

Expert report

on the Application of the Evaluation Agency Baden-Württemberg (evalag) dated 14/10/2013 for Accreditation and Assessment of the Compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)

- submitted on 15/08/2014 -

1. Procedural basis

1.1 Statutory mandate

As per § 2 para. 1 no. 1 of the German Law on the Establishment of a “Foundation for the Accreditation of Study Programmes in Germany”, the Foundation has the mandate to accredit and reaccredit accreditation agencies. It grants, for a limited period of time, the right to accredit study programmes and internal quality assurance systems of higher education institutions by awarding the seal of the Foundation.

The decision of the Accreditation Council to award accreditation as well as the conduct of the procedure for accreditation of an accreditation agency are based on the resolution “Rules of the Accreditation Council for the Accreditation of Agencies” of 8/12/2009 as amended on 10/12/2010.

In order to promote the international recognition of the decisions taken by the Accreditation Council and by the accreditation agency, the Accreditation Council adopted the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) in the approval of its accreditation criteria, as approved by the ministers responsible for higher education at the Bologna follow-up conference in Bergen in May 2005. By including the ESG, the Accreditation Council emphasised the central role of accreditation in implementing the objectives set for the Bologna Process, making it clear that quality assurance in higher education – and particularly accreditation – can no longer be exclusively orientated toward national standards or particular characteristics. Other important sources for the formulation of the criteria set by the Accreditation Council are the Code of Good Practice laid down by the European Consortium for Accreditation on 03/12/2004 and the Guidelines of Good Practice elaborated by the International Network for Quality Assurance Agencies in Higher Education in April 2005.

1.2 The German Accreditation System

In 1998, an accreditation procedure based upon the "peer review principle" was introduced for study programmes in the tiered graduation system. The group of reviewing peers includes scientists but also students, representatives of professional practice and international experts. The German Law on the Establishment of a Foundation for the Accreditation of Study Programmes in Germany adopted on 15 February 2005 provided a new legal foundation for accreditation. The objective of accreditation is to ensure content- and subject-related standards by assessing the conceptual outline of study programmes and the academic feasibility of the courses offered, including the assessment of quality in teaching as well as the scrutiny of the professional relevance and the promotion of gender mainstreaming. Generally, accreditation is a prerequisite for introducing and maintaining Bachelor's and Master's study programmes. In addition to programme accreditation, system accreditation was introduced in 2007. The object of system accreditation is the internal quality assurance system of a higher education institution. A positive system accreditation certifies that the quality assurance system of the higher education institution attains the qualification objectives in teaching and learning and ensures the high quality of the study programmes, and in so doing applies the Standards and Guidelines for Quality Assurance, the Guidelines of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder, and the criteria set by the Accreditation Council.

In Germany, decentralised agencies conduct the accreditation of study programmes (programme accreditation) and of quality assurance systems for teaching and learning (system accreditation). In its role as central accreditation body, the Accreditation Council accredits the accreditation agencies periodically and defines the basic requirements for accreditation procedures, which are to be carried out according to reliable and transparent standards. At the same time, the Accreditation Council takes care that the interests of the entire system, which are the responsibility of each Land, are taken into consideration during accreditation. The actual accreditation procedures are conducted independently from the state. The Foundation for the Accreditation of Study Programmes in Germany also acts as a central documentation agency for the accreditation system and manages the database of study programmes accredited in Germany.

For private higher education institutions, a procedure of institutional accreditation was introduced by the Science Council, which monitors whether or not a higher education institution complies with the specifications for scientific teaching and research. Private higher education institutions must be accredited by the Science Council, preferably prior to starting operation, but at the latest prior to final state approval by the appropriate Land.

1.3 Compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area

In order to be admitted as a member of the European Association for Quality Assurance (ENQA) or the European Quality Assurance Register for Higher Education (EQAR), an agency must demonstrate that it abides by the “Standards and Guidelines for Quality Assurance in the European Higher Education Area” (ESG) in an external assessment. The full membership of an agency with the ENQA is valid as prima facie of compliance with the ESG and is thus also valid for the EQAR.

With regard to accreditation, the Accreditation Council offers the option of assessing whether the agencies are compliant with Part 2 and 3 of the ESG and presenting this explicitly in its own section of the assessment in order to prevent duplicate external assessments. This assessment is, therefore, executed according to the “Guidelines for external reviews of quality assurance agencies in the EHEA”.

2. Course of the procedure

In their letter dated 14/10/2013, evalag submitted their application for accreditation as an accreditation agency of the Accreditation Council. On 20/02/2014, the agency submitted their explanatory statement for the application, together with supporting documents. In an email dated 07/05/2014, documents were requested which were received in the letter dated 04/06/2014.¹

The following experts were named by the Accreditation Council by resolution dated 13/12/2013:

Professor Dr Andrea Schenker-Wicki, University of Zurich (President)

Dr Mark Frederiks, The Dutch-Flemish Accreditation Organisation (NVAO)

Professor Dr Volker Linneweber, Saarland University

Marcel Sauerbier, University of Freiburg (Student Representative)

Detlev Stawarz, Trade Union Expert Network (Professional Practice)

The expert group was supported by Ms Agnes Leinweber on the part of the office of the Foundation for the Accreditation of Study Programmes in Germany.

A preparatory meeting for the experts took place in Zurich on 25/06/2014. In this meeting,

¹In this report, the Annexes submitted later, before the on-site visit, are identified with an ‘N’.

the framework for the current criteria of the Accreditation Council and the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) was presented and explained. The preparatory meeting also served as an opportunity to deepen knowledge of the outline of the procedures and the understanding of the experts' role in accreditation procedures.

The expert group had a preliminary meeting on 06/07/2014 before an on-site visit took place at the agency's premises from 07 to 08/07/2014. The expert group led conversations with the management of the agency, members of the Accreditation Commission and the Foundation Board, employees of the head office, experts and representatives of higher education institutions for which the agency has already performed procedures. Supporting documents were submitted later in the framework of the on-site visit. (The operating plan is attached as an annex.)

The expert group submitted the attached report dated 15/08/2014 with unanimous vote, taking into account the opinion of evalag dated 14/08/2014.

3. Abbreviations

AC	Accreditation-Commission
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
KMK	Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany
KMK-Guidelines	Common Structural Guidelines of the Länder for the Accreditation of Bachelor's and Master's Study programmes, Resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany of 10 October 2003 as amended on 4 February 2010
Regeln	Rules for the Accreditation of Study Programmes and for System Accreditation. Resolution of the Accreditation Council of 08/12/2009 as amended on 20/02/2013

4. Evaluation Agency Baden-Württemberg (evalag)

4.1 Founding

In 2000, the Foundation Evaluation Agency Baden-Württemberg (evalag) was established as a public law foundation of the state of Baden-Württemberg on the basis of the agreement between of the Baden-Württemberg Ministry of Science, Research and the Arts (MWK) and the Baden-Württemberg higher education institutions.

From 2001 to 2006, the agency was primarily working for the higher education institutions and Ministries of Science in Baden-Württemberg. Until 2006 evalag's activities mainly focussed on performing evaluation procedures of subjects across various types of higher education institutions in Baden-Württemberg. In 2007, particularly influenced by conflict with the Baden-Württemberg higher education institutions, evalag restructured its focus, and after incidentally evaluating their activities, the agency stated that their focus was on the consultancy sector.

In 2009, their range of activities was broadened due to their certification as an accreditation agency for the programme and system accreditation procedures.

4.2 Organisation

In the statute, the composition and activities of the Foundation, the Foundation Council, the Accreditation Commission, Complaints Commission and Chief Executive Officer are specified. The Foundation Council is the central institution for the strategic and also operative activities. The Foundation Council handles the assessment report in the business environment of evaluation.

The Chief Executive Officer manage the day-to-day business of the foundation. It consists of a managing director appointed by the Foundation Council. The decisions in the programme and system accreditation are made by the Accreditation Commission.

According to § 3 of the statute, evalag is not profit orientated and is recognised as charitable.

4.3 Facilities

In 2012, evalag had accumulated proceeds amounting to around EUR [...] from all areas of operation. The personnel setup of the head office located in Mannheim consists of 16 employees (full-time equivalent). The accreditation department consists of two people and

– in the department management role – the Chief Executive Officer (in total 2.0 full-time equivalent).

4.4 Scope of Activity

According to § 2 of the statute, as a centre of excellence for quality assurance and development, evalag pursues the following aims:

“(a) Evaluations in the science department under its own responsibility and on behalf of the higher education institutions and the ministries of science of the state of Baden-Württemberg (hereinafter referred to as ‘Land’),

(b) Development of the quality assurance systems and their application in the science department, particularly in higher education institutions,

(c) Answering questions from higher education institutions and other scientific institutions concerning quality assurance and development,

(d) Accreditation of study programmes (programme accreditation) and performance of system accreditation procedures in accordance with the applicable international standards on the basis of the applicable legal regulations,

(e) any other activities related to scientific research.”

Since 2009, evalag is licensed to carry out programme and system accreditation and work with all subjects across various types of higher education institutions. As of November 2013, the agency has accredited 88 study programmes in Germany and 16 international programmes. In May 2013, the agency was licensed to perform a university's system accreditation procedures. Alongside accreditation procedures, evalag is also regularly operative in the fields of evaluation and consultancy (see introductory paragraph of Chapter 8 'Assessment based on the European Standards and Guidelines').

Since 2001, evalag is a full member of the European Association for Quality Assurance in Higher Education (ENQA), since 2010 listed on the European Register for Quality Assurance Agencies (EQAR), since 2010 a member of the German Evaluation Society (DeGEval) and since 2011 a member of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE).

5. Summary of the assessment

On the basis of the documents submitted, but mainly the framework of the on-site visit, the expert group built up a complex and overall positive view of the agency. The conversations were conducted with an open and friendly atmosphere, which also made it possible for an exchange of critical aspects.

In the opinion of the expert group, evalag is an agency with a broad and modern understanding of the concept of quality that aims for ongoing development of the quality of teaching and learning. In the conversations with university representatives it became clear that they value the agency's diverse support and consultancy activities. They describe evalag as an agency which, although rule-oriented, does not work bureaucratically and is flexible to the demands of the client. For the national accreditation, evalag reliably implemented the rules and criteria of the Accreditation Council and also made use of possibilities and opportunities to draw upon them. At the same time, evalag also thinks outside the rules and sees the guidelines as a critical reflexion. Despite the institutional proximity of consultancy and accreditation, the agency is aware of where the borders between them lie and consistently puts this into practice.

The expert group recommends the renewed accreditation of evalag to the Accreditation Council, even though in the recent accreditation period, the agency could not consistently finance the national accreditation procedures themselves. From their experience with diverse, national and international consultancy and evaluation activities, as well as from the programme and system accreditation, evalag has competences at its disposal, which the German accreditation system should not forego. The experts notice a need for certain re-adjustments to evalag's ambitious internal management system.

evalag also implements the ESG requirements in their various activity areas. Here, the expert group noticed imperfections, mainly in the composition of the Complaints Commission (ESG Standard 3.6) and the analysis of the results of their own work (ESG Standard 2.8).

6. Recommendations of the expert group

6.1 Compliance with the criteria of the Accreditation Council

The expert group advises the Accreditation Council to accredit the Evaluation Agency Baden-Württemberg (evalag) for both programme and system accreditation procedures and to issue the following conditions and recommendations:

Condition 1: The agency shall submit a financial plan for the year 2015 to 2017 and explain how it intends to ensure that the criterion to work on full cost basis in the coming accreditation period is covered. This shall include a realistic evaluation of the actual incurred costs (including general costs) and the highlighting of saving potential (Criterion 2.3.2).

Condition 2: The agency should submit a revised Quality Management Hand Book, which is orientated towards the practice of quality assurance. It should also be described how empirical data from evalag's own procedures shall be gained and evaluated (Criterion 2.5).

Recommendation 1: The basic principles for evalag's consolidation of programmes into clusters should adhere to the Accreditation Council's obligation to state reasons, aforementioned in Clause 1.3.2, for the commitment of one person on behalf of students and one on behalf of professionals. These principles should be submitted in a document aimed at higher education institutions.

Recommendation 2: evalag should create measures which ensure that active students with close proximity to higher education institutions are involved with the Accreditation Commission (Criterion 2.2.2).

Recommendation 3: evalag should ask the state of Baden-Württemberg to waive the national funding which the agency has received up to 2014, so that this amount doesn't have to be included in the price of accreditation procedures (Criterion 2.3.2).

Recommendation 4: In the future, the agency should refrain from appointing members of decision-making bodies as experts (Criterion 2.3.3).

Recommendation 5: The agency should appoint organisations for decision-making and organisations for analysis of complaints which are independent of each other, and rule out parallel memberships (Criterion 2.3.3).

6.2 Compliance with the ESG

The expert group advises the Accreditation Council that evalag essentially fulfils the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and the membership criteria of the European Association for Quality Assurance in Higher Education (ENQA).

According to the expert group's assessment, the following 13 standards/membership criteria are fulfilled: 2.1, 2.2, 2.3, 2.4, 2.6, 2.7, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, Criterion 8 of the ENQA membership criteria

According to the expert group's assessment, the following standards are essentially fulfilled: 2.5, 3.1, 3.8

According to the expert group's assessment, the following standard is partially fulfilled: 2.8

The expert group issues the following recommendations: ²

Recommendation 6: The agency should enlist students to work on the international accreditation and evaluation procedure documents (ESG Standard 2.2).

Recommendation 7: evalag should create measures which ensure the involvement of active students with the Accreditation Commission for higher education institutions (ESG Standard 2.4) [corresponds to Recommendation 2 of the recommendations for the criteria of the Accreditation Council].

Recommendation 8: The agency should check whether their texts are easily understood by their target audiences, particularly students (ESG Standard 2.5).

Recommendation 9: evalag should regularly analyse and (with the expected new version of the ESG in mind) publish the results of its own quality assurance procedures.

Recommendation 10: The agency should appoint organisations for decision-making and organisations for analysis of complaints which are independent of each other, and rule out parallel memberships. (Standard 3.7) [corresponds to Recommendation 5 of the recommendations for the criteria of the Accreditation Council].

Recommendation 11: In the future, the agency should refrain from appointing members of decision-making bodies as experts. (Standard 3.8) [corresponds to Recommendation 4 of the recommendations for the criteria of the Accreditation Council].

Recommendation 12: The agency should submit a revised Quality Management Hand Book, which is orientated towards the practice of quality assurance. It should also be described how empirical data from evalag's own procedures shall be gained and evaluated (Standard 3.8). [corresponds to Condition 2 of the criteria of the Accreditation Council].

²The recommendations for the fulfilment of the ESG are listed below, along with the outlining of the relevant conditions and recommendations for the criteria of the Accreditation Council (AR-Criteria). ESG Recommendations 6, 8 and 9 have no equivalent in the AR-Criteria conditions and recommendations. There is no equivalent for Condition 1 and Recommendations 1 and 3 of the AR-Criteria in the ESG recommendations.

7. Assessment based on the Criteria for the Accreditation of Accreditation Agencies

Criterion 2.1: Self-image and understanding of the accreditation task

2.1.1. The agency has a publicly documented perception of quality, from which it derives the basis of its accreditation activity. Its activity is geared to the objective of enhancing quality and is based on the Higher Education Institutions' key responsibility for the profile and quality of teaching and learning.

Documentation

With the explanatory statement for the application, evalag submitted a mission statement which was passed by the Foundation Council on 07/02/2014 and is published online:

“evalag is a centre of excellence for quality assurance and development, as well as quality management in the areas of higher education and science;

evalag is an established partner of higher education and scientific institutions. It offers expertise to support higher education and scientific institutions' engagement in high quality research, teaching and learning throughout the entire institution and their implementation of projects. On the basis of a dialogue and development-orientated understanding of the concept of quality, evalag contributes consultancy and tailor-made instruments and procedures for the strengthening of self-sufficiency and the production of a quality structure in higher education and scientific institutions;

evalag is based on the values of transparency, reliability, methodical professionalism and continuous further development of internal and external activities;

evalag provides higher education institutions with expert information for the preparation of appropriate higher education policy decisions;

In its certified procedures for fundamentally audited estimates with quality developing procedure elements, evalag commits to supporting programmes and higher education institutions in achieving integrated quality;

evalag commits to the principles of the European Higher Education Area and engages in European and international networks. evalag works on the basis of national and European Standards for Quality Assurance and Development, as well as Quality Management;

evalag contributes to the further development of Quality Assurance and Development, as well as Quality Management, in higher education institutions, and actively contributes on a practical, as well as a scientific and theoretical, level.

evalag is continuously pursuing and analysing developments in higher education institutions, pro-actively integrating them in its own portfolio and presenting them to the higher education institutions.”

On page 10 of the explanatory statement for the application, evalag states that it first acquired understanding of the quality concept in 2001 as a basis for the performance of evaluation procedures, and since then this understanding has continuously been developed through experiences from their own work, i.e. in particular, through feedback from higher education institutions, and through working with national and international associations.

Assessment

In the mission statement, evalag demonstrated an understanding of the quality concept based on the basic principles of higher education institutions' responsibility for the quality of programmes and the measurement and validation of the higher education objectives. This should explicitly strengthen the financial self-sufficiency of higher education institutions in accordance with Criterion 2.1.1.

Compared to the mission statement from the application for first-time accreditation in 2009, the expert group noticed a considerable development. Whilst the mission statement from 2009 was strongly tailored towards the performance of expert procedures such as peer review or programme and system accreditation, the current mission statement broadens its range of activities and describes evalag as a 'centre of excellence for quality assurance' and providers of support for quality development.

In the framework of the on-site visit it became clear that the party to the proceedings (members of the Accreditation Commission, head office, agency experts) focus their work on quality development of higher education institutions. The will to support the setup of a quality culture in higher education institutions is expressed by the diverse consultancy activities.

As a centre of excellence for quality assurance, evalag also opens up research topics without wishing to create competition for higher education institutions. Currently, the agency is carrying out surveys on behalf of the Land and an EU-funded co-operation project with European partners on the effect of accreditation procedures. The expert group welcomes these activities as they correspond to the mission statement and relate to the questions of quality assurance.

Result

Criterion 2.1.1 is fulfilled.

2.1.2 The agency accredits across types of Higher Education Institutions and also across disciplines in the case of admittance for programme accreditations.**Documentation**

From 2009 to 2013, according to their own statement (explanatory statement page 11) evalag accredited 88 study programmes in Germany in 13 programme accreditation procedures. This included two individual programme accreditations and eleven cluster accreditations equivalent to 2 to 26 study programmes at universities, higher education institutions for applied sciences and music and art colleges. The procedures were related to, amongst others, the following subjects: Agricultural, Animal and Nutrition Science, Biology, Geological Science, Gerontology, Engineering, Informatics, Music, Physics, Political Science, Psychology, Drama, Law, Sociology, Science Management, Economics and Administrative Science. A system accreditation procedure was also carried out at the time (at the Christian Albrecht University of Kiel (see also page 11 of the explanatory statement)).

Assessment

In the first accreditation period, evalag worked on various subjects across various types of higher education institutions and is striving to expand these areas further.

Result

Criterion 2.1.2 is fulfilled.

Criterion 2.2: Structures and procedures

2.2.1 For admittance to programme accreditation and/or for system accreditation, the agency proves binding internal structures and procedures, which ensure the correct and consistent application of the "Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation" in the current version. Responsibilities of the organs and their personnel are functional and legally regulated.

Documentation

In accordance with § 8 of the statutes of the evalag (Baden-Württemberg evaluation agency) Foundation (Annex 1), the Foundation has four organisations at its disposal: The Foundation Council, the Accreditation Commission, the Complaints Commission and the Chief Executive Officer.

As such, according to § 10 the Foundation Council comprises of the following:

- eight external experts appointed by the Land's Minister of Science in consultation with the Land's higher education institutions Rectors' Conferences,

- one of the members appointed (without a vote) to represent the Land's Minister of Science,
- the chair appointed by an external personality chosen by the Land's Minister of Science in consultation with the Land's higher education institutions Rectors' Conferences.

According to § 9 of the statute, the Foundation Council monitors the lawfulness, appropriateness and economic efficiency of the Foundation Management. Its duties are as follows:

- “(a) Guaranteeing the internationally recognised evaluation and accreditation standards,*
- (b) Assistance with the development of quality assurance and quality management procedures and instruments for research and teaching,*
- (c) Further development of the various activities of the Foundation,*
- (d) Development of standards for the Foundation's publications,*
- (e) Consultancy and, where necessary, resolution on evaluation reports,*
- (f) Meta-evaluations,*
- (g) Specification of the Foundation's financial plan,*
- (h) Decision concerning the appointment of the Chief Executive Officer (Company Management) and its representatives, as well as agreements on decisions of the Chief Executive Officer concerning scientific personnel,*
- (i) Decisions about co-operation with other institutions,*
- (j) Decisions about statute amendments and the abolition of the Foundation,*
- (k) Issue of rules of procedure for the Foundation Council, the Accreditation Commission, the Complaints Commission and any other committees,*
- (l) Appointment of Accreditation Commission members and appointment and deselection (with good cause) of representatives,*
- (m) Specification of general principles for the programme and system accreditation procedures,*
- (n) Issue general guidelines concerning the Accreditation Commission, particularly the approval of procedure principles, and the specification of formal requirements for the appointment and composition of expert groups,*
- (o) Booking of experts for all procedures carried out by the agency.”*

The ongoing business operations are managed in accordance with § 18 Para. 1 of the statute of the Chief Executive Officer, i.e. by a Managing Director appointed by the Foundation Council.

The statute (§ 12 and 13) also states that the Accreditation Commission consists of, in accordance with § 13 Para. 1, 30 members, including 22 scientists, four professional representatives and four student representatives (for the selection criteria, see Criterion 2.2.3).

The accreditation-relevant duties of the Accreditation Commission, in accordance with § 12 Para. 1, are as follows:

“(a) Specification of assessment parameters, criteria and procedure principles for the programme and system accreditation which particularly ensures the coherence and uniformity of the procedures’ performance,

(b) (Further) development of procedure principles for the programme and system accreditation,

(c) Selection of expert groups and their representatives,

(d) Resolution concerning accreditation of study programmes on the basis of

- the advice in the accreditation report*
- the recommendation of the expert group, and*
- where necessary, the opinion of the relevant subject committee,*

(e) Carrying out the preliminary survey of applications for system accreditation,

(f) Resolution concerning system accreditation on the basis of

- the expert group’s final report and*
- the recommendations of the expert group*
- considering the expert report on the programme sampling, as well as,*
- considering the opinion of the relevant subject committee, where necessary.*

(g) Resolution concerning the composition of the programme sampling,

(h) Resolution concerning the suspension of systematic accreditation procedures,

(i) Where necessary, appointment of subject committee members and appointment of representatives of subject committees,

(j) Report on the Commission activities and decisions concerning the Foundation made by the representative(s).”

According to § 12 Para. 2 of the statute, the Accreditation Commission can set up the subject committees for programme accreditation. On page 5 of the progress report, evalag

state that this has not yet happened. At the beginning of the first accreditation period, the Foundation Council appointed members for the Accreditation Commission, intending that half of them would serve as alternative members. This was rejected by the appointed members, so the number of Accreditation Commission members in the statute rose from 15 to 30. For the agency, this enlargement of the Accreditation Commission made the institution of subject committees obsolete.

For the preliminary survey on System accreditation certification, evalag established one out of three members (two higher education representatives from the Accreditation Commission, Chief Executive Officer) of the existing committee (see Annex 1_2f). On the basis of the data made available by a higher education institution, the committee checked the fulfilment of the formal requirements for the System accreditation certification (see Annex 1_5e).

The schedules and duties of the organisations responsible for the accreditation of study programmes and system accreditation procedures were laid down in the relevant guide (see Annex 1_4a for programme accreditation and 1_5a for system accreditation). Also included in the guide for programme accreditation is the process of specification of the fulfilment of conditions in cases which include content-related conditions and experts (Annex 1_4a, Page 10). evalag also laid down the criteria for the selection and performance of the characteristic-based sampling and the random spot checks on regimented Bachelor's and Master's study programmes (Annex 1_5i).

Various internal templates should help to achieve consistency in the spot checks: With Annex 1_4d, evalag presented a template for the structure of a programme accreditation expert report for thorough and consistent evaluation (for the full evaluation documentation for each report see Criterion 2.5). A hand book informs the programme and system accreditation procedure experts of the testing requirements, their duties and evalag's expectations of their understanding of their role (Annex 1_6 c 1 and 2). Various document templates for the communication of decisions (Annex 1_4 c, 1_4 f, 1_5 l) should ensure that decisions are communicated to higher education institutions with a professional appearance.

On page 12 of the explanatory statement, evalag states that the checks on the fulfilment of the formal, structural requirements of programme accreditation should be documentary checks, and where necessary, their results should be included in the assessment of the programme quality. The checks on the formal, structural requirements must only be included in the framework of the on-site visit in the case of considerable inadequacies. The same applies for the checks on the guarantee of a functioning quality assurance system.

Furthermore, on page 13 of the explanatory statement, evalag states that the condensation of a programme accreditation is possible if dealing with a redevelopment of an already existing and already accredited study programme, or if the study programme to be accredited is developing the existing available programmes which have all been accredited already. evalag then evaluates whether there exists a functioning quality management system and whether the formal, structural requirements are implemented. Evidence can be provided in written form with the appropriate documents, e.g. through committee decisions on a higher education institution's checks on the fulfilment of the formal requirements, or a functioning quality assurance system for a study programme, or through an additional opinion of the student body. The accreditation is then completely focused on the assessment of the subject and content-based concept. These condensed checking and assessment procedures are also possible with re-accreditation.

According to Clause 1.2 of the rules, principles for experts in programme accreditation on the clustering of several study programmes in one accreditation procedure are on page 5 f of the hand book (Annex 1_6c). Here, academic and disciplinary affinity and, in particular cases, structural characteristics, are outlined as requirements for clustering. The amount of study programmes should also be limited so that it is possible to sufficiently assess every study programme.

For programme and system accreditation procedures, the agency bars evalag, or experts working with evalag, from working in a consulting and certificating capacity in a higher education institution at the same time (Page 16 of the explanatory statement)³. This becomes clear in the experts' declaration of impartiality (Annex 1_6b_1) where consultancy or other types of support with the setup or the introduction of the to-be-accredited quality assurance system within the last five years is to be reported. In the introduction to the subsequent delivery of re-accreditation procedures/ENQA review (Page 1), evalag state that with the acquisition and performance of procedures, the separation of consultancy and certification in the Foundation Council was verbally agreed, and since then the compliance with this agreement has been regularly reported to the Foundation Council. The continued separation of certification and consultancy activities is confirmed by an additional statement from the Foundation Council dated 22/05/2014 (Annex 1_13).

In the past few years, evalag has carried out – with the Land's support – their own institutional auditing procedures, which the higher education institutions were able to use as preparation for the system accreditation. So, according to the agency's website, amongst

³ Resolution of the Accreditation Council "Standards for Structuring the Relationship between System Accreditation and Consultation Services" version dated 20/02/2013 .

others, Stuttgart Media University, Furtwangen University and Nürtingen-Geislingen University of Applied Science have passed evalag audits before acquiring system accreditation from other agencies.

(For the evalag statement on the publication of assessment reports and decisions, see Criterion 2.7)

Assessment

The obligatory structure and activities of the Foundation organisations are specified and fully described in the statute. Based on the processes in the programme and system accreditation, the activities are fully recorded, clearly defined and the relevant committees are appropriately assigned to the agency in the guide for programme and system accreditation. The model contract also implements the Accreditation Council's requirements. The documents reflect the current version of the Accreditation Council criteria and procedure rules and are appropriate to inform higher education institutions of the procedures, as well as their requirements (for the publication of decisions, see Criterion 2.7). The guide for programme accreditation seemed to the expert group to be quite detailed, but they would like to see a detailed and comprehensive guide for higher education institutions. In the framework of the on-site visit conversations, it was given positive feedback.

In the explanatory statement, evalag develops some new incentives for shortening or reorientation of the programme accreditation procedures. evalag suggests a so-called formal, structural check, which should be carried out by the head office on the completeness and plausibility checks already practised by evalag and other agencies before beginning procedures. If evalag discovers, during this check, that the internal quality management of the higher education institution complies with the Accreditation Council criteria and the KMK structure guidelines, there should be no need to discuss this aspect and consultations with the higher education institution would be able to be focused on particular topics. evalag has not yet put this suggestion into practice.

The expert group appreciates that evalag is not generally averse to the performance of an on-site visit. The idea of a preceding evaluation of the internal quality management concerning the compliance with the KMK and Accreditation Council guidelines demonstrates an interesting link between programme and system accreditation. However, the expert group deem it vital, that the preliminary evaluation of the higher education institution's internal quality assurance is not carried out solely by the agency's head office. For this reason, the expert group recommends continuing development of the procedure and – possibly monitored by the Accreditation Council – trying it out. The group highlights that, in accordance with Clause 1.6 of the Accreditation Council rules, there is already a possibility

for the first-time accreditation procedures to forgo an on-site visit under particular conditions. The expert group deems it positive that evalag is developing ideas for the further development of programme accreditation procedures and ideas concerning an increase in efficiency and would like to encourage the agency to continue along this path.

The process of specifying the fulfilment of programme accreditation conditions is sufficiently defined and in the expert group's opinion is carried out reliably.

The expert group also shared the procedures that evalag presented in the conversation concerning the involvement of higher education institutions in the compilation of academically affine study programmes. The principles laid down for the compilation of study programmes into clusters essentially correspond to the Accreditation Council rules. Missing, however, is reference to the obligation of the agency, in accordance with Clause 1.3.2 of the rules, to give reasoning for the limitation to one subject expert for every subject discipline represented in the cluster, or to a representative of professional activity and to a student representative. For transparency reasons, the principles for cluster accreditation can also be found in a document sent to the higher education institutions. In the opinion of the expert group, evalag handled the clustering of study programmes (type and number) responsibly.

The templates provided in the explanatory statement are suitable for ensuring the completeness of the evaluation and also the consistency of the assessments and decisions of the Accreditation Commission. Finally, the instrument for the expert briefing, the agency's internal quality management and the internal complaints procedures can increase the consistency of procedures and decisions. See also the evaluations in criteria 2.2.3, 2.5 and 2.6.

It became clear to the expert group that evalag implements the Accreditation Council's resolution on the separation of consultancy and certification through the use of the corresponding Foundation Council's guidelines and on the basis of their own experts. With the criteria on impartiality of the experts, the agency ensures that they are aware of the relevant person's consultancy or other types of support activities when setting up a quality assurance system to be accredited. Furthermore, evalag has not yet declared a system accreditation which rules out a higher education institution receiving a system accreditation on the basis of evalag's consultation services. In the framework of the on-site visit, the higher education institutions' representatives speak very positively of the agency's consultation services.

Result

Criterion 2.2.1 is fulfilled.

Recommendation

The expert group issues the following recommendation:

Recommendation 1: The basic principles for evalag's consolidation of programmes into clusters should adhere to the Accreditation Council's obligation, aforementioned in Clause 1.3.2, for the commitment of one person on behalf of students and one on behalf of professionals. These principles should be submitted in a document aimed at higher education institutions.

2.2.2 The agency involves representatives of interest groups (sciences, students and practitioners from the profession) relevant for the execution of the task.

Documentation

The evalag Foundation Council consists of, according to § 10 of the statute, eight external experts, one member appointed by the Land's Minister of Science, and the chair. One person currently belongs to the professional activity of the Foundation Council as an expert. According to § 13 Para. 1 of the statute, the Accreditation Commission consists of 22 scientists, of which at least six come from universities, six from universities of applied science and two from universities of education. A further four members of the Accreditation Commission are professional representatives, of which two are employers and two are employees. Four members also represent the student body and should belong to various types of higher education institutions in the Land. According to § 14 Para. 2 of the statute, it is to be ensured that all member groups are adequately represented at the meetings.

According to Page 7 of the guidelines for programme accreditation (Annex 1_4a), an expert group for programme accreditation consists of at least two to three subject representatives from different types of higher education institutions, one professional representative and one student representative. The guidelines for programme accreditation procedures (Annex 1_5a, Page 76) allow at least three members with experience in the area of higher education institution governance and internal quality assurance of higher education institutions, one professional member and one student member to be part the expert group.

(For the compilation of the preliminary check committees, see Criterion 2.2.1 and for the compilation of the Complaints Commission, see Criterion 2.6)

Assessment

The rules in the statute allow for the adequate representation of the relevant interest group in the Accreditation Commission and in evalag's programme and system accredita-

tion expert groups. According to the statute, professional and student representation is not planned only for the Foundation Council whereby one person of professional activity belongs to the Foundation Council. However, it does not correspond to any duties in the narrower sense in the governance of programme and system accreditation procedures.

With regard to the student members of the Accreditation Commission it is to be noted that, although they are enrolled in higher education institutions, they are already partially carrying out professional activities or fulfilling a long-term commitment to higher education policies. The expert group considers it necessary that active student bodies with a close proximity to the daily routine of a higher education institution contribute their perspectives to the decision-making accreditation committees. evalag should refer to the statute to check that they are providing this when re-appointing student bodies or shortening their period in office. As Criterion 2.2.2 of the Accreditation Council only covers student bodies, i.e. requires formal status, the expert group refrains from recommending any conditions.

Result

Criterion 2.2.2 is fulfilled.

Recommendation

The expert group issues the following recommendation:

Recommendation 2: evalag should create measures which ensure that active students with close proximity to higher education institutions are involved with the Accreditation Commission.

2.2.3 The competence of those involved in the procedures, with regard to all areas relevant for the assessment procedures of programme accreditation or system accreditation, is ensured by appropriate selection procedures and briefing.

Documentation

The members of the Accreditation Commission will, in accordance with § 9 Para 2, be appointed by evalag's Foundation Council and should, in accordance with § 13 Para. 2 of the statute, be equipped with the following skills: *“According to Para 1. lit. a, members should have experience in the area of study programme development and structuring as well as accreditation. Furthermore, at least 50% of the members in every type of higher education institution should have experience in the area of higher education institution governance and internal quality assurance of higher education institutions, i.e. particular experience in higher education institution management and in the quality assurance of teaching and learning. The compilation of the commission should ensure that the wider areas of science are covered. The student members should have experience in self-*

administration of higher education institutions. According to Para. 1 lit. a, at least two of the members should be foreign experts.” Further criteria is detailed in the resolution of the Foundation Council dated 26/02/2006 ‘Competence profiles of the members of the Accreditation Commission’ (Annex 1_2d). The members of the Accreditation Commission will practise for three years (§ 13 Para. 4 of the statute). Biographical information of the current members, as well as information on the members of the Foundation Council, the preliminary checks committee and the Complaints Commission is available (for their compilation, see criteria 2.2.1 and 2.6).

The expert groups for all types of procedures are, in accordance with § 12 Para 1 (c) of the statute, selected by the Accreditation Committee and, in accordance with § 9 Para. 2 (o) of the statute, appointed by evalag’s Foundation Council. Further criteria on selection are detailed in the resolution of the Foundation Council dated 26/02/2006 ‘Selection criteria and competence profiles of the members of the Accreditation Commission’ (Annex 1_6a).

For the experts’ preparation, evalag presents the resolution of the Foundation Council dated 07/02/2014 ‘Concept of preparation of the experts for the Programme and System Accreditation procedures’ (Annex 1_6c). According to this, at the beginning of a procedure, the experts are issued a compilation of the relevant documents, the application documents and the higher education institution documentation (Annex 1_6c, Page 8f). In addition, evalag offers full day seminars, discussions and experience exchanges as shorter formats of preparation. In the framework of a system accreditation procedure, an expert seminar is to determine what has not yet taken place due to the lack of cases. Since 2010, evalag has offered a large scale seminar every year and has participated in the expert seminars of the student accreditation pool (Annex 1_6c, Page 4).

On its own account, evalag maintains a pool of experts for the programme and system accreditation (of all types of higher education institutions) (Annex 1_9, Page 16). In the procedures for national and international accreditation, 126 people were working in the first accreditation period. In total, the expert pool consists of around 900 people (annex 1_6).

In its qualification profile for employees, evalag specifies that they should have work experience in higher education institutions and knowledge of socio-scientific methodology, with the essential structures and players in tertiary education (Annex 1_8). Career history information on the head office consultants is available in Annex 1_2g.

With regard to the further education of the employees of the head office, on Page 14 f. of the explanatory statement, evalag states that they will regularly take an active part in-

ternal and external seminars and conventions. In Annex 1_8, evalag lists a series of various formats, such as topic-specific workshops, a monthly jour fixe and regular conventions, which should contribute to the information and further education of the head office consultants. Current amendments to the rules and criteria of the accreditation procedures, as well as the experiences with the performance of the programme and system accreditation procedures and, where necessary, modifications to documents and processes are discussed (Explanatory statement Page 15).

Assessment

The obligatory criteria embedded in the statute on the selection of members for the Accreditation Commission, and the Foundation Council's approval of these selected members, is suitable for ensuring an adequate compilation of this committee.

The biographical information on the members, provided by the Foundation Council, Accreditation Commission, preliminary checks committee and Complaints Commission, shows a wide expanse of competence in science, professional activity and quality assurance in the higher education area.

The criteria and procedure for the selection of experts with regard to the programme and system accreditation are suitable for ensuring an adequate compilation of the expert groups. The experts are carefully prepared for the procedures and can take part in seminars for the preparation of the procedures or experience exchanges that are regularly offered. The expert pool is very large and profits from a diversity of the agency's activities. In the framework of the on-site visit, the higher education institutions' representatives speak very positively of the quality of the experts and their procedures.

evalag has also drawn up an adequate qualification profile for head office employees (see Annex 1_8). As the biographical information shows, the head office consultants have access to broad scientific competence and experience in the areas relevant to evalag's work, such as study programme management as well as internal and external quality assurance and scientific competences. The offers of further education are more than sufficient and combine internal and external activities.

Result

Criterion 2.2.3 is fulfilled.

2.2.4 If the agency engages other organisations for the implementation of parts of the procedures, the correct implementation must be ensured by reliable rules and procedures.**Documentation**

According to information on Page 15 of the explanatory statement, evalag does not assign any organisations to carry out parts of procedures and does not intend to do this either. However, the agency does state that, under circumstances with international procedures, it does work together with national institutions. This is regulated on a case by case basis in the corresponding agreements. On request, the agency states in the subsequent delivery of the re-accreditation procedures/ENQA review on Page 1, that catering, transport or, where necessary, copying services will merely be 'taken note of'.

Assessment

For national procedures, Criterion 2.2.4 is obviously not relevant as evalag carry out their procedures without the help of others. Also, for international procedures, evalag ensures that no organisation is in charge of carrying out parts of their procedures.

Result

Criterion 2.2.4 is not relevant.

Criterion 2.3: Independence**2.3.1 The agency has a separate legal entity.****Documentation**

On 18 July 2001 evalag was established as a foundation under public law and recorded in the Foundation Registry of the Regional Council of Karlsruhe (see Page 15 of the explanatory statement).

Assessment

Through the establishment as a foundation under public law, evalag has its own legal personality.

Result

Criterion 2.3.1 is fulfilled.

2.3.2 It does not work on a profit-oriented basis and carries out the accreditation procedures on full cost basis.**Documentation**

According to § 3 of the statute, evalag is not profit orientated. On 30 July 2012 Public Benefit Status (Gemeinnützigkeit) was awarded by the responsible tax office (explanatory statement Page 14, Annex 1_14).

In Annex 1_17, the agency provides a Foundation Council resolution dated 26/02/2009, whereby on the setup of the accreditation department in 2009, through re-structuring of the finances, start-up funding was granted, which would have to be paid back by 2012. This start-up funding was supposed to cover the deficit incurred by the accreditation department in the years 2009 to 2011.

In 2009, the Land paid evalag EUR [...], and in the years from 2010 to 2012, the Land paid evalag a yearly figure amounting to something between EUR [...] and [...]. However, these amounts were not exhausted because the accreditation department generated some profit, and so the money that was actually used diminished. Specifically:

2009: EUR [...];

2010: EUR [...];

2011: EUR [...];

2012: no need to take advantage of money from the Land. On the contrary, for the first time, a figure amounting to EUR [...] was paid back.

2013: EUR [...].

So the current total offered by the Land and used is EUR [...].

With Annex 1_15, the agency provides a breakdown of the profits and expenditures for the accreditation in 2013. According to this, in 2013, the accreditation department's total expenditure amounted to EUR [...] (fixed costs EUR [...] and variable costs for expense allowances and travel costs EUR [...]). In the accreditation department, profits amounting to EUR [...] were made, thus leaving a deficit of EUR [...].

In assessing the accreditation procedure costs, evalag states in Annex 1_11a that the expenditure for agency personnel was calculated based on the Land's estimated cost rates. Since 2009, evalag has carried out an internal post calculation on the accreditation procedures (Annex 1_11 b), and if requested, the figures are provided in Annex 1_15.

With the fixed costs, so-called 'general costs', i.e. pro rata rent and running costs for the premises, a portion for personnel expenses for administration and management, as well as a portion for office materials, IT, postage and furniture for the offices were itemised. In 2013 the estimated expenditure (see Annex 1_15), whereby the working hours of the

manager, who also functions as the manager of the accreditation department, were integrated in personnel expenses, was EUR [...] (in total EUR [...] in 2013).

In the introduction to the subsequent delivery of documents dated 03/06/2014, the agency deems it plausible that the cash flow was separated between work financed by the Land and accreditation work, which can be seen in the preliminary Annual Financial Statements for 2012 (Annex 1_18) as well as the 2014 business plan (Annex 1_19).

Assessment

The amounts of the annual financial contribution from the Land, as well as the revenue and expenditure of the accreditation procedures in the years 2009 to 2013, are portrayed comprehensibly in the submitted documents. Just like the activities of the other departments within and outside Baden-Württemberg, the revenue and expenditure of the accreditation department is recorded separately to comply with the separation required by the Accreditation Council.

The expert group note that the deficit incurred by the accreditation department in the last accreditation period was compensated for by restructuring the financial contributions from the Land. Firstly, this restructuring of finances approved by the Land for the setup of an accreditation department enabled evalag to enter into the 'accreditation market' which was dominated by players who had already been active in this area of business for years. Although the deficit increased in the first few years, since 2010 a declining trend has been observed. In 2012, a surplus was recorded for the first time; 2013 ended with a very minimal deficit, so it can be said that the surplus compensated for this deficit.

In the framework of the on-site visit, the expert group discovered that the Land expected their financial contributions to be repaid, which the Accreditation Council would also have had to demand on a total cost basis in accordance with Criterion 2.3.2. However, contrary to the expectation stated in 2009, the deadline was left open. In concrete terms, a repayment in the next few years would mean that the amount to be paid back to the Land would have to be apportioned to the accreditation procedures. To do this, evalag would have to demand higher prices for accreditation procedures, which the market would hardly be able to pay for. This is particularly true because, in the expert group's opinion, evalag are already operating in high price ranges. Ultimately, the consequence would be that evalag's accreditation procedures would no longer be granted support in Germany and the accreditation department would have to be shut down. To the expert groups, this appears disproportionate, particularly due the agency's very well informed understanding of the quality concept and the fact that they set the bar on a national scale in this area. For this reason, they recommend that the Accreditation Council waive the repayment of the money provid-

ed in the first few years of activity and obligate the agency to complete the appropriate full costs accounting. evalag's small share in the market (under 2% of all accredited study programmes) shows furthermore, that no relevant competitive distortions have arisen from evalag's entry into the market. Also, despite the Land's start-up funding, no indicative evidence of 'giveaway prices' could be specified because, as already stated, the agency operates in high price ranges. evalag should also request that the Land waives the obligation for them to pay back the funds.

However, in the view of the expert group, the accreditation side of the business has to pay for itself in the future. In order to achieve this, the agency must attract more business and the efficiency potential of their work must be critically monitored. The head office were already contemplating some ideas, including the more compact structure of procedures or a compression of experts and the use of more standardised parts. It is also necessary that evalag communicates the quality of its work more pro-actively in negotiations with higher education institutions.

In this regard, the calculation of costs must also to be checked. The pro rata consideration of the overhead costs in the accreditation procedures cost calculation is clearly shown in Annex 1_15, and it includes relevant material costs such as the use of offices and office materials, and personnel expenses for administration and management. For the calculation, evalag uses cost rates specified by the Land for public institutions. The expert group understand this, but the rates seem very low so the actual costs are probably higher. For this reason it must be critically monitored to what extent the actual costs correspond to the actual expenditure. In this regard, the expert group is pleased that over the past few years, evalag has begun to record the time spent working on their individual projects.

Result

Criterion 2.3.2 is partially fulfilled.

Recommendation

The expert group suggests the following conditions:

Condition 1: The agency shall submit a financial plan for the year 2015 to 2017 and explain how it intends to ensure that the criterion to work on full cost basis in the coming accreditation period is covered. This shall include a realistic estimate of the actual incurred costs (including general costs) and the highlighting of saving potential.

The expert group issues the following recommendation:

Recommendation 3: evalag should ask the state of Baden-Württemberg to waive the national funding which the agency has received up to 2014, so that this amount doesn't have to be included in the price of accreditation procedures.

2.3.3 The agency ensures the freedom from instructions of the organs in individual cases and the independence and impartiality of the persons working for it.

Documentation

According to § 13 Para. 3 of the statute, the members of the Accreditation Commission work without instruction. However, they do work in compliance with formal guidelines and the Foundation Council's instructions. According to § 15 Para. 2 of the statute, the members of the Complaints Commission work as an independent committee, free of instructions from the Foundation Council and Accreditation Commission. According to Page 16 of the explanatory statement, the Foundation Council is only obligated to make decisions concerning the foundation statutes and is subject to the relevant statutory regulations. The Ministry for Science, Research and Culture Baden-Württemberg is represented in the Foundation Council by a member appointed without a vote (see § 10 Para. 1c of the statute).

The programme and system accreditation procedures provide a model for a participation contract which regulates the rights and obligations of the experts (Annex 1_6f) and also contains the criteria for any possible prejudice. It also provides the various groups interested in the assessment (scientists, professionals and students) with specific explanations of the criteria on any possible prejudice which the experts must individually check for and, where necessary, declare, before the beginning of a procedure (Annexes 1_6b1, 16_b3).

According to the management of the Accreditation Commission, at the on-site visit, which is regulated in § 6 Para. 5, evalag suggests that members inform this committee of prejudices concerning a decision of the chair of the Accreditation Council, and do not take part in the decision.

In the introduction to the documents submitted on 4 June 2014 (Page 3), evalag states that, in the Accreditation Commission and in the Foundation Council, prejudices contiguous to criteria contained in Annex 1_6b and in the following cases have already arisen:

- Involvement in the procedure as an expert,
- Application procedure at a higher education institution as a rector,
- Member of the higher education institution.

Assessment

The criteria for possible prejudices are suitable for informing the experts of the criteria for possible exclusion from involvement in assessments and enables them to make a statement on the matter. The responsibility to make the appropriate decision on which person to employ lies with agency.

The same appropriate criteria apply to the members of the committees (Foundation Council, Accreditation Commission and Complaints Commission). The cases listed in the subsequent delivery were also indicative of prejudices. At the on-site visit, the expert group was satisfied that the rules of the Accreditation Commission management were put into practice. What became obvious in the framework of the on-site visit was that, in the past, evalag employed members of the Accreditation Commission as experts. This violates the principles of delegation of roles and authority between expert groups and commissions. In the meantime, the agency agreed that commission members only take part in assessments in exceptional cases and for particular reasons. In the interests of 'good governance', this should be totally ruled out in the future, in order to provide more explicit differentiation between roles and to avoid the interpretation of the term 'exceptional case' differing from case to case. Furthermore, with an expert pool containing around 900 experts, there should be enough selection possibilities on offer.

The expert group is critically overseeing the compilation of the Complaints Commission because out of five members, two of them are also members of the Accreditation Commission. This overlap of decision-making committee and complaint body poses the danger of prejudices which make it a lot harder to handle complaints impartially. As this practice is not customary in the context of accreditation and is taken care of by the Accreditation Council, the expert group refrains from recommending a condition. However, the agency should separate the organisations in order to avoid the prejudices and interference.

It is to be viewed as special feature of evalag as an institution of the Land that the Ministry for Science, Research and Culture is represented in the Foundation Council by one person appointed without a vote. Only the ZEvA have established a similar construction. In the framework of the conversations at the on-site visit, the expert group got the impression that the members of the Foundation Council appreciate direct communication with the ministry. It also became clear that the people involved with the ministry also value the exchange with experts representing the Foundation Council. Thus the Foundation Council plays an important role as a communication platform, which, in the expert group's opinion, is also reflected in their friendly co-operation with each other.

The ministry is happy to rely on evalag's expertise when it comes to carrying out surveys and questions on quality assurance and development in higher education, and also uses

the agency as a project manager, for example for the awarding of the Carl Zeiss Foundation scholarships. The services provided here are valued by the employer. The expert group notes that with this collaboration, alongside the role of the independent agent, evalag also takes on the role of service provider. However, this is not relevant to the agency's accreditation procedure activities, not least because the Foundation Council is not assigned any operative conditions in this area.

Result

Criterion 2.3.3 is fulfilled.

Recommendation

The expert group issues the following recommendations:

Recommendation 4: In the future, the agency should refrain from appointing members of decision-making bodies as experts.

Recommendation 5: The agency should appoint organisations for decision-making and organisations for analysis of complaints which are independent of each other, and rule out parallel memberships.

Criterion 2.4: Facilities

The agency is sustainably and adequately equipped for its function in all required functional areas in respect of personnel and material resources

Documentation

According to § 5 Para. 1 of the statute, evalag has received a yearly grant from the Land which, in the past few years has amounted to a total of EUR [...] (Page 32 in Part 2 of the explanatory statement). In 2012 the grant amounted to EUR [...] (see Annex 1_17). According to the 2013 business plan, the grant from the Land is expected to be EUR [...] for both 2013 and 2014 (also included in Annex 1_17).

In § 5 Para. 3 of the statute the possibility of evalag carrying out accreditation procedures financed by themselves is regulated. According to their own data, in the years 2009 to 2013, evalag have acquired funds amounting to more than EUR [...]. The data for the management in the years 2009 to 2013 ranges from EUR [...] to EUR [...](Page 32 in Part 2 of the explanatory statement).

In total, 18 employees are employed by evalag (see Annex 1_2g) (16 full time equivalent). The department for programme and system accreditation consists of (as of 01/02/2014) two people and – in the department management role – the Chief Executive Officer (in to-

tal 2.0 full-time equivalent).

At the foundation premises in Mannheim, according to Page 16 of the current explanatory statement (01/02/2014), the management have a total of 444 square metres of office space (10 studies, a board room, 3 service rooms) with the relevant technical equipment at their disposal. The department responsible for programme and system accreditation use two studies (40.41 square metres) and the board room.

Assessment

The provided Annual Financial Statements for 2012 and the information contained in the business plans for 2013 and 2014 show an appropriate financial setup of evalag for the continuing procedures. The conversation with the employees and the impression of the premises confirms that the material setup also ensures the smooth operation of business.

Several higher education institutions complained that, particularly because of breakdowns due to illness or absences, the contact person could not be reached as desired. They asked for a clear replacement contact which, according to the head office, has already been introduced.

Result

Criterion 2.4 is fulfilled.

Criterion 2.5: Internal quality management

The agency continuously uses a formalised internal quality management system, which is suitable for assessing the effectiveness of the internal control processes and ensures the safeguarding and continuous improvement of the quality of the activity. It is publicly accessible and covers systematic internal and external feed-back processes.

Documentation

On Page 17 of the explanatory statement, evalag describes the essential elements of the internal quality management system and provides the guide to internal quality with Annex 1_9 (evalag IQM handbook). Here, evalag distinguishes between the main processes on one hand and the core processes for the support of the main processes on the other hand (Page 10). Main processes are, for example, the performance of the national and international accreditation and evaluation procedures. Under core processes are internal communication, maintenance of the expert data bank or the administration procedures. In relation to the steps of the individual processes, requirements, procedures, internal templates and instruments for quality assurance are listed.

According to the guide, the feedback channels are as follows:

- Survey of experts and higher education institutions on procedures (Annex 1_4h, 1_6h).
- Possibility for mutual feedback between experts and higher education institutions in the framework of the final conversation of the on-site visit.
- Internal documentation of the strengths and weaknesses of a procedure from the point of view of the supervisor (for programme accreditation Page 48, for system accreditation Page 55).

According to Page 17 of the explanatory statement, the information exchange within the head office is ensured with regular conferences and meetings which should result in the modification of documents and/or processes. For their further education, employees regularly take part in national and international seminars on the evaluation and accreditation of higher education study programmes (see Annex 1_8) and they document their attendance according to the relevant internal guidelines. The quality management guide also contains specifications for data protection (Annex 1_9, Page 71 f.)

Assessment

On 01/10/2009 the first-time accreditation was issued under the conditions of the creation of a formulised quality management system established on 21/06/2010. In this context, the Accreditation Council declared, that after a suitable period of time, the detailed and highly differentiated process descriptions and the requirements for the internal documentation would undergo a critical check to see whether the cost-benefit ratio is in compliance with objectives.

The expert group were satisfied with evalag's internal quality management. It was noted as positive that, in the check, the quality management hand book (evalag IQM hand book) based on the numerous steps of the main and core processes, requirements, instruments and highly differentiated control circuits, reached the defined quality requirements. The linking of the process steps to master documents on the same server provides training for new employees and increases the consistency of the documents created by evalag. The expert group were given a credible presentation of the regular maintenance carried out by the responsible consultants.

The abundance of instruments and internal strength and weakness analysis in the evalag IQM handbook, which is always scheduled in the programme and system accreditations, seems ambitious, and because there are so many, they will not be fully implemented. With particular regard to the scheduled strength and weakness analysis, the expert group got the impression that this is not actually put into practice, and that the procedure merely ex-

ists as a shorter internal exchange. There is only documentation for one individual external strengths and weaknesses analysis of the Accreditation Commission, which is from 2013. As the expert group's view of the number of strengths and weaknesses analyses carried out by evalag is considered too complex, they recommend updating the evalag IQM handbook with the established practice.

Unfortunately, evalag's internal quality management is still providing insufficient empirical data concerning their own work, which could then also be evaluated correspondingly. Feedback mechanisms are provided for contracting higher education institutions, experts and committee members, but the head office reports low responses to their surveys conducted after procedures are completed. In the future, the Chief Executive Officer should take responsibility for obtaining the corresponding amount of feedback and, where necessary, they should take action themselves. The questionnaires for higher education institutions could also be extended to include questions on the effectiveness of the procedures to find out their views in that area.

Apart from aspects mentioned, the expert group did get the impression that evalag's quality management is integrated into everyday business.

Result

Criterion 2.5 is partially fulfilled.

Recommendation

The expert group suggests the following conditions:

Condition 2: The agency should submit a revised Quality Management Hand Book, which is orientated towards the practice of quality assurance. It should also be described how empirical data from evalag's own procedures shall be gained and evaluated.

Criterion 2.6: Internal complaints procedure

The agency has a publicly accessible, formalised internal procedure for reviewing accreditation decisions on application of a Higher Education Institution.

Documentation

According to § 15 Para. 2, evalag sets up a Complaints Commission as an independent organisation of the foundation, which, according to § 16 Para. 1 of the statute, consists of three to five voting members: two members of the Accreditation Commission, one representative of each institution concerned with quality assurance in higher education, one representative of another German accreditation agency, one representative of a foreign accreditation agency and one student representative.

In Annex 1_7 evalag provides the Foundation Council's agreed internal procedures for complaints from higher education institutions dated 26/02/2006. This distinguishes three matters:

- For complaints concerning a missing system accreditation procedure certification, the Complaints Commission makes the decision on formal complaints, if the contents of the decision (initially) concern the Accreditation Commission.
- If a higher education institution objects to the appointment of certain experts, the Accreditation Commission decides on the exchange of these people.
- Within the accreditation procedures framework, the higher education institutions may appeal conditions, suspensions, negative decisions and the lack of system accreditation certification. In cases as such, the Accreditation Commission decides whether a revision is possible or refers it to the Complaints Commission. The Complaints Commission provides the Accreditation Commission with their opinion on the complaint filed, which the Accreditation Commission then takes into consideration when making a new decision. The decision of the Accreditation Commission on a procedure remitted to them is final.

On Page 19 of the explanatory statement, evalag state that since 2009 they have received two complaints, one of which was forwarded to the Complaints Commission. The second complaint was settled directly by resolution of the Accreditation Commission.

Assessment

The evalag procedure for handling higher education institution complaints is a binding regulation and contains appropriate deadlines and methods. The expert group is critically overseeing the compilation of the Complaints Commission to check for possible prejudice because two of the five members are also members of the Accreditation Commission (see Recommendation on Criterion 2.3.3).

Result

Criterion 2.6 is fulfilled.

Criterion 2.7: Accountability

The agency describes its procedures and appraisal criteria adequately in detail and publishes them. It publishes the names of the experts, the expert reports and the decisions of the accreditation procedures carried out by it.

Documentation

According to Page 19 of the application evaluation, evalag specifies the principles of the

programme and system accreditation procedures and publishes all relevant documents on the website.

The finalised accreditation procedures are forwarded to the Accreditation Council and, in the case of a positive decision, published on evalag's website and in the database of the Accreditation Council. The Chief Executive Officer provides an annual business report.

Assessment

By publishing them on the agency website and in the Accreditation Council database for accredited study programmes, the criteria, procedures and decisions of the agency are made available to the interested public. According to Page 3 of the Accreditation Council's progress report, evalag regularly and promptly fulfils the obligation concerning publication with regard to the accredited study programmes.

On Page 10 of the system accreditation procedures guide (Annex 1_5a), the agency states that, on the successful qualification of a procedure, 'a summary of the final expert report' will be published, which obviously does not mean the entire report. As the agency has not yet completed any system accreditation procedures, it cannot be checked whether it refers to incorrect practice or whether there is merely a problem with the statement in the guide.

With regard to negative decisions on system accreditation, the guide implies that notification is only sent to the Accreditation Council and the report and the decision are not published. Regarding this, the Accreditation Council rules are inconsistent. Although the publication of the report and the decision is not forbidden according to Clause 5.14 of the rules, including in negative cases, Clause 5.1.5 states that publication in the Accreditation Council databank is only to take place in positive cases. Clause 1.1.9, explicitly for negative decisions, only includes a notification sent to the Accreditation Council, and not publication of the programme accreditation procedures. In compliance with the extensive Standard 2.5 of the current ESG, the Accreditation Council should publish the decision whether it is positive or negative.

Result

Criterion 2.7 is fulfilled.

Recommendation

The expert group issues the following recommendation:

Recommendation 5: The agency should update the sections of the system accreditation guide concerning the publication of reports and decisions.

8. Assessment based on the European Standards and Guidelines (ESG)

Alongside the accreditation of study programmes and the internal quality assurance systems of higher education institutions in Germany (Part 2 of the application evaluation), evalag operates in various areas on a national and international level. In the following evaluation, activities are only considered if they consist of the aforementioned ESG process steps of self-documentation, on-site visit and report, and if the ENQA and EQAR member criteria are relevant to the evaluation.

In its first accreditation period, evalag successfully developed, implemented and carried out national and international accreditation procedures. As of November 2013, the agency has accredited 88 study programmes in Germany. Up to now, evalag has carried out 15 international accreditation procedures, of which three were institutional arrangements (progress report Page 4 and Annex 1_10). In this context, evalag was already active in Hungary, Kosovo, Lebanon and Lithuania. Accreditation procedures in Kyrgyzstan and Lithuania are currently pending.

Alongside accreditation procedures, evalag operates largely in the evaluation sector, as much nationally as internationally. According to Page 8 of the explanatory statement (Part 2), evalag carries out evaluations under the authority of higher education institutions and/or their sub-units, other scientific institutions or ministries. The applicant determines the matter to be evaluated. Thus, alongside teaching and learning, including further education, the field of research, promotion of young talent, other scientific processes as well as the administration and management of a higher education institution can also be evaluated. The agency classes these procedures as an integral part of its consultancy skills. According to Annex 1_10, evalag mostly carries out these procedures in Baden-Württemberg, but also takes on work for the Federal Ministry of Education and Research and the German Rectors' Conference. evalag also carries out institutional evaluation procedures (also called audits) in Austria, e.g. in the University of Klagenfurt and the Upper Austria University of Applied Sciences.

Outside of the assessment fields identified in the European Standards and Guidelines, evalag also offers consultancy services to higher education institutions, nationally and internationally. These services consist of, for example:

- Consultancy and support services concerning the setup of a quality management system (e.g. workshops, consultations (via telephone), monitoring of documents),
- Consultancy and support services concerning the preparation for system accreditation procedures, and support during the procedures (e.g. workshops, consultations (via

telephone), monitoring of documents), or

- Offers of further education (see explanatory statement, Part 2, Page 9).

Since 2007, under the authority of the Baden-Württemberg Ministry for Science, Research and Art, evalag has co-ordinated the assessment procedures of the Carl-Zeiss-Foundation in terms of the annually awarded programmes for the promotion of young talent (promotion and postdoctoral fellowships, establishing of junior professorships), the programmes for strengthening the research infrastructure of universities, and (since 2013) the programmes for facilitating foundation professors in STEM subjects in selected higher education institutions in Baden-Württemberg, Rhineland-Palatinate and Thuringia. Since 2013 evalag has also carried out project management tasks to co-ordinate and support the second invitation to tender for the innovation and quality fund – a promotional programme of the State of Baden-Württemberg. The programme promotes, for example ‘Real laboratories, BaWü-Labs, for researching sustainable development in Baden-Württemberg’ (Annex 1_10).

These activities relate to the awarding of grant funds to individuals or higher education institutions and are not based on the aforementioned ESG process steps of self-documentation, on-site visits and reports. Therefore they are not relevant for the evaluation of the compliance with the ESG.

3.1 Use of external quality assurance procedures for higher education

STANDARD:

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

GUIDELINES:

The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions. The standards for external quality assurance should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

Since standard 3.1 includes the fulfilment of Part II of the ESG, the following sections will firstly deal with standards 2.1 to 2.8 before making a statement concerning standard 3.1.

2.1 Use of internal quality assurance procedures

STANDARD:

External quality assurance procedures should take into account the effectiveness of the internal

quality assurance processes described in Part 1 of the European Standards and Guidelines.

GUIDELINES:

The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met. If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

Documentation

The following documents underlie the evalag procedures which describe procedures and criteria and are available on evalag's website:

- For national accreditation procedures: programme and system accreditation guides (Annex 1_4a and 1_5a)
- For international accreditation procedures: 'evalag Institutional Accreditation' (Annex 2_6a) and 'evalag International Programme Accreditation' (Annex 2_6b)
- For evaluation principle procedures in German and English: „Basic Principles for the Conception and Organisation of Evaluation Procedures“ (Annex 2_4)

Procedure rules for the performance of procedures in Lithuania were also provided.

Assessment

The evalag criteria for German programme and system accreditation and for international programme and higher education institution accreditation procedures stresses the importance of, and focuses on, functioning internal quality assurance systems in higher education institutions, with their requirements described in detail.

The principles underlying the evaluation procedures are generally taken from the ESG, but are not orientated in detail towards Part 1 of the ESG. This is understandable as the document covers all evaluation activities, not just those in the area of teaching and learning in higher education. In those evaluation procedures which mainly relate to teaching and learning, e.g. the audit procedures in Austria, the internal higher education institution quality assurance system plays the central role, in accordance with Standard 2.1, in evalag's activity.

Result

Standard 2.1 is fulfilled.

2.2 Development of external quality assurance processes

STANDARD:

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

GUIDELINES:

In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used. As external quality assurance makes demands on the institutions involved a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

Documentation

evalag provides the relevant guides for the programme and system accreditation procedures in Germany (Annex 1_4a and 1_5a), the international accreditation of study programmes (Annex 2_6b), and the international accreditation of higher education institutions (Annex 2_6a). evalag also adopted the relevant principles for evaluation activities (Annex 2_4). According to Page 11 of the explanatory statement, these procedure documents have been developed in agreement with higher education institutions, for example at the rectors' conference in Baden-Württemberg. Along with the Baden-Württemberg Ministry for Science, Research and Art, experts and representatives of higher education institutions are also involved in the further development. All procedure documents mentioned are published online.

Assessment

The evalag programme and system accreditation procedures are built on the Accreditation Council criteria and procedure rules which are adopted with the participation of higher education institutions, professionals and student bodies. In this respect, the standard is fulfilled.

In other business areas, such as international accreditation and evaluation, according to § 9 Para. 2 of the statute, the development of evalag's procedure documents is the responsibility of the Foundation Council to which representatives of higher education institutions and a professional, but no students, currently belong. The expert group recommends that, in the future, students should also be involved in the development of these procedure documents.

Result

Standard 2.2 is fulfilled.

Recommendation

The expert group issues the following recommendation:

Recommendation 6: The agency should enlist students to work on the international accreditation and evaluation procedure documents (ESG Standard 2.2).

2.3 Criteria for decisions

STANDARD:

Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

GUIDELINES:

Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

Documentation

The requirements and the procedure for national and international accreditation and the principles for evaluations are described and published in the relevant procedure documents (see Documentation, Standard 2.1).

The decisions concerning the national programme and system accreditation procedures are checked randomly or as warranted by the Accreditation Council in compliance with the criteria and procedure rules. These checks are based on the resolution of the Accreditation Council: 'Procedure of the Accreditation Council for the monitoring of accreditations undertaken by the agencies' dated 08/12/2009 and amended 25/02/2014.

On Page 14 of the application evaluation, evalag notes that no formal decisions were made by experts in the evaluation procedures. This is because this would be the responsibility of the tendering higher education institution or, where necessary, the tendering ministry.

Various internal templates should help to achieve consistency in the assessment: With Annex 1_4d, evalag presented a template for the structure of a programme accreditation expert report for thorough and consistent evaluation (for the full evaluation documentation for each report see Criterion 2.5). A hand book informs the programme and system accreditation procedure experts of the testing requirements, their duties and evalag's expectations of their understanding of their role (Annex 1_6 c 1 and 2). Various document templates for the communication of decisions (Annex 1_4 c, 1_4 f, 1_5 l) should ensure that decisions are communicated to higher education institutions with a professional appearance.

Assessment

evalag's published procedure documents on national and international accreditation and evaluation comprehensibly define procedure steps and requirements, and present good grounds for carrying out procedures and also for decisions regarding accreditation. The Accreditation Council progress report on the first accreditation period shows that, in the spot checking of evalag's national programme accreditation, no significant shortcomings were specified.

The templates provided in the explanatory statement are suitable for ensuring the completeness of the evaluation and also the consistency of the assessments and decisions of the Accreditation Commission.

Result

Standard 2.3 is fulfilled.

2.4 Processes fit for purpose

STANDARD:

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

GUIDELINES:

Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes.

Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance. Amongst these elements the following are particularly noteworthy:

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task;
- the exercise of care in the selection of experts;
- the provision of appropriate briefing or training for experts;
- the use of international experts;
- participation of students;
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached;
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review;
- recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality

Documentation

According to the relevant guides, evalag arranges an on-site visit for all national and international accreditation procedures and for all evaluation procedures, on the basis of self-

documentation of the higher education institution and report (where necessary, as basis for a decision on accreditation) (Annexes 1_4a, 1_5a, Annexes 2_4, 2_6a, 2_6b).

The expert groups for all types of procedures are, in accordance with § 12 Para 1 (c) of the statute, selected by the Accreditation Committee and, in accordance with § 9 Para. 2 (o) of the statute, appointed by evalag's Foundation Council. Further criteria on selection are detailed in the resolution of the Foundation Council dated 26/02/2006 'Selection criteria and competence profiles of the members of the Accreditation Commission' (Annex 1_6a).

According to Clause 1.1.3 and Clause 5.5 of the Accreditation Council rules, students are to take part in the programme and system accreditation expert groups (see also Criterion 2.2.2). This is also included in the guides for the international accreditation of study programmes and higher education institutions (Annex 2_6b and 2_6a).

On the experts' preparation, evalag presents the resolution of the Foundation Council dated 07/02/2014 'Concept of preparation of the experts for the Programme and System Accreditation procedures' (Annex 1_6c). According to this, at the beginning of a procedure, the experts are issued with a compilation the relevant documents, the application documents and the higher education institution documentation (Annex 1_6c, Page 8f). In the framework of a system accreditation procedure, an expert seminar is to determine what has not yet taken place due to the lack of cases. In addition, evalag offers full day seminars, discussions and experience exchanges as shorter formats of preparation. Since 2010, evalag has offered a large scale seminar every year and has participated in the expert seminars of the student accreditation pool (Annex 1_6c, Page 4).

On its own account, evalag maintains a pool of experts (Annex 1_9, Page 16). In the procedures for national and international accreditation, 126 people were working in the first accreditation period. In total, the expert pool consisted of around 900 people (Annex 1_6). From the diversity statistics documented in Annex 1_6i, it appears that evalag employs a total of 1.6% female and 3.7% male international experts for their procedures. For the evaluation procedures, evalag employs 3% female and 10% male international experts.

The programme and system accreditation procedures provide a model for a participation contract which regulates the rights and obligations of the experts (Annex 1_6f) and also contains the criteria for any possible prejudice. It also provides the various groups interested in the assessment (scientists, professionals and students) with specific explanations of the criteria on any possible prejudice which the experts must individually check for and, where necessary, declare, before the beginning of a procedure (Annexes 1_6b1, 1_6b2, 16_b3).

With regard to the evaluation procedures, on Page 16 of the explanatory statement, evalag states that the procedures – based on the principles documented in Annex 2_4 – are specifically designed according to the requirements of the matter being evaluated, and the objectives and the purposes of the evaluation. According to the principles documented in Annex 2_4, for the evaluation procedures, evalag values the selection and preparation of the experts, and their impartiality.

Assessment

The procedure steps of self-documentation/assessment and evaluation reports are carried out according to the procedure documents for national and international accreditation, and evaluations (to follow up, see Standard 2.6). With evaluations, evalag responds to the requirements of the applicant and then specifies the matter of the procedure and the methods.

Students are part of the expert groups and normally take part in the framework of the on-site visit conversations concerning national and international accreditation procedures and evaluations. With regard to the student members of the Accreditation Commission it is to be noted that, although they are enrolled in higher education institutions, they are already partially carrying out professional activities or fulfilling a long-term commitment to higher education policies. The expert group considers it necessary that active student bodies with a close proximity to the daily routine of a higher education institution contribute their perspectives to the decision-making accreditation committees. evalag should refer to the statute to check that they are providing this when considering the possibility of re-appointing student bodies as members of the Accreditation Commission or shortening their period in office. The criteria and procedure for the selection of experts with regard to the programme and system accreditation are suitable for ensuring an adequate compilation of the expert groups. The experts are carefully prepared for the procedures and can take part in seminars for preparation for the procedures or experience exchanges that are regularly offered. The expert pool is very large and profits from a diversity of the agency's activities. In the framework of the on-site visit, the higher education institutions' representatives speak very positively of the quality of the experts and their procedures.

The criteria for possible prejudices ensure that experts are informed of the criteria for possible exclusion from involvement in assessments and enable them to make a statement on the matter. The responsibility to make the appropriate decision on which person to employ lies with the agency.

On a positive note, evalag keeps statistics on the entry of international experts with regard to all types of procedure. From these statistics, it appears that lots of international experts

are already involved in evaluation procedures, while the number could still be increased in the other types of procedures. In the framework of the on-site visit, the higher education institutions' representatives speak positively of the agency's willingness to fulfil the desire for a stronger international expert group.

Result

Standard 2.4 is fulfilled.

Recommendation

The expert group issues the following recommendation:

Recommendation 7: evalag should create measures which ensure that active students with close proximity to higher education institutions are involved with the Accreditation Commission.

2.5 Reporting

STANDARD:

Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

GUIDELINES:

In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership. Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone. In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations. There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers. Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

Documentation

evalag publishes the programme and system accreditation procedure reports and decisions in accordance with the requirements in Clause 1.1.11 and 5.14 of the Accreditation Council rules (Page 22 of the explanatory statement). Up to now (01/02/2014), evalag has carried out seven institutional evaluations (also known as audits) and, in agreement with the applicant, published five reports (explanatory statement Part 2, Page 21 f). The reports on completed evaluation procedures are also available to the public. evalag provides – if permission is given by the applicant a full version or a summary on the website (see explanatory statement Part 2, Page 21).

Basically, all evalag reports are structured in an assessment report, in which an evaluation

and the consequential recommendations are organised and procedure methods and evaluation criteria are also presented (Part 2, Page 21 of the explanatory statement). Alongside high linguistic requirements for the clarity and comprehensibility of the reports, evalag, by its own account, also attaches great importance to the adequate representation of sensitive information, the protection of personal rights and compliance with data protection laws.

A master template is provided for programme accreditation experts in Annex 1_4d. Requirements for target audience and the assembly of experts are also defined in the evaluation procedure principles (Annex 2_4).

Assessment

By publishing them on the agency website and in the Accreditation Council database for accredited study programmes, the criteria, procedures and decisions of the agency are made available to the interested public. According to Page 3 of the Accreditation Council's progress report, evalag regularly and promptly fulfils the obligation concerning publication with regard to the accredited study programmes.

On Page 10 of the system accreditation procedures guide (Annex 1_5a), the agency states that, on the successful qualification of a procedure, 'a summary of the final expert report' will be published, which obviously does not mean the entire report. As the agency has not yet completed any system accreditation procedures, it cannot be checked whether it refers to incorrect practice or whether there is merely a problem with the statement in the guide.

With regard to national accreditation decisions, the guide implies that notification is only sent to the Accreditation Council and the report and the decision are not published. Regarding this, the Accreditation Council rules are inconsistent. Although Clause 5.14 of the rules states that the publication of the report and the decision is not forbidden, including in negative cases, in Clause 5.1.5, publication in the Accreditation Council databank is only to take place in positive cases. Clause 1.1.9, explicitly for negative decisions, only includes a notification sent to the Accreditation Council, and not publication of the programme accreditation procedures. In compliance with the extensive Standard 2.5 of the current ESG, the decision should be published whether it is positive or negative.

evalag also published the decisions and reports on international accreditation procedures on the website.

With regard to contracted evaluation procedures, including audits, the expert group understands that evalag must agree to the publication of the results with the applicant and that the transparency principle and the wish for confidentiality are to be weighed up.

The texts published on the agency's website are presented clearly, so that the evaluations and recommendations of the experts are easy to find. Annex 1_4d on prototypical construction of a programme accreditation expert report also shows that evalag distinguishes between assessment and evaluation, and the experts' recommendation for the resolution is summarised in an extra chapter. However, in this respect, the construction is somewhat redundant because according to Chapter IV and Chapter VII, the accreditation of study programmes criteria should be evaluated and in this case, duplicates seem to be unavoidable.

The agency has not yet examined or reflected on whether the text is easily understandable for its target audiences such as, for example, students. Whereas the contracting higher education institutions giving feedback on completed procedures in the framework of internal quality assurance could also give feedback on the comprehensibility of the text, student bodies are not yet included as part of this feedback channel. The agency could use, for example, the student members of the Accreditation Commission to obtain feedback.

Result

Standard 2.5 is substantially fulfilled.

Recommendation

The expert group issues the following recommendation:

Recommendation 8: The agency should check whether their texts are easily understood by their target audiences, particularly students.

2.6 Follow-up procedures

STANDARD:

Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

GUIDELINES:

Quality assurance is not principally about individual external scrutiny events: It should be about continuously trying to do a better job. External quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

Documentation

On Page 23 of the explanatory statement, evalag states that, in their 31st session on 21 October 2008, the Foundation Council came to the decision that the follow-up is an inte-

gral part of every procedure, whether national or international accreditation or evaluation. Accreditation for national and international accreditation procedures is possible under certain conditions (Annex 1_4 a, 1_5a, 2_6a and 2_6b).

With regard to evaluation procedures, it is recorded in the procedure principles (in Annex 2_4 Page 3) that evalag strives for the initiation or support of follow-up measures and has been working on key questions surrounding the concept of a follow-up.

Assessment

The agency regulations for programme and system accreditation correspond to the conditions of the Accreditation Council guidelines and also fulfil the requirement of a follow-up in accordance with the ESG. The process of specifying the fulfilment of programme accreditation conditions is sufficiently defined and in the expert group's opinion is also carried out reliably. In the checks on conditions and recommendations, the regulations for international accreditation and evaluation also presented worthwhile follow-up measures in accordance with the ESG.

Result

Standard 2.6 is fulfilled.

2.7 Periodic reviews

STANDARD:

External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

GUIDELINES:

Quality assurance is not a static but a dynamic process. It should be continuous and not "once in a lifetime". It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

Documentation

According to the Accreditation Council procedure rules, the decisions on programme and system accreditation are made in a limited time period, which, with continuation of study programmes, normally involves a new accreditation. According to Page 24 of the explanatory statement (Part 2), an international accreditation from evalag is usually valid for five years.

On Page 24 of the explanatory statement (Part 2), evalag states that for subject-related procedures, such as evaluations and audits, periodic checks and dynamic process sup-

port is offered. These are voluntary on the part of the applicant.

Assessment

According to Standard 2.7, the limited accreditation period for programme and system accreditation procedures under the Accreditation Council procedure rules involves a periodical review. This also applies for international procedures for which the evalag seal of approval was given for a period of five years.

Evaluations do not require a cyclical repetition because of their event-related character, but obviously evalag does offer this option to the applicant. However, because punctual procedures also have their authority, in accordance with the ESG, and the accreditation business works with regular reviews, Standard 2.7 is fulfilled.

Result

Standard 2.7 is fulfilled.

2.8 System-wide analyses

STANDARD:

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments etc.

GUIDELINES:

All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work.

Documentation

On Page 25 in Part 2 of the explanatory statement, evalag first refers to the size and diversity of the German higher education system, which made a system-wide overview rather complicated. Based on the final expert reports, the agency tries to collect qualitative and quantitative data from the higher education area and also carries out surveys of interest groups. To present the results, evalag refers to the annual business report (Annex 1_12) and the biannual newsletter. In this context, evalag also refers to and provides a list of employees' publications (explanatory statement Pages 26-27).

According to Part 2, Page 26 of the explanatory statement, evalag is part of (as a coordinating agency) a three year application-oriented research project named 'Impact Analysis of External Quality Assurance Processes of Higher Education Institutions'. There are ten other partners involved in this project (quality assurance agencies and higher education institutions from Romania, Finland and Spain, experts and associations). Pluralistic

Methodology and Application of a Formative Transdisciplinary Impact Evaluation” (IMPALA) are obtained. This consists of the development of methods for (supporting) analysis of the effects of an external quality assurance system and should develop a systematic approach which includes an international comparison. In addition, evalag is also working with INCHER-Kassel on the project ‘Quality assurance in teaching and learning through accreditation and evaluation. An analysis of the collaboration of external and internal quality assurance in public higher education institutions in Germany.’

Since 2010 evalag has been working with the German Evaluation Society (DeGEval) (explanatory statement, Part 2, Page 27). In addition, evalag has already carried out several events concerning the results of the quality assurance procedures, such as conventions and workshops (explanatory statement, Part 2, Page 27).

Because of their ad-hoc character, the assessment of the international auditing and accreditation procedures was foregone (explanatory statement, Part 2, Page 27).

Assessment

evalag’s engagement in the acquisition and coordination of research projects is essentially seen as positive because the research of the effects of national and international levels in particular still remains a desideratum. However, only restricted analysis of the results of the agency’s work could be provided for this project, as required by Standard 2.8. This also applies for the numerous articles in specialist magazines listed in the explanatory statement, evalag employees’ presentations, and the annual business report with which evalag fulfils the accountability of § 20 of the statute.

The editions of the newsletter published on the agency website show that the agency deals with topics relevant to higher education in detail and that higher educations for whom evalag have completed a procedure also get to have their say in a retrospective analysis. However, a systematic analysis of the agency’s procedures does not take place here.

Result

Standard 2.8 is partially fulfilled.

Recommendation

The expert group issues the following recommendation:

Recommendation 9: evalag should regularly analyse and (with the expected new version of the ESG in mind) publish the results of its own quality assurance procedures.

Overall assessment on standard 3.1:

In the overview of evaluations of Standard 2.1 to Standard 2.8 it is to be noted that standard 3.1 is substantially fulfilled.

3.2 Official status**STANDARD:**

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

Documentation

According to § 1 of the statute (Annex 1_1), through the establishment as a foundation under public law, evalag has its own legal personality. As a foundation, they are subject to the foundation laws of the Land, the German foundation laws, and in financial terms, the Financial Regulations of the Land (explanatory statement, Part 2, Page 33, see also Standard 3.6).

According to § 2 Para. 1 No. 1 of the German Statute on the Establishment of a Foundation for Accreditation of Study programmes in Germany, the foundation has the authority to accredit, re-accredit, and monitor the work of accreditation agencies. It grants, for a limited period of time, the authorisation to accredit study programmes or internal quality assurance systems of high education institutions by awarding the seal of the foundation. Since 01/09/2009, evalag is authorised, without interruption, to award the seal of approval of the Accreditation Council.

Assessment

As a foundation under public law, evalag may operate independently and, in accordance with Standard 3.2 and Criterion 2 of the ENQA, must comply with the legal supervision of the responsible Baden-Württemberg Ministry for Science, Research and Art.

Also, with the first accreditation by the Accreditation Council in 2009, in accordance with Standard 3.2, evalag provided recognition of the institution. If the Accreditation Council's decision on the continuation of accreditation procedures is positive, compliance with the current criteria and procedure rules would be confirmed and the agency is re-registered for programme and system accreditation in Germany for another five years. Whether evalag implements the Accreditation Council decisions and the Common Structural Guidelines of the Länder, is subject to the monitoring of the Accreditation Council. According to Page 2f. of the progress report on the last accreditation period, the Accreditation Council's findings were positive.

Result

Standard 3.2 is fulfilled.

3.3 Activities

STANDARD:

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

GUIDELINES:

These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

Documentation

evalag lists the accreditation procedures and projects since 2001 in Annex 1_10. Over the past years, the agency has carried out various evaluation procedures based on subjects, study programmes or entire higher education institutions. Since the certification as an accreditation agency in October 2009, evalag has, according to its own information, accredited 88 national study programmes, and one system accreditation procedure is ongoing (as of 1 February 2014). Since 2010, a further 15 international accreditation procedures and 11 subject-based evaluations have been carried out (see explanatory statement Part 2, Page 30f).

Assessment

From the establishment of the procedures carried out since 2001, it became clear that evalag is regularly active in the fields of programme accreditation, national and international accreditation, and evaluation. The system accreditation area has been tackled.

Result

Standard 3.3 is fulfilled.

3.4 Resources

STANDARD:

Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

Documentation

According to § 5 Para. 1 of the statute, evalag has received a yearly grant from the Land which, in the past few years has amounted to a total of EUR [...]. (Page 32 in Part 2 of the explanatory statement). In 2012 the grant amounted to EUR [...] (see Annex 1_17). Ac-

According to the 2013 business plan, the grant from the Land is expected to be EUR [...] for both 2013 and 2014 (also included in Annex 1_17). In § 5 Para. 3 of the statute, the possibility of evalag carrying out accreditation procedures financed by themselves is regulated. According to their own data, in the years 2009 to 2013, evalag have acquired funds amounting to more than EUR [...]. The data for the management in the years 2009 to 2013 ranges from EUR [...] to EUR [...] (Page 32 in Part 2 of the explanatory statement).

In total, 18 employees are employed by evalag (see Annex 1_2g) (16 full time equivalents). The department for programme and system accreditation consists of (as of 01/02/2014) two people and – in the department management role – the Chief Executive Officer (in total 2.0 full-time equivalent).

In its qualification profile for employees, evalag specifies that they should have work experience in higher education institutions, knowledge of socio-scientific methodology, with the essential structures and players in tertiary education (Annex 1_8). Career history information on the head office consultants is available in Annex 1_2g.

With regard to the further education of the employees of the head office, on Page 14 f. of the explanatory statement, evalag states that they will regularly take an active part in internal and external seminars and conventions. In Annex 1_8, evalag lists a series of various formats, such as topic-specific workshops, a monthly jour fixe and regular conventions, which should contribute to the information and further education of the head office consultants. Current amendments to the rules and criteria, as well as the experiences with the performance of the quality assurance procedures and, where necessary, modifications to documents and processes are discussed (Explanatory statement Page 15).

At the foundation premises in Mannheim, according to Page 16 of the current explanatory statement (01/02/2014), the management have a total of 444 square metres of office space (10 studies, a board room, 3 service rooms) with the relevant technical equipment at their disposal. The department responsible for programme and system accreditation use two studies (40.41 square metres) and the board room.

Assessment

The provided Annual Financial Statements for 2012 and the information contained in the business plans for 2013 and 2014 show an appropriate financial setup of evalag for the continuing procedures in all business areas. The conversation with the employees and the impression of the premises confirms that the material setup also ensures the smooth operation of business.

evalag has also drawn up an adequate qualification profile for head office employees (see Annex 1_8). As the biographical information shows, the head office consultants have ac-

cess to broad scientific competence and experience in the areas relevant to evalag's work, such as study programme management as well as internal and external quality assurance. The offers of further education are more than sufficient and combine internal and external activities.

Result

Standard 3.4 is fulfilled.

3.5 Mission statement

STANDARD:

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

GUIDELINES:

These statements should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

Documentation

With the explanatory statement for the application, evalag submitted a mission statement which was passed by the Foundation Council on 07/02/2014 and is published online:

“evalag is a centre of excellence for quality assurance and development, as well as quality management in the areas of higher education and science;

evalag is an established partner of higher education and scientific institutions. It offers expertise to support higher education and scientific institutions' engagement in high quality research, teaching and learning throughout the entire institution and their implementation of projects. On the basis of a dialogue and development-orientated understanding of the concept of quality, evalag contributes consultancy and tailor-made instruments and procedures for the strengthening of self-sufficiency and the production of a quality structure in higher education and scientific institutions;

evalag is based on the values of transparency, reliability, methodical professionalism and continuous further development of internal and external activities;

evalag provides higher education institutions with expert information for the preparation of appropriate higher education policy decisions;

In its certified procedures for fundamentally audited estimates with quality developing procedure elements, evalag commits to supporting programmes and higher education institu-

tions in achieving integrated quality;

evalag commits to the principles of the European Higher Education Area and engages in European and international networks. evalag works on the basis of national and European Standards for Quality Assurance and Development, as well as Quality Management;

evalag contributes to the further development of Quality Assurance and Development, as well as Quality Management, in higher education institutions, and actively contributes on a practical, as well as a scientific and theoretical, level.

evalag is continuously pursuing and analysing developments in higher education institutions, pro-actively integrating them in its own portfolio and presenting them to the higher education institutions.”

On page 10 of the explanatory statement for the application, evalag states that it first acquired understanding of the quality concept in 2001 as a basis for the performance of evaluation procedures and since then this understanding has continuously been developed through experiences from their own work, i.e. in particular, through feedback from higher education institutions, and through working with national and international associations.

Assessment

In the mission statement, evalag demonstrated an understanding of the quality concept based on the basic principles of higher education institutions' responsibility for the quality of programmes and the measurement and validation of higher education objectives. This should explicitly strengthen the financial self-sufficiency of higher education institutions.

Compared to the mission statement from the application for first-time accreditation in 2009, the expert group noticed a considerable development. Whilst the mission statement from 2009 was strongly tailored towards the performance of expert procedures such as Peer Review or programme and system accreditation, the current mission statement broadens its range of activities and describes evalag as a 'centre of excellence for quality assurance' and providers of support for quality development.

In the framework of the on-site visit it became clear that the party to the proceedings (members of the Accreditation Commission, head office, agency experts) focus their work on quality development of higher education institutions. The will to support the setup of a quality culture in higher education institutions is expressed by the diverse consultancy activities.

As a centre of excellence for quality assurance, evalag also opens up research topics without wishing to create competition for higher education institutions. Currently, the

agency is carrying out surveys on behalf of the Land and an EU-funded co-operation project with European partners on the effect of accreditation procedures. The expert group welcomes these activities as they correspond to the mission statement and relate to the questions of quality assurance.

Result

Standard 3.5 is fulfilled.

3.6 Independence

STANDARD:

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

GUIDELINES:

An agency will need to demonstrate its independence through measures, such as

- its operational independence from higher education institutions and governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts);
- the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence;
- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Documentation

According to § 1 of the statute (Annex 1_1), through the establishment as a Baden-Württemberg foundation, evalag has its own legal personality. According to § 5 of the statute, the Land finances the necessary expenditure of the foundation, insofar as it is not covered by other incomes. According to § 6 Para. 2 of the statute, the foundation business plan requires the approval of the foundation authorities, in this case the Baden-Württemberg Ministry for Science, Research and Art.

According to § 13 Para. 3 of the statute, the members of the Accreditation Commission work without instruction. However, they do work in compliance with formal guidelines and the Foundation Council's instructions. According to § 15 Para. 2 of the statute, the members of the Complaints Commission work as an independent committee, free of instructions from the Foundation Council and Accreditation Commission. According to Page 16 of the explanatory statement, the Foundation Council is only obligated to make decisions concerning the foundation statutes and is subject to the relevant statutory regulations. The Land Ministry for Science, Research and Art is represented in the Foundation Council by

a member appointed without a vote (see § 10 Para. 1c of the statute).

The programme and system accreditation procedures provide a model for a participation contract which regulates the rights and obligations of the experts (Annex 1_6f) and also contains the criteria for any possible prejudice. It also provides the various groups interested in the assessment (scientists, professionals and students) with specific explanations of the criteria on any possible prejudice which the experts must individually check for and, where necessary, declare, before the beginning of a procedure (Annexes 1_6b1, 16_b3).

In the introduction to the documents submitted on 4 June 2014 (Page 3), evalag states that, in the Accreditation Commission and in the Foundation Council, prejudices contiguous to criteria contained in Annex 1_6b and in the following cases have already arisen:

- Involvement in the procedure as an expert,
- Application procedure at a higher education institution as a rector,
- Member of the higher education institution.

Assessment

The criteria for possible prejudices are suitable for informing the experts of the criteria for possible exclusion from involvement in assessments and enable them to make a statement on the matter. The responsibility to make the appropriate decision on which person to employ lies with agency.

The same criteria apply to the members of the committees (Foundation Council, Accreditation Commission and Complaints Commission). The cases listed in the subsequent delivery were also indicative of prejudices. At the on-site visit, the expert group was satisfied that the rules of the Accreditation Commission management were put into practice. It is to be noted that, as a Baden-Württemberg foundation, evalag's work is financed by the Land, insofar as its own incomes cannot finance it. The representation of the Baden-Württemberg Ministry for Science, Research and Culture in the Foundation Council (without voting) hereby corresponds to the status of evalag as an Institution of the Land. In the framework of the conversations at the on-site visit, the expert group got the impression that the active members of the Foundation Council appreciate direct communication with the ministry. It also became clear that the people involved with the ministry also value the exchange with experts representing the Foundation Council. Thus the Foundation Council plays an important role as a communication platform, which, in the expert group's opinion, is also reflected in their friendly co-operation with each other. The Foundation Council sees itself as more of a strategic committee and only takes on restricted operative duties such as the approval of evaluation procedure reports. In the past, it also occasionally made decisions on international accreditation procedures. However, in the future, the Ac-

creditation Commission, , should be responsible for all accreditation decisions for honing the profile of the organisation by statute alone. The expert group believe that evalag carry out the concept and performance of the national and international accreditation and evaluation procedures independently and autonomously.

The ministry is happy to rely on evalag's expertise when it comes to carrying out surveys and questions on quality assurance and development in higher education, and also uses the agency as a project manager, for example for the awarding of the Carl Zeiss Foundation scholarships. The services provided here are valued by the employer. The expert group notes that with this collaboration, alongside the role of the independent agent, evalag also takes on the role of service provider.

Result

Standard 3.6 is fulfilled.

3.7 External quality assurance criteria and processes used by the agencies

STANDARD:

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include

- a self-assessment or equivalent procedure by the subject of the quality assurance process;
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
- publication of a report, including any decisions, recommendations or other formal outcomes;
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

GUIDELINES:

Agencies may develop and use other processes and procedures for particular purposes. Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.

Agencies that make formal quality assurance decisions, or conclusions which have formal consequences should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

Documentation

The requirements and the procedure for national and international accreditation and the principles for evaluations are described and published in the relevant procedure documents (see Documentation, Standard 2.1).

On Page 23 in part 2 of the explanatory statement, evalag states that, in their 31st session on the 21 October 2008, the Foundation Council came to the decision that the follow-up is an integral part of every procedure,

With regard to evaluation procedures, it is recorded in the procedure principles (in Annex 2_4 Page 3) that evalag strives for the initiation or support of follow-up measures and has been working on key questions surrounding the concept of a follow-up.

Accreditation for national and international accreditation procedures is possible under the certain conditions (Annex 1_4 a, 1_5a and 2_6b).

According to 15 Para. 2, evalag sets up a Complaints Commission as an independent organisation of the foundation, which, according to § 16 Para. 1 of the statute, consists of three to five voting members: two members of the Accreditation Commission, one representative of each institution concerned with quality assurance in higher education, one representative of another German accreditation agency, one representative of a foreign accreditation agency and one student representative

In Annex 1_7 evalag provides the Foundation Council's agreed internal procedures for complaints from higher education institutions dated 26/02/2006. This distinguishes three matters:

- With complaints concerning a missing system accreditation procedure certification, the Complaints Commission makes the decision on formal complaints, if the contents of the decision (initially) concern the Accreditation Commission.
- If a higher education institution objects to the appointment of certain experts, the Accreditation Commission decides on the exchange of these people.
- Within the accreditation procedures framework, the higher education institutions may appeal conditions, suspensions, negative decisions and the lack of system accreditation certification. In cases as such, the Accreditation Commission decides whether a revision is possible or refers it to the Complaints Commission. The Complaints Commission provides the Accreditation Commission with their opinion on the complaint filed, which the Accreditation Commission then takes into consideration when making a new decision. The decision of the Accreditation Commission on a procedure remitted to them is final.

On Page 19 of the explanatory statement, evalag state that since 2009 they have received two complaints, one of which was forwarded to the Complaints Commission. The second complaint was settled by the resolution of the Accreditation Commission.

Assessment

The agency's procedures and criteria are comprehensibly described in the relevant procedure documents and made available to the higher education institutions on the agency's website (see ESG 2.3).

All of the agency's procedures are essentially based on the three-stage peer review with self-documentation, on-site visits and an evaluation report from an expert group. Student bodies will be consistently involved in the international accreditation and, normally, evaluations. (See Standard 2.4).

The agency regulations for national programme and system accreditation correspond to the conditions of the Accreditation Council guidelines and also fulfil the requirement of a follow-up in accordance with the ESG. In the checks on conditions and recommendations, the regulations for international accreditation and evaluation also presented worthwhile follow-up measures in accordance with the ESG (see Standard 2.6).

The evalag procedure for handling higher education institution complaints about accreditation is a binding regulation and contains appropriate deadlines and methods. The expert group is critically overseeing the compilation of the Complaints Commission because out of five members, two of them are also members of the Accreditation Commission. This overlap of decision-making committee and complaint body poses the danger of prejudices which make it a lot harder to handle complaints impartially. The expert group notes that this practice is not unusual in the accreditation context and it is also cultivated by the Accreditation Council. The agency should separate the organisations in order to avoid the prejudices and interference. A formalised complaints procedure is not necessary for evaluations because evalag doesn't make any formal decisions when it comes to evaluation.

For the publication of results of quality assurance procedures, see Standard 2.5.

Result

Standard 3.7 is fulfilled.

Recommendation

The expert group issues the following recommendation:

Recommendation 10: The agency should appoint organisations for decision-making and organisations for analysis of complaints which are independent of each other, and rule out parallel memberships.

3.8 Accountability procedures

STANDARD:

Agencies should have in place procedures for their own accountability.

GUIDELINES:

These procedures are expected to include the following:

1. A published policy for the assurance of the quality of the agency itself, made available on its website;
2. Documentation which demonstrates that:
 - the agency's processes and results reflect its mission and goals of quality assurance;
 - the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts;

- the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are sub-contracted to other parties;
- the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.

3.A mandatory cyclical external review of the agency's activities at least once every five years.

Documentation

On Page 17 of the explanatory statement, evalag describes the essential elements of the internal quality management system and provides the guide to internal quality with Annex 1_9 (evalag IQM handbook). Here, evalag distinguishes between the main processes on one hand and the core processes for the support of the main processes on the other hand (Page 10). Main processes are, for example, the performance of the national and international accreditation and evaluation procedures. Under core processes are internal communication, maintenance of the expert data bank or the administration procedures. In relation to the steps of the individual processes; requirements, procedures, internal templates and instruments for quality assurance are listed.

According to the guide, the feedback channels are as follows:

- Survey of experts and higher education institutions on procedures (Annex 1_4h, 1_6h).
- Possibility for mutual feedback between experts and higher education institutions in the framework of the final conversation of the on-site visit.
- Internal documentation of the strengths and weaknesses of a procedure from the point of view of the supervisor (for programme accreditation Page 48, for system accreditation Page 55).

According to Page 17 of the explanatory statement, the information exchange within the head office is ensured with regular conferences and meetings which should result in the modification of documents and/or processes. For their further education, employees regularly take part in national and international seminars on the evaluation and accreditation of higher education study programmes (see Annex 1_8) and they document their attendance according to the relevant internal guidelines. The quality management guide also contains specifications for data protection (Annex 1_9, Page 71 f.)

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modification of documents and/or processes. For their further education, employees regularly take part in national and international seminars on the evaluation and accreditation of higher education study programmes (see Annex 1_8) and they document their attendance according to the relevant internal guidelines. The quality management guide also contains specifications for data protection (Annex 1_9, Page 71 f.) and is published on the agency's website.

According to information in Part 1, Page 15 of the explanatory statement, evalag does not assign any organisations to carry out parts of procedures and does not intend to do this either. However, the agency does state that, under circumstances with international procedures, it does work together with national institutions. This is regulated on a case by case basis in the corresponding agreements. On request, the agency states in the subsequent delivery of the re-accreditation procedures/ENQA review on Page 1, that catering, transport or, where necessary, copying services will merely be 'taken note of'.

The programme and system accreditation procedures provide a model for a participation contract which regulates the rights and obligations of the experts (Annex 1_6f) and also contains the criteria for any possible prejudice. It also provides the various groups interested in the assessment (scientists, professionals and students) with specific explanations of the criteria on any possible prejudice which the experts must individually check for and, where necessary, declare, before the beginning of a procedure (Annexes 1_6b1, 16_b3). In the introduction to the documents submitted on 4 June 2014 (Page 3), evalag states that, in the Accreditation Commission and in the Foundation Council, prejudices contiguous to criteria contained in Annex 1_6b and in the following cases have already arisen:

- Involvement in the procedure as an expert,
- Application procedure at a higher education institution as a rector,
- Member of the higher education institution.

Assessment

On 01/10/2009 the first-time accreditation was issued under the conditions of the creation of a formulated quality management system established on 21/06/2010. In this context, the Accreditation Council declared, that after a suitable period of time, the detailed and highly differentiated process descriptions and the requirements for the internal documentation would undergo a critical check to see whether the cost-benefit ratio is in compliance with objectives.

The expert group were satisfied with evalag's internal quality management. It was noted

as positive that, in the check, the quality management hand book (evalag IQM hand book) based on the numerous steps of the main and core processes, requirements, instruments and highly differentiated control circuits, reached the defined quality requirements. The linking of the process steps to master documents on the same server provides training for new employees and increases the consistency of the documents created by evalag. The expert group gave a credible presentation of the regular maintenance carried out by the responsible consultants.

The abundance of instruments and internal strength and weakness analysis in the evalag IQM handbook, which is always scheduled in the programme and system accreditations, seems ambitious, and because there are so many, they will not be fully implemented. With particular regard to the scheduled strength and weakness analysis, the expert group got the impression that this is not actually put into practice, and that the procedure merely exists as a shorter internal exchange. There is only documentation for one individual external strengths and weaknesses analysis of the Accreditation Commission, which is from 2013. As the expert group's view of the number of strengths and weaknesses analyses carried out by evalag is considered too complex, they recommend updating the evalag IQM handbook with the established practice.

Unfortunately, evalag's internal quality management is still providing insufficient empirical data concerning their own work, which could then also be evaluated correspondingly. Feedback mechanisms are provided for contracting higher education institutions, experts and committee members, however, the head office in discussions, the head office reports low responses to their surveys conducted after procedures are completed. In the future, the Chief Executive Officer should take responsibility for obtaining the corresponding amount of feedback and, where necessary, they should take action themselves. The questionnaires for higher education institutions could also be extended to include questions on the effectiveness of the procedures to find out their views in that area.

Apart from aspects mentioned, the expert group did get the impression that evalag's quality management is integrated into everyday business.

It became clear that evalag carry out national and international procedures themselves and only employ other companies for specific services such as catering.

The criteria for possible prejudices are suitable for informing the experts of the criteria for possible exclusion from involvement in assessments and enable them to make a statement on the matter. The responsibility to make the appropriate decision on which person to employ lies with agency.

The same criteria apply to the members of the committees (Foundation Council, Accredi-

tation Commission and Complaints Commission). The cases listed in the subsequent delivery were also indicative of prejudices. At the on-site visit, the expert group was satisfied that the rules of the Accreditation Commission management were put into practice. What became obvious in the framework of the on-site visit was that, in the past, evalag employed members of the Accreditation Commission as experts. This violates the principles of delegation of roles and authority between expert groups and commissions. In the meantime, the agency agreed that commission members only take part in assessments in exceptional cases and for particular reasons. In the interests of 'good governance', this should be totally ruled out in the future, in order to provide more explicit differentiation between roles.

Finally, in accordance with Standard 3.8, an external assessment of the agency by the Accreditation Council took place in all of the five years.

Result

Standard 3.8 is substantially fulfilled.

Recommendation

The expert group issues the following recommendations:

Recommendation 11: In the future, the agency should refrain from appointing members of decision-making bodies as experts.

Recommendation 12: The agency should submit a revised Quality Management Handbook, which is orientated towards the practice of quality assurance. It should also be described how empirical data from evalag's own procedures shall be gained and evaluated.

ENQA criterion 8 – Miscellaneous

- i. The agency pays careful attention to its declared principles at all times, and ensures both that its requirements and processes are managed professionally and that its judgements and decisions are reached in a consistent manner, even if the judgments are formed by different groups
- ii. If the agency makes formal quality assurance decisions, or conclusions which have formal consequences, it should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of the agency.
- iii. The agency is willing to contribute actively to the aims of ENQA.

Documentation

i. evalag publishes a mission statement devised by the Foundation Council, in which the objectives of their work is described (see Standard 3.5). The agency will also publish procedure documents (see Standard 2.1) and templates for internal documents (see Standard 2.4) for all areas of business. The evalag IQM hand book also contains templates for

the areas of evaluation, consultancy and auditing (Annex 1_9).

ii. According to 15 Para. 2, evalag sets up a Complaints Commission as an independent organisation of the foundation, which, according to § 16 Para. 1 of the statute, consists of three to five voting members: two members of the Accreditation Commission, one representative of each institution concerned with quality assurance in higher education, one representative of another German accreditation agency, one representative of a foreign accreditation agency and one student representative

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On Page 19 of the explanatory statement, evalag state that since 2009 they have received two complaints, one of which was forwarded to the Complaints Commission. The second complaint was settled by the resolution of the Accreditation Commission.

evalag has not defined a complaints procedure for evaluation because no formal decisions are made when it comes to evaluations. Thereby, dialogue-based procedure steps should help to avoid conflict, concerning, for example, the establishment of evaluation subject matter, the selection of experts and the compilation of expert groups, the establishment of the self-evaluation-based questionnaire guidelines, or the evaluated institutions' checking of the factual accuracy of the final expert reports (Part 2 of the explanatory statement, Page 35).

iii. With regard to the support of the ENQA, evalag states that they engage in various

ENQA working groups and base their activities on their standards and guidelines (Part 2 of the explanatory statement, Page 39).

Assessment

i. evalag integrate the objectives formulated in the mission statements into the evaluation parameters of the procedure documents and all areas of activity are oriented towards the quality development objective. According to the expert group, the agency carries out procedures with sensitivity and is oriented towards the demands of the applicant. The templates used by evalag are suitable for increasing the consistency of assessments concerning evaluation procedures as well as the decisions of the Accreditation Commission.

ii. The evalag procedure for handling higher education institution complaints about accreditation is a binding regulation and contains appropriate deadlines and methods. The expert group is critically overseeing the compilation of the Complaints Commission because two of the five members are also members of the Accreditation Commission. This overlap of decision-making committee and complaint body poses the danger of prejudices which make it a lot harder to handle complaints impartially (see ESG Standard 2.7 and Recommendation 10). No formalised complaints procedure is necessary for evaluation because no formal decisions are made when it comes to evaluations.

iii. The business reports from 2013 and 2012 (Annex 1_12) show that evalag works actively with ENQA. With the IMPALA project, working with ENQA and various European partners, evalag wishes to contribute to developing a methodology for measuring the effectiveness of external quality assurance measures (see Standard 2.8).

Result

Criterion 8 of the ENQA members' criteria is fulfilled.

Bonn, 15/08/2014

Accreditation of the Evaluation Agency Baden-Württemberg (evalag) in 2014

Schedule for the on-site visit

Residence:

Maritim Parkhotel Mannheim • Friedrichsplatz 2 • 68165 Mannheim

Premises:

Evaluation agency Baden-Württemberg (evalag)

M7, 9a-10, 68161 Mannheim

Tel: 0621 12 85 45 10

Fax: 0621 12 85 45 99

06 July 2014		
18:00	Internal preliminary discussion in the hotel	
20:00	Internal working lunch in the hotel	
07 July 2014		
09:00 - 10:15	Conversation with the Chief Executive Officer	Dr Anke Rigbers
10:15 - 10:30	Break	
10:30 - 11:30	Conversation with a representative of the Baden-Württemberg Ministry for Science, Research and Art	[...]
11:30 - 11:45	Break	
11:45 - 13:00	Participation in Accreditation Commission meeting and conversation with the members	
13:00 - 14:00	Lunch, internal preliminary discussion	
14:00 - 15:30	Group conversation with (5-6) experts on the agency procedures (international procedures and consultancy)	[...]
15:30 - 15:45	Break	
15:45 - 17:15	Conversation with (3-5) representatives of study programmes which evalag has ac-	[...]

	credited and for which evalag has provided consultancy	
17:15 - 17:30	Break	
17:30 - 19:00	Final internal preliminary discussion of the first day	
approx. 19:30	Internal working dinner: Restaurant Onyx, Friedrichsplatz 12, 68165 Mannheim	
08 July 2014		
09:00 - 10:00	Conversation with the head office employees	
10:00 - 10:15	Break	
10:15 - 11:15	Conversation about evalag's international activities	[...]
11:15 - 11:30	Break	
11:30 - 12:30	Conversation with members of the Foundation Council and the agency management	Professor Weder Professor Künzel Dr Anke Rigbers
12:30 - 13:00	Light lunch	
13:00 - 15:45	Internal expert group closing meeting with preparation of the assessment	
16:00	Short final meeting with the agency management and departure	