



Agentur für  
Qualitätssicherung  
durch Akkreditierung  
von Studiengängen

# **Follow-up report**

## **on the recommendations in the panel report**

**submitted to**

**ENQA**

**on**

**2019-04-24**

## INTRODUCTION

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Since the last review of AQAS in 2017, the German Accreditation System experienced some major changes which also have an impact on the work of the agencies. AQAS had to review all documents for the procedures on the programme and institutional level in Germany to adapt them to the new national regulations. These processes are still ongoing.

Several of the activities discussed with the panel of experts which led to conditions and recommendations have been addressed by AQAS immediately after the site visit or within the process of fulfilling the conditions. Therefore, all topics which have been flagged by ENQA should already have been solved.

Due to the overhaul of the German Accreditation System the role of the agencies changed significantly. The German Accreditation Council (GAC) is now the accrediting body while agencies carry out the procedures requiring universities to deal with the GAC directly, without the agencies as arbitrators and decision-making bodies. The agencies now have to be reviewed by ENQA and listed in the European Quality Assurance Register for Higher Education (EQAR) – and do not need to go through the national accreditation by the GAC additionally anymore – to be allowed to carry out review processes in Germany. This integrates the German QA system closer into the European Higher Education Area (EHEA).

The agencies conduct the review procedures: they check the obeying of the criteria of programmes or quality assurance systems of universities, they set up the peer groups and organise the site visit, they coordinate the reports. The universities conclude a private contract with the agencies to “hire their services”. After the agency has carried out the review process, universities need to apply for the accreditation to the GAC, handing in their self-evaluations and the reports from the agency and the peer group. Under this construction, private and administrative law are neatly separated. The agencies have become service providers for review procedures but they do not take the final accreditation decision in Germany anymore.

However, in international accreditation procedures AQAS still is the decision-making body which is the reason why AQAS adheres to the procedures described in the self-evaluation report in 2017 and endeavours to keep the highest standards in conducting programme and institutional review procedures as well on the national as the international level.

## Areas for development

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### ESG 3.1

**AQAS should formulate requirements that define the distinction between accreditation and consultation, between ESG and non-ESG activities and between AQAS and AQAS ARCH in the form of a fundamental decision.**

Right from the start, AQAS strictly separated the tasks of AQAS, the membership organisation, and the company AQAS ARCH. The mother organisation AQAS e. V. is in charge of all accreditation procedures and decisions on the international level. AQAS ARCH only carries out national or international workshops and consultancy. Therefore, both organisations were and are strictly separated. It shall be recognized that there was no evidence nor any indication for a mix or overlap in the fields of work of our agency and the daughter company.

Already in 2014, the Board as well as the General Assembly determined the separation of consultancy and accreditation in its decision to set up the daughter company (GmbH):

*"Through the separation of the areas of classical accreditation (with the award of the seal by GAC) in the e. V. and additional projects in the daughter company (GmbH) a stronger internal and external transparency should be achieved.*

*The aim is to set up a separate company not involved in the German Accreditation System and which therefore has a greater potential to attract new business, offering universities and other education providers additional services. The non-profit company (AQAS e. V.) would therefore only serve the company's main aim (accreditation of QA systems in universities and study programmes)."*

It is perfectly clear to the Board, the commissions, the management and the consultants that AQAS e. V. cannot accredit the same organisation that received consultancy services through AQAS ARCH. We always interpreted the GAC decision "Standards for the design of the relationship between system accreditation and consultancy services" of 31.10.2008 as a fundamental requirement that we fully subscribe to in our programme accreditation procedures and in our international activities. AQAS shares the GAC position that an unbiased assessment and decision are key requirements for accreditation procedures to be trustworthy and impartial, along with agencies' professionalism and the highest levels of transparency. The ESG and the "Code of Good Practice for the Members of the European Consortium for Accreditation in Higher Education" provide us with direction and guidance in our work. We agree with GAC that the work of an accreditation agency in a particular procedure, be it programme or institutional accreditation, is incompatible with a preceding (or current) consultancy at the same university.

Consequently, and sharing the understanding of a strict requirement for separation of the business areas, the board and the management of AQAS are surprised as a number of other German agencies have daughter organisations which do provide accreditation procedures abroad and, in these procedures, this was never an area of concern in the national or international review procedures of the respective agencies. We believe that practicing transparency

– as we did in our review – shall not result in a more critical reflection and that consistency of the assessment of the relations between mother and daughter organisation should be the same for all German agencies or not an issue at all.

### ESG 3.4

**AQAS should develop a concept describing how the reflective reports are composed in future. One analysis performed previously should be published on the agency's homepage.**

Immediately after the review process by GAC, AQAS published several thematical analysis on the agency's homepage:

<http://www.aqas.de/ueber-aqas/thematische-analysen/>

Compared to the Accreditation Systems in other European countries, the German system is characterized by the fact that there is one German Accreditation Council (GAC) and 10 agencies which provide accreditation services to Higher Education Institutions. Therefore, the tasks are divided and so is the expertise which was compiled during the past years. The GAC rarely publishes on the German experiences as a whole due to a lack of human resources, and the agencies are only able to reflect on their specific experiences.

The core concept of AQAS concerning thematic analysis is that our experiences should have an immediate benefit for our stakeholders – mainly Higher Education Institutions and students. Hence, AQAS decided to publish or to present its results and experiences in theme-based overviews, gained over time from its accreditation procedures and projects (see above). Our concept of a thematic analysis is not limited to the idea of publishing reports that describe and analyse the general findings of our external quality assurance activities, but our core idea is to „report back”, so that we can contribute to the discussions within the Higher Education System. Issues are e.g. experiences with the assessment of quality management systems of HEI in Germany (“Systemakkreditierung”), experiences with the application of the ESG outside Europe, a summary on the accreditation of franchise-programmes.

Once a year in our internal Strategy Meeting, AQAS discusses topics which are up-to-date in the educational area and develops a plan how to analyse the topics on the basis of our experiences and from our perspective which have led to some of the reports published on the agency's website. Several of our thematical analysis also have been used by other stakeholders for their discussions, e.g. GAC, Federal Ministry of Education (BMBF) or Higher Education Institutions.

The importance of publications on our homepage is not underestimated, but AQAS also would like to point out that the format in which we present our experiences can vary from case to case. We are quite frequently invited to present papers on national or international conferences or meetings (e.g. by GAC, INQAAHE, EQAF as well as on conferences in Kenya, Egypt) which we think is a contribution to the thematic development of the higher education area, too.

AQAS offers workshops and trainings, e.g. on the new German Accreditation System, because a lot of information is needed by different stakeholders. In Fall 2019, we will offer a new workshop format including highly experienced external trainers from abroad on “Digitalisation in studying and teaching”. With this approach we also react on the changes in the German Accreditation System which now defines a more service-oriented role for the agencies. This gives more freedom to the agencies also to address issues which are not directly related to external QA but important for the future development of teaching and learning.

Moreover, AQAS regularly participates in panel discussions, gives interviews, provides information on certain issues for the GAC, so that the latter can publish aggregated experiences of several agencies (e.g. like in the analysis of conditions given to programmes in accreditation procedures in the German system).

[http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Veroeffentlichungen/Berichte/Bericht\\_Auflagenstichprobe\\_final.pdf](http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Veroeffentlichungen/Berichte/Bericht_Auflagenstichprobe_final.pdf)

[http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Veroeffentlichungen/Berichte/Bericht\\_themenbezogene\\_Stichprobe\\_Systemakkreditierung\\_2017\\_01.pdf](http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Veroeffentlichungen/Berichte/Bericht_themenbezogene_Stichprobe_Systemakkreditierung_2017_01.pdf)

AQAS provided support to GAC by submitting advisory statements/opinions and experiences as well as by participating in working groups (e.g. on joint programmes, on the new German Accreditation System). Moreover, AQAS recently contributed to conferences on several topics organised by GAC, the Network of Peers of the Trade Unions or to inhouse workshops at universities.

### ESG 3.6

**AQAS should expand the existing Share Point server to the extent that the quality management processes display the requirements of the PDCA cycle.**

AQAS uses a SharePoint Server, where all the agency's core processes are available with the respective responsibilities, corresponding information and required submissions. Two employees are responsible for keeping the SharePoint server up to date. It is a web-based application which offers, among other options, the possibility to manage projects over the Intranet, to coordinate tasks or to maintain documents.

AQAS uses its SharePoint Server to provide its staff members with all relevant document templates relating to accreditation procedures. The templates are provided in the form of guidelines for consultants. In addition, all key accreditation processes are illustrated on the SharePoint Server as well as the sub-processes lying behind the key processes (see appendix 1). The guidelines for consultants and the Wiki accreditation procedures guide can also be found on the SharePoint Server.

All three areas are inter-linked at specific points. This structure ensures that staff members have easy access to relevant information and documents regarding accreditation procedures. Sections marked with an „i“ refer the user to the relevant page in the guidelines or take the

user to the Wiki pages which can, if required, be connected with the templates (see *appendix 1*). Therefore, the SharePoint Server is a tool to manage knowledge and content for AQAS. It is also a handbook for the day to day activities of the agency. AQAS uses a file server to store its data (for instance documentation related to specific accreditation procedures and projects). All consultants have access to this server.

In 2017, AQAS installed the new position of a “Quality Assurance Manager” who has the task to formalise AQAS’ quality assurance mechanisms and to make them more systematic. Against this background, the AQAS QM system can thus be presented as a PDCA cycle:

**PLAN:** The Board of AQAS adopted its quality management system in May 2016 which is based on the ESG. During the review process of AQAS our QM system was presented to the panel of experts from GAC and they appreciated it but stressed that the Share Point Server should also be used to close the PDCA cycle. To fulfil the condition we created a new section called „Quality Assurance“ on SharePoint and where we store, among other documents, our QM Concept and the diagram showing the PDCA cycle which can be found below (*also see appendix 2*).

All staff members are provided with the SharePoint templates as well as information on operational details, such as the guidelines for consultants and the Wiki. This process ensures a consistent approach for accreditation procedures and the compliance with quality standards. This process can be assigned to the planning level („How should an accreditation procedure be carried out according to schedule?“).

**DO:** The level „do“ covers the implementation, respectively the practical use of the documents and materials including the planning level i.e. the carrying out of a concrete accreditation procedure. As already explained above, all relevant accreditation-related documentation is saved on the file server which is joined up with SharePoint and also accessible by all staff members.

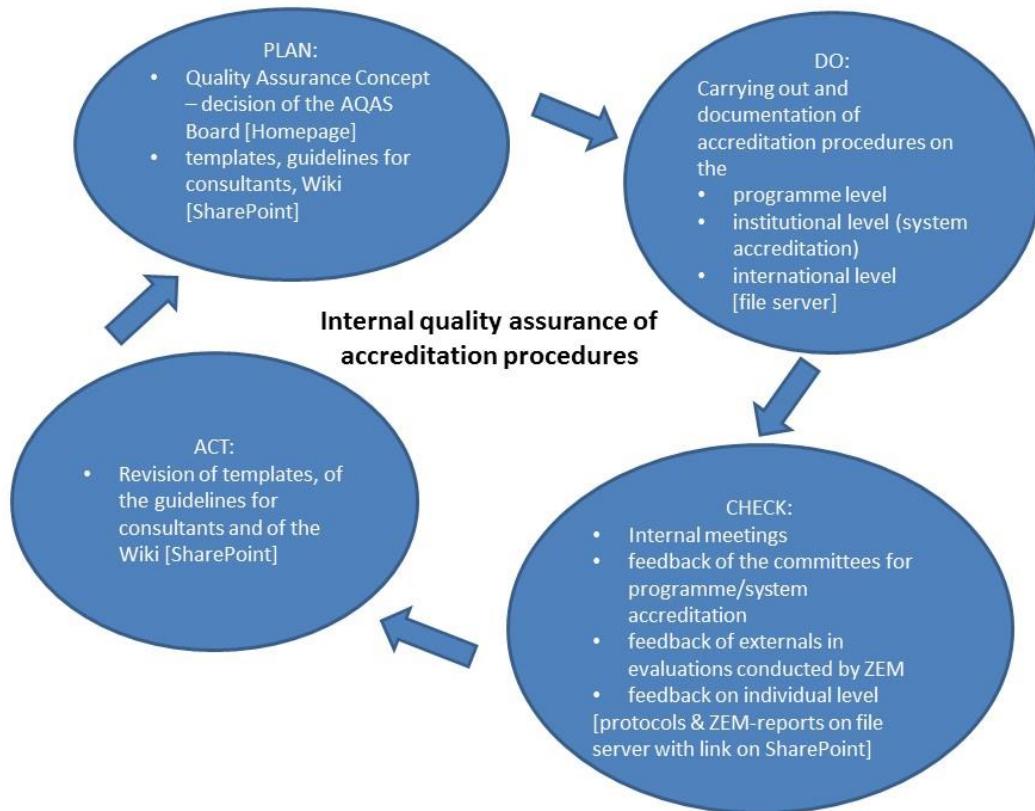
**CHECK:** AQAS continually reviews the quality of its accreditation procedures in line with the principles of a continual improvement process. These measures include: regular exchanges of the staff responsible for carrying out accreditation procedures with the committees (the Board and both Accreditation Committees); systematic surveys of experts and university contacts by ZEM (Centre for Evaluation and Methods, University of Bonn); as well as internal exchanges among staff members at the AQAS office.

Consultants also receive direct feedback from university contacts or experts which contribute to the improvement of processes. All comments and feedback for improvement are discussed in the Jour Fixe meetings of the staff. Feedback/action points for changes are implemented and documented on SharePoint. All corresponding meeting minutes or result reports of the ZEM are saved on the file server. The weblinks to all reporting instruments have been pooled together and can be accessed under the section „Quality Assurance“ on the SharePoint Server. Thus, the level „Check“ is also mapped in SharePoint.

**ACT:** The Quality Assurance Manager has overall responsibility for the implementation of the changes listed under „Check“. These changes cover the review and regular updating of templates, materials and/or explanatory texts. Minutes of the committees or the Jour Fixes

document the concrete implementation of changes and templates in SharePoint including the version number. Thereby, the closure of the control loop is also documented on SharePoint.

The PDCA cycle can be represented graphically thus:



It is important for AQAS to continually develop its quality assurance concept and to align it with the current and changing conditions. Due to the changes of the German Accreditation System, we are further developing the concept at the moment to adapt it to the new situation. Anyway, the core processes the concept described bases on will not be changed as they mainly focused the conducting of review procedures which the final accreditation decision only is a part of.

## ESG 2.5

**The criteria for international institutional accreditation should be published.**

The criteria were published immediately after the review process by GAC on the AQAS homepage in 2017 and are available here:

<https://www.aqas.eu/institutional-accreditation-audit/>

The full set of criteria and indicators for institutional accreditation are available for our clients who receive the document after signing the contract with AQAS. The reason for the restrictive

handling of the criteria is that, due to the competition of the agencies in Germany, AQAS noticed that our ideas, approaches and presentations were plagiarised several times in the past. EQAR respected this argument by AQAS in the past review process in 2017.

## ESG 2.6

**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.**

All reports on international procedures of AQAS are published on our homepage (mainly in English):

<https://www.aqas.eu/accredited-study-programmes/>

Also, the reports on programme and institutional accreditation procedures in Germany can also be found on our website (in German) so the demand to inform the public is fulfilled by the agency for all procedures:

<https://www.aqas.de/programmakkreditierung/akkreditierte-studienprogramme/>

<https://www.aqas.de/systemakkreditierung/akkreditierte-hochschulen/>

Due to the changes in the German accreditation system, GAC implements a new database on its homepage at the moment. All AQAS' entries should be found in the new GAC database which includes our past entries, which were hosted by the German Rectors' Conference (HRK) till 2019, as well as new entries. In this new database, the German Accreditation Council will enter the results of all reviews of national study programmes as well as of quality assurance systems of German universities on which the Accreditation Council itself will have made an accreditation decision.

The decision in international procedures will still be taken by the Accreditation Commission of AQAS also in the future and cannot be listed in the database of the German Accreditation Council. AQAS will, of course, continue to publish the results and reports on these procedures on our homepage and will also enter them in the EQAR database (DEQAR) from May 2019. In order to learn how to use this new database, AQAS has already successfully participated in an EQAR workshop in 2018. Gradually, all older procedures will be added to the DEQAR database so that a complete overview of all international procedures of AQAS will be available in 2019. This means that there will be complete transparency on the European level.

AQAS was and is convinced that transparency concerning the outcomes of accreditation procedures is crucial for our clients, the students and other stakeholders and is therefore in our own interest.

## ESG 2.7

**The terms in the appeals and complaints procedure should, on occasion, be clarified in relation to the ESG.**

In the German accreditation system in general, there is no term to distinguish between complaints and appeals because these terms are summarized in the German word “Beschwerde”. Each German agency must have a “Beschwerdekommision” (Complaints and Appeals Commission) which deals with both types of problems – no matter if they refer to procedural aspects (complaints) or to the result of a review procedure (appeal).

AQAS has clearly defined such processes as part of the design of its external quality assurance processes and communicated them to the Higher Education Institutions. The underlying regulatory framework forms part of the contract between the university and AQAS. On the national level, it was adapted to the regulations of the new German Accreditation System in 2018 and is available on our homepage:

<https://www.aqas.de/programmakkreditierung/beschwerdeverfahren/>

On the international level, the regulations for complaints and appeals are part of a description of the accreditation process which is also part of the contract between the university and AQAS. It is published on our homepage:

<https://www.aqas.eu/programme-accreditation/procedure/>

The “Beschwerdekommision” of AQAS had its inaugural meeting in March 2013. Due to the small number of complaints and appeals the commission met in 2015 and in 2017. In addition, two decisions were taken by the “Beschwerdekommision” by written circulation. Our experience shows so far that complaints by universities can normally be solved by the Accreditation Commission. The Complaints and Appeals Commission only intervened in very few individual cases.