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**Report**

**on the application by the Accreditation, Certification and Quality Assurance Institute ACQUIN e.V. from 15/09/2015 for accreditation and for verification of compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).**

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- submitted on 02/06/2016 -

**I. Summary**

ACQUIN is one of the long-established accreditation agencies in Germany and is regularly active both at national and international level. The review panel gained a positive impression from the agency and in particular from the persons involved in the committees and the head office. They perform their tasks with great competence and motivation.

In general ACQUIN is characterised by a communication-oriented culture, which prioritises interaction instead of fixed structures that are common in written management. Nevertheless, since the last reaccreditation the agency has made efforts to formalise internal processes, for example in quality management.

One specific characteristic of ACQUIN is the multi-level structure with standing expert committees and the accreditation commission, which simplifies the relation to the subject communities and provides an observation across all disciplines through the accreditation commission. However, this structure results in an increased internal demand of support and communication, to which even greater attention will have to be paid in future. The personal resources also require attention.

According to the impression of the review panel, the definition and documentation of procedure formats, which currently generate no or few enquiries from higher education institutions, are clearly present in the background of the agency's work. In particular these are the audits in Austria and the procedures for certifying further education opportunities, the agency's processing of which does not meet all the requirements of the ESG (which indeed are satisfied in terms of content). This is mentioned in the corresponding standards; however, it should not diminish the positive overall impression of the agency's work.

## II. Procedural framework

### II.1. Legal mandate

Pursuant to § 2 Para. 1 No. 1 of the law on establishing a *Foundation for the Accreditation of Study Programmes in Germany* [further referred to as “German Accreditation Council” or “GAC”], the foundation’s task is to accredit accreditation agencies. It grants, for a limited period of time, the right to accredit study programmes or the internal quality assurance systems of higher education institutions by awarding the foundation’s seal.

GAC’s accreditation decision, as well as the implementation of the procedure for accrediting an accreditation agency, is based on the resolution “*Rules of the German Accreditation Council for the Accreditation of Agencies*” from 8 December 2009 in the version adopted on 10 December 2010.

In order to promote international recognition of decisions made by GAC and the accreditation agencies, while approving its criteria for accreditation, GAC adopted the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, as they were passed at the Bologna Follow-Up Conference in Bergen in May 2005 by the ministers responsible for higher education. By taking these standards into account, the German Accreditation Council underlined the central role played by accreditation in achieving the objectives of the Bologna Process and made clear that quality assurance and especially accreditations in the higher education sector can no longer focus exclusively on national standards or distinctions. Further important sources for GAC’s criteria were the Code of Good Practice of the European Consortium for Accreditation from 3 December 2004 and the Guidelines of Good Practice of the International Network for Quality Assurance Agencies in Higher Education from April 2005. The German Accreditation Council will take the adoption of the new *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* in May 2015 in Yerevan as an opportunity to fundamentally revise its rules and criteria.

### 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

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for Higher Education (EQAR), an agency must demonstrate that it complies with the ESG through an external assessment. For the EQAR, full membership in ENQA is considered as prima facie evidence of compliance with the ESG.

5 In order to avoid the need for two external assessments, the German Accreditation Council also offers agencies a review of their compliance with Parts 2 and 3 of the ESG as part of the accreditation procedure, which is afterwards presented explicitly in a separate part of the review report. This assessment is therefore performed in accordance with the *Guidelines for external reviews of quality assurance agencies in the EHEA*.

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

The last Accreditation of ACQUIN by the accreditation Council in 2011 was connected with three conditions and six recommendations.<sup>1</sup> The entry in the European register (EQAR) was  
15 also issued with three so-called “flagged issues”, i.e. points were marked, which should receive special attention in the subsequent evaluation.<sup>2</sup> All of these aspects shall receive consideration with the applicable ESG standards below.

### **II.4 Outline of the procedure**

ACQUIN submitted the application as an accreditation agency to the Council via post on 15 September 2015.

The following experts were nominated by GAC on 30 September 2015:

- Prof. Dr. Christian Frevel, Ruhr-Universität Bochum, Chair of Old Testament Studies  
25 (Chair)
- Dr. Heli Mattisen, Estonian Higher Education Quality Agency (EKKA) (International expert)

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<sup>1</sup> The German Accreditation Council found that these conditions had been fulfilled on 23 February 2012 and 28 June 2012.

<sup>2</sup> The letter of the President of ENQA to ACQUIN dated 12 October 2012 was also taken into account in the assessment.

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- Franziska Raudonat, student at the Technische Universität Kaiserslautern
- Udo Seeliger, voluntary educational consultant for IG Metall (professional practice)
- Dr. Gabriele Witter, responsible for higher education planning and quality assurance, Hochschule Bremen (university representative)

5 Professor Dr. Reinhold R. Grimm and Dr. Olaf Bartz monitored the procedure on behalf of the German Accreditation Council. The review panel was supported by Agnes Leinweber from the head office of the Foundation for the Accreditation of Study Programmes in Germany.

10 On 8 January 2016, a preparatory meeting was held for the reviewers. Within the framework of the meeting, applicable criteria set by GAC and the ESG were presented and explained. The preparatory meeting also served to deepen the reviewer's knowledge of the procedure outlines and understanding of their roles in accreditation process.

### Self-evaluation report

15 On 4 January 2016, the agency submitted its self-evaluation report alongside additional documentation. Further documents were subsequently requested by email on 12 February 2016. These documents were received by post on 7 and 8 March 2016.

20 The documents submitted by ACQUIN with the self-evaluation report are informative and document the agency's procedural steps and evaluation parameters in a very comprehensive manner. The self-assessment for Part 2 of the ESG is organised according to the individual procedure formats, not the standards. Explanations of the criteria for the accreditation of agencies are also integrated into the outline of the procedures. Both make it more difficult for reading and finding out the information.

### 25 Site visit

30 Site visit took place at the agency's head office in Bayreuth from 30 to 31 March 2016, which was preceded by a preliminary discussion between the reviewers on 29 March 2016. The panel held meetings with the management of the agency, members of the accreditation commission and standing expert committees, employees in the head office, members of the worker's council, with experts and with representatives of higher education institutions

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which had previously been reviewed by the agency. Additional documents were subsequently filed during the site visit. (The schedule is included as an annex.)

The panel submitted the review report with unanimous vote on 2 June 2016, taking the statement by ACQUIN from 31 May 2016 into account.

- 5 This report is based on the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* from May 2015 and GAC's resolution "Rules of the German Accreditation Council for the Accreditation of Agencies" from 8 December 2009 in the version adopted on 10 December 2010. The resolution of the EQAR "Policy on the Use and the Interpretation of the ESG" from 12 June 2015 was implied in the assessment.

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### II.5 The German Accreditation System

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

15 The role of accreditation is to ensure the standards of the specialised content covered which, alongside a review of the study programme concept and the academic feasibility of the programme offered, also takes the quality of teaching as well as a review of a programme's professional relevance and the promotion of gender equality into account. As a  
20 general rule, accreditation is a requirement 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 German Accreditation Council for study programmes in accordance with their own internal quality assurance system.

25 GAC's work is based on the law on establishing a Foundation for the Accreditation of Study Programmes in Germany, which was passed on 15 February 2005. Alongside certifying agencies for a limited time in Germany, GAC stipulates the basic requirements for accreditation procedures, which must be conducted according to reliable and transparent standards. At the same time, GAC ensures that concerns relating to the overall system for which  
30 individual states are responsible are given consideration as part of the accreditation. The

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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.

5 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 of the decisions taken by GAC and the accreditation agencies,  
10 GAC has always been taking the ESG into account.

### III. Accreditation, Certification and Quality Assurance Institute ACQUIN e.V.

#### III.1 Foundation

The Accreditation, Certification and Quality Assurance Institute ACQUIN e.V. was founded on 26 January 2001. The resolution of the Bavarian Conference of Rectors in May 2000  
5 about setting up an independent agency for the accreditation of study programmes with Bachelor's and Master's degrees laid the corner stone for that. The initiative of the Bavarian universities was supported by representatives of research universities and universities of applied sciences from Baden-Württemberg, Bavaria, Austria, Saxony and Thüringen.

#### 10 III.2 Organisation

The Accreditation, Certification and Quality Assurance Institute ACQUIN is a registered association with recognised charitable status. Its members include science related professional and trade associations along with over 170 higher education institutions in Germany, Austria, Switzerland, Hungary and the USA.

15 The board, the general assembly and the accreditation commission are the main bodies of the association. Standing expert committees, expert groups and the complaints commission are laid out as further committees in the statute. As the central resolution committee of the agency, the accreditation commission is primarily responsible for composing the resolutions about the accreditation of study programmes, internal quality assurance systems of higher  
20 education institutions and about the assessment criteria and procedural principles of the agency. As the decision-taking committee of the agency, it is also active in procedures of certification and determines the result of the assessment in evaluations as necessary.<sup>3</sup> In accordance with the statute it also has a supervisory function in the appointment of experts<sup>4</sup>. The task of the nine standing expert committees is to appoint the expert groups and in each  
25 case give statements based on their reports and draft decisions. They also assess the documents submitted by higher education institutions in order to fulfil conditions and in response give the accreditation commission a recommended decision.

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<sup>3</sup> See p. 9 in the QM manual (Annex 4).

<sup>4</sup> See § 9 (7) of the statute.

### III.3 Equipment

According to the financial report, ACQUIN earned revenues of 2,438,328 euros in 2014. The expenses amounted 2,378,417 euros. For periodically recurring payments such as salaries and rents, ACQUIN has established for a period of approx. four months a reserve fund  
5 in the amount of about € 395k.

The staff in the head office as of 31 December 2015 is made up of 18 employees; 17 colleagues are employed indefinitely and largely full-time; Three employees are employed part-time (1.75 full time equivalents), resulting in a workforce of 16.75 full time equivalents. In addition there are eight student assistants.

10 The head office of ACQUIN is located in Bayreuth. The facilities here, which in total cover 630 m<sup>2</sup> of office space and 150 m<sup>2</sup> of ancillary areas, were hired.

Each work space is promptly equipped with furniture, computer systems, internet and telephone connections. The fixed assets of ACQUIN came to € 37k as of 31 December 2014. This consists of office and business equipment. Since April 2012 ACQUIN has a company  
15 car, which is available to all employees for official trips.

### III.4 Spectrum of activities

ACQUIN regularly carries out programme and system accreditation procedures at the national level in accordance with the statute (Annex 1). In 2014, ACQUIN accredited 325 study  
20 programmes and ensured that conditions for 293 study programmes were fulfilled (see annual report 2014, p. 16, annex 49). Four system accreditation procedures were completed and two more were initiated. Based only on the decisions in the German accreditation system, ACQUIN is among the four largest accreditation agencies (ACQUIN, ASIIN, ZEvA and AQAS). In the period from 2011 to 2015, 1907 study programmes and 18 internal quality  
25 assurance systems of higher education institutions (system accreditation) were accredited.

ACQUIN is also active internationally both in programme and institutional accreditation. Due to its listing in the Republic of Kazakhstan's National Register for Accreditation Agencies, ACQUIN is authorised to accredit study programmes and higher education institutions in Kazakhstan (Annex 33).

30 The international division carries less weight with regards to quantity: In 2014, 26 study programmes were accredited in Kazakhstan, six study programmes from Russia were worked on to fulfil conditions and a study programme in Switzerland was assessed (see

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annual report 2014, p. 19f, annex 49). In the period from 2011 to 2015, a total of 145 study programmes were accredited abroad in accordance with p. 12 of the self-evaluation report. In accordance with a schedule in annex 31, ACQUIN has been primarily active in Kazakhstan. Individual study programmes have also been accredited in Lithuania, Russia, Bulgaria and Egypt. In total, two institutional accreditations were carried out in the same period: the

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European Polytechnical University in Bulgaria and the University of Balamand in Lebanon. ACQUIN is also authorised to perform audits on universities and universities of applied science in Austria pursuant to § 22 para. 2 of HS-QSG (Austrian Act on Quality Assurance in Higher Education) (Annex 35). A procedure for an audit in Austria however has not yet been performed since the certification.

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The Swiss Federal Department of Economic Affairs approved ACQUIN on 17 January 2008 to perform applications for accreditation of Swiss universities of applied science on its behalf. The agency could not give any information on whether this certification is still valid after the Swiss Federal Act on the Funding and Coordination of the Higher Education Sector (HEdA) came into force on 1 January 2015.

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For further education offers from higher education institutions and other education providers, certification procedures are also being offered (self-evaluation report, p. 2). So far, ACQUIN has performed two of these procedures as pilot projects according to its own information (self-evaluation report, p. 11).

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ACQUIN operates a subsidiary organization ACQUINUS. ACQUINUS GmbH consults higher education institutions and university-related institutions in the areas of teaching, research and services. The focus of the activity of ACQUINUS in the report period was on consulting the private German higher education institutions in preparation for institutional accreditation by the German Council of Science and Humanities. Higher education institutions were also prepared for system accreditation, which in each case was / will be done by another agency (Annex 2). In 2013 ACQUINUS assessed a “regional reference curriculum ‘Food Technology – Bachelor of Science’” for the countries of Kazakhstan, Kyrgyzstan, Tajikistan and Uzbekistan as part of a project with the Deutsche Gesellschaft für internationale Zusammenarbeit (GIZ). ACQUINUS also performed an evaluation at the Freiburger Akademie für Universitäre Weiterbildung (Annex 2).

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For the assessment of compliance with the ESG, the fields of activities of national accreditation (programme and system accreditation), certification of further education offers, inter-

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national accreditation<sup>5</sup> (programme accreditation and institutional accreditation) and the audit are taken into consideration. As AQUINUS performed only two evaluations indirectly connected with teaching and learning in the report period and the remaining activities do not fall under the area of application of the ESG, those have not been taken into account

5 for the assessment of the ESG. It will only be necessary to keep track of the questions of whether the work of ACQUINUS in advising higher education institutions could clash with certification/accreditation by ACQUIN and whether there is any prohibited cross-subsidisation.

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<sup>5</sup> Only further education offers of higher education institutions are relevant for the assessment of the ESG.

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

##### 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-

#### 5 Documentation

ACQUIN provides a series of guidelines for the different fields of activities, which are the basis for implemented procedures:

- Programme accreditation: "Guidelines for procedures of programme accreditation" (Annex 5),
- 10 • System accreditation: "Guidelines for procedures of system accreditation" (Annex 18),
- Certification of further education offers: "Guidelines for procedures for certification of further education offers" (see subsequently filed documents),
- 15 • International programme accreditation: "Guidelines for programme accreditations procedures" (Annex 36),
- Institutional accreditation: "Guidelines for institutional accreditation" (Annex 40),
- Audits in Austria: "Guidelines 'Institutional audit and certification of quality management systems'" (Annex 29).

20 In a statement in the subsequently filed documents, ACQUIN explains that procedures of institutional accreditation take place based on the ESG and the standards for "Institutional accreditation of non-state higher education institutions" (Section B.IV) of the German Council of Science and Humanities while taking the national context into account. The international programme accreditation also takes the national context along with the ESG into ac-

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count. ACQUIN performs the procedures for certification of further education offers following the criteria of the German Accreditation Council for the programme accreditation, which implement the ESG.

### Assessment

- 5 The guidelines submitted with the application for reaccreditation provide detailed information that are oriented towards the procedures and criteria and reflect the current state of standards. The panel judged these documents largely to be sufficient (for information on the restrictions see below).

10 The programme and system accreditation procedures of ACQUIN comply with the rules of the German Accreditation Council, which follow the ESG version from 2005. The German Accreditation Council is currently revising the rules while taking the version agreed upon in 2015 into consideration. As a number of points from Part 1 of the ESG [2005] are also in the current version in some form or other, implementation can nevertheless be established for a number of standards of Part 1. There is a corresponding table in the annex of the  
15 report.

There are no detailed comparisons available for the remaining procedures performed by ACQUIN. In the meetings with members of the standing expert committees and with experts it however became plausible for the panel that the ESG Part 1 is taken into account in all fields of activity. The question of how ACQUIN shall act with appeals of the ESG and national guidelines was addressed in detail during the site visit (see ESG 2.2).  
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### Recommendations

1. A schedule should be published analogous to the equivalence table of the German Accreditation Council for implementing the ESG Part 1 in the procedures outside of their fields of business.

### 25 Result

**Standard 2.1 is fulfilled.**

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### 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

5 The guidelines for programme accreditation were the object of a condition in the last reaccreditation in 2011: *“ACQUIN shall submit guidelines for programme accreditation procedures by 7 December 2011, which illustrate that the criteria of the German Accreditation Council are the central evaluation parameter for the accreditation of study programmes. (Standard 2.2.1).”* (Condition 1).

10 Additionally, in recommendation 1 was also stated: *“ACQUIN should make clear in its guidelines (and also in the sample report framework) that accreditation is not to be understood as a consultation process, but primarily as a procedure for ensuring quality.”*

15 The international activities merited a critical comment from EQAR in the last registration (“flagged issue”): *„It should receive attention whether ACQUIN’s international accreditation and evaluation activities take place on a clearly defined and transparent basis, within and beyond the EHEA.”* (see annex 32).

### Documentation

20 ACQUIN submits guidelines for all fields of activities (see ESG 2.1). These are resolved pursuant to § 9 para. 5 of the statute (Annex 1) of the accreditation commission. Pursuant to § 9 para. 1 of the statute, universities, universities of applied sciences, art and music schools as well as professional practice and students are represented in the accreditation commission. Pursuant to § 9 para. 5, the revision and update of guidelines takes also place within the accreditation commission.

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The programme and system accreditation procedures are, according to the guidelines, based on the rules of the German Accreditation Council, and they also take common structural and state-specific guidelines of the States (“Länder”), as well as the German Qualification framework for higher education degrees (cf. ESG 2.1 and 2.5) into account.

- 5 In the international field of activities the agency also takes the legal framework in the higher education institution’s home country, along with the evaluation parameters of its guidelines into account (self-evaluation report, p. 12; 15 and code of ethics in annex 46). ACQUIN submits the Kazakh Higher Education Act in English for background information.

### **Assessment**

- 10 The relationship with the German Accreditation Council has occasionally been difficult based on the panel’s impression. As a member organisation shaped by academic self-confidence, ACQUIN demands free space for itself, which may go against the task of the German Accreditation Council as a supervisory authority and competition regulator.

- 15 The documentation of the programme and system accreditation procedures generally fulfils the requirements of ESG standard 2.2. The rules of the German Accreditation Council shall be adequately implemented in the guidelines for programme and system accreditation, both with regard to the procedural steps and relating to the evaluation parameters. The criteria of the German Accreditation Council are stated more clearly than the central assessment criteria in the ACQUIN guidelines, as was already established at the previous reaccreditation in 2011 (see Condition 1 above).

- 20 Aspects of the mission statement of ACQUIN (Annex 19) have been taken into account in the guidelines for programme and system accreditation. For example, ACQUIN sets the very general aim of contributing to making German higher education more flexible and international. Accordingly, the guidelines envisage that the aims of the higher education institution in the study programme and/or in the understanding of quality of the internal quality assurance of higher education institutions are defined and that they form a standard of evaluation for ACQUIN’s assessment. The further development of study programmes and/or internal quality assurance systems of higher education institutions is explicitly issued in the guidelines (for mission statement also see ESG standard 3.1). Furthermore, the procedural steps and requirements in programme and system accreditation do not exceed those of the German Accreditation Council and thus contribute to the efficiency of the procedures in the sense of the guideline for ESG 2.2.
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Conclusive procedural documents are also available for the international activities (international programme accreditation, institutional accreditation, audit) as well as the procedures for certification of further education programmes. The evaluation parameters are appropriate and guided by the aims of the higher education institutions. In this respect, the “flag” of EQAR was taken into account.

The guidelines for the Austrian institutional audit implement the requirements from § 22 para. 2 of the Federal Act on the External Quality Assurance in Higher Education and the Agency for Quality Assurance and Accreditation in Austria (HS-QSG). The adoption of all the guidelines in the accreditation commission ensures appropriate participation of the interest groups.

The matter of how ACQUIN shall proceed with conflicts between national guidelines and the ESG in international procedures was explicitly raised during the site visit. National guidelines do not always contradict the ESG in their wording; however they may still conflict with each other. For example standard 1.2 of the ESG assumes that a higher education institution can design its study programmes itself. By way of contrast in many countries, including Kazakhstan and Russia, there are comprehensive ministerial guidelines for the curricula.

In the meetings with the agency, different points of view were expressed on how the external quality assurance could act in such cases. Individuals suggested that such cases of tension should preferably be “ignored”. At the same time, reports on study programmes in Kazakhstan can also be found on the ACQUIN website, which raise the issue of the state requirements as background information.<sup>6</sup>

The panel would like to encourage ACQUIN to develop an open procedure and advocates for transparency. The public has a justified interest in finding out whether and, if applicable, which national guidelines/requirements conflict with the ESG. This issue should be raised in the reports in a diplomatic and nuanced manner and could also be a possible subject for a comprehensive analysis of countries if necessary (see ESG 3.4). The panel judges the requirements formulated from the code of ethics by ACQUIN for its work to be positive.

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<sup>6</sup> For example the accreditation report on the assessment and accreditation procedure at the German-Kazakh university in Almaty “Finances” (B.A./M.A.), “Management” (B.A./M.A.) and “Marketing” (B.A.).

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### Recommendations

2. ACQUIN should ensure that the matter of potential inconsistencies between national guidelines and the ESG is raised in the reports.

### Result

5 **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

10 The relevant steps are also specified in the guidelines already addressed in ESG standard 2.1 and 2.2.

In terms of the procedure of the institutional audit, there are no binding stipulations on the course or the responsibilities for the individual procedural steps. It is also unclear whether a decision under conditions is possible here and how the process of fulfilling conditions would proceed. In a statement in the subsequently filed documents, ACQUIN explains that the agency is not active in this field. In its position paper dated 31 May 2016 on the review report, the agency explains that the course of the institutional audit regarding the responsibilities, the procedural steps and possibilities of decisions follows the outline of the procedures for system accreditation.

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All remaining procedures, in accordance with the guidelines, include the option of conditions including a follow-up, if deficiencies are identified in the assessment.

5 If conditions are mentioned in the guidelines, the processes for determining the fulfilment of conditions are documented in the QM manual by ACQUIN: In all types of procedure the responsible standing expert committee reviews the documents of the higher education institution and submits a position paper as a draft decision to the accreditation commission. The commission decides afterwards whether conditions have been fulfilled or not.<sup>7</sup>

10 Further, an intermediate evaluation is arranged as a follow-up process in the system accreditation according to section 5.17 of the rules of the German Accreditation Council after half of the first period of accreditation (Annex 18, p. 16). The outline is also described in the QM manual (Annex 4, p. 41 and 47). Accordingly the standing expert committee for system accreditation receives a self-evaluation report of the higher education institution, appoints an expert group and decides whether a site visit is needed. The committee and the accreditation commission of ACQUIN shall acknowledge the report of the expert group.

15 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.

### Assessment

20 All quality assurance procedures practised by ACQUIN are based on a self-evaluation of the applicant, on site visit and a report. According to p. 11 of the self-evaluation report, only in case of certification of further education offers, the assessment can be organised file-based with the help of an online conference, though. Because of the limited scope of further education offers, this procedure is also feasible and compatible with standard 2.3, which as a rule anticipates the site visit.

25 The position of ACQUIN about formal outline of procedures for the audit in Austria being unnecessary because of the low demand, cannot be shared by the panel. ACQUIN should create more transparency here, for example by adding the guidelines and relevant schedules to the QM manual.

A follow-up in in terms of the standard 2.3 is given for the accreditation procedures via the

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<sup>7</sup> In the QM manual: For programme accreditation see p. 30, for system accreditation see p. 49, international programme accreditation see p. 55, institutional accreditation see p. 68 and certification of further education offers see p. 83.

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option of the conditions; the processes of fulfilling the conditions are comprehensibly described. The intermediate evaluation in the system accreditation is constituted as a follow-up. Its organisation is the mutual responsibility of higher education institutions and agencies.

5 During the site visit the panel gained the impression that the procedural steps were not clear enough to everyone. Confusion was also caused by similar terms for different texts, for example the report of the higher education institution and the report on the intermediate evaluation. The agency should pay more attention to this while communicating with HEIs. The results of the intermediate evaluation should also be integrated into the system accreditation for the purpose of closed quality control loops and should also be explicitly recorded  
10 in the documentation of the accreditation procedure.

### Recommendations

3. ACQUIN should transparently lay out procedural steps and responsibilities for the audits in Austria for the public.

## 15 Result

**Standard 2.3 is substantially 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.

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### Recommendation/conditions from the previous accreditation

The inclusion of international experts was the object of a recommendation in the last reaccreditation in 2011: *“ACQUIN’s guidelines for procedures for system accreditation should indicate that one member of the expert group, who is deployed by the agency, should come from abroad.”* (Recommendation 2).

The following recommendation was stated for appointing the experts in the programme and system accreditation procedures in the previous reaccreditation in 2011: *“ACQUIN should implement a uniform procedure across technical committees for appointing experts, which guarantees the competence of the experts, both in a technical respect and in the area of quality assurance and accreditation (Recommendation 3).”*

The following recommendation for the preparation of experts was stated in the last reaccreditation in 2011: *“The measures for the preparation and qualification of experts should go beyond the previous level. Special preparatory measures should be introduced in particular for experts who are participating in procedures for the first time.”* (Recommendation 4). EQAR similarly formulated the “flag” on the subject: *„It should receive attention whether ACQUIN has further developed its activities for training and preparation of experts.”* (Annex 32). ACQUIN referred to it on p. 29 of its self-evaluation report, stating that in addition to the measures described previously, the introduction of online training courses is planned.

### Documentation

#### Selection and appointment of experts

The criteria and the course of making appointments for the programme and system accreditation procedures is laid out in a resolution of the accreditation commission (Annex 7). It is noted there that the experts are appointed by the responsible committee and that a supervisory function falls to the accreditation commission when the expert groups are being appointed. The standing expert committee appoints one of its members to be in charge of each procedure. He/she takes the self-documentation of the higher education institution as a basis to suggest experts who are appointed by the committee.

The following standing expert committees were deployed by the accreditation commission (see annex 3):

- Architecture and planning committee
- Humanities, languages and cultural studies committee

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- Information science committee
- Engineering committee
- Art, music and design committee
- Mathematics and natural sciences committee
- 5 - Medicine and health science committee
- System accreditation committee
- Economics, law and social sciences committee

In the criteria for appointing experts ACQUIN distinguishes between “must”, “should” and “can” criteria. While “must” criteria must be strictly adhered to, “should” criteria may be deviated from if justification is given. “Can” criteria apply in the procedures if this is possible. The following “must” criteria are obligatory in programme accreditation (Annex 7):

- 10 *“- The relevant stakeholders (science representatives, students and representatives of professional practice) are represented in the expert group.*
- *The expert group includes at least two science representatives, a representative of professional practice and a representative of students.*
- 15 *- The experts have relevant technical expertise.*
- *A ‘cross-over assessment’ shall be avoided. This is when a science representative from study programme A assesses study programme B and then a science representative from study programme B assesses study programme A.*
- 20 *- The ‘four eyes principle’ must also be guaranteed in cluster accreditations with regard to the relevant technical expertise.”*

ACQUIN has laid out the following “must” criteria for system accreditation (Annex 7):

- 25 *“- The relevant interest groups (science representatives, students and representatives of professional practice) are represented in the expert group.*
- *The expert group includes at least five people, of whom there are three members with relevant expertise in the area of higher education institution governance and higher education institutions’ internal quality assurance, a representative of professional practice and a representative of students with experience in self-administration of higher education institutions and accreditation.*

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- *The experts from the higher education sector have expert levels of competence in accreditation and/or evaluation procedures (esp. knowledge of the procedure and regulations, knowledge of the German system of higher educational institutions and of the Bologna Process).*

5 - *A ‘cross-over’ assessment shall be avoided. This is when an expert from higher education institution A assesses higher education institution B and then an expert from higher education institution B assesses higher education institution A.*

- *The participation of experts who are active in the same state as the applying higher education institution or in neighbouring higher education institutions will be avoided.”*

10 The “should” criteria include, among other things, to avoid appointing professors from the same state (“Land”) as the applicant higher education institution. One aim that is set for the “can” criteria is to appoint one expert from abroad if possible.

The higher education institution may raise objections to the nomination of experts in writing within ten work days after receiving the expert list (p. 4 and p. 8 of the self-evaluation report).

15 Objections are, for example, lack of impartiality or lack of expertise, and must be justified. The standing expert committee decides on the complaints.

On p. 8 of the self-evaluation report ACQUIN clarifies that in each procedure for system accreditation at least one person from a foreign institution is included. In three of the 18 procedures for system accreditation even more than one person with international expertise has participated. In the subsequently requested documents ACQUIN submits an overview of the experts deployed in 2014 in all of the agency’s procedures.

25 In the QM manual (Annex 4, p. 71) it is laid out that the selection and appointment of experts for the certification procedure of further education offers comply with the criteria and procedures for appointing experts in programme accreditation (see annex 7). The responsible member suggests candidates to the standing expert committee, who in turn are appointed by the committee. The appointment of a student member is mandatory.

30 Pursuant to p. 13 of the self-evaluation report, the procedures for international programme accreditation are following German practice. The expert group consists of at least two representatives of science and at least one person each from professional practice and students, who are appointed by the responsible standing expert committee upon the suggestion of the responsible member (Annex 4, p. 52). While selecting the expert group members, ACQUIN takes into account the specific profile of the study programme to be accredited

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and knowledge of the higher education sector in which the assessment is performed. In some countries, e.g. in Kazakhstan, national experts are integrated into the groups in addition.

5 During the procedure of institutional accreditation, the expert group consists of three people: one each from the sciences, from professional practice and a student. The agency takes different types of higher education institutions as well as people with experience in managing higher education institutions into account (see annex 40, p. 3). The system accreditation committee appoints experts upon the suggestion of the responsible member (see annex 4, p. 58).

10 Despite demanded, the criteria and procedures for appointing experts for audits in Austria were not available.

### **Impartiality**

In all procedure formats, the experts sign a declaration of impartiality, data protection and confidentiality (see annex 8), which also refers to ACQUIN's own code of ethics (Annex 46).

15 The criteria for impartiality are laid out in the declaration as follows:

*"- currently ongoing application procedures, negotiations for appointments or a pending change*

*- less than five years previous employment or study*

*- relations, close personal or professional connections to or conflicts with its members*

20 *- participation in commissions, advisory boards or counselling committees, which have an immediate effect on the higher education institution to be assessed*

*- currently ongoing intensive cooperation projects, which have an immediate effect on the higher education institution to be assessed*

*- assessment by its members within the past year"*

### 25 **Preparation**

In the programme and system accreditation procedures in Germany, the experts are prepared for their activity in a preparatory meeting before the site visit. According to p. 4 of the self-evaluation report, this meeting takes at least an hour and a half for programme accreditation and at least four hours for system accreditation (p. 8). In annex 27 there is a presentation on criteria and the course of system accreditation which will be used in this preparatory meeting.

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In addition the experts receive manuals that deal with the procedure schedule and the specific roles of every expert (Annex 9 for programme accreditation, annex 26 for system accreditation).

5 In the international procedures for accreditation, along with the higher education institution's documents, the experts receive further detailed information about the role, the tasks and the context abroad in advance (self-evaluation report, p. 13). The (Annex 36) manuals about procedure schedule and understanding of the roles are included in the expert documentation (Annex 37).

10 In case of a first-time accreditation in a country or in cases of complex programme clusters, one-day preliminary meetings are held between the experts and the programme manager from the head office in Germany if necessary (self-evaluation report, p. 13). For international accreditations the site visits are also accompanied by two people (programme procedure in Germany: one person) from ACQUIN's head office. The site visit starts with an internal preparatory meeting for several hours on the evening before. Background information are  
15 given, the roles which the experts are expected to fill are drafted and open questions regarding the assessment of study programmes are discussed.

There is no information on the preparation of the experts in procedures for certifying further education offers concerning the audits in Austria.

## 20 **Assessment**

### **Selection and appointment of experts**

The appointment of experts for the programme and system accreditation procedures is regulated with sufficient obligation. The practice of appointing the expert groups by the standing expert committees together with responsible members of the committees and the head of-  
25 fice was clear for the panel and works well. It was also conveyed that the accreditation commission deals with overarching questions of appointing experts, for example for defining criteria, and that the concrete composition of individual expert groups is primarily raised for discussion in cases of anomalies.

30 During the meeting, representatives of the agency mentioned difficulties in finding experts for programme accreditation in certain subjects. This problem cannot be solved by just one agency. It could be helpful for ACQUIN if, in addition to the existent occasional communi-

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cation, the exchange between standing expert committees and the accreditation commission was intensified. This could also make the accreditation commission's perception of the supervisory function more transparent, for example with regular reports of the committees on the practice of appointing the experts in the accreditation commission (see also ESG 3.6).

As the resolution of the accreditation commission (dated 7 December 2015) "Procedures and criteria for appointing experts" (Annex 7) sets the number of experts in programme accreditation to at least four people, the requirements of the German Accreditation Council regarding the size of the expert group are fulfilled. The involvement of experts from science, professional practice and on the part of students in the appointment is guaranteed.

The question of including a person from abroad in the expert groups for system accreditations is now raised in the guidelines and as a result, recommendation 2 is met. The submitted information demonstrates that in 2015 at least one person from abroad was involved in the majority of the expert groups for system accreditations. However, in the procedures for programme accreditation, with a few exceptions, only experts from Germany were deployed. More international members would be desirable from the expert group's perspective in order to fully comply with the standard ESG 2.4.

For international accreditations (programme accreditation and institutional accreditation), the appointment of the experts is only laid out in the QM manual instead of the agency's guidelines. However, as the QM manual is also published on the agency's website, this is sufficient. The appointment practice could nevertheless be more transparent for outsiders by including the issue in all relevant guidelines.

The panel criticises the agency for not yet having defined a process for selecting and appointing the experts in procedures of the audits. Even if ACQUIN is not currently active in this field, these procedural steps must be specified so as to be transparent to the public.

### **Impartiality**

The impartiality of experts is ensured by the criteria in the corresponding declaration. However, the declaration of impartiality for experts (Annex 8) does not include a clear enough statement about a consultation of the higher education institution as an exclusion criterion for expert activities. The agency should supplement this (see also ESG standard 3.3).

As previously it is not apparent how ACQUIN ensures the impartiality of committee members and experts. This could for example be mentioned in the guidelines. In this respect the

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situation has not yet improved based on the critics from the report on the previous reaccreditation in 2011.

It was made comprehensible to the panel that, in individual cases, members of standing expert committees could also become active as experts, for example, in order to enable members of the system accreditation committee to gain experience with the newly introduced instrument of system accreditation. In these cases, the persons do not participate in decision processes and do not take the function of the responsible member. According to the panel's assessment, this is an appropriate practice and should be laid out in a comprehensible written way for the public.

### 10 Preparation

With regards to the preparatory briefing of experts, no significant change from the reaccreditation in 2011 can be observed. Even in system accreditations the preparation is limited to a longer meeting before the beginning of the actual site visit. The online training courses mentioned in the self-evaluation report do not play any role in practice yet. Meanwhile, introductory information for experts has been uploaded into the social network Youtube<sup>8</sup>.

For programme accreditation, the panel assessed the preparation as plausible, as the procedures mainly focus on questions related to the discipline. However it was not clear to the panel how the online training is being put into concrete terms and how it can effectively contribute to the preparation of experts. In particular, practice-oriented exchanges with experienced experts, which can be ensured in expert seminars, appear to be beneficial to a competence-oriented training course for experts and to be appropriate for preparing first-time experts.

ACQUIN only ensures a minimum for preparation for the system accreditation procedures. Other agencies accredited in Germany regularly offer events for new experts and integrate a one-day preparatory workshop into procedures for system accreditation. During the site visit, the members of the system accreditation committee appeared to be sensitive to the high demands on the experts. The panel states that the selection of suitable people in this procedural format plays a central role, as for example in the area of higher education institution governance, prior knowledge cannot be compensated by the agency. On the other

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<sup>8</sup> ACQUIN refers in the position paper dated 31 May 2016 to the following internet address: <https://www.youtube.com/watch?v=GO1yYNwWRfE>

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hand, an additional event could make them less likely to be willing to participate in these assessments.

5 In its resolution “Preparation of experts in accreditation procedures”, dated 31 October 2008, the German Accreditation Council emphasised the significance of a general preparation procedure, which also raises the issues of tasks and understanding of roles. However, it did not adopt a compulsory guideline for events in this regard.

10 Furthermore, since the German Accreditation Council’s previous monitoring procedures established a positive image of the agency’s assessments, the basic principle of the practice of preparing the expert group has not been objected. Nevertheless, the agency should create offers on a voluntary basis for preparation and/or for exchange for evaluation activity and ensure the further qualification of the pool of experts.

### Recommendations

4. ACQUIN should increase the proportions of international experts in programme accreditation procedures, in particular if smaller subject communities are affected.
- 15 5. ACQUIN should comprehensibly document how the impartiality of experts and members of the committees is ensured for the public.
6. ACQUIN should regularly offer events that prepare and/or further qualify experts for the procedures on a voluntary basis and make it possible to exchange experience.
7. ACQUIN should also set out and publish criteria and responsibilities for selecting experts for the procedures of the audits in Austria, despite of the low demand in this field of activity.
- 20 8. ACQUIN should clarify that a prior consultation of the higher education institution is excluded in the criteria for the impartiality of experts.

### Result

25 **Standard 2.4 is substantially 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 to a formal decision.

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### **GUIDELINES:**

External quality assurance and in particular its outcomes have a significant impact on institutions and programmes that are evaluated and judged.

In the interests of equity and reliability, outcomes of external quality assurance are based on pre-defined and published criteria, which are interpreted consistently and are evidence-based. Depending on the external quality assurance system, outcomes may take different forms, for example, recommendations, judgements or formal decisions.

### **Recommendation/conditions from the previous accreditation**

Regarding consistency in the standing expert committees, the following was established in the report of the previous accreditation on p. 15: *“In this context the significant influence of the technical committees must be used as an explanation for the inconsistent consideration of the criteria of the German Accreditation Council. The expert group has the impression that a different practice for assessing the higher education institution’s reports and position papers for each disciplinary culture was developed. The meetings held with the representatives of the technical committees during the on-site visit did not indicate that the technical committees communicate with each other sufficiently to achieve a consistent and comparable application of the criteria. The agency must therefore explicitly encourage the technical committees to hold the annual cross-committee meetings more frequently or to carry out joint workshops in order to increase rigour in the application of the criteria.”* Based on this evaluation, the consistency of the decisions in the committees was the object of a “flag” of EQAR in the last registration: *“It should receive attention whether measures have been taken to enhance consistency in decision-making across different technical committees.”* (see annex 32).

### **Documentation**

ACQUIN lays out the evaluation parameters for the various types of procedure in its field of activities in the guidelines (see ESG standard 2.1-2.3). With the exception of the guidelines for the procedures of the audits in Austria, the stated documents are published on the agency’s website.

As a tool for consistency there are so-called “report frameworks” for the reports, which are supposed to act as a sample to ease the writing of the reports (programme accreditation annex 14, system accreditation annex 23), giving also sample wordings for recurring conditions and recommendations (Annex 51).

### **Assessment**

The evaluation parameters in the guidelines are informative and presented clearly. They

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are guided by the objectives of the procedures and are publicly accessible – with the exception of the guidelines for audits in Austria.

During the site visit, it was discussed in detail how ACQUIN ensures the consistency of evaluations and decisions in the various procedure formats and committees. This confirmed the impression already established during the previous accreditation that the standing expert committees are primarily related to their disciplinary culture. Subject-related consistency should be produced through the collective memory of the members of the committee in collaboration with the head office. No structural change from the last reaccreditation in 2011 could be ascertained in terms of the committees' communication with each other. In the position paper dated 31 May 2016 ACQUIN refers to a meeting of the standing expert committees' spokespersons with the accreditation commission in 2014.

The members of the accreditation commission emphasised that they view creating consistency across disciplines as one of their crucial tasks. The sample template for reports and the list of the recurring conditions also serve this purpose. The panel considers these instruments to be helpful in principle. ACQUIN should develop them further and intensify the exchange between the committees structurally and factually. Institutionalised formats such as meetings across disciplines or the chairs of the committees rotating participation in meetings of the accreditation commission would help to maintain the consistency of the agency's decisions across all committees. The agency's idea expressed in the meeting of making relevant results from the consultations of the accreditation commission available not just to those affected, but to all the committees, is explicitly welcomed by the panel. If the accreditation commission deviates from the recommendations of the standing expert committees, this should always be justified and passed back to the respective committee – as it is already common practice.

The panel emphasises that the demand for consistency of evaluations and/or decisions in the different fields of activities can only apply to the same formats, for example between national and international programme accreditation. Nonetheless, the different designs of the programmes and their respective environment will require an individual inspection of every case.

### **Recommendations**

9. In order to ensure consistency between the committees there should be institutionalised communication in fixed formats, such as meetings across disciplines or the chairs regularly participating in the accreditation commission's meetings. Measures and communication

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loops should be laid out in internal quality management.

10. The guidelines for the Austrian audits should be published on the agency's homepage.

### Result

#### 5 **Standard 2.5 is substantially 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**

- 10 ACQUIN publishes reports and decisions on programme and system accreditations on the agency's website and in the database of accredited study programmes (p. 5 of the self evaluation-report). As until 2010 the only documents that needed to be published in Germany were the decision, a summary of the reports and the names of the experts; there are still reports that correspond to these former requirements. For all procedures whose con-
- 15 tracts were entered into after 1 June 2010, the complete report must be published. Before the report is published, the factual corrections noted in the higher education institution's position paper are incorporated into it. Regarding the publication of negative accreditation decisions, ACQUIN refers in the self-evaluation report on p. 30 to the German Accreditation Council's resolution dated 30 September 2015: *"In programme and system accreditation*

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*procedures that were opened after 1 January 2016, the agency publishes the accreditation decision and the complete report within six weeks of the decision being made, regardless of whether the procedure was judged positively or negatively.”* This resolution is implemented by ACQUIN.

- 5 It emerges from the German Accreditation Council’s progress report that ACQUIN did not always upload entries with the complete accreditation report into the database of accredited study programmes during the report period and in some cases made them after a long delay. The agency announced on 31 March 2015 that the accreditation commission of ACQUIN decided also to publish the experts’ recommended decision in future. A first random  
10 assessment of GAC’s head office showed that meanwhile the publishing duties are substantially fulfilled.

In January 2015 the head office of the German Accreditation Council found out on the occasion of a complaint that ACQUIN published the accreditation of a series of study programmes on its own homepage and entries were made into the German Accreditation  
15 Council’s database. However, these could not be published by the German Accreditation Council in the internet, as the reports were not enclosed. ACQUIN was obliged to update this part and indicated the update as completed in January 2016. Random sample assessments by GAC’s head office in the meantime confirmed the implementation.

In terms of the international activities, information about 225 internationally accredited study  
20 programmes can be found on ACQUIN’s website in its own area. A number of entries only include the names of the experts and short reports, such as for the entries on study programmes from Switzerland.<sup>9</sup> For other procedures the complete report is also made available. In terms of the procedures of institutional accreditation abroad, the entries can only be found if the name of the higher education institution is entered into the search field.

- 25 Reports on certifying further education offers cannot be found on ACQUIN’s website. As no audit procedure has been performed in Austria until now, no report could be published yet.

It emerges from the guidelines that the ACQUIN reports are written by the experts with divided responsibilities.

### **Assessment**

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<sup>9</sup> In its position paper dated 31 May 2016 ACQUIN refers to the legal situation in Switzerland, which at the time did not allow for the publication of reports. In this respect publication is not contractually agreed with the higher education institutions.

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As the concept of experts writing the reports themselves is one of ACQUIN's trademarks, it is plausible that as a rule, all the experts are included in this process. Furthermore, the report structure for the programme and system accreditation procedures is clearly arranged.

5 Action is required in regard to the publication of reports. Even though the ACQUIN intends to publish the decisions and reports in all procedure formats, gaps remain on the homepage as before. The agency named its homepage in the meeting as a "permanent building site", which because of limited resources cannot always be satisfactorily maintained (see ESG standard 3.5).

10 The term of six weeks stated in the German Accreditation Council's resolution dated 30 September 2015 for the publication in the programme and system accreditation procedures was described by the agency in the meetings as being ambitious. Nevertheless, it appears to be possible to observe the time guideline, after ACQUIN has internally reorganised the processes for publication and the internal responsibilities. A formal written stipulation is however still pending. A stipulation of this sort would also be appropriate for the remaining  
15 fields of activities.

### Recommendations

11. ACQUIN should ensure that the reports of the various procedure formats are easy to find on the homepage, for example through separate areas.

12. ACQUIN should define a process with responsibilities and representation regulations  
20 for prompt publication of the reports (on the homepage and/or in the database of accredited study programmes) for each procedure format (for GAC criterion 2.7 also as a condition).

### Result

**Standard 2.6 is substantially fulfilled.**

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### 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.

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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**

The following recommendation for the complaints procedure was stated in the previous re-accreditation in 2011: *“The complaints procedure of ACQUIN should be further developed. The complaints procedure should include information on terms and a special board of complaints with external participation should be designated.”* (Recommendation 6)

### **Documentation**

ACQUIN has established a complaints procedure which is open to higher education institutions in all procedure formats.

Pursuant to § 11 para. 2 of the statute (Annex 1), ACQUIN has established a complaints commission. It is made up of five members, of which one member comes from each of the group of universities of applied science, universities, art and music schools, professional practice and students. The members of the complaints commission must not be members of the board, the accreditation commission or one of the technical committees. They are chosen pursuant to § 11 para. 3 of the statute for a period of three years, with the possibility of re-election.

Pursuant to § 5 of the complaints commission’s rules of procedure (Annex 17), higher education institutions may submit complaints in response to decisions of the accreditation commission. These must be submitted in writing within 20 days of the date when the institution was informed of the decision. As a first step the accreditation commission discusses the complaint (§ 7 para. 1 of the rules of procedure). It is only submitted to the complaints commission if the accreditation commission does not remedy the complaint. Pursuant to § 8 of the rules of procedure this gives the complainant, a member of the expert group, a member of the standing expert committee and a member of the accreditation commission an opportunity to make a statement before the decision is made. Pursuant to § 10 the complaints commission may issue a recommendation to the accreditation commission about the decision to be repealed if it estimates that the complaint is fully or partially justified. It refers

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the decision back to the accreditation commission with a statement. This must be taken into account by the complaints commission in order to review the decision (§ 10 para. 2) and give justification if it does not follow the recommendation (§ 10 para. 4).

5 In its QM manual ACQUIN defines the number of complaints regarding accreditation decisions as an indicator for the subgoal of trust/reliability. (P. 88, annex 4) In the annual quality reports (Annex 52) ACQUIN assesses the number of complaints for the corresponding year. For example in 2015, five complaints were filed and two complaints were complied with.

Beyond this complaints procedure there is also the opportunity for higher education institutions to raise objections in the course of the procedure, for example regarding the potential bias of experts or within the position paper on the report (see annex 17\_2).

### Assessment

ACQUIN addresses complaints and appeals from higher education institutions at different levels and in all fields of activities. The procedures for handling complaints and appeals are regulated so as to be sufficiently binding and include appropriate terms and routines. In this respect recommendation 6 from the previous accreditation has, in the meantime, been implemented. Compiling the percentage proportion of the complaints as measured by the decisions of the accreditation commission is a helpful indicator of at least the comprehensibility of accreditation decisions.

20 It emerged from the meetings with the members of the accreditation commission that the complaints are generally directed against this body's decisions and they were also largely remedied there. When asked about the assessment of the complaints regarding the practice of the agency's decisions, the members of the accreditation commission shall refer to the individual nature of the complaints. This was made comprehensible to the panel.

### Recommendations

25 13. In order to improve transparency, the complaints/appeals procedure should be incorporated into the procedure representations in the QM manual.

### Result

**Standard 2.7 is fulfilled.**

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### 3.1 Use of external quality assurance procedures for higher education

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### **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.

### **Documentation**

The mission statement of ACQUIN is as follows: *“The objective of the Accreditation, Certification and Quality Assurance Institute (ACQUIN) is to make a contribution to shaping the European Higher Education Area and to ensure a comparable quality of degrees.*

- 5 *The core task of the work of ACQUIN is to support German higher education in becoming more international and flexible and to support the improvement of the effectiveness of education at German higher education institutions. ACQUIN is aiming to perform accreditations of Bachelor's and Master's study programmes in all disciplines across all regions and types*
- 10 *of higher education institutions, in order to ensure a higher quality of the available programmes, create market transparency, increase the attractiveness of the higher education institutions for overseas students and promote the comparability of academic degrees. Abroad, ACQUIN considers itself a partner of higher education institutions that want to offer Bachelor's, Master's and doctoral programmes at a European level.*

- 15 *The performance of all the quality assurance procedures at home and abroad is guided by international standards of good practice, in particular by the “Standards and Guidelines for Quality Assurance in the European Higher Education Area” (ESG). As the self-governing organisation of the higher education institutions, ACQUIN is free of state influence and independent in the spirit of academic standards and traditions. Academic freedom and autonomy for higher education institutions are guiding principles of all decision processes. The*
- 20 *higher education institutions affiliated with each other through ACQUIN ensure consistent communication with professional practice and representatives of the student body.” (see annex 19)*

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This text is not published on the agency's German website, but other formulations can be found in the "Objectives" area. The mission statement can be found on the English language site. Upon request the managing director explains that the agency's internet presence is currently being revised, adding that the mission statement in the annexes of the self-evaluation report is valid.

As evidence for the implementation of the goals of the mission statement, the agency submits the code of ethics (Annex 46) and a strategy paper of the general assembly from 2014 (subsequently filed during the site visit), which states, among other, that the quality assurance of structured doctoral programmes and research efforts of universities are relevant areas for quality assurance.

### Assessment

ACQUIN regularly performs external quality assurance procedures and has fulfilled this part of the standard for many years (for the scope of the activities see section 3.4).

The mission statement of ACQUIN defines higher education policy objectives that are suitably substantive. During the meeting the management of the agency explained that the agency had been founded based on the model and the self-image of the *Deutsche Forschungsgemeinschaft* (DFG). With this high expectation of itself, a more or less unspoken "research university spirit" of the agency, which was also expressed in the strategy paper of the general assembly in 2014, becomes visible to the panel. The impression during the site visit was that this "spirit" is appreciated by the clients, even by the non-university higher education institutions. The panel judges the code of ethics to be a good example of the practical implementation of the agency's internationalisation strategy. This goal has also found its way into the documentation of the accreditation procedure (see ESG standard 2.2). For information on implementing the goals of the mission statement into the documentation of the accreditation procedure see ESG standard 2.2.

The relevance of the mission statement should be clear, fundamentally easy to implement and transparent at all levels of the agency. The panel sees a need for ACQUIN to make improvements.

### Recommendations

14. The mission statement should be consistently taken into account in all of the agency's publications and should be published on the website.

## Result

**As standard 3.1 also encompasses fulfilment of Part II of the ESG, an overall evaluation including standards 2.1 to 2.7 is performed here. The assessment of Part II of the ESG shows that the agency substantially fulfils the standards 2.1 to 2.7.**

5 **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.

#### GUIDELINES:

In particular when external quality assurance is carried out for regulatory purposes, institutions need to have the security that the outcomes of this process are accepted within their higher education system, by the state, the stakeholders and the public.

### Recommendation/conditions from the previous accreditation

-None-

10 **Documentation**

ACQUIN was registered into the Bayreuth magistrates' court's register of associations (Annex 42) as an association under no. 1323 on 5 March 2001 and was also accredited for the first time by the German Accreditation Council in the same year. The first reaccreditation was granted on 1 July 2006 for until 30 September 2011, the second reaccreditation on 8  
15 June 2011 for until 30 June 2016. As part of the application for reaccreditation, the accreditation was temporarily extended by GAC until 30 September 2016. ACQUIN has been certified by GAC since 2008 to perform system accreditation procedures.

Based on the decision for reaccreditation, in 2012 the agency's full membership in the European Association for Quality Assurance in Higher Education (ENQA) was confirmed again  
20 and extended by five years. In 2008 ACQUIN was recorded in the European Quality Assurance Register for Higher Education (EQAR). After full membership of ENQA was extended, the listing in the register was extended until 31 January 2016.

Due to its listing in the Republic of Kazakhstan's National Register for Accreditation Agencies, ACQUIN is authorised to accredit study programmes and higher education institutions  
25 in Kazakhstan (Annex 33). ACQUIN is also certified in Austria to perform so-called audits

## Evaluation of the ESG

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on universities and universities of applied science here pursuant to § 22 para. 2 of HS-QSG (Austrian Act on Quality Assurance in Higher Education) (Annex 35). The Swiss Federal Department of Economic Affairs approved ACQUIN on 17 January 2008 to perform applications for accreditation of Swiss universities of applied science on its behalf. The agency  
5 could not give information on whether this certification is still valid after the Swiss Federal Act on the Funding and Coordination of the Higher Education Sector (HEdA) came into force on 1 January 2015.

### Assessment

The legal status of ACQUIN as a registered association is proven and appropriate to fulfill  
10 the tasks in the quality assurance procedures. ACQUIN has been regularly certified for programme and system accreditation procedures in Germany by GAC's regular licensing. There are also certifications of the responsible national authorities for activities in Kazakhstan and Austria. It was made comprehensible to the panel that because of the amended framework conditions ACQUIN has not decided yet whether activities in Switzerland should  
15 be resumed.

### Recommendations

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### Result

**Standard 3.2 is fulfilled.**

20

#### 3.3 Independence

##### STANDARD:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

##### GUIDELINES:

Autonomous institutions need independent agencies as counterparts.

In considering the independence of an agency the following are important:

- Organisational independence, demonstrated by official documentation (e.g. instruments of government, legislative acts or statutes of the organisation) that stipulates the independence of the agency's work from third parties, such as higher education institutions, governments and other stakeholder organisations;
- Operational independence: the definition and operation of the agency's procedures and methods as well as the nomination and appointment of external experts are undertaken independently from third parties such as higher 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.

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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

Attached to the reaccreditation in 2011 was the following condition among others:

5 *“By 7 December 2011 ACQUIN shall demonstrate and publish that the German Accreditation Council’s resolution “Standards for Structuring the Relationship between System Accreditation and Consultation Services”, dated 31 October 2008, is being taken into account in a suitable manner.”* (Condition 2) The evidence was promptly provided.

The background for this condition was finding that the separation of consultation and accreditation had only been laid out in a resolution from the ACQUINUS advisory board as a recommendation (report, p. 17) and/or was only discussed by ACQUINUS<sup>10</sup>.

### 10 Documentation

In the self-evaluation report on p. 17, ACQUIN references the organisational form as a privately held association and considers itself independent in the spirit of academic traditions. The majority of the over 170 members of the association are higher education institutions (universities, universities of applied sciences, art and music schools), including academic  
15 subject communities and academic professional associations (as of 2014, annex 49, p. 7).

Pursuant to § 8 of the statute, the general assembly is responsible for selecting the members of the board, the accreditation commission and the complaints commission and for appointing the auditors. In addition, it takes delivery of the board’s statement of accounts, assists them, agrees to the business plan and confirms the assessment criteria agreed by  
20 the accreditation commission. Beyond these described tasks there is no connection between the general assembly and the stated committees.

The five-person board pursuant to § 7 para. 6 of the statute is responsible for the following tasks: scheduling the business plan, attracting and bringing in new members of the association, fundamental issues of expanding membership and reaching agreements with other  
25 accreditation organisations.

Pursuant to § 9 para. 5 of the statute, the accreditation commission makes all decisions in

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<sup>10</sup> See resolution of the German Accreditation Council regarding reaccreditation of ACQUIN dated 8 June 2011, p. 6.

## Evaluation of the ESG

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the agency's quality assurance procedures. Along with the chairman it includes nine members from higher education institutions, two members from professional practice and two students. Pursuant to § 9 para. 2 of the statute, the chair of the board is also officially chair of the accreditation commission.

- 5 Pursuant to § 10 of the statute each standing expert committee includes at least 5 people from the sciences, professional practice and students, of which at least one comes from each of the fields of universities of applied science, academic universities and professional practice.

10 The committees are appointed pursuant to § 10 of the statute of the accreditation commission, which pursuant to § 9 para. 3 of the statute also have a supervisory function in the appointment of the expert groups by the technical committees.

15 Regarding the separation of consultation and accreditation, ACQUIN ensures that the areas within the structure of ACQUIN and ACQUINUS are separate (self-evaluation report, p. 18). In organising the contracts, both the higher education institution and ACQUIN declare that no consultation by the subsidiary ACQUINUS has taken place (Annex 21). For information on the declarations of impartiality of the experts, see ESG standard 2.4.

20 There is no written information available for international activities on how consultation and accreditation are separated if necessary. It follows from the mission statement that ACQUIN considers itself to be "a partner of higher education institutions" abroad, which want to offer study programmes at a European level (see ESG standard 3.1). On p. 12 of the self-evaluation report ACQUIN also cites "high consultancy needs" for procedures abroad.

25 ACQUIN states on p. 17 of the self-evaluation report that all members of the bodies are bound to the statute of ACQUIN, the code of ethics (Annex 46) and the generally applicable legal regulations. They do not take part in consultations that affect their own higher education institution. This is mentioned in the protocols.

### **Assessment**

30 ACQUIN is responsible for all its activities. The interactions laid out in the statute of committees, for example the supervisory function of the accreditation commission over the committees in the appointing of experts, promote the agency's internal communication and self-reliance. The fact that the chair of the board is also chair of the accreditation commission does not necessarily mean that any undue influence is exerted.

The composition and thus the voting habits of the accreditation commission reflect the fact

## Evaluation of the ESG

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that quality assurance is the responsibility of the higher education sector. Domination of external interest groups, for example professional practice, is excluded by the distribution of votes. This also applies to the standing expert committees, as the list of the current composition in annex 3 shows.

- 5 Individual higher education institutions cannot exert influence on the accreditation commission's decisions as members. The role of the general assembly is appropriately limited to nominating committee members, meaning that their independence in the context of the common standards in Europe is assured. The general assembly has no influence on ACQUIN's operative activities.
- 10 The projects of ACQUINUS listed in annex 2 show that activity focuses on the consultation of higher education institutions for institutional accreditation by the German Council of Science and Humanities and on international activities. One university in Germany was prepared for a system accreditation procedure, but the procedure itself was not performed by ACQUIN. A regulation in § 12 of the model contract for system accreditation (Annex 21)
- 15 established that there was no prior consultation with the higher education institution by ACQUINUS. This means that the complaint from the preceding reaccreditation in 2011 is revoked.

ACQUIN also separates consultation and accreditation in international activities. This impression from the meetings during the site visit is also supported by a comparison of the

20 consultation projects with accreditations performed previously, which do not overlap.

It has been discussed with ACQUIN if there is a share of consultation within accreditations. Although the agency has no fixed written understanding of consultation, it is aware of the thin line between feedback from an expert and prohibited consultation as part of an accreditation procedure. The panel sees an advantage for the further development of the quality

25 of the agency's work in developing and documenting a meaning of consultation.

In the meeting with the higher education institutions it was made clear to the panel that postponing both of the site visits meant that the formal suspension of a system accreditation procedure is actually avoided. The German Accreditation Council should review a time limit for the system accreditation procedure in the course of its current revision of the rules.

### 30 **Recommendations**

-None-

### **Result**

## Evaluation of the ESG

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### 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

5 -None-

#### Documentation

In the self-evaluation report on p. 19ff., ACQUIN describes a series of activities which include an analysis of its own work. Listed here are accompanying workshops at the annual general assemblies which discuss current subjects in the higher education institutions.

10 These results shall be made available to the member higher education institutions and committee members (Annex 50). ACQUIN shall also reflect on the agency's work in the annual report (Annex 49) and make this available to the public.

ACQUIN also cites the annual quality reports, which are available for the years 2012, 2013 and 2014 in annex 52, as another example of the analysis of its own work. Furthermore

15 ACQUIN's participation in various international projects and workshops contributes to its reflection on its own work. Examples stated here include a programme accreditation procedure jointly performed with the Russian agency NCPA at the St. Petersburg Polytechnic University, also the "Seminar on Cross-Border External Quality Assurance" organised by EQAR, which was set up by ACQUIN in April 2014 in Bayreuth (Annex 56).

20 ACQUIN makes documents available for the project of the International Centre for Higher Education Research Kassel (INCHER), called "External and internal quality assurance of teaching and learning using accreditation and evaluation procedures", and offers the possibility of supporting several programme and system accreditation procedures by participating in them (see self-evaluation report, p. 21).

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### Assessment

Regarding its own work, ACQUIN currently only publishes descriptive annual reports, which for example list procedures performed in the respective year but do not analyse the results. In the opinion of the panel there is also no systematic analysis of these reports for example  
5 as part of the internal quality assurance.

ACQUIN undertakes internal analyses at various points; however it does not publish them. For example surveys on the agency's work and other mechanisms for feedback are objects of the annual quality reports, which are only made available to the head office and the board, and not even to the internal committees (for information on the quality reports also see ESG  
10 standard 3.6).

Positive factors worth noting are the documentation of the recurring conditions (Annex 51) and the accompanying discussions in the workshops with the member institutions. In order to fully comply with standard 3.4, the agency would however have to make analyses of results of its work accessible to the public. ACQUIN could for example use the international  
15 work for a country report as in Kazakhstan or analyse the system accreditation procedures performed by the agency based on typical findings.

Participation in the INCHER research project cannot be classified as an independent analysis of the agency, since ACQUIN is an object of research.

### Recommendations

20 15. ACQUIN's activities regarding qualitative analysis of the results of its own work should be intensified and lead to publication.

### 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.

## Evaluation of the ESG

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### Recommendation/conditions from the previous accreditation

-None-

### Documentation

5 According to the financial report ACQUIN earned revenues in 2014 of 2,438,328 euros. The expenses came to 2,378,417 euros. For periodically recurring payments such as salaries and rents, ACQUIN has established a reserve fund of about € 395k, which can cover a period of approx. four months (p. 1, annex 60). The financial reports for 2012 and 2013 show losses: In 2012 an operating income of -80,586 euros and in 2013 of -45,556 euros was reached. In 2014 ACQUIN was operating in the black once again; the operating income  
10 was 56,511 euros. The number of programme managers continually fell from 20 people in 2012 to 12 in 2014 according to the annual reports.

The staff in the head office as of 31 December 2015 is made up of 18 employees, 17 colleagues are employed indefinitely and largely full-time. Three employees are employed part-time (1.75 full time equivalents), resulting in a workforce of 16.75 full time equivalents.  
15 In addition there are eight student assistants. As the managing director announced verbally, a financial consolidation at the beginning of 2016 has made it possible again to fill two positions, which begin on 1 February 2016 and 1 April 2016. Another employee is also returning from maternity leave on 8 February 2016, meaning that three extra people are available. According to an e-mail dated 8 March 2016 the calculation of the workload in the  
20 head office is based on an assumption of 230 work days. It is documented in the introduction concept for new employees that the agency assumes 18 programme accreditation procedures per year and consultant (Annex 61).

Information on calculating costs for a procedure are available for both national and international programme accreditation and system accreditation. For the other procedure formats,  
25 calculations are only generated on request according to the managing director's statement. An estimate of the amount of the head office's work is only available for national programme accreditation (see criterion 2.3.2). How extensive the amount of work in the head office turns out to be for the tasks not related to procedures, such as supporting the technical committees and the accreditation commission, maintaining the database of accredited study programmes and/or the homepage or further developing the documentation of the accreditation  
30 procedure, has not been established.

In the 2013 quality report (Annex 52) the results of an anonymous survey of the employees

## Evaluation of the ESG

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of ACQUIN from June 2013 is referenced. They show that a considerable portion of the employees are unsatisfied with the working conditions. Furthermore, the German Accreditation Council's progress report states that in the previous accreditation period ACQUIN frequently asked for extensions of deadlines with reference to work overload, responsible  
5 employees being absent or on holidays. Also, entries in the database of accredited study programmes were made with a time delay.

The head office of ACQUIN is located in Bayreuth. The facilities here, which in total cover 630 m<sup>2</sup> of office space and 150 m<sup>2</sup> of ancillary space, are hired. Each work space is equipped with furniture, computer systems, internet and telephone connections. The fixed  
10 assets of ACQUIN came to € 37k as of 31 December 2014. This consists of office and business equipment. Since April 2012 ACQUIN has a company car, which is available to all employees for company journeys.

### Assessment

The panel were impressed by the agency's good spatial and material setup in a tour during  
15 the site visit.

There was no reason for queries regarding the qualitative human resources planning, however the panel found shortcomings in regards to the strategic and capacitive human resources planning, which affect the appropriateness of the personnel setup. In the meetings during the site visit the panel gained the impression that employees, particularly the  
20 agency's academic collaborators, were being overworked. This observation was supported by GAC's progress report noting that deadlines for queries being repeatedly passed and time delays occurring when making entries into the database of accredited study programmes.

When asked about the personnel resources, the managing director referred to the negative  
25 operating income in 2012 and 2013. In order to save personnel costs, positions that have become open have not been filled, which has led to a greater workload in the head office. It is comprehensible to the panel that it is difficult for the agency to plan for incoming mandates. In this respect fluctuations in revenue have to be absorbed with flexible human resources planning. The decline in the number of academic consultants in the last few years  
30 to just 12 people in 2014 is recorded in the annual reports. The numbers of study programmes accredited by ACQUIN may have been falling slightly since 2011, but only to a smaller extent as staff was being reduced. There is also a growing number of system accreditation procedures, which require very intensive support. In terms of figures, in 2012

## Evaluation of the ESG

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each programme manager dealt with approx. 30 accredited study programmes and 0.36 system accreditation procedures. Also in light of the fact that some of the study programmes were accredited together in clusters, the announced number of 18 programme accreditation procedures per year and consultant could be exceeded.

- 5 The strategic human resources planning is made more difficult from the panel's perspective due to several factors: Personnel capacities are calculated based on the overly high assumption of 230 work days per year, which takes holidays, family time, time for further training and instances of sick leave only insufficiently into account. For example the state of Bavaria calculated approx. 207 work days for 2014 (247 work days minus 30 days for holiday and the average number of sick days according to the report on absences of employees of the free state of Bavaria 2011).<sup>11</sup>

10 The capacitive human resources planning is too poorly developed in the opinion of the panel. ACQUIN has only ascertained a parameter of the amount of work for personnel for one of its procedure formats (10 work days in national programme accreditation, also see criterion 2.3.2). In the remaining procedure formats the agency cannot put a number on how high the costs on personnel are, which may make empirically based planning of the use of resources more difficult.

15 The panel also judged the lack of a detailed schedule of responsibilities, which depicts the responsibilities, tasks and representation regulations, to be making capacitive human resources planning more difficult.

20 The amount of work for activities across procedures such as servicing bodies, quality management, further education, lectures at conferences or maintaining the database has also not yet been established. This means that the multi-level structure with the accreditation commission and nine technical committees generates an especially high frequency of meetings and as a result a large expenditure; in 2014 alone there were four two-day meetings of

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<sup>11</sup> [https://www.uni-muenchen.de/forschung/service/drittmittelverwaltung/downloads\\_dritt/personaldurchschnittskosten.pdf](https://www.uni-muenchen.de/forschung/service/drittmittelverwaltung/downloads_dritt/personaldurchschnittskosten.pdf)

retrieved on 06 April 2016. Since according to the 2013 quality report (Annex 52) ACQUIN has only recorded on average 2 sick days, for example 215 work days would be the result for 2014. Strictly speaking ACQUIN would only have to schedule 213 work days, as the agency itself defines the aim of at least two days of participation in the conference per year for each consultant in the QM manual (Annex 4).

## Evaluation of the ESG

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the accreditation commission and a total of 18 meetings of technical committees<sup>12</sup>. The human resources planning has to cope with several unknown factors and is also based on an overly high assumption of the annual working time.

- 5 As the agency does not maintain any time logging system, no information on possible over-time at the head office could be given. This contradicts § 16 para. 2 of the German Working Hours Act<sup>13</sup>, according to which the employer must record the time spent beyond regular working hours. Whether filling the positions on 1 April 2016 as solicited sustainably alleviates the overload situation could not be ascertained at the time of the panel's site visit and has to be kept in view.
- 10 In light of this load, the proper functioning of the agency must be attributed to the motivated and committed employees in the head office. In this context the panel welcomes the fact that as the first accreditation agency ACQUIN has set up a works council.

### Recommendations

- 15 16. ACQUIN should submit a compilation of the amount of work for the activities related to and across procedures in the head office, comprehensively and sustainably adapt the strategic human resources planning to the actual capacities and demonstrate in the medium term that the subsequent filling of positions at the beginning of 2016 makes the human resources sufficient (cf. Condition 1, criterion 2.3.2 and condition 2, criterion 2.4 GAC).

### 20 Result:

**Standard 3.5 is partially fulfilled.**

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

##### **STANDARD:**

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

##### **GUIDELINES:**

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<sup>12</sup> See annual report 2014, annex 49. The servicing of bodies may be included in the 10 work days estimated for national programme accreditation. However this does not follow from the submitted procedure calculation.

<sup>13</sup> German Working Hours Act dated 6 June 1994 (BGBl. I p. 1170, 1171), which was last amended with Article 3 Section 6 of the act dated 20 April 2013 (BGBl. I p. 868), retrieved at: <http://www.gesetze-im-internet.de/arbzbz/BJNR117100994.html> on 6 April 2016.

## Evaluation of the ESG

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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**

Among others, the following condition was attached to the reaccreditation in 2011:

5 *“ACQUIN shall demonstrate by 7 December 2011 in a suitable manner that the agency's quality management system includes systematic procedure steps and measures for all the core processes described by the agency (criterion 2.5).”* (Condition 3) The evidence was provided on time.

Additionally, the experts issued the following recommendation: *“The quality management system to be implemented by ACQUIN should include systematic feedback of the experts in accreditation procedures.*

10 *In addition the expert group suggests that the agency's internal internet portal (Moodle) should also be used for a statistical analysis of the data on the deployment of the experts. (Recommendation 5).”*

15 Internal quality assurance was also the subject of a “flag issue” in the last entry in EQAR: *„It should receive attention whether systematic internal quality assurance processes have been put in place by ACQUIN.”*

### **Documentation**

ACQUIN submits a comprehensive QM manual in annex 4. It defines the core processes (programme accreditation, system accreditation, certification, programme accreditation/evaluation and institutional accreditation), support processes and processes for measuring, analysis and improvement. The support processes also include how the agency deals  
20 with the deficiencies noticed by GAC's monitoring procedures.

## Evaluation of the ESG

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The variables for process-objectives, typical ideal schedules and process measurements are defined as quantitative key figures for the individual processes. All procedures in the different fields of activities are evaluated after completion, at which point both the experts and the higher education institutions submit an anonymous evaluation online. The questionnaires are standardised and contain free text comments (Annex 62). The members of the committees are also regularly surveyed (Annex 63). The surveys are centrally analysed in the head office.

The implementation of intended goals is analysed, including those regarding the quantitative key figures, the results of the surveys are evaluated and measures that were taken as results of the internal quality management are documented in annual quality reports. The quality reports also discuss the results of programme and system accreditation assessment procedures implemented by the German Accreditation Council (Annex 52). During the site visit, the managing director explained that the quality reports are made available to the board. He added that the idea of a publication was ultimately abandoned, so that other agencies cannot use the information in competition against ACQUIN.

The QM team is responsible for internal quality assurance. The main task of the team is to continuously develop the quality management system of ACQUIN. Furthermore, it deals with conceptual deliberations regarding the quality aims and the type of data collection (p. 93, Annex 4).

In the self-evaluation report ACQUIN ensures that the employees give feedback on the procedures carried out and possible measures for improvement in regular team meetings. These meetings, together with the survey data and the assessments of the procedures, form the basis for the further development of the business processes and of the internal quality assurance by the QM team. Problems that occur are directly communicated within the agency and employees work together to find possible solutions. Oversight of the processes falls under the responsibility of the management.

ACQUIN submits a document with sample wordings for recurring conditions and recommendations (Annex 51), a concept for incorporating new consultants (Annex 61) and a check list for reports in programme accreditation (Annex 68).

### 30 **Assessment**

## Evaluation of the ESG

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In the previous two reaccreditations of ACQUIN (2006 and 2011) the subject of internal quality assurance played a large role and was attached to conditions in both cases. Deficiencies in the internal quality management during the previous reaccreditation procedure also led to a short-term suspension and were discussed by the renewal of the agency's  
5 entry in the European register. The submitted QM manual and the quality reports from 2012, 2013 and 2014 can now be seen in an even more positive light. They are significant for further development, however, there remains a potential for improvement in the implementation of the quality management.

The QM manual is accessible to the public and quite comprehensively defines steps, requirements, instruments and control loops for reviewing the quality achieved. However, the  
10 compilation of the core processes should still be completed. For example, the steps for fulfilling conditions are included in the text but not in the outline scheme. The institutional audit and the complaints procedure were not taken into account and would still have to be incorporated. How the agency reaches its key figures (Annex 4, p. 94) could not be ascer-  
15 tained by the panel. There are no justifications available for individual stipulations such as the number of sick days or the length of stay of the permanently employed consultants. The control function of the key figures could not be shown in any examples to the panel during the site visit.

Although the QM manual still gives the impression of fixed areas to which the employees  
20 are assigned, in practice ACQUIN actually works more freely. There are only responsible people for certain procedure formats such as programme and system accreditation, the remaining consultants can be categorised according to order situation. In this respect the illustration in the QM manual should be updated. Otherwise, this example also indicates that the structures and allocations stipulated in the QM manual form a guideline for practice  
25 only partly. Implementation and observance should be more binding.

The annual quality reports give clear information on observations, connected with the quality key figures and document measures that improve quality, for example those that ACQUIN has taken as a result of assessment procedures by the German Accreditation Council. The introduction of a check list for reports in programme accreditation in 2013 is stated as an  
30 example of this (Annex 68). The panel understands the agency's concerns regarding the publication of the quality reports, but they should at least be made available to all the agency's internal committees. The fact that the quality reports are not available for the accreditation commissions, was especially incomprehensible for the panel.

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5 The establishment of a three-person QM team that works on a case-by-case basis and consults other employees when needed is judged by the panel to be appropriate and a clever solution concerning the size of the agency. Although a control function is not structurally implemented by the QM team, its work has a recognisably positive effect on internal quality management and the agency's internal processes. The panel gained a positive impression from the current QM team. The persons appeared to be very engaged in the meeting and were able to name a few examples of measures for improving quality being implemented.

### Recommendations

10 17. ACQUIN should complete and constantly update the description of core processes in the QM manual.

### Result

**Standard 3.6 is substantially fulfilled.**

15

### 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

20 The previous evaluation of ACQUIN during a procedure of reaccreditation by the German Accreditation Council took place in 2011. ACQUIN applied for renewal of accreditation on 15 September 2015.

(For information on the chronological sequence of the initial accreditation and reaccreditations of ACQUIN, see ESG standard 3.2)

25 **Assessment**

## Evaluation of the ESG

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With the current procedure of reaccreditation, ACQUIN fulfils the requirement for a regular evaluation contained in standard 3.7. The extension of the previous period of accreditation is justified in the adoption of the new ESG in May 2015.

### Recommendations

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### Result

**Standard 3.7 is fulfilled.**

## 10 V. Evaluation concerning the criteria from the German Accreditation Council

Explanation of numbering: Earlier in this report, in chapter IV, the standards 2.1 to 3.7 of the European Standards and Guidelines (ESG) were assessed. Here in chapter V now follows the evaluation of the criteria 2.1 to 2.7 of the German Accreditation Council for accrediting agencies.

15

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

**2.1.1 The agency has an openly documented understanding of quality, from which it derives the basis of its accreditation activities. It focusses its activities on the objective of enhancing quality and takes the higher education institutions' primary responsibility as its basis for the profile and quality of teaching and learning.**

### Recommendation/conditions from the previous accreditation

-None-

## 20 Documentation

Criterion 2.1.1 concerns the agency's mission statement, without using this term. For information on the mission statement see ESG standard 3.1.

### Assessment

The mission statement is assessed in ESG standard 3.1.

## 25 Recommendations

For information on the recommendations see standard 3.1.

## Evaluation of the criteria from the German Accreditation Council

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### Result

**Criterion 2.1.1 is substantially fulfilled.**

**2.1.2 The agency's accreditation activities span different types of higher education institutions and, in certification for programme accreditation, also cover different disciplines.**

### Recommendation/conditions from the previous accreditation

5 -None-

### Documentation

Pursuant to p. 3 of the self-evaluation report, ACQUIN performs accreditation across the entire range of academic subjects and at all types of higher education institutions.

### Assessment

10 The schedules of procedures in the activity reports from 2012-2014 (Annex 52) show the agency's work across types of higher education institutions and across subjects – both in Germany and internationally – in the previous period of accreditation.

### Recommendations

-

15 **Result**

**Criterion 2.1.2 is fulfilled.**

### **Criterion 2.2: Structures and procedures**

**2.2.1 For certification for programme accreditation and/or system accreditation, the agency demonstrates binding internal structures and procedures, which guarantee the correct and consistent application of the "Rules of the German Accreditation Council for the Accreditation of Study Programmes and for System Accreditation" in its current version. The competences and responsibilities of the institutions, as well as their staffing, are governed appropriately and by law.**

### Recommendation/conditions from the previous accreditation

20 See ESG standard 2.2.

### Documentation

## Evaluation of the criteria from the German Accreditation Council

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For information on the guidelines in programme and system accreditation and the implementation of the guidelines of the German Accreditation Council see ESG standard 2.2.

For information on the responsibilities of the bodies see ESG standard 2.4 and 3.3.

5 In annex 21 ACQUIN submits a model contract for the system accreditation procedures, the counterpart for programme accreditation is submitted in the subsequently filed documents.

### Assessment

The guidelines for programme and system accreditation and their implementation of the guidelines of the German Accreditation Council are evaluated in ESG standard 2.2.

10 The structure and tasks of the bodies are specified with binding force in the statute and are comprehensibly described. The tasks are recorded in full, clearly defined and appropriately assigned to the corresponding committees of the agency based on the processes in programme and system accreditation. Likewise the model contracts for programme and system accreditation implement GAC's requirements.

15 When summarising study programmes as part of a joint accreditation (cluster accreditation), the agency takes the German Accreditation Council's criteria for affinity as a basis. This became clear during the site visit. The collaboration of the head office and the responsible member of the respective procedure from the committee has been maintained. In broader clusters, the participation of several committees was established. This practice complies with the German Accreditation Council's requirements.

20 For information on the separation of consultation and accreditation see ESG standard 3.3.

### Recommendations

-None-

### Result

**Criterion 2.2.1 is fulfilled.**

25

**2.2.2 The agency involves the interest groups that are relevant with regard to the fulfilment of conditions (academics, students and professional practice).**

**Recommendation/conditions from the previous accreditation**

## Evaluation of the criteria from the German Accreditation Council

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-None-

### Documentation

For information on involving the interested parties in the adoption and further development of the documents of the accreditation procedure see ESG standard 2.2.

- 5 For information on involving the interested parties in the assessments and/or appointing experts see ESG standard 2.4.

### Assessment

The involvement of the interested parties in the adoption and further development of the documents of the accreditation procedure is evaluated in ESG standard 2.2.

- 10 The involvement of the interested parties in the assessments and/or appointing experts is evaluated in ESG standard 2.4.

### Recommendations

-

### Result

- 15 **Criterion 2.2.2 is fulfilled.**

**2.2.3 The competence of those involved in the procedures with regard to all of the areas relevant to programme accreditation or system accreditation testing procedures is guaranteed by a suitable selection procedure and preparation.**

### Recommendation/conditions from the previous accreditation

-None-

### Documentation

- 20 For information on the procedures of selecting, appointing and preparing experts see ESG standard 2.4.

On p. 25 of the self-evaluation report, ACQUIN describes the procedure for selecting the members of the accreditation commission. They are selected by the ACQUIN general assembly (Annex 64). The members are requested in advance to suggest appropriate academic representatives of students as candidates for election. The student accreditation pool

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## Evaluation of the criteria from the German Accreditation Council

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is also asked for nominations for student members. The board takes the submitted suggestions and draws up a list of candidates, which incorporates the members' suggestions and only removes duplicate nominations from one higher education institution if necessary. The skill profiles and personal statements of the candidates are made available to the member  
5 institutions for the election of the members of the accreditation commission.

According to the self-evaluation report, new members of the accreditation commission receive a comprehensive information package to prepare for the new task (Annex 65). Before the first accreditation commission meeting a preparatory meeting of the new members of the accreditation is held by the head office. The chair of the board of ACQUIN, the managing  
10 director and an experienced member of the accreditation commission are also available for questions from the new members.

The members of the ACQUIN standing expert committees are appointed by the accreditation commission; along with corresponding professional expertise, experience in quality assurance and developing study programmes and/or in executive positions is also taken into  
15 account for the appointments. Suggestions for new members may be given to the accreditation commission by the committees. Comprehensive informational material is also made available to new committee members (self-evaluation report, p. 26). In annex 48 ACQUIN submits a manual for new members of standing expert committees.

For information on appointing the members of the complaints commission see ESG standard  
20 2.7.

### **Assessment**

The selection, appointment and preparation of experts is evaluated in ESG standard 2.4.

The procedure for selecting and appointing the members of the committees is appropriate.

25 The information packages documented in the annexes for new members of the accreditation commission and technical committees are also a positive element.

The submitted biographical information of the members of committees and head office show a wide range of competences from academia, professional practice and quality assurance in higher education institutions.

### **Recommendations**

30 -None-

## Evaluation of the criteria from the German Accreditation Council

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### Result

**Criterion 2.2.3 is fulfilled.**

**2.2.4 If the agency commissions other organisations to implement parts of the procedures, it guarantees that these parts are implemented correctly using reliable rules and procedures.**

### 5 Recommendation/conditions from the previous accreditation

-None-

### Documentation

ACQUIN cooperates with AKAST in the accreditation of full-theology study programmes (see annex 67).

### 10 Assessment

According to the cooperation agreement with AKAST, ACQUIN plays the role here of the contractor.

### Recommendations

-None-

### 15 Result

**The criterion is not relevant.**

## Criterion 2.3: Independence

**2.3.1 The agency has its own legal entity.**

### Recommendation/conditions from the previous accreditation

20 -None-

### Documentation

ACQUIN has been listed as association no. 1323 in the Bayreuth magistrate's court's register of associations (Annex 42) since 5 March 2001.

### Assessment

## Evaluation of the criteria from the German Accreditation Council

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As a registered association, ACQUIN is its own legal entity.

### Recommendations

-

### Result

5 **Criterion 2.3.1 is fulfilled.**

**2.3.2 It is a non-profit organisation and carries out the accreditation procedures on a full-costs basis.**

### Recommendation/conditions from the previous accreditation

-None-

### 10 **Documentation**

ACQUIN submits an up-to-date notification for the Bayreuth Tax Collector's Office, as the responsible body, establishing charitable status (Annex 43).

ACQUIN submits a cost calculation for the programme and system accreditation procedures (Annex 59), according to which a standard procedure of programme accreditation costs  
15 12,000 euros and a system accreditation procedure costs 42,000 euros plus VAT. The costs are composed of a basic flat rate and a flat rate for the travel and accommodation costs incurred during the procedure. The head office's work days or expenditures for experts, committees and material costs are not broken down separately in this.

In programme accreditation the basic flat rate is 6,000 euros, while higher education insti-  
20 tutions that are not members of the association are charged with additional 1,000 euros. The basic flat rate includes the time spent by the head office, which is placed at 10 work days.<sup>14</sup> The procedure flat rate is also calculated at 6,000 euros. Value added tax of currently 7 per cent is added to the fees (Annex 59).

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<sup>14</sup> ACQUIN applies the wage agreement for the German states' civil service (TV-L) in its current version.

## Evaluation of the criteria from the German Accreditation Council

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In system accreditations the basic flat rate is 21,000 euros plus 1,000 euros for non-members. The procedure flat rate is estimated to be 21,000 euros, VAT of currently 7 per cent is also added. For programme and system accreditation ACQUIN submits some financial statements as examples (see subsequently filed documents).

- 5 Along with their own financial reports (see ESG standard 3.5) ACQUIN also submits the financial report of ACQUINUS from 2015 and the financial statement of the costs incurred by ACQUIN for the work of ACQUINUS (see subsequently filed documents).

### Assessment

- 10 Charitable status is demonstrated by the notification of the Bayreuth Tax Collector's Office (Annex 43).

The panel establishes that action must be taken regarding the procedure calculations for programme and system accreditation. This is because there is a statement on the expenditure on staff for programme accreditation with 10 work days. However this was raised in preparation for the previous reaccreditation in a separate project with an external consultation in 2009 and has not been validated since. Furthermore, the portion of the basic flat rate for personnel costs is calculated based on an unrealistic assumption of annual working days (230 instead of 207-215) (see ESG standard 3.5).

20 There has not yet been any compilation or validation of the amount of work needed for system accreditation procedures. The agency's statement that this has not taken place yet due to the changes in the rules of the German Accreditation Council is not considered satisfactory by the panel.

25 The overheads (such as material setup or servicing bodies) are not declared separately in either procedure calculation. In this respect it cannot be ascertained whether the assumptions on which the basic flat rate is based are realistic. The multi-level committee structure in ACQUIN may result in high costs for example for travel and catering for – according to its own figures – approx. 100 people working on a voluntary basis.

30 A comprehensible calculation basis is essential for assessing the competitive situation. According to the opinion of the panel, GAC should insist on a comprehensible calculation for setting prices, validating the assumptions regarding the amount of work needed and overheads. The panel also thinks that this could positively effect the overall fulfilment of ESG standard 3.5 and criterion 2.4.

## Evaluation of the criteria from the German Accreditation Council

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### Recommendations

The panel suggests the following condition:

- 5 1. ACQUIN submits an empirical validation of the calculation of the procedure formats for programme and system accreditation with a breakdown of the amount of work needed and the proportion of overheads.

### Result

**The criterion 2.3.2 is partially fulfilled.**

10

**2.3.3 The agency guarantees the freedom from instruction of the organs based on the individual cases and the independence and impartiality of the people acting on behalf of them.**

### Recommendation/conditions from the previous accreditation

-None-

### Documentation

15 For information on independence see ESG standard 3.3.

For information on ensuring impartiality see ESG standard 2.4.

### Assessment

The independence of the agency is assessed in ESG standard 3.3. Impartiality is ensured in ESG standard 2.4.

20 **Recommendations**

The panel issues the following recommendation:

See ESG 2.4.

### Result

**The criterion 2.3.3 is fulfilled.**

25

### Criterion 2.4: Equipment

The agency is sufficiently equipped with staff and resources to sustainably carry out its function in all the required areas.

#### Recommendation/conditions from the previous accreditation

-None-

#### 5 Documentation

For information on the equipment see ESG standard 3.5.

#### Assessment

The equipment is evaluated in ESG standard 3.5.

#### Recommendations

10 The panel suggests the following condition:

Condition 2: ACQUIN submits a compilation of the amount of work for the activities related to and across procedures in the head office, adapts the strategic human resources planning to the actual capacities and demonstrates that, through the subsequent filling of positions at the beginning of 2016, human resources remain sufficient.

#### 15 Result

**Criterion 2.4 is partially fulfilled.**

### Criterion 2.5: Internal quality management

The agency continuously uses a formalised internal quality management system, which is suitable for judging the effectiveness of the internal controlling processes and which guarantees the assurance and continuous improvement of the quality of the activity. It is publicly accessible and includes systematic internal and external feedback processes.

#### Recommendation/conditions from the previous accreditation

20 See ESG standard 3.6.

#### Documentation

For information on the internal quality management see ESG standard 3.6.

#### Assessment

## Evaluation of the criteria from the German Accreditation Council

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The internal quality management is evaluated in ESG standard 3.6.

### **Recommendations**

See ESG standard 3.6.

## 5 **Result**

**Criterion 2.5 is substantially fulfilled.**

### **Criterion 2.6: Internal complaints procedure**

**The agency has a publicly accessible, formalised internal procedure for assessing accreditation decisions upon request from the higher education institution.**

## 10 **Recommendation/conditions from the previous accreditation**

-None-

### **Documentation**

For information on the internal complaints procedure see ESG standard 2.7.

### **Assessment**

15 The internal complaints procedure is evaluated in ESG standard 2.7.

### **Recommendations**

-None-

### **Result**

**Criterion 2.6 is fulfilled.**

20

### **Criterion 2.7: Reporting**

**The agency describes its procedures and assessment criteria in sufficient detail and publishes them. It publishes the names of the experts, the reports and the decisions of the accreditation procedures which it has carried out.**

## **Recommendation/conditions from the previous accreditation**

## Evaluation of the criteria from the German Accreditation Council

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-None-

### **Documentation**

For information on the documents of the accreditation procedure in programme and system accreditation see ESG standard 2.2 and 2.3.

- 5 For information on publishing the accreditation decisions see ESG standard 2.6.

### **Assessment**

The documents of the accreditation procedure are evaluated in ESG standard 2.2 and 2.3.

The publication of the accreditation decisions is evaluated in ESG standard 2.6.

### **Recommendations**

- 10 The panel suggests the following condition:
3. ACQUIN submits a process with responsibilities and representation regulations for the prompt provision of the reports in the database of accredited study programmes.

### **Result**

- 15 **Criterion 2.7 is substantially fulfilled.**

## **VI. Recommendations from the panel**

### **VI.1 Regarding compliance with the ESG**

- 20 The panel recommends that the German Accreditation Council finds ACQUIN to have substantially fulfilled the “Standards and Guidelines for Quality Assurance in the European Higher Education Area” (ESG).

According to the evaluation by the panel, the ESG where full compliance has been achieved are: 2.1, 2.2, 2.7, 3.2, 3.3, 3.7

- 25 According to the evaluation by the panel, the ESG where substantive compliance has been achieved are: 2.3, 2.4, 2.5, 2.6, 3.1, 3.6

## Evaluation of the criteria from the German Accreditation Council

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According to the evaluation by the panel, the ESG where partial compliance has been achieved are: 3.4, 3.5

The panel issues following recommendations:

5

**Recommendation 1:** A schedule should be published analogous to the equivalence table of the German Accreditation Council for implementing the ESG Part 1 in the procedures outside of their fields of business (ESG standard 2.1).

10 **Recommendation 2:** ACQUIN should ensure that the matter of potential inconsistencies between national guidelines and the ESG are raised in the reports (ESG standard 2.2).

**Recommendation 3:** ACQUIN should transparently lay out procedural steps and responsibilities for the audits in Austria for the public (ESG standard 2.3).

15 **Recommendation 4:** ACQUIN should increase the proportions of international experts in programme accreditation procedures, in particular if smaller subject communities are affected (ESG standard 2.4).

**Recommendation 5:** ACQUIN should comprehensibly document for the public how the impartiality of experts and members of the committees is ensured (ESG standard 2.4).

20 **Recommendation 6:** ACQUIN should regularly offer events that prepare and/or further qualify experts for the procedures on a voluntary basis and make it possible to exchange experience (ESG standard 2.4).

**Recommendation 7:** ACQUIN should also set out and publish criteria and responsibilities for selecting experts for the procedures of the audits in Austria, despite of the low demand in this field of activity (ESG standard 2.4).

25 **Recommendation 8:** In the criteria for the impartiality of experts ACQUIN should clarify that a prior consultation of the higher education institution is excluded (ESG standard 2.4).

**Recommendation 9:** In order to ensure consistency between the committees, there should be institutionalised communication in fixed formats, such as meetings across disciplines or the chairs regularly participating in the accreditation commission's meetings. Measures and communication loops should be laid out in internal quality management (ESG standard 2.5).

## Evaluation of the criteria from the German Accreditation Council

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**Recommendation 10:** The guidelines for the Austrian audits should be published on the agency's homepage (ESG standard 2.5).

5 **Recommendation 11:** ACQUIN should ensure that the reports of the various procedure formats are easy to find on the homepage, for example through separate areas (ESG standard 2.6).

**Recommendation 12:** ACQUIN should define a process with responsibilities and representation regulations for prompt publication of the reports (on the homepage and/or in the database of accredited study programmes) for each procedure format (for GAC criterion 2.7 also as a condition) (ESG standard 2.6).

10 **Recommendation 13:** In order to improve transparency, the complaints/appeals procedure should be incorporated into the procedure representations in the QM manual (ESG standard 2.7).

**Recommendation 14:** The mission statement should be consistently taken into account in all of the agency's publications and should be published on the website (ESG standard 3.1).

15 **Recommendation 15:** ACQUIN's activities regarding qualitative analysis of the results of its own work should be intensified and lead to publication (ESG standard 3.4).

**Recommendation 16:** ACQUIN should submit a compilation of the amount of work for the activities related to and across procedures in the head office and demonstrate that the subsequent filling of positions at the beginning of 2016 makes the human resources sufficient  
20 (ESG standard 3.5 and condition 2, criterion 2.4 GAC).

**Recommendation 17:** ACQUIN should complete the description of core processes in the QM manual (ESG standard 3.6).

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

25 The panel recommends that the German Accreditation Council should accredit ACQUIN for both programme accreditations and system accreditations and in doing so issue the following conditions and recommendations:

**Condition 1:** ACQUIN submits an empirical validation of the calculation of the procedure formats for programme and system accreditation with a breakdown of the amount of work  
30 needed and the proportion of overheads (Criterion 2.3.2)

## Evaluation of the criteria from the German Accreditation Council

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**Condition 2:** ACQUIN submits a compilation of the amount of work for the activities related to and across procedures in the head office, adapts the strategic human resources planning to the actual capacities and demonstrates that through the subsequent filling of positions at the beginning of 2016 human resources remain sufficient. (Criterion 2.4)

- 5 **Condition 3:** ACQUIN submits a process with responsibilities and representation regulations for the prompt provision of the reports in the database of accredited study programmes (Criterion 2.7)

The recommendations are listed in the previous section of the ESG and apply to the programme and system accreditation procedure formats, including in the area of the German

- 10 Accreditation Council's criteria.

Annexes

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**Annex 1: Schedule for the site visit**

**Meeting venue:**

30 March: ACQUIN e.V., Brandenburger Str. 2, 95448 Bayreuth <http://www.acquin.org/>

31 March: Hotel Rheingold, Austraße 2, 95445 Bayreuth <http://www.hotel-rheingold-bay-reuth.de/>

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**Accommodation:**

Hotel Bayerischer Hof, Bahnhofstraße 14, 95444 Bayreuth <http://www.bayerischer-hof.de/>

<b>29 March 2016</b>		
6:00 p.m.	Internal preparatory meeting in the hotel	Hotel Bayerischer Hof
8:00 p.m.	Internal dinner discussion at the hotel	Hotel Bayerischer Hof

<b>30 March 2016</b>		
09:00 – 10:30 a.m.	Meeting with the management of the agency	Prof. Dr.-Ing. Gerd Zimmermann (Chair of the board) Thomas Reil (Managing director)
10:30 – 10:45 a.m.	Break	
10:45 – 11:45 a.m.	Meeting with representatives of individual standing expert committees in programme accreditation	Dr. Christoph Anz (Economics, law and social sciences TC) Prof. Dipl.-Ing. Peter Berten (Architecture and planning TC) Prof. Dr. Franz Bosbach (Humanities, languages and cultural studies TC) Prof. Dr. Rolf Bühner (Economics, law and social sciences TC) Walter Leonhardt (Information science TC) Prof. Dr.-Ing. Andrea Kobylka (Engineering TC) Prof. Dr. Wolfgang Dinglinger (Art, music and design TC) Prof. Dr. Karl Heinz Hoffmann (Mathematics and natural sciences TC) Tina Agsten (Engineering TC)
11:45 a.m. – 12:45 p.m.	Midday snack and opportunity for a tour of the facilities	

Annexes

12:45 – 1:45 p.m.	Meeting with representatives of the system accreditation technical committee	Alexander Buchheister (Studies in Economic geography at the RWTH Aachen University) Prof. Dr. Helmut Konrad (Former rector of the University of Graz) Prof. Dr. Beate Finis Siegler (former Vice President of the Frankfurt University of Applied Sciences)
1:45 – 2:00 p.m.	Break	
2:00 – 3:00 p.m.	Group meeting with experts of the agency	Prof. Dr. Christiana Nicolai (Professor for human resources management and organisation, Frankfurt University of Applied Sciences) Alois Geiwitsch (Consultant and coach for error culture, customer orientation and quality management) Philipp Schulz (Studies in Industrial engineering at RWTH Aachen University)
3:00 – 3:30 p.m.	Break	
3:30 – 4:30 p.m.	Meeting with representatives of higher education institutions accredited and/or if applicable consulted by ACQUIN	Prof. Dr. Wilfried Diwischek (President of Hochschule Aschaffenburg) Prof. Dr.-Ing. Joachim Litz (Vice President of Fachhochschule Lübeck) Prof. Dr. Ulrike Tippe (Vice President of TH Wildau) Prof. Dr. Tobias Engelsleben (Vice President of Hochschule Fresenius)
4:30 – 4:45 p.m.	Break	
4:45 – 5:45 p.m.	Meeting about international activities if necessary with international representatives of higher education institutions or ministries (via Skype if needed)	Prof. Dr. Johann W. Gerlach (Former rector of the German-Kazakh University (DKU), Almaty, Kazakhstan) Irina Orynassarova (online) (Quality management at DKU) Maria Efimova (Former coordinator for accreditation, Southern Federal University in Rostov-on-Don, RU) Prof. Dr. Yanka Totseva (Coordinator for accreditation, European Polytechnical University (EPU), Pernik, Bulgaria)
5:45 – 7:00 p.m.	Internal concluding meeting for the first day	Hotel Bayerischer Hof
approx. 7:30 p.m.	Internal dinner discussion of German Accreditation Council panel	Restaurant Weihenstephan, Bahnhofstr. 5, 95444 Bayreuth <a href="http://www.restaurant-weihenstephan.de/">http://www.restaurant-weihenstephan.de/</a>

Annexes

from 7:00 p.m.	Dinner for ACQUIN accreditation commission and the participants in the meeting who were invited by ACQUIN for reaccreditation	Restaurant Plaka, Sophienstraße 18, 95444 Bayreuth <a href="http://www.plaka-bayreuth.de/">http://www.plaka-bayreuth.de/</a>
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<b>31 March 2016</b>		
09:00 – 10:00 a.m.	Group meeting with employees of the head office from all areas of work	Tobias Auberger Stephanie Bernhardt Helke Biehl Clemens Bockmann Dorit Gerkens Ursula Hammon Dr. Stefan Handke Katja Kryvko Bettina Kutzer Valérie Morelle Marion Moser Holger Reimann Dr. Alexander Rudolph Nina Soroka Hilde Volkmann
10:00 – 10:15 a.m.	Break	
10:15 a.m. – 12:00 p.m.	Participation in the meeting of the accreditation commission and meeting with the members	Members of the accreditation commission
12:00 – 12:30 p.m.	If applicable opportunity for queries to the management of the agency	Prof. Dr.-Ing. Gerd Zimmermann (Chair of the board) Thomas Reil (Managing director)
12:30 – 1:00 p.m.	Lunchtime snack	
1:00 – 3:45 p.m.	Internal concluding meeting of the panel with preparation of the report	
4:00 p.m.	Short concluding meeting with management of the agency and departure	Prof. Dr.-Ing. Gerd Zimmermann (Chair of the board) Thomas Reil (Managing director)

## Annex 2: Abbreviations

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
HS-QSG	Federal Act on the External Quality Assurance in Higher Education and the Agency for Quality Assurance and Accreditation Austria ( <i>Hochschul-Qualitätssicherungsgesetz – HS-QSG</i> ) in Austria
KMK	Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany [ <i>Ständige Konferenz der Kultusminister der Länder in der Bundesrepublik Deutschland</i> ]
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 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 [ <i>Regeln für die Akkreditierung von Studiengängen und für die Systemakkreditierung</i> ]

**Annex 3: Equivalence between Part 1 of the ESG 2015 and the criteria for programme and system accreditation**

As of September 2015

<b>ESG 2015</b>	<b>Programme accreditation</b>	<b>System accreditation</b>
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 Setup	Teaching staff: 6.2
1.6 Learning resources and student support	2.7 Setup	Setup: 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

## Annexes

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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