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Review report

on the application by Agency for Quality Assurance through the Accreditation of Study Programmes (AQAS) from 11 May 2016 for accreditation and for verification of compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)[1]

-submitted on 23.01.2017[2]

I. Summary

AQAS was founded in 2002 and is one of the largest agencies in Germany today. AQAS operates both at national and international level. Its main focus lies on the programme accreditation. AQAS has been reaching high percentages of the market here in Germany for years. The agency is especially well renowned for teacher training programmes and joint programmes.

Since its foundation, the agency has performed 1953 programme accreditation procedures and has accredited 5734 study programmes, including 67 joint programmes. Among 1052 procedures, performed at universities, 155 procedures were conducted for teacher training programmes. As of today, AQAS has successfully completed ten system accreditation procedures.

The review panel gained a positive impression of the agency. AQAS is characterised by professionalism, a good culture of internal communication as well as competent and engaged employees.

AQAS endeavours to expand its activities on the international market. The agency has so far performed over thirty programme accreditations as well as one institutional accreditation abroad.

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[1] For reasons of easier legibility, gender-neutral differentiation will not be repeatedly made. Corresponding terms always and without exception apply to women and men pursuant to non-discrimination.

[2] In accordance with the "Guidelines for ENQA Agency Reviews" (see cl. 6.4, p. 18), only information that was available at the time of the site visit or that was subsequently filed based on additional demands of the review panel during the site visit, has been considered for the report.

II.   Procedural framework

II.1. Statutory mandate

Pursuant to § 2 Para. 1 No. 1 of the law on establishing a *Foundation for the Accreditation of Study Programmes in Germany,* the foundation's task is to accredit accreditation agencies. It grants, for a limited period, the right to accredit study programmes or the internal quality assurance systems of higher education institutions by awarding the foundation's seal.

At the time of the agency's application, the *"Rules of the Accreditation Council for the Accreditation of Agencies"* from 8 December 2009 in the version adopted on 10 December 2010 were valid. A new version of the rules, including the "European Standards and Guidelines" (ESG) agreed in 2015 by the ministers of the European Higher Education Area, was in preparation. The Accreditation Council and the agency agreed that the structure of the self-evaluation report should have already been submitted according to the draft version of the new rules which has been finally adopted by the Accreditation Council on 23 September 2016. The Accreditation procedure was therefore conducted according to the (2016) rules as well. However, no formal agreement was arranged with the agency on the application of the (2016) rules. Therefore, the Accreditation Council takes its decisions on the basis of the (2010) rules.

II.2 Compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area

In order to be recognised as a member of the European Association for Quality Assurance in Higher Education (ENQA) or to be included in the European Quality Assurance Register for Higher Education (EQAR), an agency must demonstrate, through an external assessment, that it complies with the ESG. For EQAR, full membership of ENQA is considered prima facie evidence of compliance with the ESG.

Accreditation by the Accreditation Council includes evaluation along the ESG and thus avoids a duplicated external review. The Accreditation Council is guided by the *Guidelines for external reviews of quality assurance agencies in the EHEA*.

II.3. Significant results from the previous accreditation/ENQA review/EQAR registration

The Accreditation Council issued four conditions and four recommendations upon the last reaccreditation of AQAS in 2012.[3] The entry in the European Register (EQAR) was also associated with two so-called "flagged issues", i.e. points were marked that should receive special attention in the subsequent evaluation. In the following evaluation of the review panel, all of these aspects shall receive special attention regarding the applicable ESG standards.

II.4 Course of the procedure

AQAS submitted the application for accreditation as an accreditation agency to the Accreditation Council by post on 11 May 2016. On 31 August 2016, the agency submitted a self-evaluation report alongside additional documentation. Further documents were subsequently requested by email on 28 October 2016. These documents were received by post on 11 November 2016.

The following experts were nominated by the Accreditation Council on 22 June 2016:

- **Prof. Dr. Andreas Musil**, vice president of University of Potsdam for teaching and learning, Professor of Public Law, in particular Administrative and Tax Law, University of Potsdam (Chair)

- **Prof. Dr. Lutz-Helmut Schön**, Professor of Didactics of Sciences and Head of the Center for Teacher Training, University of Vienna

- **Prof. Dr. Blaženka Divjak**, Professor of Mathematics and Computer Sciences, Faculty of Organisation and Computer Sciences, University of Zagreb

- **Timo Gayer**, M.A. Vocational Pedagogy, Political Secretary in Training and Qualification Policy department, IG Metall (Professional practice)

- **Florian Pranghe**, University of Cologne (Student)

For the Accreditation Council, Professor Dr.-Ing. Stefan Bartels observed the procedure.

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[3] The Accreditation Council found that these conditions had been fulfilled on 12 September 2013.

The review panel was supported by the managing director Dr. Olaf Bartz and the programme manager Ketevan Becker from the head office of the Foundation for the Accreditation of Study Programmes in Germany.

On 9 September 2016, a preparatory meeting was held in Berlin for the experts during which the criteria set by the Accreditation Council and the ESG were presented and discussed. The preparatory meeting also served to deepen the experts' knowledge about the procedure outlines and understanding of their roles in accreditation procedures.

Self-evaluation report

On 31 August 2016, the agency submitted a self-evaluation report with additional documentation. Further documents were subsequently requested by email on 28 October 2016. These documents were received by post on 11 November 2016.

The agency's self-evaluation report is informative, it documents comprehensively the agency's areas of activities and represents the respective quality assurance and development parameters. In the self-evaluation report, each standard of the ESG and the additional German criteria are assessed and implemented.

The agency additionally describes its approaches regarding handling the conditions and recommendations from the previous reaccreditation.

Site visit

A site visit took place at the agency's head office in Cologne from 27 to 29 November 2016, preceded by a preliminary discussion between the members of the review panel on 27 November 2016. The review panel led discussions with the management of the agency, members of the accreditation commissions for programme and system accreditation, employees in the head office, experts, as well as with representatives of German and foreign higher education institutions, where the agency has been conducting accreditation procedures. Additional documents were subsequently filed during the site visit. (The process schedule is included as an annex.)

The review panel submitted the following review report with an unanimous vote on 23 January 2017, taking the statement by AQAS from 18 January 2017 into account.

This review report is based on the *Standards and Guidelines for Quality Assurance in the*

European Higher Education Area (ESG) from May 2015 and the resolution of the Accreditation Council *"Rules of the Accreditation Council for the Accreditation of Agencies"* from 23 September 2016.

II.5 The German Accreditation System

Germany has a decentralised accreditation system which is characterised by the fact that accreditation agencies are certified for their activities in Germany by the Accreditation Council. Accreditation was introduced in 1998 and has always been based on the involvement of academics, students and professional practice representatives.

The role of accreditation is to ensure the standards of the covered specialised content, which alongside a review of the study programme concept and the academic feasibility of the programme offered, also considers the quality of teaching as well as a review of a programme's professional relevance and the promotion of gender equality. As a rule, accreditation is required for introducing and running Bachelor's and Master's study programmes. In addition to programme accreditation, system accreditation was introduced in 2007. Positive system accreditation entitles a higher education institution to award the quality seal of the Accreditation Council for study programmes in accordance with their own internal quality assurance system.

The work of the Accreditation Council is based on the law on establishing a Foundation: "Foundation for the Accreditation of Study Programmes in Germany", which was passed on 15 February 2005. Alongside certifying agencies, for a limited time for operations in Germany, the Accreditation Council determines the basic requirements for accreditation procedures, which must be conducted according to reliable and transparent standards. At the same time, the Accreditation Council ensures that concerns relating to the overall system for which individual states are responsible are given consideration as part of accreditation. The Foundation for the Accreditation of Study Programmes in Germany also functions as a centralised documentation office for accreditation and manages the database of accredited study programmes in Germany.

A European consensus in quality assurance of higher education institutions was reached for the first time by the ministers responsible for higher education with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (hereafter ESG) at the Bologna Follow-Up Conference in Bergen in May 2005. A revised version of the ESG was enacted in May 2015 at the conference of ministers in Yerevan. In order to promote

international recognition for the decisions made by the Accreditation Council and accreditation agencies, the Accreditation Council has always taken the ESG into account.

III. Agency for Quality Assurance through the Accreditation of Study Programmes (AQAS)

III.1 Foundation

The Agency for Quality Assurance through the Accreditation of Study Programmes (AQAS) was founded in 2002 on the initiative of universities and universities of applied sciences in North Rhine-Westphalia and Rhineland-Palatinate. The agency considers itself to be an organisation supported by higher education institutions and academic societies and whose remit is connected with the quality assurance and development of teaching and learning. The agency works across subjects and higher education institutions.

In accordance with the agency's statute, AQAS contributes to the development of European higher education through its activities in programme and system accreditation both on the national and on the international level.

III.2 Organisation

The agency is a registered association. The statute gives detailed information on the purpose of the association and the organisational structure. The association's bodies[4] are the General Assembly, the Management Board and the Complaints and Appeals Commission as well as the two commissions for programme and system accreditation. The work of the above-named bodies is supported by the Head Office.

General Assembly: The general assembly ordinarily meets once per year. The main responsibilities of the assembly refer to the decisions regarding the association's important affairs, rules of procedure, the statute, business plans and similar matters. In addition, the general assembly is authorised to submit proposals to the accreditation commissions for the accreditation criteria and for procedural principles.

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[4] AQAS uses the terms "bodies" and "committees" synonymously.

Management Board: The board appoints the accreditation commissions and the Complaints and Appeals Commission, awards the quality seal on behalf of the Accreditation Council and bears responsibility for preparing the budget plan.

Accreditation Commissions: The accreditation commissions are the central decision-making bodies for programme and system accreditation. They are responsible for the final decision of the individual accreditation procedures. They also decide on procedural principles and standards for accreditation.

Complaints and Appeals Commission: The complaints and appeals commission makes final decisions about appeals and complaints that could not be resolved through repeated consultation with the corresponding commission.

Since the second half of 2016, the agency's **Head Office** is structured into three central areas: system accreditation, programme accreditation and international operations. Each of the three areas is managed by one employee. The two Managing Directors are responsible for all areas and manage, in addition, system accreditation and international operations, where they also act on an operational level.

The agency's members include 91 higher education institutions and one academic society.

AQAS e.V. operates a subsidiary organisation AQAS ARCH. AQAS ARCH Ltd advises higher education institutions and university-related institutions in teaching, research and other services. The focus of the activity of AQAS ARCH is on consultancy which is carried out through diverse instruments – training sessions, thematic workshops, certifications.

III.3 Resources

According to the agency's annual financial statements, AQAS achieved an annual turnover in 2015 of EUR […]

AQAS currently has 25 employees (as of August 2016). Along with the two Managing Directors, the employees include twelve programme managers, two administrative assistants, three secretaries and two organisational assistants. The agency's head office is also supported by four student assistants.

The head office is located in Cologne. The facilities here, which in total cover 480 m^2 of office space, are rented. Each office is usually shared by two employees.

Each workspace is equipped with a PC or laptop, a telephone and one laser printer per office. The fixed assets of AQAS come to about EUR […] (as of 31 December 2015).

III.4 Spectrum of activities

In accordance with the statute, AQAS regularly performs programme and system accreditations in Germany. The agency is one of the largest agencies in Germany with a market share of approx. 30 %. A special profile of the agency is associated with its extensive experiences in teacher training study programmes and Joint Programmes.

Furthermore, AQAS is active internationally in the field of programme accreditation. AQAS conducted large number of accreditation procedures in Germany in the report period, above all in programme accreditation. Since its foundation in 2002, the agency has performed 1953 programme accreditation procedures and accredited 5743 study programmes, of which 155 procedures were for teacher training programmes (self-evaluation report, p. 14). In the field of system accreditation, the agency has accredited ten higher education institutions, among which four were universities and six were universities of applied sciences. In addition, 37 procedures have been conducted internationally. The largest proportion of international programme accreditation comprises of programmes in Moldova (15 programmes). Other procedures were performed in Kazakhstan, Laos, Liechtenstein, Luxembourg, Northern Cyprus, Austria and Russia.

The institutional accreditation, as one of the activity fields of AQAS, is at present in the development stage. The agency successfully completed its first procedure in Oman recently.[5]

Areas of activity of AQAS relevant to the ESG:

Field of activity	In Germany	Abroad
Programme accreditation	X	X
System accreditation	X	-
Institutional accreditation	-	X

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[5] The review report on the institutional procedure in Oman can be found here: http://www.aqas.de/downloads/International/Gutachten/Final%20Report_SQU_CASS.pdf

The role of the subsidiary organisation AQAS ARCH was initially vague for the review panel, as this role has been redefined during 2016. It was clarified in the procedure that AQAS ARCH is responsible for activities that are not relevant to the ESG. So far four projects have been performed through AQAS ARCH:

1. Operative implementation of a review procedure for a study programme: Eastern Mediterranean University/Northern Cyprus: "Interior Architecture" ("Bachelor of Interior Architecture", 2015, based on the ESG) for accreditation by AQAS e. V.

2. Assessment of an evaluation order of the University of [...], Germany (2015)

3. AQAS workshops in Cologne: "Programme accreditation organised successfully" (2016) and

4. "Practice-integrated study programmes as a key to success for higher education institutions" (2016)

A detailed evaluation on the relationship between AQAS and AQAS ARCH is presented under ESG standard 3.1.

IV. Evaluation of the European Standards and Guidelines (ESG)

3.1 Use of external quality assurance procedures for higher education

STANDARD:
Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

GUIDELINES:
To ensure the meaningfulness of external quality assurance, it is important that institutions and the public trust agencies.

Therefore, the goals and objectives of the quality assurance activities are described and published along with the nature of interaction between the agencies and relevant stakeholders in higher education, especially the higher education institutions, and the scope of the agencies' work. The expertise in the agency may be increased by including international members in agency committees.
A variety of external quality assurance activities are carried out by agencies to achieve different objectives. Among them are evaluation, review, audit, assessment, accreditation or other similar activities at programme or institutional level that may be carried out differently. When the agencies also carry out other activities, a clear distinction between external quality assurance and their other fields of work is needed.

Recommendation/conditions from the previous accreditation

-None-

Documentation:

The agency's mission statement is published[6] on the website and describes the most important principles that AQAS applies in order to fulfil the task of "one of the institutions involved in the creation of the European Higher Education Area and contributing to the development of reliable and comparable systems of quality assurance in both national and international contexts".

According to the mission statement, the agency considers itself to be an organisation based on higher education institutions and academic societies and is dedicated to quality assurance and development of teaching and learning at higher education institutions. The agency supports privately or publicly sponsored higher education institutions. The quality assessment of study programmes, particularly of bachelor's and master's programmes as part of programme accreditation as well as of quality assurance systems at higher education institutions within the scope of system accreditation is considered as main task of the agency. AQAS fulfils this task by:

- *"reviewing and certifying the quality of study programmes and quality assurance systems at higher education institutions as part of accreditation procedures,*
- *following within their own work the international developments in higher education institutions in the field of quality assurance and contributing to its further development,*
- *guaranteeing the implementation and maintenance of national and European resolutions and requirements,*
- *Involving academics, representatives of professional practice and students in the procedures,*
- *ensuring the independence of the experts and committees in the procedures,*
- *participating in European and international procedures,*
- *designing procedures to be flexible and transparent,*
- *reflecting and continuously developing its own processes and*
- *informing interested parties about the approaches and results of the procedures."*

AQAS aims to ensure the participation of all interest groups in the procedures and processes performed by the agency (Annex I.7). AQAS is also active outside of Germany and reviews study programmes as part of the programme and institutional procedures. As one

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[6]http://www.aqas.de/ueber-aqas/konzept-von-aqas/#a01

of the largest agencies in Germany, AQAS has already gathered many years of experience in programme accreditation. Special focuses of the agency are also placed on accreditation of Joint Programmes and teacher training study programmes.

The agency's further development and strategic planning were discussed during the site visit. From the point of view of AQAS e.V., the German market is changing considerably due to the introduction of system accreditation and stronger competition in programme accreditation. This is leading to greater fluctuations in the order situation. Besides, the international accreditations still are one of the volatile fields of activity which particularly has a high impact on German agencies, since they, as private entities, face competition with the state-funded agencies abroad.

At the same time the demand for other services (certification of further education courses, consultation or the implementation of thematic workshops) is increasing. In order to use the agency's experience and to stabilise the income base, AQAS founded a subsidiary organisation, AQAS ARCH in January 2015 as Ltd, which in the future shall carry out the consultation projects on the national as well as on the international level (e.g. TEMPUS or DAAD projects, self-evaluation report, p. 15). AQAS currently provides its staff for the activities of AQAS ARCH. Corresponding transferring assignments are made for the employees for this purpose. Since the number of orders is still low, the AQAS ARCH does not have its own personnel, nor its own bodies.

It emerged from the discussions with the management and employees of AQAS that the new field of activities is in a developmental phase. Originally the organisation was founded with the goal of performing international procedures of all kinds. The European Register (EQAR) made AQAS aware that the subsidiary's accreditation activities would be seen critically as long as AQAS ARCH is not also listed in the register. Therefore AQAS decided not to perform any accreditation or other ESG-related procedures under the umbrella of the Ltd in the future.

This matter was also raised in the European Register's decision regarding the "substantive change report" of AQAS. AQAS was asked to clearly separate consultation and external quality assurance from one another, in order to avoid potential conflicts of interest: *"The Register Committee's concern was whether there is a clear separation between the consultancy activities and external quality assurance activities, with adequate policies in place to prevent any conflicts of interest between them".*

Evaluation

AQAS regularly performs quality assurance procedures. The agency has defined clear and plausible goals in its mission statement that are lived out in everyday life of the agency.

The stakeholders are involved in all the agency's decision-making bodies and in all the expert groups employed by the agency. (self-evaluation report, p. 12ff.)

So far AQAS has not submitted any written provisions for the separation of quality assurance and consultation. It emerged from the discussions with the management and the employees of the agency that the activities of AQAS e.V. and AQAS ARCH are separated on an organisational and administrative level and corresponding staff transfers are arranged for personnel working on AQAS ARCH activities. The projects already carried out by AQAS ARCH raised a few questions for EQAR which were clarified through written discussion between EQAR and AQAS.[7] As a result, the procedures (as the one performed in Northern Cyprus) that fall under the ESG will in future be conducted by AQAS e.V. In discussions with the management and employees of the agency, it became clear for the review panel that the separation of quality assurance and consultation is being secured. However, from the panel's point of view, an official policy document, describing the relationship between the agency and the subsidiary, would become advisable at the latest when the increase of AQAS ARCH's activities takes place.

Recommendation 1: AQAS should, in form of the formal resolution, define the distinction between accreditation and consultation, between ESG and non-ESG activities and between AQAS and AQAS ARCH.

Result:

Standard 3.1 is substantially fulfilled.

3.2 Official status

STANDARD:

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

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[7] AQAS - Substantive Change Report. Published on the website of the register: http://eqar.eu/fileadmin/agencyreports/2016-06_C12_SubstantiveChangeReport_AQAS.pdf

Recommendation/conditions from the previous accreditation

-None-

Documentation

AQAS was listed as association no. 8059 in the Bonn magistrate's court's register of associations on 25 January 2002. After the head office was moved to Cologne, the agency's entry was finally updated by the Cologne magistrate's court on 12 January 2015 (Annex I.10). The first reaccreditation was granted on 15 March 2007 until 14 March 2012, the second reaccreditation on 23 February 2012 until 31 March 2017. AQAS has been an ENQA member since 19 November 2008 and has been registered in the European Register – EQAR – since 2010.

Evaluation

The legal status of AQAS as a registered association is verified. The agency has been certified for programme and system accreditations in Germany through the accreditation procedures of the Accreditation Council. The agency did not require any separate certification for the activities performed abroad.

Result:

Standard 3.2 is fulfilled.

3.3 Independence

education institutions, governments and other stakeholders;
• Independence of formal outcomes: while experts from relevant stakeholder backgrounds, particularly students, take part in quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Anyone contributing to external quality assurance activities of an agency (e.g. as expert) is informed that while they may be nominated by a third party, they are acting in a personal capacity and not representing their constituent organisations when working for the agency. Independence is important to ensure that any procedures and decisions are solely based on expertise.

Recommendation/conditions from the previous accreditation

The reaccreditation in 2012 was connected, inter alia, with the following conditions:

- For the non-uniform statements of exclusion criteria that should ensure the independence of experts, AQAS suitably demonstrates that these criteria have been bindingly set for the individual accreditation procedures and stated in all relevant documents in a uniform manner by 22.08.2012".

AQAS has standardised the exclusion criteria for activity as experts for all accreditation procedures by adjusting the "Manual for Experts in Programme Accreditation Procedures" and the "Declaration of Willingness towards Expert Activity for Programme Accreditation Procedures". In addition, they are specified with a binding effect as being resolutions of the respective accreditation commission. AQAS has revised the nomination of experts with the following resolutions:

- Programme accreditation – Resolution of the commission from 28 August 2012;
- System accreditation – Resolution of the commission from 10 May 2013;
- International programme and institutional accreditation – Resolution of the commissions from 29 August 2016.

Furthermore, the review panel declared recommendations during the previous review that were related to the personnel link between the agency's different bodies (complaints commission, accreditation commissions and board) as well as to the committee members' freedom from instruction and independence.

- "In light of the overlapping of personnel between the board and accreditation commissions, AQAS should be bindingly obliged to document the functions and decision-making powers of the board members in the commissions of the agency".
- "In composing the independent complaints commission, an overlapping of personnel with further decision-making bodies of the agency should be excluded".
- "AQAS should bindingly document how it ensures freedom from instruction and the independence and impartiality of its committees and their members".

At AQAS' general assembly in 2013, the amendments to the statute were made to eliminate the personnel link between the bodies. Since then the chair of the board is no longer a member of the accreditation commissions. The chair is elected among the representatives of higher education institutions. The commission members are appointed by the board; however, the commissions bear no accountability to the board. The composition of the complaints commission was adjusted to the effect that all members except the representatives of the accreditation commissions are entitled to vote.

The independence of the experts' decisions was noted as a "flagged issue" by EQAR during the last registration. (EQAR Approval of the Application, cl. 9). This topic concerned the Accreditation Council as well: As part of the monitoring in the 2012-2016 report period, the Accreditation Council criticised in a programme accreditation procedure that AQAS accreditation commission subsequently changed the review report without any further involvement of the experts. It obliged the agency to change its practice. The accreditation commission consequently corrected its approach with a resolution from 18/19 August 2014.

Documentation

The agency considers itself to be an organisation that is deliberately separate from the state and devoid of influence from third parties (self-evaluation report, p. 19-21). Pursuant to § 6 of the statute, the general assembly is responsible for electing the board members. It receives the statement of accounts and the approval of the actions of the board. In addition, the general assembly can submit proposals for criteria of accreditation and procedural principles to the accreditation commissions. Beyond the tasks of the AQAS general assembly described, it has no connection with the agency's other bodies.

The board consists of five people: First and second chair, a treasurer and two other members (statute, § 7). The board appoints the accreditation commissions and the complaints commission, compiles the budget plan and reaches agreements with other accreditation organisations while taking into account the suggestions of the general assembly.

The agency's central decision-making bodies are the two accreditation commissions for programme and system accreditation. Each one makes decisions on individual accreditations based on the recommendation of the respective expert group (statute, § 8) and concludes procedural principles and standards while taking the general assembly's recommendations into account. The accreditation commission of programme accreditation is interdisciplinary in its composition and representation of all interest groups is ensured by the statute.

The impartiality of the members of the complaints commission is also governed in the corresponding rules of procedure (Annex I.06).

Along with the resolutions of the responsible accreditation commissions, the agency presents criteria for appointing experts for programme and system accreditation that ensure the experts' impartiality and independence.

According to the criteria in terms of the programme and system accreditation procedure, partiality of an expert occurs if: had been awarded a doctorate or the qualification of university as a lecturer by the institution undergoing accreditation in the last five years, had been active as a lecturer at the institution in the last two years, applied for a post at the respective institution in the last five years or is currently applying for a post, is/was related to a member of the faculty of the respective institution, or has regular or current joint publications or research projects with a member of the faculty of the respective institution in the last five years.

In addition, the experts are obliged to sign a statement of impartiality in order to declare their independence. The criteria listed above are also included in the impartiality declarations (self-evaluation report, p. 20).

For the procedures performed abroad, AQAS uses the "Principles for the selection of Experts" (Annex VI.10). The principles of expert selection by the European Consortium "ECA" underlie the document.[8] There are also criteria for the composition of the expert group as well as the declarations of impartiality that are signed by the experts for individual procedures.

Evaluation

The review panel positively evaluated the measures taken by AQAS to ensure independence. The agency has ensured independence and impartiality for its own bodies as well as the employed expert groups through resolutions and restructuring.

The debates in the previous procedures on the accreditation of the agency primarily involved the activities in Germany. AQAS has also submitted criteria and declarations of impartiality for international procedures (programme and institutional accreditation) to ensure

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[8] ECA Principles for the Selection of Experts – http://ecahe.eu/w/index.php/Principles_for_the_Selection_of_Experts

the experts' independence and impartiality. In order to ensure the independence of the expert decisions, AQAS attached a resolution of the programme accreditation commission on "Intervention in review reports" to the submitted application.

The review panel of the Accreditation Council was therefore convinced that with this resolution, AQAS guarantees that experts hold full sovereignty over the review report for which they are responsible.

Result:

Standard 3.3 is fulfilled.

3.4 Thematic analysis

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

GUIDELINES:
In the course of their work, agencies gain information on programmes and institutions that can be useful beyond the scope of a single process, providing material for structured analyses across the higher education system. These findings can contribute to the reflection on and the improvement of quality assurance policies and processes in institutional, national and international contexts.

A thorough and careful analysis of this information will show developments, trends and areas of good practice or persistent difficulty.

Recommendation/conditions from the previous accreditation

The European Register identified the standard as a "flagged issue" in the previous confirmation of eligibility.

Documentation

The agency indicates to be performing thematic analyses with the "reporting back" instrument. This instrument is issued to gather the results and experiences over the course of the various projects and accreditation procedures. They are presented and/or released through events, conferences, purpose-specific newsletters, training sessions, workshops, discussions or even publications. This allows AQAS to incorporate the essential findings into the system (Annex V.4).

According to the assessment in the course of the previous reaccreditation of AQAS, the agency used to compile annual reports that summarised the results and experiences of the agency and were provided to the board and the employees. This was no longer outlined in

the current self-evaluation report.

In the self-evaluation report AQAS indicates that in the past it has fallen to the Accreditation Council to perform comprehensive analyses. AQAS states it plans to publish analyses in future, however it will continue to follow the "reporting back" instrument.

Evaluation

In the previous version of the ESG, the standard was called "system-wide analysis". It was therefore difficult for the agencies to implement the system-wide analyses due to the decentralised configuration of the German accreditation system. In accordance with the new version of the ESG, agencies are obliged to perform thematic analyses of their own work, both at domestic and international level and to reflect the results in the external quality assurance.

The standard consists of three requirements for quality assurance and quality development organisations. Firstly, attention is paid to how/ in which form the agency analyses internally its activity. The next step is the publication of the analysis. Finally, it is expected that the agency uses the results of the analysis for the further development of its activities.

AQAS, as the largest agency in Germany, has comprehensive knowledge and experience in the conducted procedures as well as in the statistical information. These have so far not been used in terms of the standard 3.4. The information on events, projects, fora etc. can be found on the agency's website, however this information does not have any analytical character. Thematic analyses should take place at regular intervals, in order to better assess and consider the observed developments, trends or even difficulties in their own work.

The review panel was able to gain the impression from the discussion with the management that the agency has the willingness to deal systematically with analytical work in future. The self-evaluation report performs a first step by prompting the agency to present and categorise the conditions in German programme accreditations, which were categorised and analysed for the sake of forming their quality impact (section 3.1.10). Some of the agency's activities (presentations, contributions, newsletters), also include partially analytical aspects. However, the results of the performed analyses are not found on the website of the agency.

From the point of view of the review panel, the agency should in future produce reports or documents with analytical character, use them in an aggregated form for the further development of their own activities and make them available on the website, in order to convey their findings to an interested public.

Recommendation 2: AQAS should develop a concept for future thematic analyses and publish a first contribution on their homepage within a short period of time.

Result:

Standard 3.4 is partially fulfilled.

3.5 Resources
STANDARD:
Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.
GUIDELINES:
It is in the public interest that agencies are adequately and appropriately funded, given higher education's important impact on the development of societies and individuals. The resources of the agencies enable them to organise and run their external quality assurance activities in an effective and efficient manner. Furthermore, the resources enable the agencies to improve, to reflect on their practice and to inform the public about their activities.

Recommendation/conditions from the previous accreditation

-None-

Documentation

Staffing:

The agency's head office is managed by two full-time Managing Directors who share responsibility in various areas and perform operative functions. The employed programme managers are responsible for the content management of the procedures. AQAS currently employs twelve programme managers who have an academic background ([…] full time equivalents/FTE), including three "senior programme managers", along with the administrative staff. The head office is also supported by four student assistants. The CVs of the employees can be found in Annex II.05. The administration at AQAS is divided into three areas: organisational assistance ([…] FTE), bookkeeping ([…] FTE) and the secretariat ([…] FTE). According to the self-evaluation report (p. 78), an average of 20 procedures per programme manager are performed in a year. The costs are calculated in such a way that 20 procedures per programme manager per year should be covered by 85 % of the existing capacity.

The employees for the agency are recruited based on criteria compiled previously. AQAS has developed preparatory measures for integrating new staff (Annex I.23). Along with general advanced training measures, in 2010 AQAS adopted a concept for individual professional training, through which all employees receive a flat rate of EUR […] for them to take

a further education opportunity, for example during legal educational leave.

The board of AQAS has also adopted a concept for the compatibility of family and work. (Annex I.21).

Financial resources:

According to the financial report AQAS had revenues in 2015 of EUR […]. The expenses came to EUR […]. The enclosed financial plan for 2016 shows the agency's total output at EUR […].

Material resources:

The agency has modern office spaces (480 m^2) available for material setup. Each work space is equipped with an ergonomic table and chair, a telephone connection and a PC or laptop. The fixed assets of AQAS came to approx. EUR […] as of 31 December 2015.

The agency has a virtual work environment (Citrix Environment), which works with an external data centre via stream to allow employees to access the system from outside. In terms of data security, the agency has developed an IT guideline (Annex I.18) that establishes the rights and duties of the employees in this area.

Evaluation

The staffing, material setup and financial resources of the agency are appropriate and sufficient. The employees are well qualified according to the submitted CVs and appeared to be very motivated and dedicated during the site visit. The calculations of the work standard of 20 procedures per year were confirmed by the programme managers as being realistic. They stated that this would leave enough time for cross-departmental tasks.

The agency's management monitors the usual fluctuations in the volume of orders as well as the shrinking of the accreditation market in Germany, which is caused by the transition to system accreditation. The chosen strategy to keep present staff levels and to obtain more international contracts in order to do so, represents a comprehensible decision.

Result:

Standard 3.5 is fulfilled.

3.6 Internal quality assurance and professional conduct

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

GUIDELINES:

Agencies need to be accountable to their stakeholders. Therefore, high professional standards and integrity in the agency's work are indispensable. The review and improvement of their activities are ongoing so as to ensure that their services to institutions and society are optimal.

Agencies apply an internal quality assurance policy which is available on its website. This policy ensures that:
- all persons involved in its activities are competent and act professionally and ethically;
- includes internal and external feedback mechanisms that lead to a continuous improvement within the agency;
- guards against intolerance of any kind or discrimination;
- outlines the appropriate communication with the relevant authorities of those jurisdictions where they operate;
- ensures that any activities carried out and material produced by subcontractors are in line with the ESG, if some or all of the elements in its quality assurance activities are subcontracted to other parties;
- allows the agency to establish the status and recognition of the institutions with which it conducts external quality assurance.

Recommendation/conditions from the previous accreditation

-None-

Documentation

AQAS adopted a new version of the quality assurance concept as a formalised binding system on 31 May 2016 through the resolutions of the board (Annex V.01) and published it on the homepage.[9] The new version is based on part III of the ESG (standards for quality assurance agencies) and pursues the following aims:

1. Permanently positioning AQAS e. V. as an agency for quality assurance in education,

2. Recognition of AQAS e. V. in a national and an international context,

3. Ensuring the high quality of the procedures performed by AQAS e. V.[10]

The understanding of quality described in the **mission statement** underlies this as a starting point for the agency's internal quality assurance. This includes the following maxims:

-Responsibility for teaching and learning and their quality assurance is borne by the higher education institutions.

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[9] http://www.aqas.de/downloads/QM-KonzeptAQAS.pdf

[10]http://www.aqas.de/ueber-aqas/aqas-qualitaetssicherung/

-The assessment by AQAS is based on the one hand on the aims set by the higher education institution and on the other on fulfilling standards.

-In the programme accreditation procedure, the suitability of the aims and the competences expressed in them, as well as the suitability of the concept and the study programme, resources, organisation and quality assurance procedures of the higher education institutions for achieving these aims are reviewed.

AQAS writes in the guidelines Annex V.01 (Concept for quality assurance of AQAS): The QA concept of the agency "includes internal and **external feedback mechanisms** that contribute to continuous development within the agency". AQAS presents an example of one of the external feedback mechanisms in the form of the monitoring results of the Accreditation Council, which were later integrated into AQAS' procedure materials.

In addition, AQAS assigns the Center for Evaluation and Methods at the University of Bonn (ZEM) to conduct surveys on the procedures performed. The results are presented by ZEM in semi-annual reports and are submitted to the board, the responsible accreditation commission and the head office. In addition, the summarised results are published on the agency's website. The questionnaires are aimed on the one hand at accreditation experts and on the other hand at contact persons of the applying higher education institutions. The agency presented the results of the surveys in detail in the self-evaluation report (page 32, 6.4. External feedback mechanisms). According to its own statement, AQAS uses the results to improve the procedural materials and processes, which find their way into the corresponding brochures and other binding procedural documentation.

Internally, AQAS has various feedback methods:

Annual feedback session – The head office reviews the accreditation commissions' resolutions for consistency. The results of this review are submitted to the accreditation commissions and discussed during an annual feedback session with the members of the commissions.

Exchange of both accreditation commissions – After the feedback session, an exchange of the accreditation commission takes place.

The head office uses various formats to exchange views internally and give feedback. For one, they meet twice per month at the Jour **Fixe**. Furthermore, **regular meetings** take place with the management and once per year there is a **closed meeting**.

In order to professionally shape the work atmosphere, the consultants have developed the

"Self-image of the programme managers" (Annex I.9) on their own initiative. The agency ensures that the employees regularly reflect on their roles.

In addition, AQAS regularly employs **internal working groups**, which handle current issues and present their results at the Jour Fixe or the closed meeting. Meetings concerning reflection on ongoing procedures take place regularly at the head office and are led by the senior consultants.

AQAS uses a Share Point server, where all the agency's core processes are available with the respective responsibilities, corresponding information and required submissions, as a manual for internal quality management. Two employees are responsible for keeping the Share Point server up to date.

Evaluation

The agency's shared understanding of quality, clear quality goals and especially the systematic external and internal feedback mechanisms represent a sufficient basis for quality management.

A notable positive aspect is related with the instruments for guaranteeing the employees' professionalism and integrity. Regular reflection and a defined self-image can contribute significantly to the further development of the agency's internal processes and activities.

The surveys carried out by ZEM are also very welcome, as the results are primarily used for the continuous optimisation of procedural processes. However, this instrument concentrates heavily on programme accreditation within Germany. This is accounted for by the fact that the agency's work largely consists of national programme accreditation. Nonetheless, it would be desirable in the long term to also analyse other types of AQAS procedures regarding internal quality development and to integrate the findings appropriately.

During the site visit, the review panel could assure itself that the internal quality assurance system is used continuously and represents a solid basis for simplifying day-to-day work.

However, the agency's quality management concept remains incomplete insofar as the quality cycles are not closed systematically. In order to guarantee that each individual process is presented and improved and to fulfil the PDCA principle (plan-do-check-act), the Share Point server should be supplemented with the available quality measures, including the ZEM analyses, and clear feedback loops should be defined.

Recommendation 3: AQAS should expand the existing Share Point server to the extent

that the quality management processes display the requirements of the PDCA cycle.

Result:

Standard 3.6 is substantially fulfilled.

3.7 Cyclical external review of agencies

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

GUIDELINES:
A periodic external review will help the agency to reflect on its policies and activities. It provides a means for assuring the agency and its stakeholders that it continues to adhere to the principles enshrined in the ESG. .

Recommendation/conditions from the previous accreditation

-None-

Documentation

AQAS was reviewed for the first time by the Accreditation Council in 2002. The agency has been reaccredited every five years since then. This ensures that there are regular reviews.

Evaluation:

With the current procedure of reaccreditation, which proves the compliance with the ESG as well, AQAS meets the requirement for regular external monitoring contained in ESG standard 3.7.

Result:

Standard 3.7 is fulfilled.

2.1 Consideration of internal quality assurance

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

GUIDELINES:
Quality assurance in higher education is based on the institutions' responsibility for the quality of their programmes and other provision; therefore it is important that external quality assurance recognises and supports institutional responsibility for quality assurance. To ensure the link between internal and external quality assurance, external quality assurance includes consideration of the standards of Part 1. These may be addressed differently, depending on the type of external quality assurance.

Recommendation/conditions from the previous accreditation

-None-

Documentation

AQAS has developed corresponding guidelines for all procedure formats.

- Programme accreditation: Guidelines for preparing an accreditation application (Annex III.18)
- System accreditation: Guidelines for preparing the application for admission for a system accreditation procedure (preliminary assessment) (Annex III.38)
- System accreditation: Guidelines for system accreditation (Annex III.39)
- Programme accreditation abroad: Guidelines for preparing an application for programme accreditation (Annex VI.3)
  Institutional accreditation abroad: Guidelines for preparing an application for institutional accreditation (Annex VI.08)

1. Programme and system accreditation: Programme and system accreditation procedures are conducted by AQAS on the basis of the relevant rules of the Accreditation Council. The rules of the Accreditation Council take into account the standards included in part 1 of the ESG and are defined in the agency's corresponding guidelines.

2. International programme accreditation and institutional accreditation: For the international programme accreditation procedures, AQAS has described a total of seven standards, which are oriented around the ESG (Annex VI.02).[11] AQAS has also developed eight quality standards for institutional accreditation in accordance with part 1 of the ESG. (Annex VI.07). However, these have not been published on the agency's website (see ESG 2.5).

After the new version of the ESG was published in May 2015, the agency revised the criteria for international procedures accordingly.

Evaluation

In relation to programme and system accreditation with the Accreditation Council seal, no detailed review of the attached synopses is required, as these procedures comply with the Accreditation Council's "Rules for accrediting study programmes and for system accredita-

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[11] http://www.aqas.eu/downloads/Criteria%20for%20Programme%20Accreditation.pdf

tion", which are oriented around the version of the ESG from 2005. The Accreditation Council is currently revising the rules while taking the new version of ESG into consideration. As a number of points from Part 1 of the ESG from the earlier version are also found in the current version in some form or other, implementation of part 1 of the ESG can already be established today for a majority of the standards. There is a corresponding table in the annex of the application assessment.

In addition, AQAS has developed corresponding guidelines for the programme and institutional accreditation procedures outside of Germany. Despite the fact that the agency has not submitted any synopses for this, it clearly follows from the listed criteria with the aid of the corresponding references to the relevant ESG standards that the standards conform to the ESG.

Result:

Standard 2.1 is fulfilled.

2.2 Designing methodologies fit for purpose

STANDARD:
External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

GUIDELINES:
In order to ensure effectiveness and objectivity it is vital for external quality assurance to have clear aims agreed by stakeholders.

The aims, objectives and implementation of the processes will
• bear in mind the level of workload and cost that they will place on institutions;
• take into account the need to support institutions to improve quality;
• allow institutions to demonstrate this improvement;
• result in clear information on the outcomes and the follow-up.

The system for external quality assurance might operate in a more flexible way if institutions are able to demonstrate the effectiveness of their own internal quality assurance. .

Recommendation/conditions from the previous accreditation

    -None-

Documentation

AQAS has defined goals and purposes of the different procedures in its guidelines and

brochures, which are published on the website[12]. (Annex IV.01 and IV.02)

In programme and system accreditation, study programmes or the internal quality assurance systems of higher education institutions must be accredited in accordance with the guidelines of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder (KMK) and of the Accreditation Council (AC). The rules of the Accreditation Council for the accreditation of study programmes and for system accreditation specify clear criteria for the organisation of the procedures; in addition, the agencies are obliged to take the relevant statutory regulations into account. The guidelines of AQAS substantiate and interpret the guidelines of the Accreditation Council where necessary.

In addition, AQAS has developed brochures for accreditation of teaching training study programmes for the German federal states of North Rhine-Westphalia, Rhineland-Palatinate, Lower Saxony and Schleswig-Holstein (Annexes IV.03, IV.04, IV.05, IV.06). These include collections of the relevant provisions in the states mentioned.

In international activities (programme accreditation, institutional accreditation), AQAS follows the standards of ESG 2015. In the area of programme accreditation, the agency focuses on reaching the corresponding level of the European Qualification Framework in addition to evaluating the teaching and learning processes (self-evaluation report, p. 43). In the case of institutional accreditation, the quality assurance system is the subject of a review. The focus is to monitor the system with a perspective on the criteria derived from the ESG. Research and governance are not explicitly reviewed in the institutional procedure; however, they are incorporated into the various interfaces of the teaching and learning processes.

Evaluation

The procedural documents for programme and system accreditation fulfil the requirements of ESG standard 2.2. The Accreditation Council's rules are adequately implemented in the agency's guidelines and brochures both for the evaluation criteria and for the procedural rules.

There are also procedural documents for international activities which comply with the ESG and are suitable for achieving the goals aimed within the reviews.

Additionally, possible challenges in planning procedures performed abroad and potential

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[12]http://www.aqas.de/download/

conflicts between national guidelines and the ESG were discussed during the site visit. AQAS has been able to gather international experience, partly also outside of the European higher education area. It is necessary to deal with complications that cannot be assessed beforehand. The accreditation procedures in […] for example have shown that the quality assurance was still in a developmental phase. Therefore, part of the project consisted of obtaining detailed information about the procedural rules and criteria. In the case […], common subjects in Europe such as gender equality or the Lisbon Convention have encountered difficulties.

The review panel emphasises that the agency is aware of the particular challenges appearing in international procedures. The ESG are used by AQAS in an appropriate manner. The experience gathered could be also integrated into thematic analyses in terms of ESG standard 3.4.

Result:

Standard 2.2 is fulfilled.

2.3 Implementing processes

STANDARD:
External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include
• a self-assessment or equivalent;
• an external assessment normally including a site visit;
• a report resulting from the external assessment;
• a consistent follow-up.

GUIDELINES:
External quality assurance carried out professionally, consistently and transparently ensures its acceptance and impact.

Depending on the design of the external quality assurance system, the institution provides the basis for the external quality assurance through a self-assessment or by collecting other material including supporting evidence. The written documentation is normally complemented by interviews with stakeholders during a site visit. The findings of the assessment are summarised in a report (cf. Standard 2.5) written by a group of external experts (cf. Standard 2.4).

External quality assurance does not end with the report by the experts. The report provides clear guidance for institutional action. Agencies have a consistent follow-up process for considering the action taken by the institution. The nature of the follow-up will depend on the design of the external quality assurance.

Recommendation/conditions from the previous accreditation

-None-

Documentation

AQAS uses a four-step method for all types of procedures, which is also laid out in the corresponding manuals. The procedures fundamentally consist of:

- a self-evaluation report submitted by the higher education institution. In response to this, AQAS makes corresponding guidelines for the application available, both in German programme and system accreditation (Annex III.18, III. 38) as well as in international programme accreditation and institutional accreditation (Annex VI.03, VI.08)

- a site visit that generally takes place once in programme and institutional accreditation. The exception to this is system accreditation which includes two site visits in accordance with the relevant procedural rules of the Accreditation Council. (cf. III.11, III.12, III.30, III.32),

- A publicly accessible concluding report (review report). It is documented for the higher education institution and other interest groups in the report that each criterion is evaluated in detail and then a recommended decision with conditions and recommendations, if required, is issued. AQAS has submitted the corresponding templates for this for programme and system accreditation (cf. Annex III.14, III.33).

- a follow-up process which is scheduled at AQAS to review whether conditions are fulfilled.

The processes for the assessment whether conditions are fulfilled are documented in the brochure for programme accreditation (Annex IV.01, p. 17). In the case of conditions referring to formal criteria, the head office takes the responsibility for reviewing them. The members of the respective expert group are responsible for reviewing the content-related conditions. Afterwards, the programme accreditation commission takes the final decision regarding the fulfilment of conditions.

In international programme accreditation, AQAS describes in the document "Sequence of the Programme Accreditation Procedure" how the conditions are fulfilled:

"In case of a conditional accreditation, the university has to provide evidence that the conditions are met. The documentation providing evidence on the fulfilment of the condition(s) needs to be submitted to AQAS in written form within the time defined by the Accreditation Commission in its decision. If required, AQAS will forward the delivered evidence to members of the panel of experts and ask them to assess the fulfilment of the condition(s)". (Annex VI.04, cl. 22, 23) This rule also applies to institutional accreditation abroad.

As further follow-up, an intermediate evaluation is scheduled in the system accreditation according to section 5.17 of the rules of the Accreditation Council after half of the first period of accreditation (self-evaluation report, p. 63, chap. 3.2.9). The outline is also described in the brochure for system accreditation (Annex 4, p. 47).

In addition, AQAS raises the matter of accreditation procedures for Joint Programmes and the challenges associated with them in its self-evaluation report. As the majority of joint programmes are generally run in at least two different countries, AQAS has signed an agreement (MULTRA)[13] with ECA intends to promote a trusting collaboration between the European agencies and facilitate the mutual recognition of accreditation decisions .

AQAS has summarised its experiences with the 15 accreditation procedures in international programme accreditation in Moldova and put this into writing for the country's education ministry.

For information on the structure and publishing of the reports see ESG standard 2.6.

For information on consistency of evaluations and decisions see ESG standard 2.5.

Evaluation

All procedures performed by AQAS are based on self-documentation of the applying higher education institution, the site visit, the review report and follow-up measures and are therefore based on the steps described in the ESG.

AQAS is equipped with predefined outlines of procedures for all types of procedures. These are generally also published on the website. This excludes detailed guidelines for procedures abroad; in relation to this, AQAS was able to comprehensibly explain that copyright infringements of published AQAS documents have occurred in the past, meaning that the agency only issues some documents upon request. The review panel considers this approach to be appropriate.

The review panel learned from the discussions with the experts who were employed by the agency in the procedures performed abroad that in some cases the review also contained consultation elements, in particular in […]. The agency's employees explained that there is occasionally a decline in the degree of maturity of quality assurance systems for activities abroad. Therefore, there is a need of transferring the information without mixing consultation and review impermissibly. The review panel joins this assessment and encourages AQAS

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[13] http://ecahe.eu/home/services/joint-programmes/multra/

for future reference to explain the understanding of roles in procedures abroad as precisely as possible and to define it unambiguously for all participants, if this is not already happening.

Result:

Standard 2.3 is fulfilled.

2.4 Peer-review experts

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

GUIDELINES:
At the core of external quality assurance is the wide range of expertise provided by peer experts, who contribute to the work of the agency through input from various perspectives, including those of institutions, academics, students and employers/professional practitioners.

In order to ensure the value and consistency of the work of the experts, they
• are carefully selected;
• have appropriate skills and are competent to perform their task;
• are supported by appropriate training and/or briefing.

The agency ensures the independence of the experts by implementing a mechanism of no-conflict-of-interest.

The involvement of international experts in external quality assurance, for example as members of peer panels, is desirable as it adds a further dimension to the development and implementation of processes.

Recommendation/conditions from the previous accreditation

The Accreditation Council issued a condition regarding ESG 2.4 with the previous accreditation of the agency:

"By 22.08.2012, AQAS presents a bindingly defined procedure that ensures the participation of all interest groups in the appointment of experts for programme accreditation". AQAS revised the appointment of experts in programme accreditation with the resolution from 28 August 2012. According to the resolution mentioned, experts are generally appointed for programme accreditation by the accreditation commission and thus with the involvement of the relevant interest groups (academics, students and professional practice).

Documentation

Selection and appointment:

The experts for programme and system accreditation in Germany are appointed by the responsible accreditation commissions. Regarding the composition of the groups, AQAS aims to involve experienced as well as junior experts to encourage productive discussions about relevant issues (self-evaluation report, p. 67).

Three different subjects are presented in the agency's criteria for selection of experts for programme and system accreditation: The expert group's composition, their impartiality and the procedure for selecting the experts. The general criteria for selection of the experts are also prescribed in the agency's statute (statute § 10).

The composition of the expert group in system accreditation follows the relevant rules of the Accreditation Council (statute § 10 (2)) and consists of:

- three members with experience in the area of higher education institution governance and internal quality assurance of higher education institutions,
- one student member with experience in the self-administration of higher education institutions and accreditation,
- one member from professional practice.

When appointing the expert group, it is ensured that one member of the expert group comes from abroad. In addition, one member should, if possible, have experience in higher education institution administration, study programme design and quality assurance in teaching and learning.

All relevant interest groups are also included in programme accreditation procedures and for samples in system accreditation: "The expert group generally includes academics, a student and a representative of professional practice. The representative of professional practice should come from a professional field that is typical of or relevant to the study programme. Committees and experts act independently in the procedure". (Annex IV.01. page 15)

For international procedures, the agency has also established criteria (Annex VI.10), which were developed in accordance with the "Principles for the Selection of Experts" of the European Consortium for Accreditation (ECA): "The number of experts varies depending on the number of programmes which are reviewed. Each panel of experts is composed of members of higher education institutions, a representative from the labour market and a student representative. Gender balance is taken into consideration. If AQAS accredits abroad, representatives with the same or similar cultural background and knowledge of the local higher education system are included in the panel of experts".

AQAS mainly attempts to gain student members in international procedures through the European Student's Union (ESU). Due to heterogeneous experiences, AQAS also draws on the German student accreditation pool.

Impartiality:

The experts who participate in the programme and system accreditation procedures in Germany are obliged to sign a statement of impartiality. By signing the document, the experts declare themselves to be impartial and commit themselves to confidentiality. Criteria for impartiality are laid out in the statements. (Annex III.08, III.28).

Criteria for the impartiality of the experts are also prescribed for the selection of experts for international procedures:

"- Panel members must be independent and in a position to make unbiased judgments. Any possible conflict of interest must be disclosed.

- Panel members must treat all documents and findings as strictly confidential." (Annex VI.10).

Preparation:

The expert group is prepared for the programme accreditations in Germany in two stages. Firstly, the experts receive all the higher education institution's documents together with the agency's relevant manuals, brochures and guidelines. These include relevant information, resolutions or even requirements for the procedure. Secondly, the experts receive requirements specific to each German state and up-to-date statute books of the agency for the review of teacher training study programmes.

The next step involves a half day preparatory meeting before the site visit, in which the expert group is informed about the particular features of the concrete review.

The agency claims that general training sessions without a focus targeted on a certain accreditation procedure are not required. It states that this point of view from AQAS is based on a large amount of feedback from the experts.

In addition, the agency indicates the first results of the INCHER[14] study "Quality Assurance

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[14]The International Centre for Higher Education Research Kassel (INCHER-Kassel) is an interdisciplinary research organisation of the University of Kassel. INCHER-Kassel does research into issues

of Teaching and Learning using Accreditation and Evaluation Procedures". According to this study the experts particularly valued the collegial exchange in preparing the procedures and considered expert workshops to be less important. Subject-specific workshops are regularly offered by AQAS and are used by experts as well as higher education institutions (self-evaluation report, p. 68).

In system accreditation procedures, the appointed experts take part in a workshop in Cologne. They only receive the documents for system accreditation submitted by the higher education institution after the workshop has taken place. An example of the outline of the workshop in enclosed with the application (Annex III.26). A preparatory meeting for the expert group also takes place immediately before the site visit for system accreditation procedures.

Evaluation

The selection, appointment and composition of the experts for programme and system accreditation as well as for international procedures are regulated appropriately and with binding effect. Many years of experience in quality assurance result in a wide pool of experts. All stakeholders are involved.

The measures for ensuring the impartiality of experts are appropriate for all national and international procedures.

The same applies to the preparation of the expert groups; it became clear during the site visit that the agency generally applies the same instruments in international procedures as it does in Germany. The separate workshop in advance of system accreditations is in particular to be welcomed.

Result:

Standard 2.4 is fulfilled.

2.5 Criteria for outcomes

STANDARD:
Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads

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of higher education and study as well as subjects at the interfaces between higher education institutions and other social sections. More information can be found on the website: http://www.uni-kassel.de/einrichtungen/incher/ueber-incher.html

to a formal decision.

Recommendation/conditions from the previous accreditation

-None-

Documentation

In Germany, the criteria for programme and system accreditation are specified by the Accreditation Council and applied by the agencies. These criteria are documented with binding effect in the agency's different guidelines, manuals and brochures.

The agency has submitted rules of the accreditation decisions in programme accreditation with the Annex III.16. The rules outline the basic principles and options for decisions in detail.

In 2013 the agency developed a new review report format. AQAS outlined criteria for monitoring the six report areas for review reports (for information on the structure of the review report, see ESG standard 2.6.). They guarantee:

- an orientation guide for experts,
- the completeness of the criteria to be assessed,
- a uniform foundation of information for the accreditation commission and thus
- the consistency of the accreditation commission's decisions with the applicable requirements.

For each report area, AQAS prescribes in what case conditions can be issued. For example, conditions are formulated in the "Curriculum" report area, if it:

a. is not consistently geared towards the formulated study goals (also regarding the use of suitable forms of examination) and/or

b. is not consistent in parts and/or

c. does not include required subject-specific or interdisciplinary elements and/or

d. shows signs of flaws in the didactic concept and/or

e. is not properly modularised and/or

f. is not documented transparently.

The stated rules are included in the agency's brochures and are therefore also published on the website.

AQAS has also submitted the decision rules for system accreditation with the application, which describe in what cases the system accreditation commission:

1. issues system accreditation;
2. suspends the accreditation procedure once for twelve to 24 months;
3. and denies system accreditation.

AQAS takes criteria that are based on part 1 of the ESG as a basis for international procedures. The assessment parameters for programme and institutional accreditation are specified. The former are published online, the latter are not (Annex VI.07).

Evaluation

Consistent application of the criteria is ensured by the guidelines and brochures and by AQAS internal quality assurance measures (cf. ESG 3.6).

In the case of procedures in Germany, the Accreditation Council occasionally detected smaller inconsistencies as part of its monitoring activity, however they mostly referred to documentation issues and in this respect, were of no consequence.

In individual cases, no clear separation between the recommendations and conditions proposed by the experts had been recognised. The agency therefore introduced a new review report format in 2013 (self-evaluation report, p. 71), through which it explicitly differentiated between conditions as a requirement for change and recommendations as hints for further development.

According to the review panel's point of view, the fact that the criteria for international institutional accreditation are not published violates standard 2.5.

Recommendation 4: The criteria for international institutional accreditation should be published.

Result:

Standard 2.5 is partially fulfilled.

2.6 Reporting
STANDARD:
Full reports by the experts should be published, clear and accessible to the academic community,

external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

GUIDELINES:

The report by the experts is the basis for the institution's follow-up action of the external evaluation and it provides information to society regarding the activities of an institution. In order for the report to be used as the basis for action to be taken, it needs to be clear and concise in its structure and language and to cover

- context description (to help locate the higher education institution in its specific context);
- description of the individual procedure, including experts involved;
- evidence, analysis and findings;
- conclusions;
- features of good practice, demonstrated by the institution;
- recommendations for follow-up action.

The preparation of a summary report may be useful.

The factual accuracy of a report is improved if the institution is given the opportunity to point out errors of fact before the report is finalised.

Recommendation/conditions from the previous accreditation

-None-

Documentation

Publication of the review reports:

All review reports are published together with the formal decisions on the AQAS website. In national programme and system accreditation, according to the agency's information, a corresponding entry is made at the same time in the central database of the AC's accredited study programmes. It is scheduled in the internal process developed by AQAS for the resolution and the review report to be published on the homepage within four weeks after the decision and after the documents have been sent to the higher education institution. After that, the entry into the database of the Accreditation Council's accredited study programmes follows.

By submitting the documents, AQAS has provided the follow-up process of the meeting of the accreditation commission. It includes process descriptions about the entry of the results into the Accreditation Council's database. During meetings with the management and members of AQAS, the follow-up process was discussed. The agency has a so-called traffic light system for keeping the entry of accredited study programmes into the central database under control. As soon as the Accreditation Council's e-mail with confirmation of the publication of the data set is received, the process is considered completed for the agency and is marked with "Green". This has also been mentioned by the agency with regard to the functionality of the beta-version of the database. In the opinion of the personnel responsible for the database, the automatic confirmation e-mail from the AC is a helpful step in the

development of the smooth processing of data sets and represents a good instrument of control for the agency. However, there are still options for improvement, particularly regarding the reliability of the data content entered in the database. Accidental loss of entries or parts of information should be avoided.

AQAS is of the opinion that the specified six weeks for entering the accreditation information into the Accreditation Council's central database is too short. It states this is mainly because the term is shortened to de facto two weeks considering the appeal term of four weeks. The agency therefore emphatically rejects the Accreditation Council's criticism regarding immediately entering the accreditation data (self-evaluation report, p. 72).

Structure of the review reports:

In the programme accreditation manual that was developed for the experts, AQAS has laid out a structure for the format of the review report.

"*The structure of the review report generally follows the chapters of the higher education institution's accreditation application:*
1. profile and aims of study,

2. curriculum,

3. academic feasibility,

4. vocational field orientation,

5. resources and

6. quality assurance.
Each criterion of the Accreditation Council for the accreditation of study programmes must be assessed in the review report".

This is also prescribed in the manual for system accreditation:

"The experts assess in the review report whether the higher education institution's internal quality assurance system is suitable for guaranteeing the qualification aims and quality of the study programmes while considering the European Standards and Guidelines for Quality Assurance in Higher Education (ESG), the guidelines of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder (KMK), and the criteria of the Accreditation Council, and whether this finding can be confirmed by random samples. If flaws are detected within the random samples, it must be assessed whether the flaw in quality has a systemic cause or whether these are flaws that should not be blamed on the higher education institution's quality assurance system. In its review report the expert group issues

a final recommended decision for a system accreditation with or without conditions or for the procedure to be suspended or for the higher education institution's system accreditation to be denied. (Annex IV.02, page 15).

AQAS has enclosed the corresponding templates for the review report structure in programme and system accreditation. (Annex III.33, III.14)

Evaluation

The review report structure for programme and system accreditation in Germany is clearly structured by AQAS and outlines all the criteria of the Accreditation Council. Moreover, the review report format and the structure of the content in the review reports for all accreditation procedures (both national and international) are ensured by the agency's existing templates. The following flaws exist in regard to the publication of the review report: According to the Accreditation Council's progress report, with the help of random sample assessment the lack of database entries of the accreditations handled by AQAS were identified. For example, it appeared that just barely half of the study programmes accredited in June 2016 could be found in the database of accredited study programmes two months later. A random sample based on 2015 produced a similar result.

In addition, the links in the central database to the review reports frequently do not work. The publication and editing of all database entries for AQAS, which has a relatively high market share, is associated with high database maintenance requirements and a great deal of effort. AQAS should here check whether the provided personnel capacity is sufficient. The agency's instruments for the commission meeting follow-up, together with the process described for entering the decisions into the Accreditation Council's central database were fundamentally assessed positively by the review panel. However, in order to rectify the existing complaints, AQAS was asked during the site visit to document alleged crashes in order to search for causes and solutions together with the programmer.

The search options for review reports from international procedures on the AQAS website only had limited functionality during the site visit. The review reports are all available but difficult to find, as the search mask is aligned with Germany.

Recommendation 5: AQAS should improve the search options on its website for review reports of international procedures.

Recommendation 6: AQAS should look for solutions together with the Accreditation Council and the personnel responsible for the database in order to resolve the entry problems in

the central database. The disputed function restrictions and data losses should be documented.

Result:

Standard 2.6 is substantially fulfilled.

2.7 Complaints and appeals

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

GUIDELINES:
In order to safeguard the rights of the institutions and ensure fair decision-making, external quality assurance is operated in an open and accountable way. Nevertheless, there may be misapprehensions or instances of dissatisfaction about the process or formal outcomes.
Institutions need to have access to processes that allow them to raise issues of concern with the agency; the agencies need to handle such issues in a professional way by means of a clearly defined process that is consistently applied.

A complaints procedure allows an institution to state its dissatisfaction about the conduct of the process or those carrying it out.

In an appeals procedure, the institution questions the formal outcomes of the process, where it can demonstrate that the outcome is not based on sound evidence, that criteria have not been correctly applied or that the processes have not been consistently implemented.

Recommendation/conditions from the previous accreditation

-None-

Documentation

AQAS has an appeals and complaints procedure that was adopted by the Management Board on 15 June 2015 and allows the higher education institutions to lodge justified appeals and complaints relating to the composition of the expert team, the expert team's review report, the design of the procedures and the accreditation decision (cf. Annex I.17). [15]

These must be sent to the head office of AQAS e.V. in written form within four weeks' notice of having been received.

In accordance with the statute (§ 9), AQAS has established a complaints commission which has the task of assessing complaints (appeals in terms of the ESG) submitted by higher

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[15] The appeals and complaints procedure is published on the agency's website: http://www.aqas.de/programmakkreditierung/beschwerdeverfahren/

education institutions that concern a decision about accreditation or an accreditation procedure and cannot be solved through repeated consultation by the corresponding commission, as well as the task of making a final decision on them.

According to the described procedure, AQAS provides the option of submitting appeals (that relate to the formal decision) on the one hand and complaints (that relate to the overall process) on the other. Both are shown as appeals on the agency's website. The higher education institution's appeal may for example relate to the timing of the procedure or to consultation errors of the employees at the head office. At the same time the agency operates a complaints commission, which as a second authority is responsible for both appeals and complaints. There is also the option to submit complaints or appeals through the international procedures performed by the agency: "*The university has the right to appeal the decision or any imposed conditions. […] In the event of formal complaints that do not relate to decision of the Accreditation Commission […]*" Annex VI.04 and Annex VI.09)

These rules apply to both international programme accreditation and international institutional accreditation.

Evaluation

The current version of the appeals and complaint procedure of AQAS essentially complies with the requirements of the ESG. The options for making complaints and appeals are defined and made public to the higher education institutions. The procedures for handling complaints and appeals are regulated so as to be sufficiently binding and include appropriate terms and routines.

The use of the terms "appeals" and "complaints" appears to not yet be fully consistent. AQAS should differentiate more clearly between complaints and appeals.

The complaints commission has nine members and ordinarily meets when necessary. The complaints and appeals procedure in Germany is published on the agency's website and is thus made accessible to potentially interested parties. In the case of international procedures, although the procedural rules are not published online, the agency does however inform the potential clients about them in advance and in this way fulfils standard 2.7.

Recommendation 7: The terms in the appeals and complaints procedure should be clarified in relation to the ESG on occasion.

Result:

Standard 2.7 is substantially fulfilled.

V.   Assessment concerning the criteria from the Accreditation Council

The Accreditation Council integrated the ESG into its rules for the accreditation of agencies in 2016. In relation to this, the Accreditation Council issues conditions and recommendations, whereas ENQA and EQAR only work with recommendations. In order to simplify the handling of the ESG evaluation for ENQA and EQAR, recommendations were universally discussed in the previous section. As part of this, the review panel proposes some of these recommendations to the Accreditation Council – for its jurisdiction – as conditions.

Recommendation 2: AQAS should develop a concept by describing how the reflective reports are to be composed in future. One analysis performed previously should be published on the agency's homepage (ESG 3.4).

→ **Condition 1:** AQAS develops a concept by describing how the reflective reports are to be composed in future. One analysis performed previously is published on the agency's homepage.

Recommendation 3: AQAS should expand the existing Share Point server to the extent that the quality management processes display the requirements of the PDCA cycle (ESG 3.6).

→ **Condition 2:** AQAS expands the existing Share Point server to the extent that the quality management processes display the requirements of the PDCA cycle.

Recommendation 6: AQAS should look for solutions together with the Accreditation Council and the personnel responsible for the database in order to resolve the entry problems in the central database. The disputed function restrictions and data losses should be documented. (ESG 2.6).

→ **Condition 3:** AQAS looks for solutions together with the Accreditation Council and the personnel responsible for the database in order to resolve the entry problems in the central database. The disputed function restrictions and data losses must be documented.

V.1 Regarding compliance with the Accreditation Council's criteria

The review panel recommends that the Accreditation Council accredits AQAS for both programme accreditations and system accreditations and in doing so issues the following conditions:

Condition 4: AQAS ensures that academic representatives wield the majority of the votes even if they do not represent the majority of the members (criterion 3.7).

Criterion 3.1.

> 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 its current version. The agency concludes an agreement with the Accreditation Council pursuant to § 3 of the ASG.

Recommendation/conditions from the previous accreditation

-None-

Documentation

AQAS has criteria for the procedures in the competence area of the Accreditation Council (Annexes III.17, III.37), manuals on the sequence of the procedures (Annex III.06) and collections of documents (Annexes IV.03, IV.04, IV.05, IV.06). The agency also uses other templates: Sample review reports (III.14, III.15, III.33, III.34) and sample process schedules both generally for the procedures (III.02, III.21) and for the site visits (III.11, III.12, III.30, III.32.) and expert workshops (Annex III. 26).

The corresponding procedural routines are specified by the respective responsible accreditation commission and take the Accreditation Council's requirements into account. AQAS supports the higher education institutions in the procedure by providing guidelines and criteria, which meet and implement the Accreditation Council's requirements and the KMK guidelines. In this way the agency guarantees the consistent application of the "Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation". (self-evaluation report, p. 37).

The implementation of the rules of the Accreditation Council also includes compliance with the Accreditation Council's resolution "Standards for Structuring the Relationship between System Accreditation and Consultation Services" from 31 October 2008 in the version from 20 February 2013. According to this resolution, the activity of an accreditation agency in a

system accreditation procedure is incompatible with a preceding or current activity outside of system accreditation that involves supporting, through consultation or other means, the setup, introduction or further development of the internal quality assurance system to be accredited at the same higher education institution.[16]

Although there is no comparable resolution for programme accreditation, the basic principle of the separation between consultation and accreditation is also inherent to programme accreditation procedures. AQAS raised this issue in the self-evaluation report on ESG standard 3.1. From the point of view of the agency, "the Accreditation Council's resolution on the Standards for Structuring the Relationship between System Accreditation and Consultation Services (from 20 February 2013) obviously applies. It is completely beyond question for all the responsible committees and the management of AQAS that there must not be any mixing of consultation and accreditation and that there must not be any instance where AQAS ARCH provides consultation and AQAS e.V. performs the accreditation afterwards. This meant that the assessment of the evaluation order at the University of [...] led AQAS e. V. to decline a request to carry out a system accreditation at the University of [...]". (self-evaluation report, p. 16).

AQAS has submitted synopses that document the coverage of the ESG standards by the criteria of the AC (Annexes V.06 and V.07). In addition, AQAS has finished collecting the relevant laws and resolutions in the area of teacher training study programmes from multiple federal states into another annex. They are available on the agency's homepage.

For information on the consistency of the accreditation decisions see ESG standard 2.5.

Evaluation

The internal structures and procedures are appropriate.

Criterion 3.1 is fulfilled.

Criterion 3.2.

The agency has a separate legal entity.

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[16]http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/AR_Beratung_Systemakkreditierung.pdf

Recommendation/conditions from the previous accreditation

-None-

Documentation

The agency is a registered association (Annex I.10).

Evaluation

AQAS has its own legal entity status (in addition to the agency's official status, see ESG standard 3.2.).

Criterion 3.2. is fulfilled.

Criterion 3.3.

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

Recommendation/conditions from the previous accreditation

-None-

Documentation

The agency submitted cost calculations for programme and system accreditation in the application. These include information about the basic flat rate and procedural flat rate in the case of programme accreditation and total cost information in the case of system accreditation. AQAS also outlined the breakdown of the costs in the self-evaluation report (page 78, 79).

Evaluation

AQAS does not work for profit and works on a full-costs basis. This secures the agency's non-profit orientation. Worthy of note are the calculations of system accreditation. These appear to be plausible and realistic and guarantee a thoroughly managed procedure.

Criterion 3.3. is fulfilled.

Criterion 3.4.

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

Recommendation/conditions from the previous accreditation

-None-

Documentation

As the largest agency in Germany with a market share of almost 30 %, AQAS has, since its foundation, accredited over 5,000 study programmes and performed system accreditations of ten higher education institutions. AQAS performs procedures in all disciplines and works in all types of higher education institutions in Germany.

Evaluation

Criterion 3.4. is fulfilled.

Criterion 3.5.

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

Recommendation/conditions from the previous accreditation

-None-

Documentation

The General Assembly is responsible for the following matters:

a) Selecting the Board members

b) Receiving the statement of accounts as well as the approval of the actions of the board.

c) Passing the budget plan submitted by the board for the next financial year.

d) Determining the amount of the annual contribution and shares in the costs and when they are due.

e) Passing resolutions regarding the statute of the association, if necessary regarding its modification and the dissolution of the association.

f) Passing resolutions regarding important matters that affect the association, e.g. regarding limiting or expanding the associations activities and regarding cooperation with other accreditation agencies.

g) Passing resolutions regarding establishing, involving the association in or the task of involving the association in, or the dissolution of a society.

h) Passing resolutions regarding rules of procedure.

i) Deciding on appeals of excluded members.

j) Passing resolutions regarding other matters that are submitted to it by the board.

k) The general assembly can submit proposals for criteria of accreditation and for procedural principles to the accreditation commission. The criteria and procedural principles adopted by the accreditation commission are submitted to the general assembly in order to inform them.

The Board has the following tasks:

a) Appointing the accreditation commissions and the substitute representatives pursuant to § 9(4). The general assembly's suggestions are to be taken into account when making appointments.

b) Appointing the complaints commission.

c) Issuing the quality seal on behalf of the Accreditation Council.

d) Preparing the budget plan.

e) Reaching agreements regarding cooperation with other accreditation organisations.

f) Passing resolutions regarding admitting and expelling members.

g) All other tasks for which no other responsibility is specified by this statute.

In addition, two accreditation commissions (for programme and system accreditation) and a complaints commission are classed as important bodies in AQAS. The commissions are responsible for the accreditation decisions. At the same time, they determine the criteria and procedural principles.

The Accreditation Commission for Programme Accreditation has an interdisciplinary composition of professors from universities and universities of applied sciences, representatives of professional practice and students. The board sets the number of members of the commission. Among the representatives from professional practice, one person from each

group should represent the employee's perspective and one person should represent the employer's perspective. Women should be appropriately represented among the members of the accreditation commission and expert groups.

Additional experts from abroad can be admitted into the accreditation commission as extra members.

The Accreditation Commission for System Accreditation is composed of the following:

- six professors with acknowledged expertise in internal quality assurance systems at higher education institutions;

- one expert from professional practice, who is currently responsible for internal quality assurance in a company;

- one expert from professional practice, who is currently responsible for quality assurance at higher education institutions and who brings in the perspective of university administration;

- one expert in quality assurance in higher education from another European country;

- one student, who has already been involved in programme accreditations as an expert.

The Complaints Commission has the task of assessing complaints submitted by higher education institutions that concern a decision by one of the two accreditation commissions in an accreditation procedure and cannot be solved through repeated consultation in the corresponding commission, as well as making a final decision for the association.

The complaints commission is composed of the following:

-two representatives from universities;

-two representatives from universities of applied sciences;

-one external representative of another accreditation agency;

-one representative of professional practice;

-one student representative.

-one representative of the accreditation commission for programme accreditation (with no voting rights);

-one representative of the accreditation commission for system accreditation (with no voting rights);

Evaluation

Academics, students and professional practice are represented in all the committees that deal with accreditation decisions. The agency's organisation is governed appropriately and the competences and responsibilities of the bodies are governed by law.

Criterion 3.5 is fulfilled.

Criterion 3.6.

In the expert groups appointed by the agency, academics, students and professional practice are represented. The experts are carefully selected and prepared for the specific accreditation procedure. The agency ensures the impartiality of experts using suitable measures.

Recommendation/conditions from the previous accreditation

See ESG standard 3.3.

Documentation

For information on fulfilling this criterion, see ESG standards 2.4 and 3.3

Evaluation

Criterion 3.6. is fulfilled.

Criterion 3.7.

In the bodies and expert groups, academic representatives have the majority of the votes.

Recommendation/conditions from the previous accreditation

-None-

Documentation

The bodies of AQAS are: the general assembly, the board, the accreditation commission for programme accreditation (AC^{prog}), the accreditation commission for system accreditation (AC^{sys}) and the complaints commission. Cf. details, criterion 3.6.

Academic representatives wield the majority in every committee of the agency as well as in the expert groups for system accreditation. The expert groups for programme accreditations each consist of one member from the students and professional practice groups, as well as "two to three professors" (Annex III.07).

Evaluation

The majority vote is assured in most cases with the exception of small expert groups in programme accreditation. Improvements need to be made here. It is not compulsory to increase the size of the expert group; changes to the voting structure are also sufficient.

Criterion 3.7. is partially fulfilled.

Condition 4: AQAS ensures that the academic representatives wield the majority of the votes even if they do not represent the majority of the members.

Criterion 3.8.

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

Recommendation/conditions from the previous accreditation

-None-

Documentation

See standard ESG 2.7. and ESG 3.6

Evaluation

See standard ESG 2.7

Criterion 3.8. is substantially fulfilled.

Criterion 3.9.

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

Recommendation/conditions from the previous accreditation

-None-

Documentation

There have not been any instances of a commission of this sort previously. AQAS also does not plan to outsource services to third parties in future.

Evaluation

Criterion 3.9. is not relevant.

Criterion 3.10.

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

Recommendation/conditions from the previous accreditation

-None-

Documentation

The programme and system accreditation procedures in Germany are generally performed in German. The information is uploaded in detail to the website in German. The decisions are also published together with the respective review reports in German. The most important documents, the statute, contracts, and submissions on daily work are drafted and used in German.

Evaluation

Criterion 3.10. is fulfilled.

Criterion 3.11.

> The agency's quality assurance includes internal and external feedback.

Recommendation/conditions from the previous accreditation

-None-

Documentation

The agency uses different internal and external feedback mechanisms for quality assurance and quality development.

The internal feedback mechanisms are:

- jour fixe

- One-day closed meeting

- Internal working groups for current issues

- Regular meetings

Among other things, surveys of participants in procedures and results of monitoring are used by the Accreditation Council as external feedback mechanisms.

For more information see ESG standard 3.6.

Evaluation

Criterion 3.11. is fulfilled.

VI.   Recommendations from the review panel

VI.1 Regarding compliance with the ESG

The review panel recommends that the Accreditation Council finds AQAS to have substantially fulfilled the "Standards and Guidelines for Quality Assurance in the European Higher Education Area" (ESG).

According to the evaluation by the review panel, the following eight standards/ENQA membership criteria are fulfilled: 3.2; 3.3; 3.5; 3.7; 2.1; 2.2; 2.3; 2.4.

According to the evaluation by the experts, the following standards are substantially fulfilled: 3.1; 3.6; 2.6; 2.7.

According to the evaluation by the experts, the following standards are partially fulfilled: 3.4; 2.5.

The review panel issues the following recommendations:

Recommendation 1: AQAS should formulate requirements that define the distinction between accreditation and consultation, between ESG and non-ESG activities and between AQAS and AQAS ARCH in the form of a fundamental decision (ESG standard 3.1).

Recommendation 2: AQAS should develop a concept by describing how the reflective reports are composed in future. One analysis performed previously should be published on the agency's homepage. (ESG standard 3.4).

Recommendation 3: AQAS should expand the existing Share Point server to the extent that the quality management processes display the requirements of the PDCA cycle (ESG standard 3.6).

Recommendation 4: The criteria for international institutional accreditation should be published (ESG standard 2.5).

Recommendation 5: AQAS should improve the search options on its website for review reports of international procedures. (ESG standard 2.6).

Recommendation 6: AQAS should look for solutions together with the Accreditation Council and the personnel responsible for the database in order to resolve the entry problems in the central database. The disputed function restrictions and data losses should be documented. (ESG standard 2.6).

Recommendation 7: The terms in the appeals and complaints procedure should, on occasion, be clarified in relation to the ESG. (ESG standard 2.7).

VI.2 Regarding compliance with the Accreditation Council's criteria

The review panel recommends that the Accreditation Council accredit AQAS for both programme accreditations and system accreditations and in doing so issues the following conditions**:**

Condition 1: AQAS develops a concept by describing how the reflective reports are composed in future. One analysis performed previously is published on the agency's homepage. (ESG standard 3.4, cf. recommendation 2)

Condition 2: AQAS expands the existing Share Point server to the extent that the quality management processes display the requirements of the PDCA cycle (ESG standard 3.6, cf. recommendation 3)

Condition 3: AQAS looks for solutions together with the Accreditation Council and the personnel responsible for the database in order to resolve the entry problems in the central database. The disputed function restrictions and data losses must be documented. (ESG standard 2.6, cf. recommendation 6)

Condition 4: AQAS ensures that the academic representatives wield the majority of the votes even if they do not represent the majority of the members (criterion 3.7).

Annex 1: Schedule for the site visit

Accommodation/Meeting venue

Stadthotel am Römerturm, Sankt-Apern-Street 32, 50667 Cologne

27 November 2016		
6:00 p.m.	Internal preparatory meeting at the hotel	
8:00 p.m.	Internal dinner discussion at the hotel	

28 November 2016		
9:00 – 11:00 a.m.	Meeting with the agency's management at the AQAS head office	Prof. Dr. Eberhard Menzel, chair of the board Doris Herrmann, managing director Dr. Verena Kloeters, managing director
11:00 – 11:15 a.m.	Break	
11:15 – 11:30 a.m.	Meeting with the agency administration	Patricia Liesenfeld, secretary Monika Meier, secretary Julia Palnau, assistant Andrea Schwedler, secretary Claudia Wagner, assistant
11:30 a.m. – 1:30 p.m.	*Transfer to commission meeting venue and midday snack* *Stadthotel am Römerturm, Sankt-Apern-Street 32. 50667 Cologne, Tel. 0221/20930*	
1:30 – 2:30 p.m.	Group meeting with experts from procedures of the agency	Prof. Dr. Axel Faßbender, University of applied sciences, Cologne Prof. Dr. Matthias Kropp, Pforzheim university of applied sciences Prof. Dr. Michael Neubrandt, Carl von Ossietzky university Oldenburg Prof. Dr. Maria Peters, University of Bremen Prof. Dr. Claudia Riemer, University of Bielefeld Dr. Markus Toschläger, myconsult, Paderborn (representative of professional practice)

		Christopher Bohlens, FernUniversity Hagen (student expert)
2:30 – 2:45 p.m.	Break	
2:45 – 3:45 p.m.	Meeting with representatives of national study programmes accredited and/or if applicable advised by AQAS	Prof. Dr. Antje Kley, Friedrich-Alexander-University Erlangen-Nürnberg Dr. Marion Rieken, University of Vechta Martin Spreen, Bochum <u>University of applied sciences</u> Dr. Gabriele Witter, Bremen University of applied sciences
3:45 - 4:00 p.m.	Break	
4:00 – 6:00 p.m.	Participation in the joint meeting of the commissions for programm and system accreditation and discussions with their members	
6:00 – 7:30 p.m.	Internal concluding meeting for the first day	
approx. 8:00 p.m.	Internal dinner discussion	

29 November 2016		
9:00 – 10:45 a.m.	Discussion with employees of the head office * * successive meetings with the two teams of the head office	Ass.Iur. Mechthild Behrenbeck, programme manager, legal advisor Anette Büning, organisational assistant Dr. Simone Kroschel, programme accreditation department manager Kevin Kuhne, programme manager Dr. Christoph Pflaumbaum, programme manager Ulrich Rückmann, programme manager Frederike Wilthelm, programme manager Ninja Fischer, quality assurance department manager Dr. Dorothee Groeger, programme manager Ronny Heintze, commissioner for international affairs Simon Lau, programme manager, system administrator/IT

		Jennifer Lenzen, organisational assistant
		Dr. Katarina Löbel, programme manager, international affairs
		Andrea Prater, programme manager
10:45 – 11:00 a.m.	Break	
11:00 a.m. – 12:00 p.m.	Meeting about international activities with representatives of higher education institutions or ministries (via Skype if needed)	Dr. Valentina Pritcan, Balti State University, Moldova Detlev Kran, educonsult, Brühl, for the procedure at KMU-Academy, Austria *Via Skype:* Prof. Dr. Gülşen Musayeva Vefali, Eastern Mediterranean University, Cyprus Dr. Abdullah Khamis Al Kindi, Sultan Qaboss University, Oman
12:00 – 12:30 p.m.	Meeting with the management of the agency if necessary	Prof. Dr. Eberhard Menzel, chair of the board Doris Herrmann, managing director Dr. Verena Kloeters, managing director
12:30 – 1:00 p.m.	Lunchtime snack	
1:00 – 4:00 p.m.	Internal concluding meeting of the review panel with preparation of the report	
4:00 p.m.	Short concluding meeting with management of the agency and departure	Prof. Dr. Eberhard Menzel, chair of the board Doris Herrmann, managing director Dr. Verena Kloeters, managing director

Annex 2: Abbreviations

AC	Accreditation Council
AC^{sys}	Accreditation commission for system accreditation
AC^{prog}	Accreditation commission for programme accreditation
ECA	European Consortium for Accreditation
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 [*Ständige Konferenz der Kultusminister der Länder in der Bundesrepublik Deutschland*]
KMK Structural Guidelines	Common Structural Guidelines of the Länder for the Accreditation of Bachelor's and Master's study programmes. Resolution by the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder from 10 October 2003 in the version adopted on 4 February 2010
Rules	Rules for the Accreditation of Study Programmes and for System Accreditation from 8 December 2009 in the version adopted on 20 February 2013 [*Regeln für die Akkreditierung von Studiengängen und für die Systemakkreditierung*]
ZEM	Center for Evaluation and Methods of the University of Bonn [*Zentrum für Evaluation und Methoden der Universität Bonn*]

Annex 3: Equivalence between Part 1 of the ESG 2015 and the criteria for programme and system accreditation (as of September 2015)

ESG 2015	Programme accreditation	System accreditation
1.1 Policy for quality assurance	Implicit in 2.9 Quality assurance and further development	6.3 Internal quality assurance systems of higher education institutions
1.2 Design and approval of programmes	Implicit in 2.3 Study programme concept	Implicit in 6.2 Internal management of higher education institutions
1.3 Student-centred learning, teaching and assessment	Animated learning – examinations: 2.5	Animated learning – organisation of examinations: 6.2
1.4 Student admission, progression and certification	Certification: 2.3 Curriculum design: 2.4 Recognition: 2.3 Certificates: 2.2	Implicit in 6.2
1.5 Teaching staff	2.7 Resources	Teaching staff: 6.2
1.6 Learning resources and student support	2.7 Resources	Resources: 6.2
1.7 Information management	2.9 Quality assurance	6.3 Internal quality assurance systems of higher education institutions
1.8 Public information	2.8 Transparency and documentation	6.4 Report system and data collection

1.9 On-going monitoring and periodic review of programme	2.9 Quality assurance	6.3 Internal quality assurance systems of higher education institutions
1.10 Cyclical external quality assurance	3.2.1 Time limitation	7.2.1 Time limitation