (Senior Consultant) Ms. Ninja Fischer (Senior Consultant) Ms. Mechthild Behrenbeck (Consultant & Lawyer) Mr. Tim Christossek Mr. Simon Lau (Consultant & ICT) Ms. Andrea Pagel Ms. Frederike Wilhelm	ESG Part 2, ESG 3.1, ESG 3.4, ESG 3.5, ESG 3.6	Alastair Delaney
	5 min	Connection set-up			

12	15.20 – 16.10 (50 min)	Meeting with key staff of the agency/staff in charge of external QA activities at international level	Mr. Ronny Heintze (Senior Consultant) Ms. Dr. Melanie Brück (new) Ms. Dr. Dorothee Groeger (National & International Procedures) Mr. Patrick Heinzer Ms. Corinna Herrmann (new) (National & International Procedures) Mr. Alexandre Wipf (National & International Procedures)	ESG Part 2, ESG 3.1, ESG 3.4, ESG 3.5, ESG 3.6	Alastair Delaney
	16.10 – 16.30 (20 min)	Review panel's private discussion			Aurelija Valeikienė
	5 min	Connection set-up			
13	16.35 – 17.10 (35 min)	Meeting with administrative staff of the agency, Project Assistance, student assistants	<i>Administration:</i> Ms. Patricia Liesenfeld (Administration) Ms. Monika Meier (Administration) Ms. Julia Palnau (Administration) <i>Project Assistance:</i> Ms. Ayda Alizadeh (Project Assistant International) Ms. Annette Büning (Project Assistant International, part-time) Ms. Sara Schönfeldt (Project Assistant National) <i>Student Assistants:</i> Mr. Domenic Dahl (Student Assistant)	ESG 2.1, ESG 2.2, ESG 2.3, ESG 2.4, ESG 2.5, ESG 2.6, ESG 2.7 ESG 3.3, ESG 3.4, ESG 3.7	Joshua Weygant
	17.10 – 17.30 (20 min)	Break			
14	17.30 – 18.30 (60 min)	Wrap-up meeting among panel members and preparations for day II		Wrap-up meeting among panel members and preparations for Day 2	Aurelija Valeikienė
<p>THURSDAY, September 2nd, 2021</p> <p>https://us02web.zoom.us/j/83134399385?pwd=Z043SS80cFFQeWx1N1BlUDdPcW14UT09</p>					
SESSION No.	TIMING (CET)	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED	LEAD PANEL MEMBER
	8.45 – 9.00 (15 min)	Connection set-up			

15	9.00 – 9.15 (15 min)	Review panel private meeting			Aurelija Valeikienė
	5 min	Connection set-up			
16	9.20 – 10.10 (50 min)	Meeting with representatives of the Standing Commission	<p>Prof. Dr. Urban Titulaer, Universität Linz, Professor for Theoretical Physics (Chair)</p> <p>Prof. Marc Grief, Hochschule Mainz, Professor of Architecture (not present)</p> <p>Ms. Prof. Dr. Ilka Mindt, Universität Paderborn, Professor of English Language and Literature</p> <p>Ms. Jenny Rath, Rheinische Friedrich-Wilhelms-Universität Bonn, Representative of Student (not present)</p> <p>Mr. Dipl.-Kfm. Stefan Scheidgen, Deutsche Post AG Köln, Vice President</p> <p>Mr. Prof. Dr. Richard Sturn, Karl-Franzens-Universität Graz, Professor of Economics (not present)</p> <p>Mr. Prof. Dr. em. Reinhard Zintl, Otto-Friedrich-Universität Bamberg, Professor of Politics</p>	ESG 3.1, ESG 3.5, ESG	Aurelija Valeikienė
	10.10 – 10.30 (20 min)	Review panel private meeting			Aurelija Valeikienė
	5 min	Connection set-up			
17	10.30 – 11.20 (50 min)	Meeting with heads of some reviewed HEIs/HEI representatives	<p>Ms. Prof. Dr. Regina Jucks, WWU Münster, Vice Rector of Studies and Teaching</p> <p>Mr. Prof. Dr. rer. pol. Thomas Pawlik, Hochschule Bremen, VP Academic Affairs</p> <p><i>System accreditation:</i></p> <p>Mr. Prof. Dr. rer. nat. Wolfgang Bock, OTH Regensburg, former Vice President for Studies and Learning</p> <p>Mr. Prof. Dr.-Ing. Carsten Busch, HTW Berlin, President</p> <p>Ms. Prof. Dr. Sylvia Heuchemer, TH Köln, Vice President for Studies and Teaching</p> <p>Mr. Prof. Dr.-Ing. Josef Rosenkranz, FH Aachen, Vice President for Studies and Teaching (available from 11 a.m.)</p>	ESG 2.1, ESG 2.2, ESG 2.3, ESG 2.4, ESG 2.5, ESG 2.6, ESG 2.7 ESG 3.3	Alastair Delaney
	11.20 – 11.40 (20 min)	Review panel's private discussion			Aurelija Valeikienė
	5 min	Connection set-up			

18	11.45 – 12.35 (50 min)	Meeting with heads of some reviewed HEIs/HEI representatives from abroad	<p>Mr. Dr. Abdulrahman D. Abdullah, Al Ain University (UAE), Head of Programmes</p> <p>Mr. Prof. Abdullah Al-Kindi, Sultan Qaboos University (Oman), former Dean</p> <p>Mr. Prof. Dr. Eric Danquah, University of Ghana (Ghana), Director of West Africa Centre for Crop Improvement (ACE WACCI)</p> <p>Mr. Prof. Nail Öztas, Istanbul Gelisim University (Turkey), Vice Rector</p> <p>Mr. Dr. Hendi Pratama, Universitas Negeri Semarang (Indonesia), Vice Rector for Partnership Affairs</p> <p>Mr. Prof. Dr. H. Didi Sukyadi, Universitas Pendidikan Indonesia (Indonesia), Vice Rector for Education and Student Affairs (not present)</p>	ESG 2.1, ESG 2.2, ESG 2.3, ESG 2.4, ESG 2.5, ESG 2.6, ESG 2.7 ESG 3.3	Alastair Delaney
	12.35 – 12.55 (20 min)	Review panel's private discussion			Aurelija Valeikienė
	12.55 – 13.45 (50 min)	Lunch break Connection set-up			
19	13.45 – 14.35 (50 min)	Meeting with quality assurance officers of HEIs/ HEIs representatives involved in external QA activities	<p><i>National:</i></p> <p>Ms. Dr. Solvejg Schulz, Westfälische Wilhelms-Universität Münster, in Charge of QA of Teaching and Learning</p> <p>Ms. Dr. Gaby Krekeler, Universität Osnabrück, Consultant for Teaching and Learning</p> <p>Ms. Susanne Lippold, Ruhr-Universität Bochum, Consultant of Vice Rector and in Charge of QA</p> <p><i>System accreditation:</i></p> <p>Ms. Magdalena Lieb, Universität Erlangen-Nürnberg, in Charge of QA of Teaching and Learning</p> <p>Ms. Dr. Gabriele Witter, Hochschule Bremen, Head of QA Unit</p> <p><i>International:</i></p> <p>Ms. Dr. Francisca Gomez Gajardo, Universidad Autónoma De Chile, Director of QM, Vice Rector of QA</p> <p>Mr. Dr. Nandi, Universitas Pendidikan Indonesia, Coordinator of Accreditation in 2019/20</p>	ESG 2.1, ESG 2.2, ESG 2.3, ESG 2.4, ESG 2.5, ESG 2.6, ESG 2.7 ESG 3.3	Joshua Weygant
	14.35 – 14.55 (20 min)	Review panel's private discussion			Aurelija Valeikienė
	5 min	Connection set-up			

20	15.00 – 15.50 (50 min)	Meeting with representatives from the reviewers' pool	<p><i>National:</i></p> <p>Ms. Corinna Broeckmann, MISEREOR, Representative of Labour Market Ms. Prof. Dr. Ingrid Darmann-Finck, Universität Bremen, Pflegewissenschaft</p> <p><i>System accreditation:</i></p> <p>Mr. Prof. Dr. Matthias Kropp, Hochschule Pforzheim, Project Leader Experimentierklausel, Professor for Management Mr. Prof. Alexander Kumpf, Hochschule Landshut, Professor for Logistics, Reviewer in System Accreditation and International Programme Accreditation</p> <p><i>International:</i></p> <p>Mr. Prof. Robert Hänsch, Technische Universität Braunschweig, Dean for Teaching and Learning Ms. Prof. Ellen Roemer, Hochschule Ruhr-West, Professor of Market Research and International Marketing</p>		Alastair Delaney
	15.50 – 16.05 (15 min)	Review panel's private discussion			Aurelija Valeikienė
	5 min	Connection set-up			
21	16.10 – 16.45 (35 min)	Meeting with representatives of the Complaints Commission	<p>Mr. Prof. Dr. Dieter Kilsch, Technische Hochschule Bingen, Chair Mr. Georg Reschauer, CEO AHPGS (agency representative) Mr. Dr. Daniel Voll, Director Group Accounting at Deutsche Wohnen Gruppe Berlin, Representative of the Labour Market Mr. Prof. Dr. em. Falk Roscher, Hochschule Esslingen, Consulting Member</p>	ESG 2.7, ESG 2.3	Alastair Delaney
22	16.45 – 17.20 (35 min)	Meeting with representatives of the universities which had complaints/appeals cases with AQAS	<p>Mr. Markus Fessler, QA Unit, Hochschule Fulda Mr. Dr. Jens Taken, QA Unit, Universität Münster</p>	ESG 2.7, ESG 2.3	Alastair Delaney
	17.20 – 17.40 (20 min)	Break			
23	17.40 – 18.40 (60 min)	Wrap-up meeting among panel members: preparation for day III and provisional conclusions			Aurelija Valeikienė

FRIDAY, September 3rd, 2021

<https://us02web.zoom.us/j/83134399385?pwd=Z043SS80cFFQeWx1N1BlUDdPcW14UT09>

SESSION No.	TIMING (CET)	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED	LEAD PANEL MEMBER
	8.45 – 9.00 (15 min)	Connection set-up			
24	9.00 – 09.40 (40 min)	AQAS ARCH GmbH staff	Ms. Doris Herrmann Dr. Verena Kloeters Mr. Ronny Heintze Dr. Dorothee Groeger Mr. Patrick Heinzer	ESG 3.1, ESG 3.6	Aurelija Valeikienė
	09.40 – 09.55 (15 min)	Review panel's private discussion			Aurelija Valeikienė
	5 min	Connection set-up			
25	10.00 – 10.50 (50 min)	Meeting with students involved in external QA activities (reviewers and representatives of HEIs reviewed by AQAS)	Ms. Carla Harold, Universität Wien Mr. Dominik Kubon, Rheinisch-Westfälische Technische Hochschule Aachen (national + international) Mr. Damon Mohebbi, Universität Düsseldorf (national + international) Mr. Florian Puttkamer, Universität zu Köln Ms. Laura Ritter, Universität Osnabrück Ms. Judith Schreier, Universität Leipzig	ESG 2.1, ESG 2.2, ESG 2.3, ESG 2.4, ESG 2.5, ESG 2.6	Joshua Weygant
	10.50 – 11.05 (15 min)	Review panel's private discussion			Aurelija Valeikienė
	5 min	Connection set-up			
26	11.10 – 11.55 (45 min)	Meeting with stakeholders , such as other education sector organisations, employers, local community, etc.	Ms. Gudrun Chazotte, DAAD (German Exchange Service), Bonn Mr. Sebastian Gries, DAAD Jakarta, SHARE project Mr. RD Hoser, Ministry of Education/Schools in North-Rhine Westfalia (labour market representative for teachers) Mr. Dr. Ulrich Hoffmeister, IHK Lübeck (Chamber of Commerce)	ESG 3.1, ESG 3.3, ESG 3.5, ESG 3.6, ESG 2.1	Aurelija Valeikienė
	11.55 – 12.10 (15 min)	Break + Connection set-up			

27	12.10 – 13.10 (60 min)	Meeting among panel members		To agree on final issues to clarify with AQAS	Aurelija Valeikienė
	13.10 – 14.00 (50 min)	Lunch break Connection set-up			
28	14.00 – 15.00 (60 min)	Meeting with the CEOs	Ms. Doris Herrmann, Managing Director Dr. Verena Kloeters, Managing Director	To clarify any pending issues	Aurelija Valeikienė
29	15.00 – 16.00 (60 min)	Private meeting among panel members		To agree on the main findings per each ESG	
	16.00 – 16.15 (15 min)	Break + Connection set-up			
30	16.15 – 16.45 (30 min)	Final de-briefing meeting with AQAS staff and Management Board members of the agency		To inform about preliminary findings	Aurelija Valeikienė
	30 min	Panel members and ENQA review coordinator		Feedback and reflection on the visit, discussion on further work to be done	All Panel members & Goran Dakovic

ANNEX 3: TERMS OF REFERENCE OF THE REVIEW

External review of the Agency for Quality Assurance through Accreditation of Study Programmes (AQAS)

by the European Association for Quality Assurance in Higher Education (ENQA)

Annex I: TRIPARTITE TERMS OF REFERENCE BETWEEN AQAS, ENQA AND EQAR

February 2021

I. Background and context

AQAS e.V. – Agency for Quality Assurance through Accreditation of Study Programmes – is a non-profit organisation, founded in 2002 by Higher Education Institutions and has meanwhile more than 90 member institutions. The operational part of the accreditation procedures (coordination and organisation) takes place in the Head Office located in Cologne. At present, there are two managing directors, thirteen consultants, three project assistants and three administrative employees.

The core business of AQAS e.V.:

The Interstate Study Accreditation Treaty, which came into force in January 2018, defines standards for accreditation processes in Germany and ensure that accreditation occurs according to reliable, transparent, and internationally accepted criteria. Independent, non-governmental agencies are responsible for carrying out review procedures of study programmes or HEI quality assurance systems on the basis of the so called “Musterrechtsverordnung” (MRVO)/ “Specimen decree”, a resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany. Based on the report provided by the agency as a result of the review process, the German Accreditation Council (GAC) decides on the outcome of the accreditation procedure.

The activities of AQAS in accreditation are not restrained to specific academic disciplines or degrees. AQAS carries out review procedures for study programmes in all academic disciplines.

On an international level AQAS offers accreditation procedures for programmes of different disciplines and institutions based on the European Standards and Guidelines (ESG). AQAS works in several countries inside and outside Europe.

Other activities of AQAS:

- On the European level AQAS e.V. is quite involved in different activities which target to accredit joint programmes and to implement the European Approach (ESG-based).
- AQAS e.V. accredited two PhD-programmes in Germany (using criteria set in the MRVO).
- AQAS e.V. carries out a pilot project for one TVET programme at a VET school abroad. Another one at a Politechnic just started. The basis are specific criteria developed by AQAS. In case of success an AQAS-Certificate will be given (no accreditation).

AQAS has been a member of ENQA since 2008 and is applying for ENQA renewal of membership.

AQAS has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2010 and is applying for renewal of EQAR registration.

AQAS e.V. has a daughter organisation “AQAS ARCH GmbH” which offers trainings/workshops, e.g. for DAAD, EU, UNESCO. Two procedures took place to assess modules/short-term courses of

further education. The basis are specific criteria developed by AQAS. In case of success an AQAS-Certificate will be given (no accreditation). Accreditation is not part of the AQAS ARCH portfolio.

2. Purpose and scope of the evaluation

This review will evaluate the extent to which AQAS fulfils the requirements of Parts 2 and 3 of *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of AQAS should be reconfirmed and to EQAR to support AQAS application to the register.

2.1 Activities of AQAS within the scope of the ESG

In order for AQAS to apply for ENQA membership and for registration in EQAR, this review will analyse all activities of AQAS that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is independent of whether the activities are carried out within or outside the EHEA and whether they are obligatory or voluntary in nature.

The following activities of AQAS have to be addressed in the external review because they fall within the scope of the ESG:

- Programme Review (BA/MA) in Germany, including review of joint programmes involving German universities
- Review of Joint Programmes based on the European Approach
- PhD-accreditations in Germany (using criteria set in the MRVO)
- Institutional (System) Review in Germany
- Programme Accreditation (BA/MA/PhD) international²
- Institutional Accreditation international
- Alternative procedure³.

The review should address the way in which AQAS ensures a clear presentation and separation between quality assurance activities within the scope of the ESG and its other activities, considering Annex 2 of the Policy on the Use and Interpretation of the ESG.

Considering the renewal of AQAS' application to EQAR, the self-evaluation report and the external review report is expected to give specific attention to the issues where the Register Committee concluded in its last decision that the agency complied only partially with the ESG, namely ESG 3.1 and ESG 3.4.

Following EQAR's decision on AQAS's Substantial Change report in 2019, the review should also analyze whether the new arrangements and accreditation criteria, deriving from the Interstate treaty between German federal states, are consistently applied by the agency (i.e. ESG 2.3 and ESG 2.5).

3. The review process

The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with *the Guidelines for ENQA Agency Reviews* and the requirements of *the EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

² Including the evaluation pursuant to Section 27b of the Austrian Act on Quality Assurance in Higher education as an optional add on report.

³ Considering its ad-hoc character and that this activity has only took place once.

- Formulation and agreement on the Terms of Reference for the review between AQAS, ENQA and EQAR;
- Nomination and appointment of the review panel by ENQA;
- Notification of EQAR about the appointed panel;
- Self-assessment by AQAS including the preparation and publication of a self-assessment report;
- A site visit by the review panel to AQAS;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Decision making by the EQAR Register Committee on the agency's registration on EQAR;
- Follow-up of the panel's and/or the ENQA Board's recommendations by the agency, including a voluntary progress visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts (at least one of which is currently employed by an ENQA member agency), an academic employed by a higher education institution, a student member, and eventually a labour market representative (if requested). One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency under review. In this case, an additional fee to cover the reviewer's fee and travel expenses is applied.

The panel will be supported by the ENQA Review Coordinator who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The ENQA staff member will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide AQAS with the list of suggested experts and their respective curricula vitarum to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards the AQAS review.

3.2 Self-assessment by AQAS, including the preparation of a self-assessment report

AQAS is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part 2 and 3) addressed individually, and considerations of how the agency has addressed the recommendations as noted in the ENQA Board's membership decision letter and the instances of partial compliance noted in the previous EQAR Register Committee decision of inclusion/renewal.

All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.

- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which AQAS fulfils its tasks of external quality assurance and meets the ESG.

- The self-assessment report is submitted to the ENQA Secretariat which has four weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within two weeks. In such cases, an additional fee of 1 000 EUR will be charged to the agency.

- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule which shall be submitted to the agency at least two months before the planned dates of the visit. The schedule is to include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is usually 2,5 days. The approved schedule shall be given to AQAS at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted in a site visit by the ENQA Review Coordinator.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency or the granting or reconfirmation of ENQA membership.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings concerning each standard of part 2 and 3 of the ESG. A draft will be first submitted to the ENQA Review Coordinator who will check the report for consistency, clarity and language, and it will be then submitted to AQAS usually within 10 weeks of the site visit for comment on factual accuracy. If AQAS chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter, the review panel will take into account the statement by AQAS and finalise and submit the document to ENQA.

The report is to be finalised within three months of the site visit and will normally not exceed 40 pages in length.

When preparing the report, the review panel should also bear in mind the *EQAR Policy on the Use and Interpretation of the ESG* to ensure that the report will contain sufficient information for the consideration of the Register Committee of the agency's application to EQAR⁴.

For the purpose of applying for ENQA membership, AQAS is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which AQAS expects to contribute to the work and objectives of ENQA during its membership. This letter will be taken into consideration by the Board together with the final evaluation report when deciding on the agency's membership.

4. Follow-up process and publication of the report

AQAS will receive the expert panel's report and publish it on its website once the ENQA Board has approved the report. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. As part of ENQA Agency Review follow-up activities, AQAS commits to react on the review recommendations and submit a follow-up report to the ENQA Board within the timeframe indicated in the Board's decision on membership. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

The follow-up report could be complemented by a small-scale progress visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered to be of particular importance or a challenge to AQAS. Its purpose is entirely developmental and has no impact on the judgement of membership and/or judgment of compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

5. Use of the report

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.

The review report is used by the ENQA Board for the purpose of reaching a conclusion on whether AQAS can be admitted/reconfirmed as a member of ENQA. The report is also used as a basis for the Register Committee's decision on the agency's registration on EQAR. The review process is thus designed to serve these two purposes. However, the review report is to be considered final only after being approved by ENQA. Once submitted to ENQA and until it is approved by its Board, the report may not be used or relied upon by AQAS, the panel, or any third party and may not be disclosed without the prior written consent of ENQA. The approval of the report is independent of the decision of the ENQA Board on membership.

For the purposes of EQAR registration, the agency will submit the review report (once approved by the ENQA Board) via email before expiry of the agency's registration on EQAR. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, full curriculum vitae (CVs) of all review panel members and any other relevant documents to the application (i.e. annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency's application at its Register Committee meeting in March 2022 or June 2022.

6. Indicative schedule of the review

Agreement on Terms of Reference	February 2021
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⁴ See here: https://www.eqar.eu/assets/uploads/2020/09/RC_12_1_UseAndInterpretationOfTheESG_v3_0.pdf

Appointment of review panel members	February 2021
Self-assessment completed	10 May 2021
Pre-screening of SAR by ENQA Review Coordinator	May 2021
Preparation of site visit schedule and indicative timetable	June 2021
Briefing of review panel members	July-August 2021
Review panel site visit	Early September 2021 (possibly 1-3 September)
Draft of evaluation report and submitting it to ENQA Review Coordinator for pre-screening	End October 2021
Draft of evaluation report to AQAS	Early November 2021
Statement of AQAS to review panel if necessary	November 2021
Submission of final report to ENQA	End November 2021
Consideration of the report by ENQA Board	December 2021 or February 2022
Publication of report	January/February 2022
EQAR Register Committee meeting	March/June 2022

ANNEX 4: GLOSSARY

AQAS	Agency for Quality Assurance through the Accreditation of Study Programmes
AQAS ARCH GmbH	Accreditation, Reviews and Consulting in Higher Education
DEQAR	European Database of External Quality Assurance Reports
DFG	Deutsche Forschungsgemeinschaft/ German Research Foundation
ECA	European Consortium for Accreditation
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
GAC	German Accreditation Council
HE	higher education
HEI	higher education institution
HRK	Hochschulrektorenkonferenz/ German Rectors' Conference
KMK	Kultusministerkonferenz/ Standing Conference of the Ministers of Education and Cultural Affairs
MRVO	Musterrechtsverordnung/ Specimen decree pursuant to Article 4, paragraphs 1 – 4 of the interstate study accreditation treaty
QA	quality assurance
SAR	self-assessment report
ZEM	Zentrum für Evaluation und Methoden – Centre for Evaluation and Methods

ANNEX 5. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY AQAS

Self-assessment report (June 2021)

Annexes of the self-assessment report

I. Core annexes

I.1 Organisational documents

- I.1.1 Excerpt from the Register of Associations / Auszug Vereinsregister (German)
- I.1.2 Notice of exemption for AQAS e.V./Freistellungsbescheid (German)
- I.1.3 Excerpt from the Commercial Register for AQAS ARCH GmbH / Handelsregisterauszug (German)
- I.1.4 Draft Budget plan 2021 of AQAS e.V.
- I.1.5 Mission Statement of AQAS e.V.
- I.1.6 Articles of Association of AQAS e.V.

I.2 Documents in use for procedure specifics

a National procedures (programme accreditation)

- a.1 Sample contract (programme assessment, German)
- a.2 Specimen Decree pursuant to Article 4, paragraphs 1–4 of the Interstate Study Accreditation Treaty (MRVO)
- a.3 Work aid
- a.4 Selection principles according to the German Rectors' Conference
- a.5 Declaration of experts' impartiality (national) (German)
- a.6 Guidelines for experts
- a.7 Sample of preliminary statements (according to the MRVO)
- a.8 Structure of experts' report

b National procedures (institutional accreditation)

- b.1 Sample contract (system accreditation)
- b.2 Specimen Decree pursuant to Article 4, paragraphs 1–4 of the Interstate Study Accreditation Treaty (MRVO)
- b.3 Selection principles according to the German Rectors' Conference
- b.4 Declaration of experts' impartiality (national)
- b.5 Sample of preliminary statements (according to the MRVO)
- b.6 Structure of experts' report

c International procedures (programme accreditation)

- c.1 Sample contract (programme accreditation)
- c.2 Course of international procedures
- c.3 Criteria & indicators (Bachelor's & Master's programmes)
- c.4 Criteria & indicators (PhD programmes)
- c.5 Guidelines "How to draft an SER" (Bachelor's & Master's)
- c.6 Guidelines "How to draft an SER" (Bachelor's, Master's & PhD)
- c.7 Selection principles ECA
- c.8 Declaration of impartiality (international)
- c.9 Guidelines for experts
- c.10 Structure of experts' report (Bachelor's and/or Master's)
- c.11 Structure of experts' report (Bachelor's, Master's & PhD)

d International procedures (institutional accreditation)

- d.1 Sequence of international procedures
- d.2 Criteria & indicators (institutional accreditation)

- d.3 Guidelines “How to draft an SER”
- e *European Approach*
 - e.1 Criteria (European Approach)
 - e.2 Structure of experts’ report
- I.3 *Internal quality assurance*
 - I.3.1 Internal quality assurance handbook
 - I.3.2 ZEM questionnaire (German)
 - I.3.3 Example of a ZEM questionnaire (English)
 - I.3.4 Results ZEM (international) (English)
 - I.3.5 Development ZEM (national) (2009-2020)
 - I.3.6 Development ZEM HEI (national) (since 2020)
 - I.3.7 Development ZEM experts (national) (since 2020)
- I.4 *Documentation of previous reviews*
 - a *ENQA*
 - a.1 Confirmation letter 2017
 - a.2 AQAS Follow-up report 2019
 - a.3 Letter to AQAS
 - b *EQAR*
 - b.1 Renewal decision 2017
 - b.2 Substantive change report 2019
 - b.3 Additional letter EQAR registration
 - c *German Accreditation Council*
 - c.1 Final decision GAC 2017
 - c.2 Final report by GAC
 - c.3 Report on fulfilment of conditions Sep 2017
 - c.4 GAC decision on fulfilment of conditions 2017
 - c.5 Approval by GAC (Change to MRVO) 2018
 - c.6 Additional letter GAC 2018
- II *Additional annexes*
 - II.1 *Commissions / Management Board*
 - II.1.1 CVs of Management Board Members
 - II.1.2 Rules of Procedure for the Management Board
 - II.1.3 CVs of Standing Commission Members
 - II.1.4 Standing Commission Concept
 - II.1.5 Rules of Procedure for the Standing Commission
 - II.1.6 CVs of Complaints Commission Members
 - II.1.7 Rules of Procedure for the Complaints Commission
 - II.2 *Staffing*
 - II.2.1 CVs of staff
 - II.2.2 Document on the reconciliation of work and family life
 - II.2.3 IT policy
 - II.2.4 Concept paper on further training of staff
 - II.2.5 Concept of training new staff
 - II.2.6 Paper on professional self-conception
 - II.2.7 List of staff development (training & conferences)
 - II.3 *Further Annexes*
 - II.3.1 Comparison ESG – Specimen Decree pursuant to Article 4, paragraphs 1–4 of the Interstate Study Accreditation Treaty
 - II.3.2 Appeals and complaints procedure
 - II.3.3 Overview of thematic analyses (2016–2021)

II.3.4 Overview of thematic activities (2016–2021)

II.3.5 AQAS ARCH GmbH

II.3.6 Comparison ESG – AQAS criteria international programme accreditation

ADDITIONAL DOCUMENTS PROVIDED BY AQAS, BEFORE AND DURING THE VISIT, ON REQUEST OF THE REVIEW PANEL

1. AQAS Strategy: current period strategy and the immediately preceding past strategy, with information on implementation
2. Work plans of 2020 and 2021: (a) matrix for planning of national + b) international procedures)
3. Updated statistics on procedures completed by 1st of August 2021
4. Growth/changes in membership of AQAS over the period from 2016
5. Examples of AQAS ARCH contracts: 1) 2018 – with FAU re SER in Logopaedics for the state ministry (written agreement); 2) 2019 – with ATT GmbH Castrop-Rauxel (certification) contract with a private company to assess further education which is not part of ENQA-review; 3) 2019 – OWL UAS (certification); 4) 2020 – LUH (assessment of teacher training model); 5) 2020 – KMU Linz (Evaluation according to §27 HSG Austria, evaluation of BA and MA programmes)
6. Labor supply contracts between AQAS e.V. and AQAS ARCH
7. Documents about the relationship between AQAS e.V. and AQAS ARCH
8. Recent examples of publications related to thematic analysis (e.g. publications for the system to use to help improve practice)
9. Link to access the book chapter of 2021 publication, presented in the SAR as thematic analysis (www.aqas.de/die-agentur/#12); confidential, for internal use only
10. Overview table on income/expenditure for the last 5 years
11. Example of an executed budget (e.g. 2020) – with breakdowns of different categories of income and expenditures
12. Job descriptions of consultants and CEOs.
13. Examples of matters identified at AQAS's Jour Fixe meetings and One-Day Retreat, leading to changes in processes and practice (parts of the minutes - summarized)
14. Examples with minutes of meetings of the review team where judgments are made
15. Links to GAC's decisions based on AQAS reports.
16. Development of AQAS finances
17. Flow-charts of national and international procedures
18. Documents related to international recognition of the outcomes for international procedures.
19. Statistics on procedures and decisions, by year (2016-2021)

OTHER SOURCES USED BY THE REVIEW PANEL

1. AQAS website <https://www.aqas.de/>, <https://www.aqas.eu/>
2. AQAS ARCH website <https://www.aqas-arch.de/en>
3. GAC website <https://www.akkreditierungsrat.de/en/welcome-german-accreditation-council>
4. Council of Europe website on Lisbon Recognition Convention <https://www.coe.int/en/web/conventions/full-list?module=signatures-by-treaty&treatynum=165>

ENQA AGENCY REVIEW 2021

THIS REPORT presents findings of the ENQA Agency Review of the Agency for Quality Assurance through Accreditation of Study Programmes (AQAS), undertaken in 2021.

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European Association for
Quality Assurance in Higher Education