



FIBAA

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IN HIGHER EDUCATION

Application¹

(Self-Assessment Report)

by the Foundation for International Business Administration Accreditation (FIBAA)

for reaccreditation by the German Accreditation Council for programme and system accreditation,

for renewal of membership to the European Association for Quality Assurance in Higher Education (ENQA) and

for re-registration in the European Quality Assurance Register for Higher Education (EQAR)

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The organisation of the self-documentation follows the communication by the German Accreditation Council upon the opening of the procedure from 11th July 2016, according to which the first part should demonstrate compliance with the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), Chapters 3 and 2 and the second part should demonstrate compliance with the “Additional Criteria for Certification in Germany” in accordance with Cl. 4 of the draft of the German Accreditation Council’s revised rules for the accreditation of agencies from 30th May 2016.

Response to previous recommendations

FIBAA was last reaccredited on 23rd February 2012 without any conditions. During this procedure, the experts identified potential for further development with the result that a total of four recommendations and two “flagged issues” (from EQAR) were issued. FIBAA’s response to these recommendations in the last reaccreditation period is outlined below.

1. FIBAA quality management (recommendation based on the assessment according to the criteria of the German Accreditation Council)

The experts issued the following recommendation regarding the internal quality management (QM) of FIBAA, since although the outlines of the processes at the time were comprehensively documented, the experts did not believe they were practised sufficiently on a day-to-day basis. In addition, no results of the QM were available at the time:

“In order to improve the quality management concept and the agency’s work, the expert group recommends including more sources of external feedback. For example, results of the review and monitoring by the German Accreditation Council or the complaints of higher education institutions should be systematically analysed. Comparisons with national and international good practice could also be helpful for further developing the agency’s own processes. In this context, the expert group welcomes the creation of a knowledge database, which is intended in particular to pool international experience.”

In previous years FIBAA has again and again placed its QM under scrutiny, continued to develop it, professionalised it and made it the foundation of its day-to-day work. External feedback from experts, higher education institutions² and committee members is systematically incorporated into the QM. Review and complaints procedures are coordinated and analysed by the respective division management responsible for their areas. If a need for modification in the interpretation of criteria, the processes or the procedural documents becomes apparent during these analyses, improvements are developed, if necessary discussed by the committees, and adopted and added to the respective documents or processes.

This guarantees that the results of the German Accreditation Council’s review and complaints from higher education institutions are systematically entered into the quality control circuit. More details about this can be found in ESG Standard 3.6.

Comparisons with national good practice are made by implementing the German Accreditation Council’s corresponding bulletins and resolutions and in regular meetings of the accreditation agencies certified in Germany. Comparisons with international good practice result in particular from participation in international projects. For example, FIBAA has contributed to the ECA project “CeQuInt”. As part of this EU-sponsored project, which aimed to promote internationalisation in the higher education area, thirteen pilot procedures were implemented. Based on the experience gained at the higher education institution, faculty and study programme level, FIBAA has contributed to the development of a criteria catalogue for the assessment of internationality. Because FIBAA has many years of experience in work with higher education institutions with an international focus and because it places a special focus on internationality in

² In order to improve readability, FIBAA uses the term “higher education institution” (HEI) in the following as an umbrella term for academic universities, higher education institutions and universities of applied sciences.

its accreditation procedures in accordance with the FIBAA quality standards, it has been able to introduce clear impulses into the project's control group. FIBAA in turn profited from the project experience by optimising its own procedures. In addition, the many years of individual FIBAA employees working together as short time experts in international projects (TEMPUS, TWINNING) have made experience of good practice productive for FIBAA.

The knowledge database was further expanded over the course of the current accreditation period. It primarily contains detailed country information (see annex 70), which gathers cultural, organisational and review-related (accreditation) findings, but also includes background information such as legal bases and information on the respective national education system, which are prepared according to a standard form (see *ibid.*).

Reference document:

70 Template for country information and example of country information, Northern Cyprus / Turkey

2. Transparency in relation to the criteria and regulations for awarding the FIBAA premium seal (recommendation based on the evaluation according to the ESG)

Because at the time of the last reaccreditation of FIBAA the criteria for awarding the FIBAA premium seal were not sufficiently publicised, the expert group issued the following recommendation:

“FIBAA should establish greater transparency in relation to the criteria and regulations for awarding the FIBAA premium seal.”

Because of the recommendation issued regarding all procedures, FIBAA published the basic principles for awarding the premium seal in greater detail on its website in the previous accreditation period³, meaning that these are now transparent and available to the higher education institutions. The internal investigation tables are in the annexes 13, 34 and 52.

In the same review process, FIBAA also configured the requirements in the procedures for awarding the FIBAA Quality Seal to be more transparent; since the experts made the criticism that there could be a possible problem of transparency, because at the time FIBAA still differentiated between an expert version and a higher education institution version of the questions and assessment catalogues (AG)⁴ and only the experts were aware of the standards for a “quality-requirement-exceeded assessment”. This point was implemented by publishing the “exceeded” criteria. Both experts and higher education institutions now work with the same AG

³ Cf. PROG: <http://www.fibaa.org/en/procedures-at-programme-level/prog-according-to-fibaa-quality-standards/quality-seals.html> (revised on 15th of March 2017)

Cf. INST: http://www.fibaa.org/fileadmin/files/folder/Institutionelle_Verfahren/Grunds%C3%A4tze_Vergabe_Premiumsiegel_INST.pdf (revised on 15th of March 2017)

Cf. ZERT: <http://www.fibaa.org/en/procedures-at-programme-level/certification-of-continuing-education-courses/quality-seals.html> (revised on 15th of March 2017)

⁴ Instead of a question and assessment catalogue, the application and assessment catalogue (AAC) is used for the Institutional Audit Austria procedure. Where general information regarding the AG of FIBAA is stated in the following, it shall also apply to the AAC. Deviations will be indicated on an individual basis.

and criteria sets. It has turned out since this changeover in 2014 that higher education institutions/other institutions with knowledge of the concrete “exceeded” criteria are now increasingly able to emphasise their strengths. Therefore as a result of publishing the “exceeded” criteria, there is a developing tendency towards more premium seals. This will have to be monitored in order to prevent the value of the premium seal from becoming diminished. As previously there are deliberately no specified quality standards for the “excellent” assessment level. This is due to the fact that excellence is characterised by being individual to a large degree. A specified standard would contradict the object of the criterion, narrow the focus of the experts and higher education institutions/other institutions in description/assessment too much and restrict the higher education institutions/other institutions from developing innovative ideas. This helps the FIBAA quality levels (and in particular the “excellent criterion”) to create an incentive for the higher education institutions/other institutions to think outside the box for criteria and to continue to develop their quality to above average. The experts’ assessment (concerning all quality levels) is justified in the review report in any case, meaning that the assessment is comprehensible for the higher education institution/other institution and any interested party.

Reference documents:

- 13 Criteria for awarding the FIBAA premium seal and quality profile for the premium seal – programme accreditation
- 34 Criteria for awarding the FIBAA premium seal and quality profile for the premium seal – Institutional Audit Austria and institutional accreditation: strategic management
- 52 Criteria for awarding the FIBAA premium seal and quality profile for the premium seal – certification

3. Methodology of the quality profile (recommendation based on the assessment according to the ESG)

The expert group made the criticism that in the FIBAA review reports, the so-called quality profile, in which the assessment of all criteria is clearly outlined in an overview, did not reference the underlying AG, meaning that the methodology of the quality profile was not made immediately accessible to those outside the agency. The expert group subsequently issued the following recommendation:

“The underlying methodology must be referenced in the published ‘quality profile’ of the individual study programmes.”

Based on the stated recommendation, the AGs and the corresponding review reports for programme accreditation were revised to the effect that the individual assessments of the criteria in the quality profile refer clearly recognisably to the structure, headings and chapter numbers in the AG and in so doing reveal the methodology (cf. ESG standard 2.5). Furthermore a corresponding legend is shown in the AGs.

As an example, the quality profile (excerpt) from the AG for programme accreditation is outlined here in accordance with the rules of the German Accreditation Council, as well as the associated legend:

		Exceeds quality requirements	Does not meet quality requirements	n.r.
3.1	Implementation of content			
3.1.1	Logic and conceptual coherence of the curriculum	x		
3.1.2	Rationale for degree and programme name	x		
3.1.3	Examinations and final thesis	x		

Quality profile

Criteria	Appraisal			
	Exceeds quality requirements	Does not meet quality requirements	n.r.	

Quality profiles are also included in the AGs of institutional procedures. They accordingly take account of the particulars of these procedures (cf. ESG standard 2.2). The subject fields/requirements to be assessed are stated in the quality profiles of the various chapters in note form.

As an example, the quality profile (excerpt) from the AG for institutional accreditation is here: Strategic Management stated:

Quality requirements	Exceptional	Exceeds quality requirements	Meets quality requirements	Does not meet quality requirements
IV. RESEARCH				
IV.1 Strategic objectives				
IV.2 Research objectives				
IV.3 Quality assurance				
IV.4 Ressources				

4. Thematic analyses (recommendation based on the assessment according to the ESG)

As the analysis of the quality assurance procedures had not taken place earlier to a sufficiently systematic and predominantly informal degree, the expert group recommended:

“FIBAA should analyse the findings from its procedures more systematically, together with other agencies if necessary.”

Findings from procedures have been regularly analysed for some years now by FIBAA through continuous analysis of the conditions issued in accreditation procedures and the evaluation feedback of experts, higher education institutions/other institutions and project managers. Furthermore, in particular FIBAA Consult workshop articles (“Factory”) (cf. ESG standard 3.4) adopts current developments and trends and shows examples of good practice, which are also

made accessible to the other agencies through means including the FIBAA newsletter. In addition FIBAA has since developed multiple formats for publishing thematic analyses (FIBAA newsletter, FIBAA Expert newsletter, publications in specialist journals and in the Handbuch Qualität in Studium und Lehre (Handbook of Quality in Teaching and Learning)), which have proven to be useful instruments for information higher education institutions and other institutions and at the same time are also freely accessible to all interested parties. The exchange with other agencies for the purposes of joint work on improving the procedures' quality takes place at the agency meetings that FIBAA regularly attends. New challenges are discussed here with representatives of the other agencies. FIBAA profits from the findings and strategies of the other agencies and shares good practices with them. More details about this can be found in the statements on ESG standard 3.4.

5. Recommendations based on the assessment by EQAR

EQAR named two so-called "flagged issues" i.e. points that are to be subjected to special attention in the current reaccreditation. These correspond to recommendations 2 and 4 mentioned above, meaning that insofar as the statements above are referred to:

- *"It should receive attention whether FIBAA has enhanced the transparency of the criteria for awarding its 'FIBAA Premium' seal to accredited programmes."*
- *"The establishment of systematic analyses of FIBAA's overarching reflections and observations from its accreditation, evaluation and audit activities should receive attention. Such analyses should include developments and trends identified across the programmes and institutions reviewed by FIBAA."*

A) European Standards and Guidelines chapter 3

In accordance with the structure mentioned above, the individual requirements of the ESG are shown below in their implementation by FIBAA.

This begins with chapter 3 of the ESG, which contains the requirements for the agencies, followed by chapter 2 of the ESG, which covers the requirements for the external quality assurance procedures. If any reference to chapter 1 of the ESG is needed, this shall be taken into account. This deductive strategy guarantees that all necessary information about the structure and working method of FIBAA is known before going into the respective quality assurance procedures in detail. It is also recommended by ENQA in the “Guidelines for ENQA Agency Reviews⁵”.

Occasionally there are redundancies within the chapter. They are accepted in the interests of providing a self-contained presentation in each chapter.

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.

FIBAA regularly performs procedures for quality assurance in higher education in its four business areas of programme accreditation (PROG), institutional procedures (INST), certification of continuing education courses (CERT) and consultation (FIBAA Consult) based on defined and published criteria (cf. ESG standard 2.5).

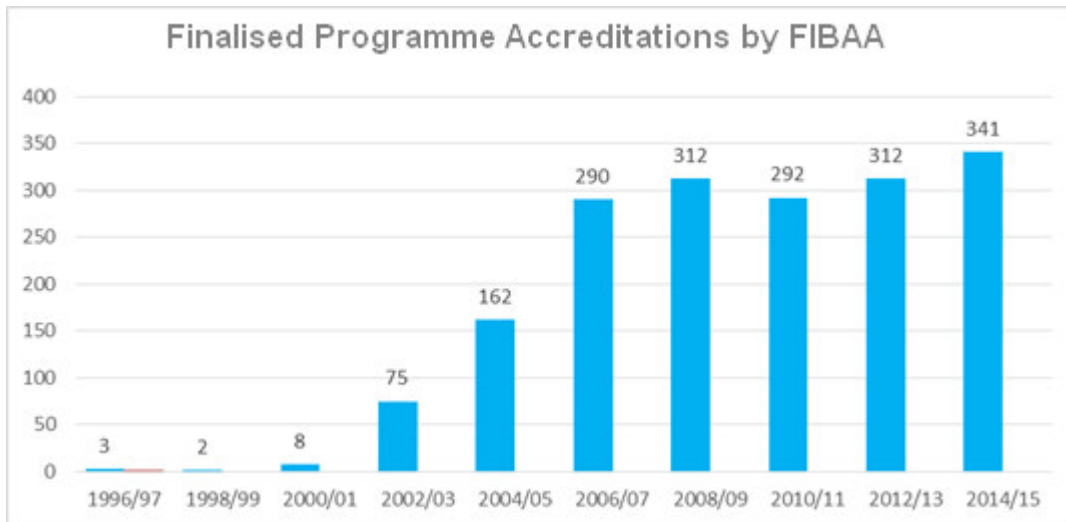
1.) In the **PROG** area, these are:

- Programme accreditation in accordance with the requirements of the German Accreditation Council with due consideration of the ESG (for the acquisition of the seal of the German Accreditation Council for programmes);
- Programme accreditation in accordance with FIBAA standards with due consideration of the ESG (for the acquisition of the FIBAA Quality Seal for programmes⁶).

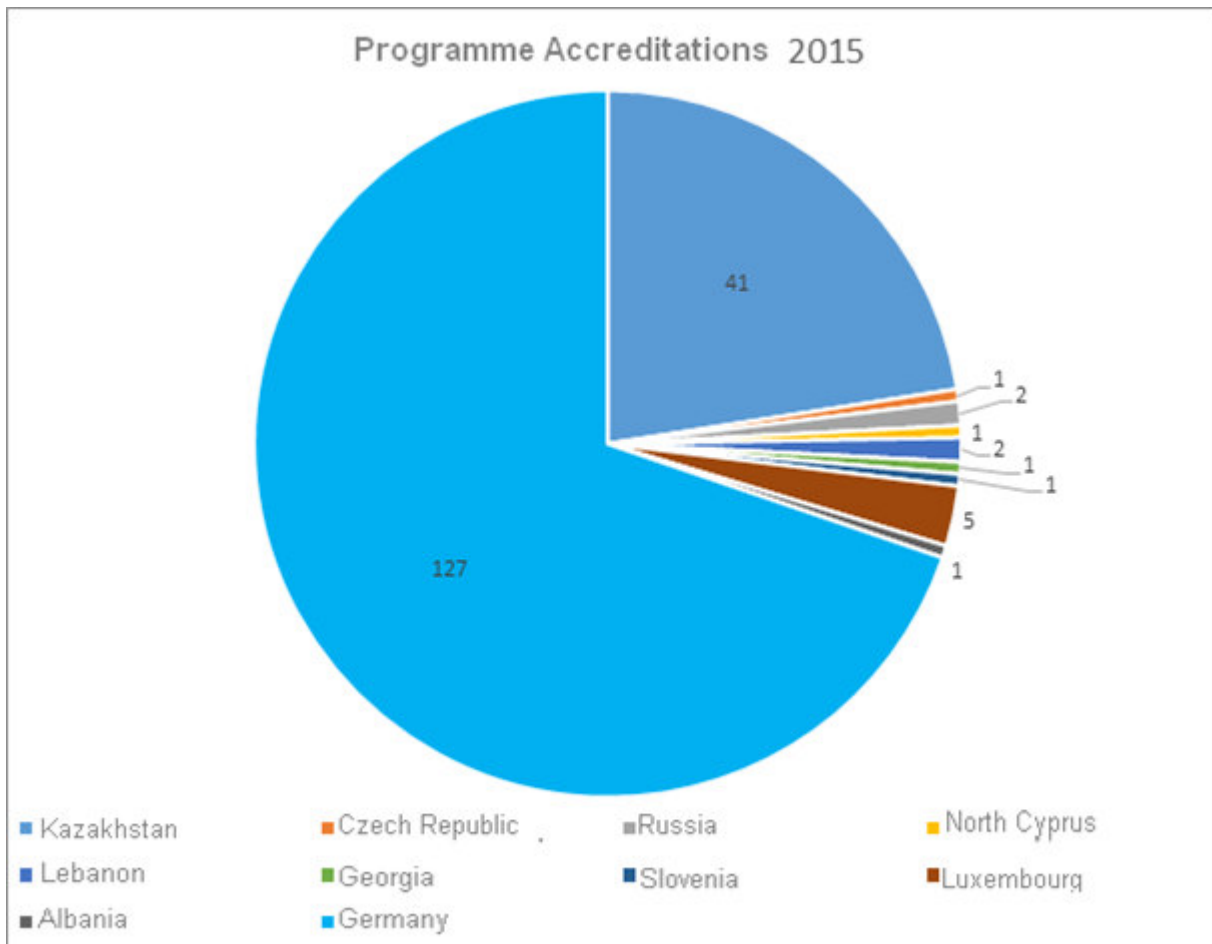
In the area of programme accreditation FIBAA has concentrated on law, social sciences and economics-focused study programmes as well as management qualifications. PROG represents FIBAA’s main field of business. In total FIBAA has to date (as of 30th June 2016) accredited 1,838 programmes at home and abroad. The following diagram shows the number of the study programmes accredited by FIBAA since 1996.

⁵ Cf. <http://www.engq.eu/wp-content/uploads/2015/12/Guidelines-for-ENQA-Agency-Reviews.pdf> last accessed on the 29th of June 2016

⁶Bachelor’s and master’s programmes as well as doctoral programmes (PhD)



In 2015 FIBAA accredited a total of 55 programmes abroad, which corresponds to around 30 per cent of all the programmes accredited by FIBAA in the same year. In the first half of 2016 FIBAA has to date accredited two programmes abroad (Albania, Russia).



2.) In the **INST** area FIBAA performs the following procedures:

- System accreditation in accordance with the requirements of the Accreditation Council (for the acquisition of the seal of the Accreditation Council for system accreditation);
- Institutional Audit Austria (certification) in accordance with the requirements of the Austrian Act on Quality Assurance in Higher Education (German abbreviation HS-QSG) (for the acquisition of the FIBAA Quality Seal of Institutional Audit Austria);
- Institutional Accreditation in accordance with FIBAA quality standards⁷ (for the acquisition of the FIBAA Quality Seal for Institutional Accreditation),
- Institutional Accreditation: Strategic Management in accordance with FIBAA quality standards (for the acquisition of the FIBAA Quality Seal of Institutional Accreditation: Strategic Management).

On the development: FIBAA initially performed the institutional procedure “**Institutional Audit**” from 2010 to 2012 in accordance with FIBAA’s requirements. Before Institutional Audit Austria was introduced as the national Austrian procedure (see above), it was carried out at Austrian higher education institutions that wanted to subject their entire institution to a quality assessment and not just some study programmes. The same applies to a Swiss higher education institution that has successfully performed the procedure. In English-speaking countries, FIBAA’s programme accreditations were more interesting to many higher education institutions at the time as smaller and more manageable procedures than as costlier institutional accreditation. As FIBAA’s own procedure, Institutional Accreditation: Strategic Management was then initially developed as a specialised procedure in which a strategy analysis regarding internationally active higher education institutions’ primary areas of activity takes place (cf. ESG standard 2.2). One substantial element that it contains is a SWOT analysis (strengths, weaknesses, opportunities, threats) of each of the areas. In the meantime it has been performed at two Austrian, one Kazakh, one Lebanese, and even at a German higher education institution. However it is now recognisable that higher education institutions are showing greater interest in classical, extensive institutional accreditations in English-speaking countries. In 2016 FIBAA therefore developed a general procedure focused on the international higher education area, namely the “Institutional Accreditation” procedure. In future this is to become the primary international procedure in the INST area⁸. The institutional accreditation procedure: Strategic Management shall, however, remain in the FIBAA portfolio in the institutional area as a specialised alternative.

FIBAA has to date (as of August 2016) performed a total of 21 institutional procedures (eleven system accreditations, one Institutional Audit Austria, five Institutional Accreditation: Strategic Management procedures – including in Lebanon and Austria – as well as four Institutional Audits (three in Austria, one in Switzerland). There are also currently five ongoing procedures (two system accreditations, two Institutional Audit Austria procedures and one institutional accreditation procedure in Kazakhstan).

⁷ This procedure is a further development of the Institutional Audit in accordance with the FIBAA quality standards

⁸ The question and assessment guide for the institutional accreditation procedure will be adopted by the FIBAA Accreditation Committee for Institutional Procedures in September 2016.

3.) From May 2012 to April 2016 FIBAA offered the “**Certification of Corporate Learning Units**” procedure, in which the quality of company in-house training units was reviewed. Due to a lack of further demand, FIBAA has decided to no longer offer the procedure.

4.) In the **CERT** area, FIBAA certifies continuing education courses that do not lead to an academic degree but are offered at university level (for acquisition of the FIBAA quality seal for continuing education courses).

FIBAA has to date performed 48 certification procedures on continuing education courses predominantly in Germany; five were conducted at international institutions (Switzerland, Kazakhstan, Cyprus, Austria) and one in cooperation with institutions in Poland, Romania and the UK.

5.) In the **FIBAA Consult** area, FIBAA has offered the “Evaluation Procedures According to Individual Objectives” since 2016. It concludes with recommendations for further development, but without a formal decision or a seal. No such evaluation procedure has been carried out to date.

Aside from this, FIBAA Consult will, on request, perform individual consultation services, give presentations, study programmes, in-house workshops, conferences and seminars. However, clear separation of assessment and consultation is always observed (cf. ESG Standard 3.3).

All of FIBAA’s procedures and services offered are based on the principles and aims set down in FIBAA’s mission statement below and published on FIBAA’s homepage (<http://www.fibaa.org/en/fibaa.html>). The mission statement affects the day-to-day work of FIBAA. In accordance with the demands of the mission statement the ESG are taken into account in all quality assurance and development procedures. Therefore the AGs of the procedures are based on the defined ESG standards 1.1 to 1.10 in accordance with their respective test frame (cf. ESG standard 2.1):

“FIBAA is a nationally as well as internationally experienced agency for quality assurance. Customer-oriented, efficient, fast and flexible work are some of its trademarks. It awards the Seal of the German Accreditation Council according to the Council’s standards. FIBAA awards its Quality Seal to higher education institutions and programmes of high quality worldwide. Excellent performances, especially those that demonstrate a strong strategy-based and international profile, receive the FIBAA Premium Seal.

The task of quality assurance lies within the responsibility of higher education institutions. FIBAA supports them in achieving their self-defined objectives. It offers impulses for further quality development. It promotes quality and transparency in academic education by assessing Higher Education Institutions, Business Schools, study programmes and further study offers nationally and internationally based on international standards and regulations and by means of documenting and publishing the results.

FIBAA’s procedures on institutional level (system accreditation, institutional accreditation) are interdisciplinary; they are directed at all HEIs and other education providers. In the realm of programme accreditation procedures and certification procedures of academic continuing education courses FIBAA places particular emphasis on programmes in law, social and economic sciences as well as management qualification. As FIBAA’s advisory unit, FIBAA Consult supports higher education institutions and assists them in the development and implementation of their quality oriented strategies. FIBAA Consult conducts evaluation procedures according to individual objectives of higher education institutions and other academic institutions and offers workshops and seminars on current issues.

FIBAA bases its work on national and international requirements and standards. Particular attention is given to the European Standards and Guidelines (ESG) as well as to the promotion of practical relevance and employability.

Our experienced committee members, experts and employers possess comprehensive know-how in all questions of quality assurance and quality management. The results of their work are of benefit to the higher education institutions and other education providers, to students, prospective students, graduates, employers and other interested parties alike.

FIBAA's close ties to science and economy, praxis orientation and internationality are reflected in the compilation of its foundation board and committees that decide on the requirements and the results of accreditation procedures, as well as in the expert panels. FIBAA meets the respective constitutional requirements.

FIBAA is a non-profit organisation.

It is approved by the Accreditation Council and enlisted in the European register EQAR. Active membership with ENQA, EUA, CEENQA and INQAAHE, amongst others, document its international networks. Furthermore, as an official agency for quality assurance, FIBAA is officially recognised in the Netherlands, in Austria and in Kazakhstan. Official recognition in Switzerland is in preparation. FIBAA holds cooperation agreements with foreign agencies of quality assurance in Australia, Kazakhstan, Kyrgyzstan, the Netherlands, Poland and Russia.

All persons linked to FIBAA (committee members, experts, employers etc.) are committed to equal opportunities and do not discriminate against anyone, neither explicitly nor implicitly, and in particular not on the basis of ethnicity, religion, conviction, disability, age, sexual identity or sex.”

FIBAA not only continuously further develops its quality assurance procedures; it also regularly puts its goals and work to the test. For this reason it has performed a SWOT analysis in order to identify potential opportunities for further development and so that it can further develop strategically overall (see annex 96). In particular the short duration of procedures (approx. six months in programme accreditation and approx. nine to twelve months for institutional procedures) as well as the transparent and differentiated AGs for experts and higher education institutions/other institutions can be identified as strengths. The continued opening-up of foreign markets to accreditation agencies brings FIBAA the chance to also position itself in other countries. However FIBAA must address the challenge of often being perceived as a specialist agency in the INST and Consult areas, even though it accredits and evaluates across disciplines in both of these areas.

The foundation bodies are the FIBAA Foundation Council, as the highest body, and the management (see annex 84)⁹. The voluntarily acting FIBAA Foundation Council selects its original and new members by itself and also conducts their re-election. It determines the guidelines in accordance with the statutes, appoints and monitors the management and appoints the members of the committees and FIBAA Appeals Committee. The FIBAA Foundation Council consists of six to fifteen members in accordance with the statute. Five trade associations and consortia from Switzerland, Austria and Germany have each dispatched one member to the

⁹ Another body according to Swiss federal law is the external auditor, which is responsible for auditing accounts.

FIBAA Foundation Council¹⁰. The committee appointed other members. Currently the FIBAA Foundation Council is made up of two German, three Austrian and two Swiss representatives.

The term of office is two years, a re-election is permissible without restriction. The names of those who make up the FIBAA Foundation Council can be found in annex 92.

For the accreditation and certification procedures, FIBAA has established the following committees:

- FIBAA Accreditation Committee for Programmes (F-AC PROG, see annex 01),
- FIBAA Accreditation Committee for Institutional Procedures (F-AC INST, see annex 20),
- FIBAA Certification Committee for Continuing Education Courses (F-CC CERT, see annex 44),

They make the accreditation and certification decisions in the procedures of FIBAA. Moreover there are FIBAA Panel Appointing Committees and the FIBAA Appeals Committee. The majority of the members are representatives of science, while the remainder are representatives of professional practice and students. The concrete composition of the committees is regulated by the appointment regulation of the FIBAA Foundation Council (see annex 95). It is also apparent from the composition (*curricula vitae*) of the committee members (see annexes 04, 23, 47, 75, and 95).

The F-AC PROG is made up of 19 members (eleven higher education institution representatives, six business representatives and two students). Of these two members are from Austria and there is one member each from the Netherlands, Spain and Switzerland.

The F-AC INST currently has 16 members and is made up of ten higher education institution representatives, four professional practice representatives and two students. Of these, two members come from Austria, two from Switzerland and one from the Netherlands.

The F-CC CERT is currently made up of ten members (four higher education institution representatives, five professional practice representatives and one student), two of these members come from Switzerland¹¹.

FIBAA's FIBAA Appeals Committee is currently made up of two higher education institution representatives, one professional practice representative and one student representative.

In accordance with their rules of procedure, the responsibilities of the committees include:

- making the final decisions in the individual procedures;
- deciding on the fulfilment/non-fulfilment of conditions;
- defining and further developing the standards of FIBAA's own procedures;
- defining and further developing the AGs;
- determining the appointment criteria for experts;
- appointing and dismissing the experts;

¹⁰ The Swiss Employers' Association left the foundation by a resolution of the Foundation Council on 27th of June 2016. The foundation statute of FIBAA is soon adjusted accordingly.

¹¹ At the upcoming FIBAA Foundation Council meeting on the 5th September 2016, two more higher education institution representatives will be appointed to the F-CC CERT (cf. F-CC CERT member list). The *curricula vitae* of the two newly appointed members will be considered during the on-site assessment.

- reviewing the expert teams assembled for the individual procedures and confirming or rejecting them¹².

Owing to the composition, responsibilities and duties of the respective committees, all the relevant interest groups (incl. International representatives) are consequently firmly incorporated into the structures of FIBAA.

All the relevant interest groups are also substantially involved in the procedures to be performed, these being FIBAA's day-to-day work. The expert teams are each made up of higher education representatives, professional practice representatives and students, just like the committees. Their independence is thus always guaranteed (cf. ESG standard 2.4). The constitutional requirements¹³ regarding the composition of the committees that decide on accreditation and certification as well as the composition of the expert teams, are therefore fulfilled.

Reference documents:

- 01 List of members of F-AC PROG
- 04 Curricula vitae of members of F-AC PROG
- 20 List of members of F-AC PROG
- 23 Curricula vitae of members of F-AC INST
- 44 List of members of F-CC CERT
- 47 Curricula vitae of members of F-CC CERT
- 75 Curricula vitae of members of the FIBAA Appeals Committee
- 84 Organisational chart of FIBAA
- 92 List of members in the FIBAA Foundation Council
- 95 Appointment regulation for the Foundation Council
- 96 SWOT analysis of FIBAA

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.

FIBAA is a Swiss charitable foundation documented in the public deed from 24/07/2000 and the Commercial Register entry of the Canton of Zürich from 07/10/1987. It has been organised as such since 1994 pursuant to art. 80ff. of the Swiss Civil Code (see annex 90).

¹² For this reason there is a so-called FIBAA Panel Appointing Committee as part of each committee (made up of a science representative, a professional practice representative and a student representative).

¹³ Cf. https://www.bundesverfassungsgericht.de/SharedDocs/Entscheidungen/DE/2016/02/Is20160217_1bvl000810.html;jsessionid=FD185EA71ED31631F2C61CC2AA8B71CA.2_cid383, last accessed on 17th of August 2016.

The historical background is that FIBAA started life when it took control over an already existing Swiss federal foundation with the name Foundation for International Business Administration (FIBA), which had lost much of its staff. The statutes of FIBAA from 28th March 2011 underlie this report (see *ibid.*). The foundation was established by the leading organisations of Swiss, Austrian and German industry¹⁴. The head office of FIBAA is located in Bonn, the registered office is in Zurich¹⁵.

In compliance with the law on establishing a “Foundation for the Accreditation of Study Programmes in Germany”, the German Accreditation Council has concluded a contract with FIBAA, in which the rights and obligations of the two parties in the German accreditation system are determined. According to this, FIBAA is obliged to apply the resolutions of the German Accreditation Council as well as to take into account the Common Structural Guidelines of the Länder set by the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the version of them applicable to each resolution. FIBAA has been authorised in Germany since its first accreditation in 2002 to award the seal of the German Accreditation Council for programmes and internal quality assurance systems to higher education institutions.

Moreover FIBAA has been listed as full member of ENQA¹⁶ since 2002 and in the register of EQAR since April 2009¹⁷. By making this application for reaccreditation by the German Accreditation Council, FIBAA pledges to renew its full membership in ENQA and re-register with EQAR.

Other international recognition:

1. Netherlands

FIBAA is entitled to carry out nationally recognised accreditation procedures at Dutch higher education institutions through employees (Lars Weber and Kristina Weng) who are certified "Panel Secretaries" at the Accreditation Organisation of the Netherlands and Flanders (NVAO).¹⁸ NVAO accepts the reports prepared by FIBAA as a basis for its accreditation decisions.

2. Kazakhstan

With the issuance from June 2014 and on the basis of the recommendation from the Kazakh Republican Accreditation Council, the Ministry of Education and Science of the Republic of Kazakhstan has incorporated FIBAA into the National Register of Accreditation Agencies. This means that FIBAA's resolutions on the accreditation of study programmes at Kazakh higher education institutions are officially recognised (see Annex 97).

¹⁴ Cf. <http://www.fibaa.org/en/fibaa/fibaa20.html> (revised on 15th of March 2017)

¹⁵ Cf. <http://www.fibaa.org/en/imprint.html> (revised on 15th of March 2017)

¹⁶ Cf. <http://www.enqa.eu/index.php/enqa-agencies/members/full-members/> last accessed on 29th of June 2016.

¹⁷ Cf. [https://www.eqar.eu/register/detailpage.html?tx_pxdeqar_pi1\[ciid\]=22](https://www.eqar.eu/register/detailpage.html?tx_pxdeqar_pi1[ciid]=22), last accessed on 29th of June 2016.

¹⁸ Cf. <https://www.nvaio.net/over-nvaosamenwerking/register>, last accessed on 29th of June 2016.

3. Austria

The Federal Ministry for Science and Research in Vienna incorporated FIBAA into the “Regulation on quality assurance agencies” in 2013.¹⁹ FIBAA is, therefore, entitled to perform audits at public universities and universities of applied science in Austria.

Requested recognition (as of August 2016):

1. Switzerland

On 8th June 2016, FIBAA submitted a request for recognition by the Swiss Accreditation Council in order to gain authorisation to conduct institutional accreditation procedures in accordance with the Swiss Federal Act on the Funding and Coordination of the Higher Education Sector. The procedure for recognition includes that the agency introduces itself to the Swiss Accreditation Council. FIBAA is invited to Bern on 16 September 2016 for this purpose.

2. Kyrgyzstan

In accordance with the law of the Kyrgyz Republic “On Education”, independent accreditation of educational institutions will be introduced from 1 September 2016 in Kyrgyzstan. In May 2016, FIBAA applied to the National Accreditation Council at the Ministry of Education and Research of the Kyrgyz Republic for registration as an accreditation agency. In the event of a positive decision, FIBAA will be listed in the Kyrgyz Republic’s National Register for Accreditation Agencies and will therefore receive the right to implement programme-related as well as institutional accreditation procedures at Kyrgyz higher education institutions.

During the assessment on-site (AoS), FIBAA is welcome to report on the current status of the requested recognition.

Reference documents:

- 90 Foundation statute and commercial register excerpt
- 97 Evidence of FIBAA’s international recognition and collaborations

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.

The operational independence, i.e. the autonomy and independence of individuals (of the experts and committees), is guaranteed by FIBAA’s legal entity status, by the regulations in the Foundation Statutes (see Annex 90) and in the Rules of Procedure (see Annexes 01, 21, 45, 73 and 94). All experts and committee members employed by FIBAA perform their duties on

¹⁹ Cf. http://www.ris.bka.gv.at/Dokumente/BgblAuth/BGBLA_2015_II_47/BGBLA_2015_II_47.pdf last accessed on 29th of June 2016.

the basis of their individual expertise and not as representatives of organisations. Influence by third parties is precluded both in law and through the voluntary commitment of those involved.

The FIBAA Foundation Council appoints the members of the F-AC PROG, F-AC INST and F-CC CERT. It has no right to issue instructions in accreditation or certification decisions or in the development of procedures.

The committee members have signed a confidentiality agreement, a data protection notice and a Impartiality Declaration (see Annex 03). If a committee member is not impartial in a procedure, for example due to an affiliation with the higher education institution, they do not take part in the formation of an opinion or the decision-making process when the corresponding procedure is addressed and must leave the room during the discussion and voting. If a committee member was involved in a quality assurance procedure by FIBAA as an expert, they likewise do not participate in the decision-making process for the relevant procedure. In addition, all committee members are required to provide notice immediately of any possible conflicts of interest that arise. This is stipulated in the Rules of Procedure of the respective committee (see above). Additionally, a code of conduct forming part of the rules of procedure stipulates for committee members that

- committee members and experts must act and make decisions exclusively on the basis of quality considerations and must not be bound by third-party instructions,
- they must not use their membership to pursue their own interests or the interests of third parties and
- they must not disclose confidential information and operational or business secrets.

Furthermore, the independence of FIBAA's activities is ensured by the fact that the committees reach their decisions solely on the basis of the expert evaluations in the reports and on the basis of the statements made by the higher education institutions. The committees may deviate from the recommendations and recommended decisions given by the experts, provided that this seems necessary in terms of coherence, conformity of the specified procedural principles or consistency with other decisions. The same applies for members of the FIBAA Appeals Committee whose independence is also guaranteed by the rules of procedure of the FIBAA Appeals Committee and through declarations of impartiality (cf. ESG Standard 2.7). The experts in all quality assurance procedures also perform their duties as independent experts (cf. ESG Standard 2.4). All internal and external FIBAA employees also sign a Impartiality Declaration (see Annex 88).

The FIBAA Foundation Council regulated the separation of assessment (quality assurance procedures) and consultancy (FIBAA Consult) by an updated resolution from February 2016 (see Annex 56). The assessment procedure may not be linked to consultancy services provided at the same time by FIBAA Consult in programme and system accreditation procedures, in the certification of study courses or in evaluations according to individual objectives. The resolution is available on the web pages of all assessment procedures and on the FIBAA Consult page²⁰.

²⁰ Cf. http://www.fibaa.org/uploads/media/Decision_Foundation_Council_Separation_Consultancy_Assessment.pdf (revised on 15th of March 2017)

Reference documents:

- 02 Rules of procedure of F-AC PROG
- 03 Confidentiality and data protection notice, exclusion of bias and Appendix to CV for FIBAA Experts for committee members
- 21 Rules of procedure of F-AC INST
- 45 Rules of procedure of F-CC CERT
- 56 Resolution of the FIBAA Foundation Council on the “Separation of assessment and consultancy” (February 2016)
- 73 Rules of procedure for the board of complaints
- 88 Confidentiality and data protection notice, exclusion of bias and Appendix to CV for FIBAA Experts for FIBAA employees
- 90 Foundation statute and commercial register excerpt
- 94 Internal regulation for the activities of the FIBAA Foundation Council

3.4 Thematic analysis

Standard

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

The findings FIBAA obtains in its external quality assurance procedures are summarised and systematically evaluated related to specific tasks above all by FIBAA Consult and by the division Expert Management.

FIBAA Consult assesses the following continuously and systematically:

- Conditions issued in accreditation procedures
- Evaluation responses from the FIBAA Consult workshops
- Feedback from the FIBAA project manager regarding obstacles in accreditation in the *jour fixe*
- Contributions from various media (newsletters from the German Accreditation Council ENQA, EQAR, EUA, ECA, HRK, DAAD, Deutsche Gesellschaft für Hochschuldidaktik (German Society for Higher Education Didactics) etc. and publications such as Forschung und Lehre (Research and Teaching), duz (Deutsche Universitätszeitung: German University Newspaper), Handbuch Qualität in Studium und Lehre (Handbook of Quality in Teaching and Learning) etc.

in order to improve its own procedures and to generate findings for quality development.

The following formats for thematic analyses result from this:

FIBAA Newsletter:

The FIBAA newsletter is published around five times a year and provides information on general findings and events that FIBAA has encountered during its activities in external quality assurance. The latest issues of the newsletter are available on the FIBAA homepage in German and English and are also sent to subscribers as an email link²¹ (see Annex 99).

Since the newsletter was started in 2011, it has established itself as an informative tool for keeping customers and other interested parties up to date on trends and FIBAA's activities in accreditation and quality assurance. The structure of the newsletter – it briefly touches on current topics and then refers the reader to related links – has proven successful. Currently around 2,000 people are subscribed to the newsletter.

Newsletter for experts "FIBAA Expert"

"FIBAA Expert" newsletter is published twice a year and provides information on new developments in German and international accreditation as well as within FIBAA that are particularly important for the work of experts. It also addresses the topics and results from each previous expert seminar (cf. ESG Standard 2.4 and Annex 71).

FIBAA Consult workshop articles ("factory"):

The FIBAA Consult so called "workshop articles" or "factory" evaluate general findings from FIBAA's accreditation practice and highlight common problems in accreditation procedures encountered by experts and project managers in their daily work. They highlight new developments, offer suggestions for improvement and examples of good practice, show possibilities for decision making and give reference to further information on the topic of quality assurance and development within the higher education sector. Workshop articles are released around four times a year and are circulated via the FIBAA newsletter. In addition, all workshop articles are available as a free download from the FIBAA Consult homepage, both in German²² and English²³ (see Annex 62).

Previous workshop articles:

- Qualification for social engagement – background and implementation (German)
- Programme or system accreditation – the agony of choice (German)
- Accreditation of joint programmes according to the rules of the Accreditation Council (German)
- Admission to Master's study – possible deviation from the 300 ECTS points rule (German)
- Implementing the relative ECTS mark (German)
- Lisbon Convention (German)
- Permissible degree grade in Germany (German)

²¹ Cf. <http://www.fibaa.org/en/news.html> (revised on 15th of March 2017)

²² Cf. <http://www.fibaa.org/de/fibaa-consult/werkstatt.html> (revised on 15th of March 2017)

²³ Cf. <http://www.fibaa.org/en/fibaa-consult/factory.html> (revised on 15th of March 2017)

- Dual study programmes (German)
- Recognition in the higher education area - an overview (German)
- Changes to accredited study programmes (German)
- The new MBA-Guidelines (German and English)
- Crediting work and performance from outside of the higher education institution (German)
- Competence-oriented study programmes (German and English)
- Franchising courses of study (German)
- Writing Learning Outcomes (German and English)
- Learning Outcomes in Accreditation (German and English)
- Modifications in the European Standards and Guidelines (German and English)
- System accreditation decision (German)
- Student-Centred Learning (German and English)

Publications:

In addition, employees of FIBAA Consult and FIBAA analyse various topics from the area of higher education quality assurance and publish the results of this in professional journals:

- Dettleff/Noe (2016): Dual study programmes from the perspective of external quality assurance. Handbook of Quality in Teaching and Learning (see Annex 98) German.
- Dettleff/Schröder (2015): External quality assurance as a tool for consumer protection, product security, strategy development and marketing. Handbook of Quality in Teaching and Learning²⁴. German.
- Assenmacher/Bischof (2013): Equal opportunities as a focus in quality assurance – problems and opportunities in the implementation of an accreditation criterion. Quality in academics. German.
- Schmidt (2013): Implementing the Bologna reform: Notes on aspects of quality management in German higher education institutions – experience from programme accreditation. Liber amicorum, vol. 2. German.
- Schmidt (2013): On the relationship between learning objectives, learning outcomes and their recognition. Handbook of Quality in Teaching and Learning. German.
- Assenmacher/Bischof (2013): Equal opportunities as a focus of accreditation – wish and reality. Handbook of Quality in Teaching and Learning. German.
- Schmidt (2013): About learning outcomes. Magazine “Higher Schools of Kazakhstan”, third issue.
- Schmidt (2013): The Euro FH University of Applied Sciences Hamburg – an example of progressive and quality-oriented higher education design Liber amicorum, vol. 3:
- Schmidt (2012): Quality assurance: A challenge for higher education institutions – an opportunity for students. Liber amicorum, vol. 1. German.

The articles in the professional journals, therefore, focus on overarching issues and are intended to facilitate a general improvement in the attractiveness of quality assurance and the work of the agencies. For example, 36 models of dual study programmes accredited by FIBAA

²⁴ Cf. http://www.fibaa.org/fileadmin/files/folder/FIBAA_Consult/Projekte/Externe_Qualit%C3%A4tssicherung_als_Instrument_f%C3%BCr_Verbraucherschutz_Produksicherheit_Strategieentwicklung_und_Marketing.pdf (revised on 15th of March 2017)

were empirically evaluated in order to investigate the opportunities and risks involved in dual study programmes with regard to academic quality (ibid.).

The findings from their work have been taken into account in both national and international specialist lectures by FIBAA (for example in 2016 at the BundesDeKaneKonferenz on the topic: “Accreditation in accordance with the decision by the Federal Constitutional Court” and at a conference at the KAZGUU University in Kazakhstan in 2016 on the topic “Academic Integrity in Higher Education”). In addition, individual project managers are also active in other working groups, for example in the HRK working group on the topic of franchises.

Reference documents:

- 62 FIBAA Consult workshop article (“factory”, selection)
- 71 Newsletter “FIBAA-Expert” – issue 01/2016
- 98 Example article from the Handbook of Quality in Teaching and Learning
- 99 FIBAA newsletter (June 2016 issue)

3.5 Resources

Standard

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

Finances

The FIBAA Foundation was made exempt from state tax, general municipal taxes and direct federal tax in Switzerland with effect from the 2005 tax period due to its pursuit of public-interest causes. This confirms that FIBAA’s activities are not for profit and that the interests of maintaining the organisation are secondary to the organisation’s public-interest cause. In this sense, the members of the FIBAA Foundation Council (see Annex 92), the committees²⁵ and the FIBAA Appeals Committee are employed on a voluntary basis.

FIBAA primarily generates income (revenues) through contracts it concludes with national and international higher education institutions on the implementation of programme and institutional accreditation procedures. Contracts for certification and evaluation procedures are also concluded.

FIBAA covers its costs (expenses) using this income. FIBAA recoded the following revenues and expenses on its balance sheet for the years 2014 and 2015:

²⁵ Including the FIBAA Panel Appointing Committees

In EUR k	Revenues	Expenses	Difference	Comment
2014	[...]	[...]	[...]	
2015	[...]	[...]	[...]	Improvement of EUR [...] compared to 2015

This information is taken from FIBAA's annual financial statements for 2014/15, which are enclosed as Annex 83. The result for the year 2014 therefore shows a loss of EUR [...]. In contrast, the year 2015 ended with a slight profit of EUR [...] thousand. Taking into account the prior year level (2014), this amounted to a revenue increase of EUR [...]. Nonetheless, a retro-active adjustment of balance sheet entries was effected for the 2015 financial year. Due to the first-time deferral of income corresponding to the services provided by FIBAA – the deferral amounted to EUR [...] – there was a resulting deficit of EUR [...] according to accounting rules, which could be compensated in the years 2016 and 2017 to an appreciable extent due to an improved cost structure. The tax consultant and accountant Grass of Cologne therefore granted FIBAA the audit certificate for both years (2014 and 2015).

An interim statement from 20 June 2016 (ibid.), also prepared by the tax consultant Grass, shows a surplus of EUR [...] as the income statement result. The balance sheet deficit from the prior year resulting from the first-time deferral has, therefore, practically been settled. FIBAA's financial position thus ensures that all financial resources are adequate and suitable for facilitating the full breadth of work conducted by FIBAA. This applies both to personnel expenses and to all other necessary expenses.

Fees are set on the basis of a project cost calculation whereby the costs of the agency and of those directly involved in the accreditation procedure (experts, project managers) are taken into account (see Annex 81). The calculations contain flat rates that cover the incurred costs (expert fees, travel expenses and accommodation for the experts, committee meetings for decisions on ongoing accreditation procedures etc.).

FIBAA's fees are regularly reviewed by the management and the internal finance department to establish whether they cover the costs incurred by FIBAA. If necessary, they are adjusted. In order to monitor this and to establish the required financial as well as staff resources, the agency drafts annual plans of expected revenues and expenses (see Annex 82).

Personnel

The staff body in FIBAA's head office in Bonn is composed as follows, based on the situation expected on 1 October 2016²⁶: FIBAA's head office is managed by a managing director. The previous managing director left the organisation on 31 December 2015. He was followed by a managing director who was appointed on a temporary basis from the outset up to the point at which a new, permanent successor is appointed. This position as permanent successor for the post of managing director was advertised in June 2016. We expect the post to be filled in the

²⁶ 1 October 2016 is taken as the reporting date as there are interim staff changes caused by fluctuation, staff returning from parental leave and new appointments.

coming weeks. There are three additional functional areas: firstly the office together with IT and Finance, and secondly Project Management. Alongside this is the area FIBAA Consult.

There are seven employees in total in the area Office, IT and Finance (5.45 FTE). For the area of Project Management there are twelve employees (9.0 FTE)²⁷, for the area FIBAA Consult there is one employee (1.0 FTE). Four external project managers (one also as a special representative of FIBAA) are employed as freelancers for FIBAA. From October 2016, it is anticipated that there will be eight employees available for supervising procedures who work entirely or in part as project managers, alongside the external project managers who can be deployed flexibly. This ensures that around 80 procedures per year can be processed promptly and punctually. All employees possess the appropriate qualifications for their areas of responsibility (see Annexes 84, 85 and 86). The service areas PROG/CERT national, INST G-A-CH²⁸, PROG/CERT/INST international and FIBAA Consult are coordinated by the division management, which is responsible for coordinating and further developing the areas.

FIBAA employees regularly receive training opportunities (in recent years, for example, this has included training courses on conflict discussion techniques, time management and quality management) and have the opportunity to attend Consult workshops. In addition, individual training measures can be arranged (e.g. English classes).

Premises

A conference room and a meeting room are integrated into the office space. The employed project managers have individual offices in order to maintain the quality of the project process. FIBAA has long-term rental agreements on its office space. The space is sufficient for its current personnel. External meeting rooms are rented for meetings, if required.

IT architecture

FIBAA uses a computer and network infrastructure. The employees at the head office have modern desktop or laptop computers where required. Laptops are selected according to specific criteria (readability on the screen, matt surface, weight, battery life) and are supplemented with external monitors and additional input devices in the office for ergonomic reasons. A current Windows operating system and an Office solution are installed as standard on the basis of a volume agreement with Microsoft. Service programmes such as virus protection, archiving tools, document management, printing services and various collaboration tools are also provided. In addition, each employee has access to a landline telephone with an extension number. FIBAA provides intranet/internet access in every room (external copper wire, 16 Mbit) via a wired gigabit Ethernet or WPA2-protected WiFi only accessible to employees. In 2016, a change to the infrastructure and leasing of an additional internet connection allows for online and image-based expert training courses. Separate WiFi with limited internet access has been set up for guests (e.g. training participants). Employees who regularly travel as part of their work receive mobile telephones (Apple iPhones) with telephone and 3G/4G internet services. FIBAA assumes the operating and administrative costs for these in full.

²⁷ One employee is on parental leave.

²⁸ Germany, Austria and Switzerland.

For all business data, a daily RDX-protected, central memory device is available, which can only be accessed via FIBAA's intranet. The databases necessary for procedure management can also be found there: project management, document workflow, correspondence, publication database and invoicing. In addition, there is extensive wiki-based technical documentation for the system administrator. A colour copier with a high-performance scanner and several network printers supplement the equipment.

For reasons of transparency, FIBAA has a modern, multilingual website²⁹ (German, English, Russian), which contains all information about the procedure models offered and other services. By the end of 2016, a modest, visual improvement will be made to the website together with the system conversion to the latest TYPO3 version. The website can be found through all common search engines. In addition, publicly accessible, password-protected tools are available for procedure evaluation (LimeSurvey), committee meetings (password-protected homepages) and the publication of reports. There is also a central groupware solution (project and date manager, calendar and address book). FIBAA has outsourced email receipt, sending and archiving to a service provider (based in Germany). The encrypted access to the email inboxes takes place via a local mail programme or password-protected online access.

Reference documents:

- 81 Full-cost based calculation for all FIBAA quality assurance procedures
- 82 Revenue planning 2016/17
- 83 Annual statements 2014/15 and interim statement 2016
- 84 Organigram of FIBAA (Foundation/Head Office)
- 85 Employee overview
- 86 Employee and project manager CVs
- 91 Decision of the cantonal tax office ZH, 06/10 103 from 17.02.2006
- 92 List of members in the FIBAA Foundation Council

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.

Internal quality management system (QMS)

Since the last reaccreditation of FIBAA by the German Accreditation Council, FIBAA has further integrated its internal quality assurance measures in all of its work processes and areas (management – service areas – support areas). This includes defining and updating all

²⁹ Cf. <http://www.fibaa.org/en/welcome-page.html> (revised on 15th of March 2017)

business processes in a quality management handbook (QM handbook), systematic and regular revision of working documents, evaluation of all of FIBAA’s services as well as the creation and modification of internal checklists and tutorials³⁰.

In addition, the position of Quality Manager (QM), an employee responsible for the internal QM, was created in January 2011.

FIBAA’s quality principles, as well as the procedures and instruments of internal Quality Management, are made available on FIBAA’s homepage³¹.

Since May 2011, FIBAA has also received support from a data protection representative who is available for employees as a contact person in exercising their rights and who endeavours to ensure the maintenance of all regulations relevant to data protection by providing clarification and advice. A detailed presentation of data protection within FIBAA including legal sources can be found in Annex 89.

Quality management handbook

In consultation with the people responsible for each area, the QM compiles and reviews the QM handbook in electronic format using the software ViFlow. The current version is password protected and can be viewed online by all employees. Its use is intended for job-related tasks. The QM describes in proportionate detail all processes in all levels from the management, service and support area. It also includes templates, work instructions and additional information. All standard processes that are regularly repeated are described. The definition of these processes serves to inform the employees about the intended execution of the tasks and activities in the areas so that each process fulfils the specified quality standards and all relevant guidelines are observed. Above all new employees can use the QM handbook to look up which tasks they need to complete in which order and with which work steps.

Evaluations

All FIBAA procedures are evaluated by those involved (both internal and external participants) (see Annexes 77 and 79):

Who performs the evaluation?	Who is evaluated?	How?	How often?
Assessor	Project manager, office, workflow procedure	Electronically, email link	After decision of the responsible committee
Project managers	Experts	Email	After decision of the responsible committee

³⁰ A tutorial is a document for end users of a software system that serves as an introduction explaining the most important system functions.

³¹ <http://www.fibaa.org/en/fibaa/fibaa30.html> (revised on 15th of March 2017)

HEIs, other providers of continuing education	Reviewer, project manager, office, workflow of procedure	Electronically, email link	After decision of the responsible committee
Participants of workshops	Project officer, head office, sequence	Paper version	After each workshop
Members of the Committees	Head office, division management, documents, sequence	Paper versions, email link	Annually

The results from the evaluations will be used for the further development of the respective formats: References to unnecessary passages in the procedure documents were addressed during the respective reviews. Important topics that concern experts, higher education institutions and committees were discussed in detail in the annual topic stores in the committees³². The results of these discussions are also taken into consideration during procedure processing and in the further development of documents.

The questionnaires were reviewed during the last accreditation period with regard to their structure and content, redundant questions were removed and new questions relevant to quality assurance were added in their place. The offer of online questionnaires has also been systematically expanded. In addition, the process for the evaluation of project managers has been revised and is now systematic. This allowed for an increase in the return rates and therefore an improvement in the usefulness of the evaluations (e.g. return rate for evaluations by experts in 2013: 77 and in 2015: 123). FIBAA Consult evaluations procedures and events (workshops, seminars, conferences) are now also evaluated (see Annexes 78 and 80).

The results of the evaluations are summarised in the annual quality management report³³ by the QM and are published together with the description of the quality concept on FIBAA's homepage. Any striking results are discussed with the responsible area managers and in the quality team (division management, general management and quality management representative). If changes to the process sequences result from this, these are reviewed with the respective division manager and the QM and are added to the QM handbook accordingly. If the amendments concern procedural documents, checklists or tutorials, these are also updated accordingly, submitted to the committees for approval and announced in a suitable manner (see below). Those affected by the amendments in the processes are contacted directly and are obliged to implement the changes in the future.

³² This is the last committee meeting of the year in which requirements for further development are discussed and, if necessary, topic areas from past meetings are addressed in more detail.

³³ Cf. http://www.fibaa.org/fileadmin/files/folder/Qualitaetsmanagement/QM-Bericht/QM_Bericht_2015_end_extern_.pdf (revised on 15th of March 2017)

Internal checklists and tutorials as well as external manuals and templates

In consultation with management, the division managers create internal checklists and tutorials for the employees as well as external guidelines and templates³⁴ for FIBAA's customers and experts. These are amended according to changes in processes, new regulations, results from the German Accreditation Council's evaluated monitoring procedures and from complaints procedures and adjustments to the procedural documents and are therefore always up to date. The internal checklists and tutorials serve to provide FIBAA employees with information and training and are issued at the beginning of the introductory training phase. The employees are obliged to use these documents. With this FIBAA aims to ensure that all its employees adhere to the standards it issues and the respective relevant rules in full in their work processes. FIBAA customers receive all relevant manuals and templates directly before a contract is concluded. FIBAA experts receive these as soon as the respective expert team is appointed and approved/confirmed by the FIBAA Panel Appointing Committee. The manuals and templates (alongside the AG) ensure that FIBAA customers know how the self-documentation should be structured and which criteria are assessed so that they can prepare everything accordingly³⁵.

Procedures for the continuous improvement of the internal QMS

FIBAA systematically revises all procedure documents as well as the QM handbook:

- If changes are made to the national and international guidelines (such as ESG, EQUAL MBA Guidelines, Rules of the German Accreditation Council for the Accreditation of Study Programmes and for System Accreditation, Common Structural Guidelines of the Länder for the Accreditation of Bachelor's and Master's Study Programmes etc.).
- If FIBAA employees suggest a need for improvement.
- During the regular review of processes as part of the plan-do-check-act control cycle.

The further development of working process is an essential part of the internal QM system. As part of this, it is essential that improvement is seen as a path towards more efficient and higher quality working and not as an end target.

The following formats are available as regular events for providing information by the management and the area managers and for employees to discuss with one another and also to provide a platform for suggestions for improving processes in the procedures:

- **Jour Fixe:** Once a month (usually on the second Tuesday of the month) there is a regular fixed meeting for all employees³⁶. Employees can have topics added to the agenda that they believe should be discussed as a group. The agenda is given to the FIBAA team around one week before the event. A fixed point on the agenda is "Suggestions for improving internal quality assurance", i.e. topics that serve to improve FIBAA's internal processes. In addition, the management, area managers and the project managers, in addition to interested employees, discuss suggestions, criticisms, problems from procedure supervision and current issues. Currently (July 2016), the lack of concrete information regarding when a study programme can bear the title "of

³⁴ E.g. <http://www.fibaa.org/de/programmbezogene-verfahren/prog-gemaess-den-anforderungen-des-akkreditierungsrates/handreichungen-und-vorlagen.html> (revised on 15th of March 2017)

³⁵ E.g. templates for [curriculum overview](#)

³⁶ External project managers are connected through telephone conferencing for this purpose.

Arts” or “of Science” has been the subject of critical discussion. In addition, in the jour fixe information on current developments, events, upcoming procedures and projects, the awarding of these and changes in the procedures is provided. Absent employees are subsequently informed through the record of results.

- **Subsequent improvements from the committee meetings:** Following the committee meetings, the area managers report to the project managers working in these areas on the procedure adopted in the meeting, topics of discussion in the respective committees and other notes on experts or procedures. The aim is to familiarise project managers who are not present at the meetings, usually for reasons of cost, with the perspective of the committee members, to ensure the consistent implementation of procedures and to optimise FIBAA’s procedures both for project managers and for the committee members. These discussions are usually held four times per year and are particularly useful for the area of programme accreditation, as a high number of procedures are processed by different project managers³⁷.
- **Project manager workshops:** Area managers from the service areas invite both internal and external project managers working in their area to this meeting format in order to provide information about changes in the procedures or in their processes. In particular, if an AG has been changed or if changes to the project processing sequences arise due to national or international guidelines, the project managers receive the tools necessary to process future projects here.
- **Emails:** Alongside verbal discussions in the jour fixe, committee meeting or project manager workshop, important changes or information from relevant institutions that issue guidelines are also communicated in emails to the mailing lists set up for all project managers. Employees are obliged to incorporate these changes or information in their own work processes.
- **Info day:** Usually, FIBAA’s management invites all internal and external employees to an information day once a year where employees can discuss topics with one another and be introduced to all other areas. This primarily serves to provide information about the services offered by FIBAA, current projects being processed by FIBAA and the status of the respective activities.
- **Situation-related discussions:** If none of the communication formats mentioned above is suitable for a topic or suggestion for improvement (because it either concerns a specific group of people or because the discussion should be held at short notice), then the format and participants are decided by those responsible according to the situation.

In all formats, employees have the opportunity to report on their experiences from their projects, to present recurrent problems and to suggest process improvements. In the event of systematic anomalies, the employee responsible for the process reviews the process, if appropriate in coordination with the management or the QM. If the responsible employee considers the change to a process to be advisable, they give their reasons for this to the QM. All employees are appropriately informed (see above).

³⁷ External project managers are also involved here through telephone conferencing.

Changes during the regular review of processes as part of the plan-do-check-act control cycle

The QM regularly reviews internal processes with regard to their currentness, feasibility and orientation towards results. The focus is, above all, on the following questions:

- Is the process implemented in the form documented?
- Are the employees/roles involved indicated?
- Do additional employees/roles need to be added or removed?
- Is the process coherent?
- Can the process be streamlined?
- Does the process achieve its objective?
- Are all guidelines observed?

If the QM comes to the conclusion that a process needs to be reviewed, they discuss this with the responsible division manager. They apply the changes to the QM handbook and provide the division manager and, if appropriate, the management with a draft. They then check the draft and correct or approve it. All employees are informed of the results in a suitable manner.

Ensuring maintenance of the ESG by the QM

FIBAA provides documents for all procedures (for example the relevant AG). These are based around the ESG and take the ESG standards into account (cf. ESG Standards 2.1 and 2.5). All experts and all committee members sign the Impartiality Declaration with which they pledge to prevent intolerance and all forms of discrimination (cf. ESG Standard 2.4). FIBAA's employees are obliged by the General Equal Treatment Act [*Allgemeine Gleichbehandlungsgesetz*] applicable in Germany to prevent or eliminate in their work discrimination on the grounds of race or ethnic origin, sex, religion or belief, disability, age or sexual identity.

The QM handbook is continually revised as structural changes have been made in many areas and process since the last reaccreditation. It is up to date and will be made available for inspection during the AoS.

Reference documents:

- 77 Sample feedback questionnaire for FIBAA expert seminar participants
- 78 Sample feedback questionnaire following evaluation procedures (FIBAA Consult)
- 79 Sample evaluation questionnaire for expert assessment by the project manager
- 80 Sample evaluation questionnaire following FIBAA Consult workshop
- 89 FIBAA data protection declarations

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.

Every five years, FIBAA undergoes external review by the German Accreditation Council as well as re-registration by EQAR and renewal of its ENQA full membership. This application serves as the basis for the expert assessment for all three procedures.

A) European Standards and Guidelines Chapter 2

2.1 Consideration of internal quality assurance

Standard

External quality assurance should address the effectiveness of the internal quality assurance described in Part 1 of the ESG.

The question and assessment catalogues for **programme accreditation** (AG PROG), for procedures in accordance with the requirements of the German Accreditation Council (FKB PROG AR) and for procedures in accordance with the quality requirements of FIBAA (AG PROG FIBAA and AG PhD) arise from an understanding of quality that was developed in compliance with the ESG and the criteria of the German Accreditation Council. All quality standards from Chapter 1 ESG are reviewed with regard to their fulfilment by the higher education institution in accordance with the AG PROG AC (see Annex 09) and the AG PROG FIBAA (see Annexes 10 and 11). This is the result of a detailed comparison of the criteria from the different AGs for programme accreditation and the ESG standards, which can be found in Annex 12.

The structure of the question and assessment catalogue for **certification** (AG CERT, see Annex 50) is based on the AG PROG. All quality standards from Chapter 1 of the ESG are also reviewed in certification with regard to their fulfilment by the application in accordance with AG CERT. The detailed comparison of the criteria of the AG for certification and the ESG standards can be found in Annex 51.

In contrast to FIBAA's accreditation and certification procedures, which review either study programmes, training courses or higher education institutions, in **Evaluation Procedures According to Individual Objectives**, the subject and the goals of evaluation as well as the concrete criteria are determined by the client together with FIBAA Consult. A detailed comparison of the specific criteria for the evaluation and the ESG standards is therefore not possible. On the one hand, the evaluation procedures can contribute to success monitoring and therefore to reporting, and on the other hand, they can provide incentives for (further) quality development. For this too there is a sample question and assessment catalogue (AG EVAL, see Annex 58), which can, depending on the procedure, be added to individually and in coordination with the higher education institution and the experts by FIBAA Consult's project management. The essential phases of an evaluation and the criteria and standards of the ESG are considered here in analogous application in accordance with the subject of evaluation and the respective objective of the evaluation.

While the QACs are explicitly based around Chapter 1 of the ESG standards in programme-related procedures (PROG CERT and in the FIBAA Consult evaluation procedures), these standards are reflected on the corresponding institutional level in the AGs for FIBAA's respective **institutional procedures** (see Annexes 29, 30, 31 and 32). As a result, the relevant standards are not allocated and addressed individually as in programme-related procedures, but are viewed and assessed in the overall institutional context. A comparison of the criteria for INST procedures and the ESG standards can be found in Annex 33.

Reference documents:

09	AG PROG AC
10	AG PROG FIBAA
11	AG FIBAA PhD
12	Comparison of the PROG AG criteria and the ESG standards
29	AG system accreditation
30	AAC Institutional Audit Austria
31	AG Institutional Accreditation: Strategic Management
32	AG Institutional Accreditation
33	Comparison of the INST AG criteria and the ESG standards
50	AG CERT
51	Comparison of the CERT AG criteria and the ESG standards
58	AG EVAL

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.

In accordance with its foundation statute, FIBAA realises its objective “*above all through the development of suitable methods and tools which define the quality guidelines for the respective educational objectives of training courses on offer and institutions*” and thus serve to facilitate a differentiated assessment. The quality assurance procedures conducted by FIBAA pursue clear objectives, which are set out below for each procedure, and follow the relevant statutory regulations described below.

In the area of **programme accreditation** and **certification** FIBAA uses specific quality criteria to review whether the objectives and the strategy of study programmes/academic continuing education courses are achieved (or can be achieved). As part of this, during the procedures, the higher education institution receives helpful information for the further development of the quality of its study programmes/continuing education courses.

In the AG testing areas and criteria for attaining a **FIBAA seal** (cf. ESG standard 2.1 and 2.5), the accreditation and certification procedures make assessments according to the following decision bases (see Annexes 08 and 49):

- ESG
- ECTS Users’ Guide
- Dublin Descriptors

- MBA Guidelines³⁸
- Lisbon convention (in relation to crediting study and exam performance from higher education institutions)
- Framework for Qualifications of the European Higher

Education Area (for programme accreditation, provided there is no applicable national qualification framework)

- European qualification framework for life-long learning (in the certification of continuing education courses)
- National regulations, if applicable

In programme accreditation procedures for awarding the seal of the German Accreditation Council in Germany, the guidelines of the German Accreditation Council and the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder, state-specific structural guidelines and the qualification framework for German higher education degrees are taken into account alongside the ESG (see Annex 07). The same applies to programme accreditation for joint programmes. Within the meaning of the European Approach for Quality Assurance of Joint Programmes³⁹, accreditation results are recognised that come from EQAR-listed agencies.

FIBAA Consult's evaluation procedure according to individual objectives can concern the quality of teaching and learning in an institution or a sub-unit; it may involve subjects and departments, consider study programmes, courses or individual learning units, or be thematically focussed on specific features. The precise objectives are identified together with the client. The (institutional) evaluation procedure is, therefore, an important tool for the strategic planning and the further development of a higher education institution. Depending on the objective, the evaluation procedure may also serve as preparation for an accreditation procedure.

The ESG are also used as a basis in the evaluation procedure. FIBAA Consult also incorporates relevant guidelines that are specified together depending on the subject of the evaluation and the location of the institution, for example:

- for Germany, the guidelines of the German Accreditation Council and the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder as well as state-specific regulations, if appropriate;
- for Bologna signatory states, the European directives and recommendations, if necessary taking account of national regulations (e.g. ECTS Users' Guide).

As FIBAA Consult has not yet been able to gain any experience with this kind of evaluation procedure, the agency has not yet been able to learn the lessons necessary for further development. However, it can be said that although the ESG can be applied to individual and voluntary procedures, their application could set too strict of a framework that might restrict the results and the intended quality developments in the higher education institutions. This is because, in an individual procedure, only a limited degree of transparency can be established before the procedure. The framework conditions for the review (such as the basic procedure outline and the assessment levels) could be published. It is, however, not possible to publish

³⁸ Only in the context of programme accreditation in accordance with the FIBAA quality standards.

³⁹ Cf. https://www.eqar.eu/fileadmin/documents/bologna/02_European_Approach_QA_of_Joint_Programmes_v1_0.pdf last accessed on 29th of June 2016

the review areas and criteria in advance that are only developed together with the institution and are dependent on the respective subject of the evaluation. In addition, evaluation procedures according to individual objectives are often chosen when strategic decisions are to be made using the input of external experts. The preparation of sensitive decisions, such as the closure of study programmes or the centralisation of quality assurance, is not a topic area that an institution would like to publish or could publish before a decision is reached. For this reason, the requirement to publish reports results in certain evaluations being given to other consultancy service providers, which would ideally be conducted by accreditation agencies using their expertise.

FIBAA pursues the following objectives in its **institutional procedures**:

- The subject of **system accreditation** is the assessment of the internal quality assurance system of a higher education system in the area of teaching and learning. Essentially, the procedures review whether the existing quality assurance system guarantees that the qualification objectives defined by the higher education institution for the study programmes offered can be achieved and whether the ESG (Chapter 1 and 2) as well as the guidelines of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder and the criteria of the German Accreditation Council are applied in the developed and further development of study programmes. Following successful system accreditation, procedures that are established in accordance with the accredited system or were already subject to internal quality assurance in accordance with the guidelines of the accredited system, are accredited. As the seal of the German Accreditation Council is awarded in system accreditation, the same guidelines apply as in programme accreditation with the awarding of the seal of the German Accreditation Council (see above and Annex 28).
- The **Institutional Audit Austria** aims to provide evidence that a higher education institution successfully assumes institutional responsibility for quality assurance and development in the areas of learning, research and organisation with the aid of a quality management system effective across the higher education institution. In addition, the Institutional Audit Austria is intended to support higher education institutions in the further development of their internal quality management system as it does not review the higher education institution's quality management system selectively in relation to the individual study programmes, but rather takes a holistic view and demonstrates both the strengths of the system and also areas for potential development. In the Institutional Audit Austria, the guidelines of the Austrian HS-QSG are taken into account in the AAC alongside the ESG.
- The **institutional accreditation** procedure aims to provide a comprehensive review of the functional capability of the management and quality management system of a higher education institution and the associated processes of its various service areas. This procedure may be carried out at any higher education institution, regardless of their place of establishment. However, as a result of thematic overlapping with the German and Austrian national procedures, the procedure is primarily intended for higher education institutions in other countries.
- The aim of the **Institutional Accreditation: Strategic Management** procedure is a strategic analysis and review of various service areas in a higher education institution.

The higher education institutions receive feedback regarding their structures and processes beyond the status quo as well as prompts with regard to their specific development possibilities. The procedure can be conducted at higher education institutions that have already successfully undergone one of the institutional procedures mentioned above in the area of quality assurance and quality management (this has already been done twice). Furthermore, it can be carried out at any higher education institution regardless of their place of establishment.

In addition to formal requirements, the higher education institutions are also asked in all of FIBAA's quality assurance procedures to describe and evaluate their respective individual objectives at the level of higher education study programmes or courses. All procedures stated take the principles of "fitness of purpose" and "fitness for purpose" into account.

FIBAA develops and updates the criteria in the AG regularly on the basis of feedback from higher education institutions, experts and project managers as well as in the event of changes to the legal basis (cf. ESG Standards 3.6 and 2.5) and, in doing so, reviews whether the procedures and methods are still appropriate. In order to ensure the interests of the various interest groups (academics, representatives of professional practice), these are involved in the preparation and further development of the AG as part of the F-AC PROG, F-AC INST and F-CC CERT committees (cf. ESG Standard 3.1). These groups discuss and adopt, if necessary, reviewed versions of FIBAA's AG (usually in the last meeting of the year). In addition, their feedback is incorporated into FIBAA's QM as part of the evaluations (cf. ESG Standard 3.6). In FIBAA Consult's evaluation procedure, project management should further develop the AG in consultation and cooperation with the higher education institution and expert team as a result of the individual adjustment and structuring of the procedure in accordance with the pursued objective of the higher education institution for each procedure, in order for all relevant interest groups to be involved in the structuring of the procedure.

Reference documents:

- 07 Collection of documents for programme accreditation (German Accreditation Council)
- 08 Collection of documents for programme accreditation in accordance with FIBAA's quality standards
- 28 Collection of documents for system accreditation
- 49 Collection of documents for the certification of continuing education courses

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.

In all of FIBAA's quality assurance procedures, quality criteria that are derived from the national and international standards are taken as a basis (cf. ESG Standard 2.2). In this respect, they are reliable and appropriate. The basic standards, like the AG derived from them, are specified in advance, published on FIBAA's website and are also made available to the higher education institutions without this needing to be requested.

In principle, all of FIBAA's external quality assurance procedures consist of

- the self-documentation in which the higher education institution or institution describes itself in accordance with the pre-defined and published standards and in accordance with the respective AG/ RAC for the procedure itself,
- the subsequent AoS in the peer-review procedure,
- the decision by the responsible FIBAA accreditation or certification committee⁴⁰ on the basis of the report and the statement by the higher education institution/institution,
- the subsequent complete publication of the report on FIBAA's homepage, (regardless of whether it is a positive or negative decision), and, if the seal of the German Accreditation Council is awarded, publication in the "Higher Education Compass" as well as
- a consistent follow-up in the form of the review of the fulfilment of conditions and continuous monitoring based on the contractually regulated disclosure requirement of the higher education institution in the event of subsequent amendments. In addition, all quality assurance procedures are limited in time and require reaccreditation, recertification and re-evaluation after set and published time periods. For system accreditation, an interim evaluation is planned as an additional follow-up in accordance with the rules of the German Accreditation Council.

The detailed process steps for all external quality assurance procedures are described on FIBAA's homepage in both German and English, as well as in the manuals for the respective procedures (see Annexes 5, 6, 24, 25, 26, 27, 48 and 57) and are discussed with the higher education institutions as part of the preparatory informational discussions. Sample schedules for the assessments on site can be found in Annexes 14, 15, 35, 36, 37, 38, 53 and 57.

Reference documents:

- 05 Programme accreditation manual – German Accreditation Council procedures
- 06 Programme accreditation manual – FIBAA procedures
- 14 Sample schedule for the assessment on site – German Accreditation Council procedures
- 15 Sample schedule for the assessment on site – FIBAA procedures
- 24 System accreditation manual
- 25 Institutional Audit Austria manual
- 26 Institutional accreditation: strategic management manual
- 27 Institutional accreditation manual
- 35 Sample schedule for the assessment on site – system accreditation

⁴⁰ This does not apply to FIBAA Consult evaluation procedures, which do not include a formal decision.

- 36 Sample schedule for the assessment on site – Institutional Audit Austria
- 37 Sample schedule for the assessment on site – Institutional accreditation: strategic management
- 38 Sample schedule for the assessment on site – institutional accreditation
- 48 Certification manual
- 53 Sample schedule for the assessment on site – certification
- 57 Guidelines FIBAA Consult for Evaluation According to Individual Objectives incl. sample schedule

2.4 Peer-review experts

Standard

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

All external quality assurance procedures by FIBAA are conducted in peer review procedures, i.e. with the participation of external experts including academic representatives, representatives of professional practice and students.

Appointment of experts and team composition

Experts are always (unsolicited application, advertisement) initially appointed on a probationary basis. Appointment is upon the recommendation of the relevant division manager for programme and institutional accreditation and certification and, finally, by the management. If both parties are satisfied following the expert's initial assignments, the experts are recommended for appointment by the respective FIBAA accreditation or certification committee. The recommendation for the composition of the expert teams for the respective quality assurance procedures is made centrally by the employee responsible for Panel composition in the division Expert Management. Once experts have been appointed, this person prepares an expert team sheet (see Annex 68), which is submitted to the responsible FIBAA Panel Appointing Committee for approval and then to the higher education institution for confirmation.

Criteria for professors / lecturers⁴¹

Professors / lecturers in programme accreditation and certification procedures must have sufficient academic expertise in the respective specialist core areas (in economics, social sciences, law) and, as a general rule, must have several years' experience in teaching and research in higher education or continuing education institutions. This is demonstrated by:

- active membership in the relevant scientific community

⁴¹ The criteria are publicly available and are published on FIBAA's homepage at <http://www.fibaa.org/en/information-for-fibaa-experts/criteria-for-appointing-fibaa-experts.html> (revised on 15th of March 2017)

- good reputation and extensive knowledge in their subject area.
- For certification procedures: Experience in the area of continuing education

Professors / lecturers in institutional procedures must have academic competence and leadership experience in higher education management. Specifically, these experts should meet the following criteria:

- experience in the area of higher education management and leadership,
- experience in the area of internal quality management within higher education or
- experience in the design of study programmes
- For the institutional accreditation: strategic management procedure: knowledge in the area of strategy analysis (e.g. balanced scorecard)

In addition, the following are desirable for all professors / lecturers:

- experience with accreditation and evaluation processes
- being open to the developments within the Bologna Process framework
- networking with companies and/ or cooperating with them (in research or consulting activities)
- practical competence from the contact/ cooperation with businesses and companies or business and legal consulting organisations
- international experience
- foreign language skills.

Criteria for representatives of professional practice

Representatives of professional practice in programme accreditation and certification procedures must have managerial experience. This is understood to mean managing people, organisations, finances/budgets and processes. For legal practitioners, these criteria apply in the same way with regard to legal consultation activities in companies, in administration, in comparable organisations or in freelance work, connected to professional and personal responsibility.

In addition, the following are desirable:

- networking with HEIs and/or experience with cooperating with them (in research activities or when recruiting new employees)
- ideally experience with using or managing quality processes.

Representatives of professional practice in institutional procedures must have experience with the introduction or the application of quality management systems in professional practice. Above all, these experts should have experience in introducing or managing quality processes.

In addition, the following are desirable:

- experience with certification procedures (ISO, TQM etc.)

- international experience
- foreign language skills.

For all representatives of professional practice, managerial experience in business/practice is demonstrated by:

- experience in business/operational roles (not only in purely supportive roles),
- responsibility for more than five employees,
- budget responsibility, ideally with profit responsibility and
- relevant experience in appointing staff or in filling positions in the company.

For legal practitioners as representatives of professional practice, the following applies:

- experience with legal advice and legal proceedings, e.g. in a lawyer's office or legal/personnel departments of larger companies
- having practice as a lawyer or a notary on one's own authority
- executive function (with a legal focus) in public administration.

Criteria for student representatives

Representatives from the student body in programme accreditation procedures must demonstrate relevant specialist studies (in economics, social sciences or law). This is demonstrated by their enrolment at a higher education institution. In addition, student experts should work in university committees or should have done so in the past. These include student representative associations, committees etc.

Student representatives in institutional procedures must already have experience in accreditation procedures.

In addition, the following are desirable for all student representatives:

- experience with accreditation and evaluation processes
- being open to the developments within the Bologna Process framework
- networking with companies and/ or cooperating with them
- international experience
- foreign language skills

Reference is given later in this chapter to the details regarding representatives of the student body in certification procedures.

Criteria for commissioning experts in evaluation procedures by FIBAA Consult

As a general rule, FIBAA Consult involves academic representatives, representatives of professional practice and students in the evaluation procedures. The concrete composition of the team varies depending on the objectives of the evaluation. The criteria for the experts in the

three status groups correspond to those in programme and institutional procedures and are published on FIBAA Consult's website⁴².

Composition of the expert team

The following table presents the composition of the expert teams in the individual procedures (excluding evaluation procedures, see above regarding this):

Representatives of:	Programme accreditation	Certification	System accreditation ⁴³	Institutional Audit Austria	Institutional accreditation	Institutional accreditation: strategic management
Academia (university)	X	X (with experience in continuing education)	Three representatives with experience in: <ul style="list-style-type: none"> - Higher education institution management and leadership - Internal quality assurance systems of higher education institutions - Design of study programmes - Knowledge in the area of strategy analysis (in institutional accreditation: strategic management) 			
Academia (university of applied science)	X	X (with experience in continuing education)				
Professional practice	X		X Experience in quality management			
Student body	X	X (with experience in continuing education, if possible)	X			
Additional expertise	e.g. in <ul style="list-style-type: none"> - dual study programmes, - distance learning study programmes, - country experts, etc. 		At least one foreign expert	At least two experts from Austria	At least one expert from the country where the higher education institution is based	

Furthermore, FIBAA takes the following criteria into account in appointing the expert teams:

- Internationality (e.g. for institutional procedures, inclusion of one foreign expert is necessary)

⁴² Cf. http://www.fibaa.org/fileadmin/files/folder/FIBAA_Consult/Info-Material/Kriterien_Experten_FIBAA_Consult_en.pdf (revised on 15th of March 2017)

⁴³ In institutional procedures, the expert team chooses a chairperson from amongst themselves.

- Balanced representation of genders
- Use of a maximum of one expert on probation per team
- Avoidance of use of several experts from the same higher education institution
- For Germany: no expert should come from the same federal state as the applying higher education institution
- Abroad: at least one expert must have expertise regarding the national higher education and accreditation system as well as, where necessary, the required language skills
- Profile-specific distinctions (e.g. additional expert knowledge for dual study programmes, distance learning study programmes etc.)

Independence and impartiality of the expert team

When they begin their role as expert for FIBAA, the experts first fill in a sheet: “Curriculum Vitae for Assessors” for the role of expert as well as an Appendix to CV for FIBAA Experts (see Annex 65). They then sign a Code of Conduct, Confidentiality and Data Protection Notice (see Annex 66). Before each specific assignment in an accreditation or certification procedure, the experts confirm by indicating on the Impartiality Declaration (see Annex 67) and through signing it, that they have no connection to the higher education institution in question or to the study programme to be assessed. This form is sent to experts when they are asked to perform the role of expert. All corresponding declarations are archived by FIBAA.

There are clear rules in the event that those involved in FIBAA procedures are not impartial. These are also stipulated in the Guidelines for FIBAA Experts in Accreditation Procedures (see Annex 63). Someone is not impartial if:

- They are employed by the applying higher education institution or have been employed by the institution in the last five years
- They are completing a doctoral or post-doctoral degree at the applying higher education institution or have done so in the last five years
- Students have been matriculated at the applying higher education institution in the last three years
- Experts are participating in joint research projects/consulting or other intensive cooperative projects or have done so in the last three years
- The expert’s faculty has been assessed by employees of the applying higher education institution in the last three years (exclusion of cross-over assessment)

Experts are obliged to inform FIBAA immediately if the higher education institution makes an offer of future cooperation in teaching or research during the accreditation or certification procedure.

FIBAA Consult ensures the impartiality of the experts appointed in evaluation procedures by having the experts sign the Declaration of impartiality; code of conduct, confidentiality and data protection notice for experts at FIBAA Consult (see Annex 59) before they start their activities as an expert.

Further training of experts

In order to perform the role of an expert, knowledge of the ESG; the rules of the German Accreditation Council and the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder and all other accreditation/certification criteria applicable to FIBAA and the procedure is an essential requirement. FIBAA therefore offers online training and regular face-to-face seminars for experts. Information and dates can be found on FIBAA's homepage⁴⁴.

Online training courses are explicitly directed at new experts and those who have not been involved in accreditation procedures for a long time. They cover basic topics such as the outline of accreditation procedures and the rules of the German Accreditation Council. All new experts are referred to the online training courses after their appointment on a probationary basis. Project managers also refer their experts to the option of online training courses in every procedure. Up until 2014, the training for new experts and those who had not been appointed to procedures for a long time was conducted twice a year as attendance events. It became apparent, however, that this format could only reach a small portion of the experts. In addition, even experienced experts can benefit from an occasional refresher of the basic information, but tend not to attend a day-long training event for it. For this reason, the online training format was developed as an asynchronous offer. However, with this asynchronous format, the difficulty is that there is no option for asking questions. For this reason, a transition to synchronous online events is planned in 2016.

Expert seminars (face-to-face) are held two to three times per years at various locations in Germany in order to allow all experts to participate. Experts' travel costs are reimbursed up to EUR 150. To begin, expert seminars provide information on updates and changes in FIBAA and in accreditation practice. Secondly, a key topic is addressed. In the past these topics have included features of dual study programmes (March 2015), an introduction to institutional procedures (October 2015) and the requirements on franchise study programmes in accreditation (April 2016) (see Annex 64). The presentation handouts and presentation as well as the online training courses can be accessed at any time in an internal area for experts on FIBAA's homepage at <http://www.fibaa.org/en/welcome-page.html> (information for experts). The access data are:

Username: [...]

Password: [...]

Since FIBAA has established that not all experts can be reached with training courses and seminars, the **expert newsletter** "FIBAA Expert" has been published twice a year since 2014, as mentioned above (see Annex 71). This format, which isn't dependent on time or place and is tailored to the role of experts, supports keeping experts up-to-date between training courses. The expert newsletter provides information on changes in the accreditation guidelines or interpretations as well as on further developments in procedures. It is always issued following the expert seminars and also provides a summary of the discussions held during the seminars.

⁴⁴ Cf. <http://www.fibaa.org/en/information-for-fibaa-experts/training-for-fibaa-experts.html> (revised on 15th of March 2017)

For specific questions, there are several manuals which can be provided to experts according to the situation. These include country-specific information for international procedures (see Annex 70). In previous years it became clear that some experts were unsure in written procedures which requirements these procedures placed on them. FIBAA took this opportunity to create a manual for written procedures, which has since been sent to experts together with every request for taking on a role as an expert (see Annex 69). The experts also receive them again when their project manager writes to them as part of a written procedure.

The experts are prepared for the specific quality assurance procedures by sending the self-documentation of the university / institution as well as all relevant documents and information on the procedure at an early stage. In principle, the project managers ask all experts involved for feedback on the draft process schedule for the AoS and on potentially critical points and also encourage a preliminary team discussion by email as appropriate preparation. As a general rule, a group dinner is also held with a preliminary meeting on the evening before the AoS for the purpose of preparation. All documentation that is relevant for the experts is also available on FIBAA's website⁴⁵.

Composition and further development of the expert pool

Overall (as of June 2016), 408 experts and 189 experts on probation are registered in the expert pool for programme accreditation, these are divided up as follows:

University representatives	130
Representatives from universities of applied science	214
Representatives of professional practice	121
Student representatives	56
Representatives from universities of cooperative education (Berufsakademien)	14
Representatives of distance learning programmes	13
Country experts and other	45

In 2015, 255 experts were appointed for programme accreditation; this year 168 have been appointed so far (as of June 2016).

The expert pool for institutional procedures contains 94 experts that are divided as follows:

University representatives	19
Representatives from universities of applied science	30
Representatives of professional practice	24
Student representatives	8

⁴⁵ Cf. <http://www.fibaa.org/en/information-for-fibaa-experts.html> (revised on 15th of March 2017)

Overall, 55 experts were appointed in the area of institutional procedures in 2015⁴⁶. These experts came from Germany, Switzerland, Austria, Lebanon, Finland, Romania, Great Britain, Lithuania and Kazakhstan.

The number of experts in the expert pool for system accreditation and for institutional accreditation is tailored to the project requirements and project type, as with programme accreditation. As part of this, the expert pool for programme accreditation requires greater diversification since a broader spectrum of subjects needs to be covered.

Based on previous experience, the agency does not consider a special expert pool for certification procedures necessary. Experts who have previously been appointed to programme accreditation procedures and also have experience in the continuing education segment are marked accordingly and can be found in the database. This is currently the case for 11 percent of the experts. Measured by the number of certification procedures conducted, the number of experts in the certification division has proven to be sufficient. If certain expert knowledge is missing for individual quality assurance procedures, the expert pool is, as a general rule, expanded depending on the procedures according to the procedure described above.

The expert pool is dynamic, meaning new experts are regularly added, but some experts also leave every year. Accordingly, 47 experts left and 35 joined in 2015. The division leader Expert Management conducts requirement analyses at regular intervals; in addition, they receive feedback from the employee responsible for Panel composition, the person who is in charge of expert recruitment and team appointment, as to which areas require additional support.

Student representatives in certification procedures

Student representatives are a fixed component of expert teams in programme and institutional accreditation procedures and in evaluation procedures. However, until now this was not the case in certification procedures. It has proven difficult to find students taking part in continuing education courses as these are often also employed, with many in full-time employment. The continuing education courses are also not very long in duration, meaning participants cannot join FIBAA as experts in the longer term. In spite of these difficulties, student representatives are now always involved in certification procedures. Particular importance is attached to the search for appropriate student representatives.

Evaluation of experts

Every project manager evaluates the experts after every procedure. For this there is a standardised evaluation sheet (see Annex 79). The evaluation results are collected and assessed by the division management Expert Management. These assessments can be sent to the experts upon request. The purpose of the evaluation is early detection of requirements for discussion or training. If an expert is given a mark of 3 or lower on the point "Knowledge of accreditation practice" in two or more procedures, they are requested to take part in an (online)

⁴⁶ All procedures concluded in 2015 by the F-AC INST were taken as a basis.

training course or a seminar before their next appointment. If an expert is given a mark of 3 or lower in the other assessment points in two or more procedures, the division head Expert Management discusses those points with the expert and decides on measures where appropriate, for example, participation in a training course or probationary status in their next procedure. Further information can be found in Chapter 3.6.

Reference documents:

- 59 Declaration of impartiality; code of conduct, confidentiality and data protection notice for experts at FIBAA Consult
- 63 Guidelines for FIBAA Experts in Accreditation Procedures
- 64 Topic list for expert seminars
- 65 Sample sheet: “Curriculum Vitae for Assessors” for the role of experts at FIBAA and Appendix to CV for FIBAA Experts as an annex to the “Curriculum Vitae for Assessors”
- 66 Code of Conduct, Confidentiality and Data Protection Notice
- 67 Impartiality Declaration for experts
- 68 Sample FIBAA expert team sheet
- 69 Sample manuals for experts (written procedure, dual study programmes)
- 70 Template for country information and example of country information, Northern Cyprus/Turkey
- 71 Newsletter “FIBAA-Expert” – issue 01/2016
- 79 Sample evaluation questionnaire for expert assessment by the project manager

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.

For all available procedures of the external quality assurance, FIBAA provides separate AGs (see annexes 09, 10, 11, 29, 30, 31, 32, 50 and 58), which provide a concrete framework for assessment for both higher education institutions/other institutions and the experts. These are published on FIBAA’s homepage and are also available in English. The AGs contain all legal bases and quality standards including differentiated assessment levels. They are also provided to the higher education institutions and other institutions at the opening procedure. This gives the higher education institution/other institution a transparent, accurate and complete description of the quality criteria to be reviewed for the respective quality assurance procedure, and it ensures that the recommendations from the experts and the FIBAA committees (for procedures with formal decisions) can be compared and are consistently applied. This is because the transparent definition of the quality requirements, which the experts are also obligated to follow, promotes the homogeneity of expert assessments and ensures consistency in implementation.

In FIBAA's experience, the AG as a common basis for higher education institutions/other institutions and expert teams avoids misunderstandings and prevents individual assessments based on "received opinions". Experience has shown that using the AG for higher education institutions/other institutions gives good reason to opt for FIBAA. For example, the Austrian RAC and the resulting advantages in the Institutional Audit Austria procedure have been named as a clear advantage over other accreditation agencies and a decisive criterion for the conclusion of a contract.

With regard to system accreditation, higher education institutions/other institutions that have undergone the procedure with FIBAA have already used the AG for programmes (after consultation with FIBAA), for example, to check the completeness and accuracy of the instruments and procedures for their internal quality assurance systems.

In order to ensure that the criteria are also consistently applied by their employees in all procedures, FIBAA has taken special measures:

- At the start of their employment, the project managers are fully prepared in accordance with the introductory training plans (see annex 87). Here they receive all relevant documents, legal bases and procedural principles, and usually participate as observers in two review procedures (including preparation and follow-up, and procedural communication). Then they are guided and supported by the respective divisional management or an experienced project manager for the first two individual procedures.
- Only FIBAA employees who have already gained several years of experience in programme accreditation are used in the area of institutional procedures. Before an employee supervises an institutional procedure independently, they participate as an observer in a current procedure and get involved in communication and various procedural steps. If they subsequently supervise an institutional procedure for the first time, they are then guided and supported again by INST divisional management.
- Since a project manager responsible for the procedure supervises each AoS and can answer any structural questions that emerge, and since the first draft of the review report is drawn up by the respective project manager of the procedure using a standardised sample review report (see ESG Standard 2.6), this also ensures that the procedural steps and structures of quality standards can be compared and are consistent. In addition, each review report passes through a revision loop carried out by the respective divisional management according to the "four-eye principle" in order to finally ensure the consistency of the review reports once again.

The regular revisions of the AG until now have improved the reliability of achieving the objective of the procedures and have kept the quality standards up to date (for example, to take account of the revised ESG, the new MBA guidelines and the latest version of the ECTS User's Guide as well as the amended national regulations) (cf. ESG Standard 2.2). The further development of the AG in each of the procedures is shown in the following:

In concrete terms, the AG was revised for both AC and FIBAA procedures in **Programme Accreditation** in 2014⁴⁷. In particular, redundancies were removed in the chapters, which had made their way in during the course of the previous revisions. Various information and structure elements were also addressed in the form of tables or references. As part of the revision

⁴⁷ Cf. <http://www.fibaa.org/de/aktuelles/archiv-details/date/2014/06/18/mehr-effizienz-und-kundenfreundlichkeit-durch-noch-schlanke-verfahren-18062014.html> (revised on 15th of March 2017)

process, newly included direct links to all legal sources, quality requirements and additional documents as well as sample templates ensure complete transparency and therefore provide a wide range of support when filling in the respective quality criteria. This revision structured the AG of the programme accreditation in a significantly more user friendly way, which also streamlines the procedures themselves.⁴⁸ The review reports in procedures for awarding the seal of the German Accreditation Council (AC procedure) for a study programme now generally consist of a maximum of 20 pages, and those for the FIBAA procedure have a maximum of 40 pages. The experience gained up until now with these new AGs has been positive. Both the experts and the higher education institutions/other institutions involved commend the significantly more strict, and therefore also stringent, set of criteria.

As the differences in the quality requirements for on-site, distance learning and online study programmes have become smaller, FIBAA provides only one AG, which in this regard, especially takes into account respective didactical features. Previously a AG for distance learning study programmes and a AG for on-site study programmes were available. In the past this occasionally led to uncertainty and confusion among higher education institutions/other institutions and experts. Since the revised AG was introduced, which combines all formats into one, there has been transparency. It also takes into account new study formats such as blended learning, which would otherwise not have been able to be clearly assigned.

In order to further ensure the quality in the programme accreditation procedures **in accordance with FIBAA's quality standards**, F-AC PROG has introduced two new regulations as further development:

- 1.) On the one hand, only conditions in a maximum of seven asterisk criteria⁴⁹ are accepted by the committee if a positive decision should still be possible. If this number is exceeded, accreditation is denied. This regulation comes from the experience that a higher education institution/other institution is not usually able to resolve such a high number of weaknesses in the study programme to a satisfactory level within the specified nine-month deadline for the fulfilment of the condition.
- 2.) In addition, chapters 1.1 (Objective of the study programme) and 3.1.1 (Logic and consistency of the curriculum) of the AG must both be marked as "fulfilled". No conditions can be stated here. If one of these two chapters is marked as "not fulfilled", accreditation must also be denied. This regulation also results from the experience that no satisfactory level of quality can be completely achieved in a study programme, whose objective and/or implementation of curricula are not coherent and transparent. Accordingly, FIBAA's quality seal is not awarded to this study programme. So far there have been only a few procedures where these issues have been critical. It remains to be seen what impact this regulation will have in the future.

The AG for receiving FIBAA's quality seal for **doctorate programmes** was last revised in 2013. The seemingly long period since the last revision is due to the fact that so far only two cluster procedures have been carried out in Kazakhstan, which included PhD study programmes. As a consequence, the critical number of procedures that is required for a reliable evaluation has not yet been reached (this was set to five procedures by PROG divisional management). The

⁴⁸ After the revision, the AG AC now has only 18 criteria instead of 31.

⁴⁹ Criteria, which are considered particularly important and are marked accordingly. If asterisk criteria are not met this automatically results in a condition, whereas non-compliance with a criteria that is not an asterisk criteria only results in a recommendation. Up until now there has been no upper limit for asterisk criteria.

process stipulates that the AG PhD is therefore initially tested in three to four additional procedures and then critically reviewed, and if necessary adjusted, with this additional wealth of experience.

The AG used for **system accreditations** was last revised by F-AC INST in December 2015. Few changes were made to the content here. The changes made were used to specify individual criteria and restructure the criteria within the AG. The need for improvement with regard to the specifications was mainly determined based on the experience of the expert teams and the project managers. If, for example, wording in the AG had led to requests or necessary clarifications from FIBAA in several instances at the internal evaluation stage of the criteria carried out by the experts as part of the assessments, the corresponding wording was adjusted and clarified in the AG. There was, however, no need to make changes due to the uncertainties in the AG indicated by the higher education institutions. The restructuring undertaken primarily concerned redundancies. In addition, issues of the reporting and documentation system were spread out across the individual chapters of the AG. Based on the experience of working with the AG, however, it was shown that a final, summary chapter on the reporting and documentation system is clearer and repetitions are thus avoided.

The RAC in the **Institutional Audit Austria** procedure was last adopted in May 2015 in an updated version by F-AC INST. Only editorial changes were made here. Up to now, the RAC has only been used in a completed procedure so that no significant need for change has occurred yet as a result of different experiences from higher education institutions and experts.

The AG for **Institutional Accreditation: Strategic Management** was adopted in a revised version by F-AC INST in July 2015. In this revision, primarily clarifications were made and the definitions of the evaluation standard were revised. This was also done based on the experience of the experts and project managers, which had been gained from the completed procedures up to that date. It was shown here that the questions had not yet been fully answered to a satisfactory level with the evaluation texts. In the revised version of the AG, the direct relationship of questions to the corresponding section in the evaluation part is now apparent.

The AG for **Institutional Accreditation** was developed by F-AC INST in the first half of 2016 and approved in summer 2016.

In the area of **certification**, streamlining of the AGs is planned for 2017/18 as the criteria used up until now are strongly orientated towards the AG for FIBAA programme accreditation and have proven, in part, not to be relevant for certifications.

Reference documents:

- 09 AG PROG AC
- 10 AG PROG FIBAA
- 11 AG PhD
- 29 AG System Accreditation
- 30 AG Institutional Audit Austria
- 31 AG Institutional Accreditation: Strategic Management
- 32 AG Institutional Accreditation
- 50 AG CERT

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.

The review reports of all external quality assurance procedures of FIBAA (both nationally and internationally) can be easily found on the FIBAA's homepage in the respective area of business and are published in their entirety once the procedure has been completed (usually following the decision of the relevant committees)⁵⁰, regardless of whether a positive or negative decision has been made⁵¹. The only exception to this are passages of text, which are removed from the review reports due to data protection regulations or confidential information (e.g. data on financing a study programme or a higher education institution/other institution). In order to determine whether this is the case, the higher education institution/other institution is sent the full review report, including the decision by the respective committee, following the accreditation or certification decision. They then have the opportunity to review the text with regard to data protection information and, if necessary, raise justified objections. If the objections are found to be substantiated, the corresponding points are removed from the review report.

All review reports on procedures where the seal of the German Accreditation Council is awarded are also additionally published in the "Higher Education Compass" in accordance with the rules of the German Accreditation Council. The review reports can also be found using Internet search engines.

In regards to programme accreditation, certification and institutional procedures, in which formal accreditation or certification decisions are made by the respective accreditation or certification committees, the decision of the responsible committee is added as a prefix to the review report and published together with it. The committee's decision (and if applicable, stated conditions as well as the accreditation, certification or evaluation period) and the review report of the procedural experts (with the decision recommendation) are clearly different from one another and are titled accordingly (see annexes 16, 39, 54 and 60). Conditions (if stated), recommendations and follow-up measures are outlined in a summary at the beginning of the review report and are therefore easy to find.

In order to ensure that all review reports are drafted in a clear and comprehensible manner, there is a review report template for each FIBAA external quality assurance procedure, which is based on the structure of the respective AG and is used as a basis when drawing up the

⁵⁰ E.g. <http://www.fibaa.org/nc/en/procedures-at-programme-level/prog-gemaess-den-anforderungen-des-akkreditierungsrates/akkreditiert-programmes.html> (revised on 15th of March 2017) and <http://www.fibaa.org/de/institutionelle-verfahren/systemakkreditierung/akkreditierte-hochschulen.html> (revised on 15th of March 2017)

⁵¹ This applies to procedures with conclusion of contract from 1st of January 2016.

relevant draft report⁵². The respective template is subdivided into chapters with clear headings and categories; the higher education institution/other institution and the subject of the procedure to be accredited/certified/evaluated (for example, the study programme in the case of programme accreditation) must be made just as clearly as FIBAA, as an accrediting/certifying/evaluating agency on the cover sheet. Each review report also has guidelines concerning font style and size as well as the overall length of the review report. For the project managers, there is also a manual with clear guidelines for drawing up a draft report (see annex 19). Furthermore, all review reports contain general information on the study programme/higher education institution/other institution, information on the workflow of the accreditation, certification and evaluation procedures (including legal bases, names of the experts etc.) and clearly distinguish between facts of the matter and assessment. There is also a so-called quality profile in each review report (for each chapter individually and as an overall view at the end of the report), which makes the assessment of the experts visually easy to understand and demonstrates how the respective criterion was assessed by the expert group. This ensures that all review reports have a clear, comparable and homogeneous structure. The fact that the first draft report is written by FIBAA's respective project manager, and is completed and authorised in subsequent stages by all of the experts involved in the procedure, makes it clear once again that consistent and common criteria are used when drawing up a report.

Reference documents:

- 16 Template review report for Programme Accreditation - German Accreditation Council
- 19 Manual for drawing up review reports – Example of Programme Accreditation German Accreditation Council
- 39 Template review report for System Accreditation
- 54 Template review report for Certification
- 60 Template review report for Evaluation Procedure by FIBAA Consult

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.

The higher education institutions and other institutions, which do not agree with a decision of the corresponding committee or with individually stated conditions, may lodge a complaint with FIBAA for each completed FIBAA accreditation and certification procedure. For the evaluation

⁵² In the area of system accreditation, such a template has so far proven, in part, to be unsuitable since the quality management systems of the higher education institutions to be described are different in such a way that fixed and predefined structuring would not be appropriate. The review reports on system accreditation are in fact written and published with a uniform look, but have a flexible structure. Nevertheless, all criteria required for awarding the seal of the Accreditation Council are of course observed, clearly described and assessed.

procedures by FIBAA Consult that do not conclude with any formal decision, a higher education institution/other institution may also lodge a complaint if they do not consider the recommendations in the review report to be appropriate.

In all of the aforementioned cases, this complaint must be lodged within a one month period after written notification of the decision and must be justified in writing in each case. After the complaint has been received by the FIBAA office, following renewed referral by the experts, it is forwarded to the responsible committee for a decision⁵³ to be made. If this does not remedy the complaint, the procedure is presented to the FIBAA Appeals Committee for review and an opinion. The FIBAA Appeals Committee clarifies the matter and gives the responsible committee⁵⁴ a reasoned recommendation for a final decision.

After consideration by the FIBAA Appeals Committee, FIBAA's responsible committee makes a reconsidered and final decision. In the case of a negative decision by the responsible committee, the costs of the complaint procedure must be paid by the client. These may consist of travel expenses as well as work required. If the complaint is not remedied, the higher education institution concerned may take legal action against this. This, however, only applies to higher education institutions in the State of North Rhine-Westphalia, since the agency acts here as a loaning agency.

The information on the possibility to lodge a complaint is stipulated in the procedural conditions of FIBAA⁵⁵, which form an integral part of each contract in the areas of programme accreditation, certification and institutional procedures (see annexes 17, 18, 40, 41, 42, 43 and 55). In the area of FIBAA Consult, the corresponding information can be found in § 11 Paragraph 2 of the general terms and conditions for consultancy (see annex 61). The higher education institutions/other institutions are also informed about the complaints process, including guidelines and deadlines, via legal remedy instructions in the respective decisions, which are sent following the official decision of the respective committee. For each FIBAA procedure you will find the information on the complaints process and the description of the complaints procedure on the homepage under the menu item "Procedural steps", which is accessible to the public⁵⁶. The members of the FIBAA Appeals Committee are also available there.

The rules of procedure for the FIBAA Appeals Committee (see annex 73) stipulate the tasks of the committee, ensures its impartiality in the procedures to be assessed, determines the decisions to be made and describes the procedures. The FIBAA Appeals Committee consists of four members, who are made up of the status groups professors / lecturers, professional practice representatives and student representatives and are appointed for three years (see annexes 72 and 75).

Since 2012, a total of 24 complaints procedures have been carried out:

⁵³ There is no consideration by the committee in the case of evaluation procedures by FIBAA Consult.

⁵⁴The recommendation of the board of complaints is directed at the experts in the case of evaluation procedures by FIBAA Consult.

⁵⁵ See, for example, § 13 of the procedural conditions for programme and system accreditation on behalf of the Foundation for the Accreditation of Study Programmes in Germany (Accreditation Council), annexes 17 and 40.

⁵⁶ http://www.fibaa.org/fileadmin/files/folder/Beschwerdeverfahren/Beschwerdeverfahren_EN.pdf (revised on 15th of March 2017)

Complaints procedure PROG 2012-2016

Procedure		Final decision			
		remedied	rejected	with-drawn	of which were referred to the FIBAA Appeals Committee
2012	4	2	2		2
2013	10	3	7		8
2014	7	1	6	1	6
2015	1	1	0		1
2016	2 ⁵⁷				
Total	24	7	15	1	17

As of August 2016

Up to now, complaints have only emerged in the area of programme accreditation, although the PROG area also constitutes the largest proportion of FIBAA procedures. There have not yet been any complaints in the areas of CERT and INST.

The vast majority of the complaints were referred to the FIBAA Appeals Committee, who then recommended rejecting the complaint in the majority of cases. In all of the cases up to now, F-AC PROG has agreed with the recommendations of the FIBAA Appeals Committee.

In order to improve the consistency in the implementation of the complaints procedure, a manual was created for the project managers. Especially given the fact that each individual project manager deals with only very few complaints, it is necessary to state the requirements and individual steps of the procedure in a fairly comprehensible way. To this end, a template for presenting a complaint has also been created in parallel (see annex 76).

Reference documents:

- 17 Sample contract including procedural conditions – German Accreditation Council procedures
- 18 Sample contract including procedural conditions – FIBAA procedures
- 40 Sample contract including procedural conditions – System Accreditation
- 41 Sample contract including general contractual terms and special conditions – Institutional Audit Austria
- 42 Sample contract including general contractual terms and special conditions – Institutional Accreditation: Strategic Management
- 43 Sample contract including general contractual terms and special conditions – Institutional accreditation
- 55 Sample contract including general contractual terms and special conditions – Certification

⁵⁷ The two complaints procedures in 2016 had not yet been concluded at the time of preparation of the self-documentation.

- 61 Sample contract evaluation procedure including general terms and conditions for consultancy
- 72 Member list of the FIBAA Appeals Committee
- 73 Rules of procedure for the FIBAA Appeals Committee
- 75 Curricula vitae of members of the FIBAA Appeals Committee
- 76 Manual for complaints procedures

C) Additional criteria of the German Accreditation Council for certification in Germany

4.1 Internal structures and procedures

The agency proves binding internal structures and procedures, which ensure the correct and consistent application of the “Rules of the German Accreditation Council for the Accreditation of Study Programmes and for System Accreditation” in its current version. The agency concludes an agreement with the German Accreditation Council pursuant to § 3 of the ASG.

In compliance with the law on establishing a “Foundation for the Accreditation of Study Programmes in Germany”, the German Accreditation Council has concluded an agreement with FIBAA, in which the rights and obligations of the two parties in the accreditation system are determined. Under this agreement, FIBAA is obliged to apply the resolutions of the German Accreditation Council as well as to take into account the Common Structural Guidelines of the Länder set by the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder (KMK) in the version that is applicable to each resolution (cf. ESG Standard 3.2). The agreement currently in force is dated 4 June 2013.

As shown above, FIBAA has binding internal structures and procedures and has ensured and demonstrated these using its own QMS (cf. ESG Standard 3.6), as well as using suitable procedural structuring, criteria and processes (cf. ESG Standards 2.2, 2.3 and 2.5). The correct and consistent application of the rules of the German Accreditation Council in the version applicable in each case is especially guaranteed by the fact that FIBAA is constantly and actively informed about changes (for example, by participating in agency meetings, through the evaluation of the German Accreditation Council Newsletters etc. and by taking into account the circular letters sent to the agencies).

If there are changes to guidelines, FIBAA shall immediately incorporate these changes into its documents and procedures. If the change affects a AG, the changes are presented to the responsible committee for a decision to be made. If the change results in a revision of checklists, tutorials, templates or manuals, the area managers shall draw up revised versions in consultation with the management. If a change also affects processes, the responsible employee informs the QM about the change. They change the process in the QM handbook and provide the responsible employee with a draft. They check the draft and correct it or release it. All employees are immediately informed in all cases (e.g. via e-mail, project manager workshops and monthly jour fixe meetings, cf. ESG Standard 3.6).

In this way, a correct and consistent application of the “Rules of the German Accreditation Council for the accreditation of study programmes and for system accreditation” is guaranteed in its current version.

4.2 Legal entity status

The agency has a separate legal entity.

FIBAA is a charitable foundation under Swiss federal law (pursuant to the public deed from 24/07/2000 and the Commercial Register entry from 07/10/1987). It has been organised as such since 1994 as defined by art. 80ff. of the Swiss Civil Code (see annex 90, cf. ESG Standard 3.2).

Reference document

90 Foundation statute and commercial register excerpt

4.3 Full-cost basis

The agency does not work on a profit-oriented basis and carries out the accreditation procedures on a full-cost basis.

FIBAA has been exempted from state tax as well as the general communal taxes and the direct federal tax in Switzerland with effect from the tax period 2005 on grounds of pursuing charitable purposes (see annex 91). This confirms that FIBAA is a non-profit organisation and the interests of maintaining the company are subordinate to charitable purpose. In this sense, the members of the FIBAA Foundation Council, the committees⁵⁸ and the FIBAA Appeals Committee work on a voluntary basis.

The fees are determined based on a project cost calculation, which takes into account the costs of the agency and the people directly involved in the accreditation procedure (experts, project managers) (see annex 81). The calculations include lump sums, which cover the costs incurred (expert fees, travel expenses and accommodation for the experts, committee meetings for a decision on ongoing accreditation procedures etc.).

FIBAA's fees are regularly reviewed with regard to whether they cover the costs incurred by FIBAA. If necessary, they are adjusted. In order to monitor this and to establish the required financial as well as staff resources, the agency drafts annual plans of expected revenues and expenses (see annex 82). Further details can be found in chapter 3.5.

Reference documents:

- 81 Full-cost based calculation for all FIBAA quality assurance procedures
- 82 Revenue planning 2016/17
- 91 Decision by Cantonal Tax Office ZH, 06/10 103 from 17/02/2006

⁵⁸ Including FIBAA Panel Appointing Committees.

4.4 Accreditation covering different types of higher education institutions and disciplines

The agency accredits across types of Higher Education Institutions as well as across disciplines in case of certification for programme accreditations.

In accordance with its mission statement (cf. ESG Standard 3.1), FIBAA assesses and accredits/certifies study programmes (Bachelor, Master and PhD study programmes) in the area of programme accreditation, and continuing education programmes in economics, law and social sciences, as well as in management qualification, in the area of certification. The institutional procedures of FIBAA always cover different disciplines.

FIBAA's offers are aimed at German and foreign higher education institutions, business schools and universities with private and public sponsorship (with state recognition or in preparation). Accordingly, FIBAA provides accreditation/certification that covers different types of higher education institutions and disciplines. There is also a joint cooperation agreement with the AHPGS and ASIIN accreditation agencies, which establishes guidelines for programme and system accreditation procedures carried out in joint operation (cf. ESG Standard 4.7, see annex 97).

Reference document

97 Proof of international recognition and cooperation of FIBAA

4.5 Competences, responsibilities and staffing of the bodies

Responsibilities of the bodies and their personnel composition are appropriate and regulated with binding effect. Academics, students and professional practice are properly involved.

As already outlined in ESG Standard 3.1, the main bodies of the foundation are the FIBAA Foundation Council as the supreme body and the management⁵⁹. The voluntarily acting FIBAA Foundation Council selects its original and new members by itself and also conducts their re-election. It determines the guidelines in accordance with the statutes, appoints and monitors the management and appoints the members of the committees and FIBAA Appeals Committee. The exact tasks and areas of competence of the management are listed in the "Tasks and responsibilities of the management (Rules of procedure)" (see annex 93). The FIBAA Foundation Council consists of six to fifteen members in accordance with the statute. Five trade associations and consortia from Switzerland, Austria and Germany have each dispatched one member to the FIBAA Foundation Council. The committee appointed other members. Currently the FIBAA Foundation Council is made up of two German, three Austrian and two Swiss representatives. The term of office is two years, a re-election is permissible without restriction. re-electionThe staff who make up the FIBAA Foundation Council can be found in annex 92.

⁵⁹ Except for the external auditor, who is responsible for auditing accounts.

The manager reports to the FIBAA Foundation Council and is responsible for operative business. Under Swiss law, they do not have to be registered in the commercial register.

The committees (F-AC PROG, F-AC INST and F-CC CERT) make a decision on the FIBAA accreditation and certification procedures. Furthermore, FIBAA has set up FIBAA Panel Appointing Committees and a FIBAA Appeals Committee. The competences and responsibilities of all committees mentioned above are governed by binding regulations in their respective rules of procedure (see annexes 02, 21, 45, 73 and 94). Members include professors / lecturers, professional practice representatives and student representatives. The concrete composition of the committees is regulated by the appointment regulation of the FIBAA Foundation Council (see annex 95). Its current composition can also be found on FIBAA's homepage. In the composition of each committee, there should generally be more representatives of the academic community than representatives of the professional practice sector and student body (see *ibid.*). Accordingly, academic representatives generally have the majority of votes. In addition, each committee member has a vote that can be transferred to another member of the same status group beforehand so that the majority of votes for academic representatives is ensured in each meeting (see annex 02, 21, 45).

The expert teams are usually made up of two professors / lecturers, one professional practice representative and one student. The Guidelines for FIBAA Experts in Accreditation Procedures contains a binding regulation which stipulates that the academic representatives have the majority of the votes in the case that a mutual decision is not reached (see annex 63). The same shall apply accordingly for the composition and majority of votes of the academic representatives on the FIBAA Appeals Committee. This is a binding regulation in the rules of procedure of the FIBAA Appeals Committee (see annex 73).

Reference documents:

- 02 Rules of procedure for F-AC PROG
- 21 Rules of procedure for F-AC INST
- 45 Rules of procedure for F-CC CERT
- 63 Guidelines for FIBAA Experts in Accreditation Procedures
- 73 Rules of procedure for the FIBAA Appeals Committee
- 92 Members list of the FIBAA Foundation Council
- 93 Tasks and responsibilities of the management (Rules of procedure)
- 94 Internal regulation for the operations of the FIBAA Foundation Council
- 95 Appointment regulation for FIBAA Foundation Council

4.6 Publication of internal procedures for complaints and appeals

The agency publishes its procedures for internal quality assurance and for handling complaints and appeals.

The information on the possibility to lodge a complaint is stipulated in the procedural conditions of FIBAA, which form an integral part of each contract in the areas of programme accreditation, certification and institutional procedures (see annexes 17, 40)⁶⁰. The higher education institutions/other institutions are also informed about the complaints process, including guidelines and deadlines, via legal remedy instructions in the respective decisions, which are sent following the official decision of the respective committee. For each FIBAA procedure information can be found on the complaints process and the description of the complaints procedure⁶¹ on the homepage under the menu item "Procedural steps", which is accessible to the public (cf. ESG Standard 2.7).

Reference documents:

- 17 Sample contract including procedural conditions – German Accreditation Council procedures
- 40 Sample contract including procedural conditions – System Accreditation

4.7 Commissioning other organisations

If the agency engages other organisations for the implementation of parts of the procedures, the correct implementation must be ensured by binding and documented agreements.

In 2006 (amended in 2008) a joint cooperation agreement was concluded with the AHPGS and ASIIN accreditation agencies to establish guidelines for programme and system accreditation procedures carried out in joint operation (annex 97). A "Lead agency" was defined for a joint procedure in accordance with this cooperation agreement. Detailed task distributions and guidelines for cooperation are defined in the cooperation agreement. The cooperation agreement explicitly states that the contractual obligations of the individual agencies with the German Accreditation Council shall not be changed, in which case the implementation of the procedure, regardless of which of the three agencies carried it out, complies with the regulations of the German Accreditation Council.

Up to now, procedures of this kind have only been carried out occasionally. The guidelines of the German Accreditation Council were observed in the process. In the past re-accreditation period, cooperation procedures of this kind have not been carried out.

⁶⁰ For the evaluation procedures of FIBAA Consult, the possibility to lodge a complaint is regulated in § 11 Paragraph 2 of the general terms and conditions for consultancy.

⁶¹ C.f. http://www.fibaa.org/fileadmin/files/folder/Beschwerdeverfahren/Beschwerdeverfahren_EN.pdf (revised on 15th of March 2017)

Reference document

97 Proof of international recognition and cooperation of FIBAA

4.8 German language

In the area of business of the German Accreditation Council, the agency generally uses the German language.

The business language of FIBAA, as an international agency with its head office in Germany, is exclusively German in the area of business of the German Accreditation Council. Accordingly, all information on FIBAA's homepage⁶² concerning the award of the seal of the German Accreditation Council, as well as communication with the higher education institutions, the experts and the German Accreditation Council, and all relevant contracts, agreements and explanations on procedures for awarding the seal of the German Accreditation Council are in German. All review reports for the seal of the German Accreditation Council and all decisions are, as a general rule, also drafted and published in German (see annexes 05, 07, 09, 16, 17, 24, 28, 29 and 40).

FIBAA makes exceptions where discussions, for example with English-speaking teaching staff and international partners, require small parts of the review to be written in English. Here it is ensured that all of those involved can follow the discussions, and where necessary they are translated.

Reference documents:

- 05 Manual for Programme Accreditation (German Accreditation Council)
- 07 Collection of documents for Programme Accreditation (German Accreditation Council)
- 09 AG PROG AC
- 16 Sample review report for Programme Accreditation - German Accreditation Council
- 17 Sample contract including procedural conditions – German Accreditation Council procedures
- 24 Manual for System Accreditation
- 28 Collection of documents for System Accreditation
- 29 AG System Accreditation
- 40 Sample contract including procedural conditions – System Accreditation

⁶² <http://www.fibaa.org/de/programmbezogene-verfahren/prog-gemaess-den-anforderungen-des-akkreditierungs-rates.html> (revised on 15th of March 2017)

D) Opinion on questions from the progress report of the German Accreditation Council

As part of its progress report sent to FIBAA dated 30 May 2016, the German Accreditation Council has identified subject areas and unsolved questions, which are to be investigated as part of the reaccreditation by FIBAA. The questions and topic areas are therefore addressed individually in the following.

5.1 Dealing with the challenge of system accreditation

The German Accreditation Council has found that the quality of FIBAA's work is mostly good, but dealing with the experience and challenges of system accreditation during the reaccreditation of the FIBAA should be outlined. In view of the system accreditation experience gained over the last few years, FIBAA can identify the following challenges with system review:

- The higher education institutions use, in part, extremely heterogeneous quality assurance systems. In order to accommodate this diversity, it is necessary to make the appointed experts more aware of the freedom of the higher education institutions when structuring quality assurance systems and thereby ensure that they keep an open mind when dealing with the higher education institution.
- The huge amount of freedom when structuring the higher education institutions also means that there must be a correspondingly broad range of expert knowledge in the expert team. This is ensured, among other means, by the fact that experts from various institutions (state, private, national and international university of applied sciences and universities, as well as from the professional practice sector) are represented in the expert teams.

5.2 FIBAA's understanding of dual study programmes and accreditation practice

Amidst the diversity of models for dual study programmes, which are possible thanks to the criteria for study programmes with a special profile demand of the German Accreditation Council, the core of the dual study programmes forms a successful interlinkage between the two places of learning, higher education institution and business operation. In addition to the regular rules⁶³, FIBAA takes this into consideration in the accreditation for each procedure (in particular with consideration of the principles of the academic feasibility and the academic level of the higher education institution). For that reason, when assessing dual study programmes, FIBAA always extends the expert team by one expert with corresponding expertise in dual study programme models. All experts will be provided with a manual for this study model in future (see annex 69). A corresponding online training course on dual study programmes for experts is already available.

FIBAA has evaluated and published its practical experience by means of an empirical analysis of 36 dual study programme models (see annex 98). In the publication, FIBAA's understanding of the quality of dual study programmes is firstly discussed in detail, and then secondly the

⁶³ Rules of the Accreditation Council and binding structures, structural guidelines of the KMK, qualification framework for German higher education qualifications.

opportunities and risks of duality for the quality of studies are developed. A workshop report with the essential quality requirements was also drawn up in 2014 as an aid for all higher education institutions and vocational academies of FIBAA Consult (see annex 62).

Reference documents:

- 62 Workshop article for FIBAA Consult (selection)
- 69 Example of manuals for experts (written procedure, dual study programmes)
- 98 Example of articles for handbook quality in studying and teaching

5.3 Area of conflict between thorough assessment/ limited time and resource budget

In order to combat the area of conflict between a thorough assessment and a limited time and resource budget, FIBAA has made its processes and procedures more professional, continued to standardise them and structure them more efficiently (cf. ESG Standard 2.5) as well as systematically expand its quality management (cf. ESG Standard 3.6). The following measures are intended to ensure that a continually increasing quality is achieved in conjunction with an efficient and optimised time and resource budget thus ensuring the necessary balance:

- FIBAA generally limits the number of study programmes to four per cluster for purposes of thorough assessment of the individual study programmes. Furthermore, according to the guidelines of the German Accreditation Council, only (in a subject-specific way) matching study programmes are put into a cluster here. This ensures that a thorough expert assessment can be carried out for each study programme in the cluster. The process schedule is rendered concrete and structured as efficiently as possible in accordance with the grouping (for example, discussion sessions together with the management of study programmes and the cooperating partners, divided according to study programme). With larger clusters, FIBAA also plans to have more than the usual amount of four experts involved.
- There are published procedural documents and helpful manuals for all procedures (cf. ESG standards 2.2, 2.3 and 2.5), which ensure a standardised and consistent process and unchanging quality.
- Prior to the AoS, the project managers carry out a formal preliminary assessment of the documents (using a standard form) and advise the higher education institutions on formal deficiencies in advance (without pre-empting the expert assessment) or ask for the provision of additional documents. As a result, the focus can be placed on topics besides formal issues during the AoS, and the procedures can be structured altogether more clearly and concisely.
- Prior to the AoS, the project managers point out the special features of the study programmes to the experts (duality, franchising, distance learning study programme) and provide corresponding background information in the form of manuals, for example (see annex 69).
- In general, the project managers ask the experts of the procedure in advance for a preliminary assessment of the programme to be reviewed. This information is shared in the expert team before the AoS and discussed at a meeting before AoS begins (usually the evening before). This allows all quality requirements to be enquired at an early

stage, while at the same time focusing on potential weaknesses and topics of particular interest.

- As part of the further development of FIBAA quality management, there has been an increased use in various arrangements such as jour fixes, project manager workshops and event-related meetings for several years, so that all project managers are kept up to date with the procedure implementation in order to share experiences and interpretations of criteria and identify the potential for improvement in the processes. This ensures that processes can be structured more efficiently and a high understanding of quality is promoted among all employees.
- The aforementioned revision loops carried out by the respective divisional management in accordance with “four-eye principle” ensure that all review reports undergo a quality inspection once again.
- Streamlining the programme accreditation procedures and removing redundancies in the AGs (cf. ESG Standard 2.5) has resulted in all relevant quality standards now being reviewed in shorter AGs, and therefore even faster, but in the same depth as before.
- A comprehensive introductory training of the employees by means of introductory training plans (see annex 87) and participation in two AoS as observers ensure that the knowledge of both thorough assessment and the optimal process workflow is taught right from the beginning.
- Clear processes defined by the internal QM, which are continually put to the test, ensure that all employees know their tasks and interfaces, and the workflows of the procedures run smoothly as result.

Reference documents:

- 69 Example of manuals for experts (written procedure, dual study programmes)
- 87 Sample introductory training plan for FIBAA employees

5.4 Entering the study programmes into the database

For entering the study programmes into the Higher Education Compass, FIBAA has defined a reliable process in its internal QM, which is regularly reviewed and complied with. Following an accreditation decision in which the seal of the German Accreditation Council was awarded for programme or system accreditation, the higher education institutions receive the complete review report immediately together with the decision of the relevant committee and are requested to check whether any passages of the report should be redacted for reasons of data protection or confidentiality. Likewise, for first-time accreditation procedures, FIBAA requests that the higher education institutions enter the study programmes into the HRK Higher Education Compass⁶⁴ so that the accreditation decision can be added there. Since FIBAA does not influence the processes within the higher education institutions, there are sometimes delays. An FIBAA employee who is responsible for these entries has the task of ensuring prompt completion or amendment of the data sets.

⁶⁴ The data sets are usually already available for reaccreditation procedures.

5.5 Seal separation

As a result of resolutions from 16 June and 10 December 2015, the German Accreditation Council requests that FIBAA separate the procedure for awarding the seal of the German Accreditation Council from the procedures for awarding FIBAA's own accreditation seal. This resolution is not applicable to the system accreditation procedure since FIBAA does not offer its own corresponding procedure and seal. Within the framework of the system accreditation procedure, only the procedure of the German Accreditation Council is carried out and the seal of the German Accreditation Council is awarded.

1. Method of procedure up to 1 August 2016

Since 1 January 2012, FIBAA has carried out separate procedures for awarding the seal of the German Accreditation Council and for awarding FIBAA's own accreditation seal for programmes. This method of procedure already corresponded to the unique character of the two seals. If each higher education institution aimed to be awarded the FIBAA seal as well as the AC seal in a programme accreditation procedure, then two separate contracts were concluded. The seal of the German Accreditation Council was based on a contract, which solely took into account the rules of procedure of the German Accreditation Council, and the FIBAA seal was based on a contract where the rules of procedure of FIBAA applied. A separate manual with detailed information was available for each procedure. It was submitted to the relevant higher education institution.

The external appearance (website) was based on the procedural separation carried out since the beginning of 2012, which followed the decision of the German Accreditation Council from 23 September 2011. Due to the different AGs of the two procedures for the accreditation of study programmes, the higher education institution created its self-documentation separately for the two seals and submitted them to FIBAA. FIBAA then set up an expert team for both procedures, which is usually made up of at least four experts. The relevant expertise is added to the expert team if necessary (e.g. for a special profile demand). As part of the AoS, the discussion sessions were each subdivided into two blocks (AC specific questions/aspects and FIBAA specific questions/aspects). Similar topic areas were partly discussed here, but these were each specifically arranged in their quality requirements and led to differentiated assessments. The project managers moderated the discussions and ensured that these differences were transparent for the representatives of the higher education institution and for the experts. In order to minimise the organisational effort as much as possible and ensure that both procedures run smoothly, only one AoS was carried out, which was particularly in the interest of the higher education institution. Two separate review reports were created following the AoS. The assessments in the review report on the German Accreditation Council procedure were based on the criteria stated as essential by the German Accreditation Council. FIBAA quality requirements were only reviewed in the FIBAA procedure. Separate statements from the higher education institutions were obtained for the two report drafts. The two procedures were normally discussed at the same F-AC PROG meeting. The two review reports were submitted to the committee together with the respective statements of the higher education institution. F-AC PROG discussed the respective procedures and made two separate (possibly also different) decisions.

2. Guidelines of the German Accreditation Council for seal separation

In the decision mentioned above, the German Accreditation Council pointed out that "first the procedure for awarding the seal of the German Accreditation Council must be completed and the results must be published in the Higher Education Compass before the findings obtained here can be used in a procedure for awarding another seal." The previous method of procedure of FIBAA did not comply with this guideline since the procedures continued to be carried out in parallel through the time-related AoS and the decision to be made in the same meeting of F-AC PROG. Seal separation should meet the following guidelines according to the German Accreditation Council:

1. From 01/08/2016, the procedures for awarding the seal of the German Accreditation Council shall be separated from the procedures for awarding FIBAA's own accreditation seal. The respective on-site visits shall not be scheduled together.
2. The findings gained from the procedure for awarding the seal of the German Accreditation Council may only be used in other procedures after completion of this procedure, including the publication of the report and the entering of accredited study programmes into the database.
3. The costs of the various procedures are completely separate.

As requested, FIBAA presented a concept for the implementation of these guidelines to the German Accreditation Council. This concept, whose content is described in the following, was accepted by the German Accreditation Council by way of resolution from 22 June 2016.

During the implementation of these guidelines, FIBAA was guided by the fact that the seal of the German Accreditation Council was in no way to be affected in its impact and significance as a result of the assessment for awarding FIBAA's seal. The future workflows of the procedure described below are consistent with this objective.

3. Separation of procedures

FIBAA implemented these guidelines of the German Accreditation Council as follows:

I. Review

The reviews for the AC procedure and the FIBAA procedure no longer take place in parallel, but rather at different times. Thus the review for the FIBAA procedure only begins when a decision for the AC procedure has been made by the F-AC PROG and the review report has been published in the database of accredited study programmes (Higher Education Compass). In practice, this means there will likely be at least two to three months between the reviews. Although the contracts can be concluded in parallel for both procedures, they do however continue to be concluded separately and with separate sums. The higher education institution concerned can also create the respective self-documentation in parallel. This does not affect the AC procedure in any way. It is essential that the respective reviews are carried out separately from one another and that the actual review for FIBAA's seal only begins when the AC procedure has been completed, the review report has been published, and an entry has been made in the database of accredited study programmes.

The following review for the FIBAA procedure can take place as an AoS, a conference call or virtual meeting, depending on the agreement with the higher education institution. The agency

may draw on the results of the AC procedure, e.g. regarding the basic facilities and staff infrastructure of the study programme. At the time of this review, the review report for the AC seal had already been published and could therefore be used. Subsequently, an individual review report is compiled for the FIBAA procedure. The expert teams may be identical in their composition given sufficient availability in terms of time. However, since the content assessment as part of the FIBAA procedure only takes place once the AC procedure is complete, there are no effects on the AC seal.

All in all, this process ensures that no findings from the AC procedure are used for the FIBAA procedure before the review report on the AC procedure has been published and the entry has been made in the database of accredited study programmes.

II. Information on those involved

FIBAA informed the higher education institutions and other interested persons about the described procedure separation on their website as follows:

“According to the decision of the German Accreditation Council from 18 June 2015, awarding the quality certificate of the German Accreditation Council and its own seal of an accreditation agency in the same procedure is not permitted (applies to all procedures with the conclusion of the contract from 1 August 2016). The FIBAA procedure can be carried out as soon as the review report on the quality seal of German Accreditation Council has been published.”

FIBAA will inform its experts separately about the future arrangement of the separated procedures described above.

4. Scheduled implementation of the separation

In accordance with the guidelines of the German Accreditation Council, the new procedure concept will be applied in all procedures where contracts are concluded as of 1 August 2016. Any initial experiences gained with the revised method of procedure may be reported during the AoS for FIBAA's reaccreditation in November 2016. All documents that have been revised during seal separation can also be provided to the expert team as part of the AoS.

Outlook

FIBAA has expanded its activities in recent years: alongside numerous programme accreditation procedures it has, as presented in the submitted self-documentation, been able to conduct several system accreditation procedures in Germany and institutional accreditation procedures both in Germany and abroad, and has also been able to expand its consultancy activities.

In addition, FIBAA must react to changes and further developments in the area of quality assurance and higher education institution orientation and must adjust its strategic position accordingly. This relates, above all, to aspects such as

- the trend towards institutional accreditation in Germany and abroad and for system accreditation in Germany.
- The fact that the German Accreditation Council has established a separation of seals in FIBAA.
- The fact that the seal of an agency is attractive to higher education institutions for reasons including improving their reputation.

Also of key importance is how the future structure of the German accreditation system will look.

FIBAA will continue to develop into an even more diverse international non-profit organisation with a global perspective. As before, it provides the necessary resources for this. FIBAA endeavours to receive an increasing number of committees for system accreditation procedures for Germany, as well as for institutional accreditation procedures abroad. The expert pool is being expanded accordingly. In the area of programme accreditation, FIBAA maintains its profile of subject-specific experts both in Germany and abroad.

Through workshops and publications, FIBAA will also actively focus on communicating answers to question of quality assurance, appropriately training experts and improving its own bases and tools for the procedures.

FIBAA believes the area of higher education institution consultation to be increasingly gaining importance. Firstly, this relates to higher education institutions who are seeking to obtain institutional or system accreditation and have found an agency to do so, but would like to make use of additional external advice. Secondly, this relates to the individual problems of higher education institutions for which FIBAA offers customised consultancy services. FIBAA will increase its focus on both areas in future.

List of abbreviations

Abbreviation	Explanation
RAC	Requirement and assessment catalogue
AC	German Accreditation Council
AoS	Assessment on-site
CEENQA	Central and Eastern European Network of Quality Assurance Agencies in Higher Education
DAAD	German Academic Exchange Service [<i>Deutscher Akademischer Austauschdienst</i>]
dghd	German Society for Higher Education Didactics [<i>Deutsche Gesellschaft für Hochschuldidaktik</i>]
ECA	European Consortium for Accreditation
ENQA	European Association for Quality in Higher Education
ESG	European Standards and Guidelines for Quality Assurance in the European Higher Education Area
EQUAL	European Quality Link
EQAR	European Quality Assurance Register
EUA	European University Association
F-AC INST	FIBAA Accreditation Committee for Institutional Procedures [<i>FIBAA-Akkreditierungskommission für institutionelle Verfahren</i>]
F-AC PROG	FIBAA Accreditation Committee for Programmes [<i>FIBAA-Akkreditierungskommission für Programmakkreditierung</i>]
AG	Question and Assessment Guide for evaluations according to individual objectives by FIBAA Consult
AG EVAL	Question and Assessment Guide
AG PhD	Question and Assessment Guide for obtaining the FIBAA quality seal for doctoral programmes
AG PROG	Question and Assessment Guide for programme accreditation
AG PROG AC	Question and Assessment Guide for programme accreditation in accordance with the requirements of the German Accreditation Council
AG PROG FIBAA	Question and Assessment Guide for programme accreditation in accordance with FIBAA's quality requirements
AG CERT	Question and Assessment Guide for certification
FIBA	Foundation for International Business Administration
FIBAA	Foundation for International Business Administration Accreditation
F-CC CERT	FIBAA Certification Committee for Continuing Education Courses
HRK	German Rectors' Conference [<i>Hochschulrektorenkonferenz</i>]

HS-QSG	Austrian Act on Quality Assurance in Higher Education [<i>Österreichisches Hochschul-Qualitätssicherungsgesetz</i>]
INST	Institutional procedures
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
ISO	International Organization for Standardization
KMK	Standing Conference of the Ministers of Education and Cultural Affairs of the Länder [<i>Kultusministerkonferenz</i>]
MBA	Master of Business Administration
NVAO	Accreditation Organisation of the Netherlands and Flanders [<i>Nederlands Vlaamse Accreditatie Organisatie</i>]
PROG	Programme accreditation
QM	Quality management
QM	Quality Manager
QMS	Quality management system
QM handbook	Quality management handbook
TQM	Total quality management
FTE	Full time equivalents
CERT	Certification of Continuing Education Courses

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