



European Association for  
Quality Assurance in Higher Education

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**Subject: Membership of GAC in ENQA**

Dear Dr. Olaf Bartz,

I am pleased to inform you that, at its meeting of 22 June 2022, the Board of ENQA took the decision to grant the GAC membership of ENQA for five years from that date. The Board concluded that GAC is in compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) and thus fulfils the membership criteria according to article 6, paragraph 1 of ENQA's rules of procedure.

The Board would like to use this opportunity to reflect on the panel's findings under the standard 3.1 Activities, policy and processes for quality assurance, where the Board calls upon the agency to further clarify its mission in the German higher education and quality assurance system and further strengthen collaboration and involvement of stakeholders in the agency's governance and work. The Board believes this should be approached with high priority since the credibility of the German quality assurance system is at risk.

Regarding ESG 3.6 Internal quality assurance and professional conduct, the Board evaluates the agency to be substantially compliant with the ESG, and not fully compliant due to the agency's lack of dialogue with German quality assurance agencies and other stakeholders, and due to lack of tools required for the agency's self-reflection, as well as due to a weak 'act' phase of the PDCA cycle.

All in all, the external review identifies several areas that require immediate attention of the agency, such as panel recommendations related to ESG 3.1, 3.4, 3.5, and 2.5. The Board strongly encourages the agency to provide sufficient attention to these recommendations and implement them. Should this not be addressed, the agency's compliance with the ESG and the linked membership with ENQA might be put at risk.

The Board would like to receive a follow-up report within two years of its decision, i.e., by June 2024 where GAC is expected to address the panel's recommendations.

The Board also encourages GAC to take advantage of the voluntary progress visit – an enhancement-led feature in the review process. The visit would take place in about two years' time from this decision. The ENQA Secretariat will be in touch with you in about a year's time to discuss this possibility. The costs of this visit have already been included as part of the review fee and are non-refundable except for the travel costs of the experts. More information about the progress visit can be found in the Guidelines for ENQA Agency Reviews.

If you have any further queries, please do not hesitate to contact the ENQA Secretariat.

Please accept my congratulations for the confirmation of membership of GAC.

Yours sincerely,



Douglas Blackstock  
President

Annex: Areas for development

## **Annex: Areas for development**

As outlined by the review panel, GAC is recommended to take appropriate action, so far as it is empowered to do so, on the following issues:

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

The panel recommends the agency to urgently launch a reflection process regarding its role and future strategy, in collaboration with its key stakeholders and constituencies (and beyond the stakeholder representatives already involved in the agency), and to subsequently revisit its mission statement and strategic plans accordingly.

### **ESG 3.3 Independence**

The agency should get together with other agencies with the goal of clarifying responsibilities and procedures, not just in the light of the German Specimen Decree, but also with regard to the ESG. Establishing a regular dialogue where all institutions see eye to eye as partners in the system far beyond the annual “feedback meeting” will also be pivotal in the long run, as will be a clearer formal communication line regarding decisions.

### **ESG 3.4 Thematic analysis**

The agency is recommended to strategically plan thematic analyses in consultation with the external stakeholders as soon as possible, rather than wait for the end of the accreditation cycle. In developing the new plan, GAC should consider the centrality of its role in the system for producing thematic analyses. The strategic plan should thus be more ambitious than is currently the case, both in the number of the analyses produced annually and the topics they cover.

### **ESG 3.5 Resources**

If the agency is to fulfil its tasks in the following period -which include handling an increased number of accreditations and self-reflection as well as an evaluation of the wider German QA system - it urgently needs a substantial increase in human resources.

The organisation of the work of the Accreditation Council should also be reconsidered – some suggestions include increasing the number of potential rapporteurs (e.g. by involving students) and the frequency of meetings.

### **ESG 3.6 Internal quality assurance and professional conduct**

The agency is recommended to strengthen its dialogue with German quality assurance agencies and other stakeholders, and improve tools required for the agency's self-reflection. Furthermore, the agency is recommended to strengthen the 'act' phase of the PDCA cycle.

### **ESG 3.7 Cyclical external review of agencies**

In the future, the agency should focus on the continuity of ENQA membership, as it has done in the less recent past.

### **ESG 2.2 Designing methodologies fit for purpose**

The panel believes that as the central body in the German system, the agency should start a reflection process on the ownership of processes and their methodologies in collaboration with its key stakeholders and constituencies (and beyond the stakeholder representatives already involved in the agency). One of the outcomes of the process can be a revision of its mission statement and quality policy.

### **ESG 2.3 Implementing processes**

The panel recommends the agency to consult all of its stakeholders – agencies, states, HEIs, students and professional organisations, on the need to implement additional follow-up measures, and the forms in which they could be implemented. On the basis of such a consultation, GAC can agree with the agencies on the division of tasks.

### **ESG 2.4 Peer-review experts**

The agency should address its worries about the lack of interest of experts to participate in accreditations primarily by discussing the matter with the agencies, and supporting them in coming up with new ways of attracting experts and keeping them committed and interested in this type of work.

Closer cooperation with the agencies and a clarification of their separate roles should also ensure that any issues regarding the selection of experts are prevented, rather than addressed by the agency post hoc.

### **ESG 2.5 Criteria for outcomes**

As part of its planned systematic reflection, AC should self-evaluate its method of work as well as the way it understands consistency. It is especially important that the process includes clarifying the stakeholders' demands for consistency that GAC needs to assure.

The agency should urgently devote time and resources to introducing or further developing the mechanisms ensuring consistency of decision making, which include publishing analyses of precedents, interpretations and guidelines.



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A formal on-boarding procedure, including training and opportunities to discuss with experienced members, should be developed for new AC members.

**ESG 2.7 Complaints and appeals**

The agency should publish a formal description of the appeals and complaints procedure, with clearly described escalation steps.