ENQA AGENCY REVIEW

ACCREDITATION, CERTIFICATION AND QUALITY ASSURANCE INSTITUTE (ACQUIN)

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EXECUTIVE SUMMARY

This report provides an account on how the Accreditation, Certification and Quality Assurance Institute (ACQUIN e.V.) meets expectations of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG-2015). In addition to the agency itself and its stakeholders within Germany, the report intends to serve two purposes: provide a basis for the European Association for Quality Assurance (ENQA) Board's decision on continuous membership of ACQUIN in the association and for the European Quality Assurance Register for Higher Education (EQAR) Register's Committee decision to support ACQUIN's re-application to the register. This is the fifth external review of the agency, and the first ENQA-coordinated review of ACQUIN; the previous ones were coordinated by GAC (the German Accreditation Council). ACQUIN has been a member of ENQA since 2003 and has been listed in EQAR since 2008.

ACQUIN is a Bayreuth-based agency, conducting activities across Germany, also within the European Higher Education Area (EHEA) and beyond. The agency implemented six procedures that fall under the scope of the current review. ACQUIN aims to contribute to the shaping of the EHEA, to ensure the comparability of the quality of higher education degrees, to promote the quality of higher education programmes and to support the establishment of a culture of quality at higher education institutions.

The external review process followed the tripartite terms of reference, drawn between ACQUIN, ENQA and EQAR, the Guidelines for ENQA agency reviews, and the EQAR Procedures for Applications. Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies (version 3 of 04/09/2020) by EQAR Register Committee were taken into consideration.

The panel was appointed by ENQA Board and included the following members:

- Dr. Oliver Vettori, Dean of Accreditation and Quality Management at Vienna University of Business and Economics [Austria], academic (EUA nominee), Chair;
- Ms. Aurelija Valeikienė, Deputy Director of the Centre for Quality Assessment in Higher Education (SKVC) [Lithuania], quality assurance expert (ENQA nominee), Secretary;
- Dr. Esther Huertas, Head of QA department at the Catalan University Quality Assurance Agency (AQU Catalunya) [Spain], quality assurance expert (ENQA nominee), Panel member;
- Mr. Damian Michalik, PhD candidate in physics at the University of Warsaw [Poland], student (ESU nominee), Panel member.

The panel considered information supplied in the self-assessment report (SAR), a video tour of the office premises, additional evidence requested by the panel and provided by the agency, and evidence obtained during an online visit, when meetings with a wide range of audiences were held. Progress from the last external review was considered as well. The panel thoroughly analysed all the evidence and discussed it at length. It concluded that ACQUIN standing against ESGs is as follows:

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Fully compliant with the following seven ESGs - 3.2, 3.3, 3.6, 3.7, 2.1, 2.2, 2.7; Substantially compliant with the following four ESGs - 3.5, 2.3, 2.4, 2.5; Partially compliant with three ESGs - 3.1, 3.4, 2.6.
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Overall, 13 examples of good practices were found at ACQUIN; 15 recommendations given to the agency, and 21 suggestion for improvement are made.

In light of the documentary and oral evidence considered by it, the ENQA review panel thinks that in the performance of its functions ACQUIN is in compliance with the ESG.

INTRODUCTION

This report analyses the compliance of ACQUIN – Accreditation, Certification and Quality Assurance Institute (Akkreditierungs-, Certifizierungs- und Qualitätssicherungsinstitut e.V.) with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), in particular part 2 and 3 of ESG. It is based on an external review conducted in 2020-2021 in the period of 16 months, the main milestones being agreeing on Terms of Reference in March 2020, submission of the SAR by ACQUIN in November 2020, online visit to the agency in February 2021, and the finalisation of the report to ENQA in May 2021. Subsequently, decision-making by ENQA Board is scheduled for June 2021 and EQAR's Register Committee consideration of ACQUIN's application is planned in October/November 2021.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

As this is ACQUIN's fifth review, the panel was expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review, and pay particular attention to areas flagged by EQAR's Register Committee (RC). At the same time, this is the first ACQUIN's review following the revised ENQA methodology for agency reviews. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement. This review and the findings of the panel are used also towards ACQUIN's application to extend its listing in the EQAR, on which the agency has been registered since 2008. For the complete terms of reference (ToR), please see Annex 2.

For the glossary of terms used, please see Annex 3.

MAIN FINDINGS OF THE 2016 REVIEW

In 2015-2016, a review procedure coordinated by the GAC for the external evaluation of ACQUIN was organized. As a result of it, the resolution by the GAC was made that ACQUIN substantially fulfilled the criteria pursuant to Chapter 2 of the resolution "Rules for the Accreditation of Agencies". The GAC issued a decision (dated 22 June 2016) containing that ACQUIN was granted the authority to accredit study programmes and the internal quality assurance systems of higher education institutions (HEIs) by awarding the seal of the GAC for the period of five years (expiring on 30 June 2021). Accreditation was granted under three conditions, to be fulfilled within the period of six months. Namely, ACQUIN was expected:

- to submit an empirical validation of the calculation of the procedure costs for programme and system accreditation with a breakdown of the workload needed and the proportion of overheads;
- 2. to set out how the agency continuously matches the order situation and its personnel resources;
- 3. to submit a process with responsibilities and representation regulations for the prompt provision of the reports in the database of accredited study programmes.

The above-mentioned conditions were fulfilled by ACQUIN satisfactorily.

As to compliance with the ESG and with the membership criteria of ENQA, in 2016 the GAC panel noted that ACQUIN substantially fulfilled the ESG and the membership criteria of ENQA. To be precise:

- The following six standards were fully fulfilled: 2.1, 2.2, 2.7, 3.2, 3.3, 3.7
- The following six standards were substantially fulfilled: 2.3, 2.4, 2.5, 2.6, 3.1, 3.6
- The following two standards were partially fulfilled: 3.4, 3.5

ENQA Board issued an initial decision communicated to ACQUIN on 3rd March 2017 underscoring a particular weakness in relation to meeting ESG 3.4, and that the overall level of compliance with the ESG was not sufficient to renew the agency's membership at that stage. Thus, a designation of ACQUIN as "Member under review" for a period of two years from the 14th February 2017 was offered. This meant the agency would need to undergo a new (partial) review process before the end of the two-year period. The agency did not agree with this and successfully appealed against the decision. Consequently, ENQA's Board reconfirmed ACQUIN's membership in ENQA for five years from the initial decision taken on 14th February 2017. A follow-up report was expected from the agency in two years from this date, i.e. by end of February 2019. ACQUIN submitted the report as required.

Based on the external review report by the GAC panel (of 2nd June 2016) and other documentation, in its decision on ACQUIN's renewal of inclusion on the EQAR (dated 3nd December 2016), the RC considered ACQUIN's compliance with the ESG. The RC concurred with the review panel's analysis and conclusions regarding the individual European Standards and Guidelines, except for four cases as below:

- ESG 2.3, 2.4, 2.5 the panel's conclusion was "substantially compliant", RC deemed ACQUIN only partially complied with the standard;
- ESG 3.5. the panel's conclusion was "partially compliant", the RC considered ACQUIN substantially complied with the standard.

While the RC considered that ACQUIN achieved only partial compliance with some standards, in its holistic judgement, nevertheless, concluded that these were specific and limited issues, and that ACQUIN continued to comply substantially with the ESG as a whole. As a result, the RC renewed ACQUIN's inclusion on the Register until 30th June 2021.

The EQAR's RC underlined several issues as follows:

- Regarding ESG 2.3 ACQUIN's international accreditation and evaluation activities should take place on a clearly defined and transparent basis, within and beyond the EHEA;
- Regarding ESG 2.4 activities for training and preparation of experts need to be strengthened;
- Regarding ESG 2.5 consistency of evaluations and decisions required enhancement.

Progress in these flagged areas are discussed in detail under the relevant standards below.

REVIEW PROCESS

The 2020-2021 external review of ACQUIN was conducted in line with the process described in the Guidelines for ENQA Agency Reviews and in accordance with the timeline set out in the tripartite Terms of Reference between the agency, ENQA and EQAR. The panel took note of the newest version of Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies, issued by the Register Committee [RC] (Ref. RC/12.1, Version 3.0, dated 04/09/2020), and paid particular attention to matters arising from communication between ACQUIN and EQAR that took place in between the 2016 and 2021 reviews.

The panel for the external review of ACQUIN was appointed by ENQA and composed of the following members:

- Dr. Oliver Vettori, Dean of Accreditation and Quality Management at Vienna University of Business and Economics [Austria], academic, Chair, EUA nominee;
- Ms. Aurelija Valeikienė, Deputy Director of the Centre for Quality Assessment in Higher Education (SKVC) [Lithuania], quality assurance expert, Secretary, ENQA nominee;
- Dr. Esther Huertas, Head of QA department at the Catalan University Quality Assurance Agency (AQU Catalunya) [Spain], quality assurance expert, Panel member, ENQA nominee;
- Mr. Damian Michalik, PhD candidate in physics at University of Warsaw [Poland], student, Panel member, Member of the European Students' Union Quality Assurance Student Experts Pool.

Following the ENQA methodology for agency reviews, the panel was supported by Ms. Anaïs Gourdin, ENQA Secretariat member, as coordinator of the review throughout the process from preparation to the site visit to production of the external review report, delivered for the ENQA Board's consideration. ENQA review coordinator's contribution was significant in assuring smoothness of the remote visit to the agency and overall quality of the review. ENQA created a designated place on a Google drive with folders containing all documents of the review

One of ACQUIN's Managing Directors – Ms. Marion Moser – acted as the agency resource person to support the organization of the review, and also participated in a very informative pre-visit meeting. In some sessions, interpretation was provided by Mrs. Anja Peschel and Mr. Anthony Glass as backup. Use of interpretation was very limited though, as generally participants spoke English well. The panel is thankful for input by all aforementioned individuals; their contribution was important and much appreciated.

The ENQA review coordinator organized an introductory and preparatory briefing on 4th January 2021 on Zoom platform, attended by all panel members. In addition, the panel held the second preparatory zoom meeting on 22nd January 2021 discussing panel's observations and questions for the virtual visit. Before it, the panel analysed the SAR with annexes and external references from the SAR, acquainted themselves with the ACQUIN's website and selected materials there, also checked some review reports uploaded onto the DEQAR¹. Following internal discussion among the panel, a number of requests for clarification and additional documentation were issued. The agency promptly responded to all of them, either before or during the site visit. For a list of all documentary evidence, supporting the review, please see Annex 4.

The entire panel went through all the materials and formed individual opinions on the work of ACQUIN that were subsequently thoroughly discussed. The panel used the ENQA mapping grid to record lines of enquiry as per each ESG, also each member proposed a draft list of questions per each meeting; these were later finalized by the Chair into inquiry lines per target group. After the site visit, the panel continued exchanges via email and held several video conference meetings on Zoom to discuss evidence at hand and conclusions to which it leads. All judgments were reached by consensus in the panel.

Self-assessment report

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ACQUIN produced a SAR, consisting of 14 parts (in total 69 pages), which followed the ENQA suggested template. The SAR was accompanied by seven annexes. The agency created a short, but

¹ Database of External Quality Assurance Results by EQAR https://www.eqar.eu/qa-results/search/by-institution/?query=&agency=5

very illustrative video, introducing its staff members, premises and material resources and made it available in advance of the remote visit.

ACQUIN's SAR was produced by a core group of four individuals. The Executive Board (Board), the AC and the staff of the Secretariat were consulted. Externals, such as members of the agency (HEIs and other stakeholders outside of the bodies of the agency) were not asked for input. The panel felt ACQUIN could have used this ENQA/EQAR review opportunity to gather insights and feedback from externals on this special occasion, which falls outside of the regular feedback gathering mechanisms, towards the agency's further strategic development. The panel met members from the SAR team and had an opportunity to discuss lessons learnt during the process. The SAR gave a succinct account on the complex system of the HE and QA in Germany and ACQUIN's processes.

As mentioned, to better understand the agency operations, the panel requested a number of documents which were supplied either as is (in German) or translated into English. All this evidence combined proved to be very useful to form a view on ACQUIN's work and the environment in which the agency operates.

Site visit

The site visit agenda was drafted in close collaboration between the agency represented by Ms. Marion Moser, CEO of ACQUIN and ENQA review panel, represented by the panel Secretary (also in consultation with other panel members). It followed the most recently developed ENQA template for reviews held online.

In observance of the current pandemic situation, caused by Covid-19, and international travel restrictions, the site visit took place remotely on I-4 February, 2021, by the means of Zoom video conferencing software, which was functioning smoothly. The panel had an opportunity to talk to all interviewees as foreseen in the visit schedule. The first day was devoted to Panel's preparation, a previsit meeting with one of CEOs, and also a conversation with the CEO of the GAC, which is responsible for final decisions based on ACQUIN's reports for procedures in Germany. During the next three days the Panel held 19 meetings, and altogether met 74 persons (several of whom more than once). The panel appreciates the contributions from all ACQUIN staff and members of advisory institutions to the review exercise, their dedication and professionalism were visible throughout the visit. The panel is also thankful to all the external participants contributing to the review with their input, as it was very important in building an informed and rounded view on the agency's work. For the detailed schedule of meetings, please see Annex I.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

Higher education tradition in Germany goes back to the XIVth century; currently it is a binary system. There are three main types of tertiary education institutions, including: universities (*Universitäten*,) and equivalent institutions of higher education (*Technische Hochschulen/Technische Universitäten*, *Pädagogische Hochschulen*, theological colleges) – currently there are 120 of them; more professionally oriented universities of applied sciences (*Fachhochschulen*) – 213 of them, and colleges of art and music (*Kunst-und Musikhochschulen*), 57 of them. By funding institutions fall into two categories of state (240 total) and non-state but state-recognized (150 total, of which 111 are private, and 39 – church-based).

Total student population is estimated being at 2,9 million, almost 94 % of students study in public HEIs. Total staff in HEIs account for more than 719 thousand.²

A number of establishments outside the formal higher education system offer an equivalent to higher education degrees – e.g. higher education offered by the Federal Armed Forces; administrative colleges (*Verwaltungsfachhochschulen*) offered by regions (*Länders*), and professional academies (*Berufsakademie*) which combine academic training with practical professional training.

Due to the federal system, the legal basis of higher education in Germany is found in 25 laws: the general Higher Education Act, also by the legislation on higher education of the 16 Länders (Hochschulgesetze), as well as the legislation regarding colleges of art and music and the legislation of Fachhochschulen of the Länders. The Standing Conference of the Ministers of Education and Cultural Affairs (KMK) acts as a body facilitating implementation of common basic principles in higher education, including for quality assurance, also equal treatment and mobility of students.

Germany is a signatory of the Lisbon Recognition Convention³ from the moment of its conclusion on 11th April 1997, and was in the group of the first 29 countries whose Ministerial representatives signed the Bologna Declaration on 19th June 1999. Germany is an active contributor to the building of the European Higher Education Area.

QUALITY ASSURANCE

In recent years the accreditation system in Germany has experienced a major change instigated by the resolution of the Federal Constitutional Court (Constitutional Court) on 17th February 2016 which dealt with the question of autonomy of institutions in assuring their quality. The particular way chosen to implement the Constitutional Court ruling led to far reaching consequences in changing the entire set-up for external QA in Germany. KMK with an input from the German Rectors' Conference (HRK) have agreed on the Interstate Study Accreditation Treaty (Interstate Treaty) (concluded on 8th December 2016, came into force on 1st January 2018) and the corresponding Specimen Decree (adopted on 7th December 2017), that followed it. [More on this see ESG 3.3.]

The Interstate Treaty stipulates that assuring and enhancing the quality of teaching and learning is the primary responsibility of HEIs, and in addition, that the states bear joint responsibility within the scope of quality assurance and enhancement for guaranteeing the equivalence of corresponding study and examination results as well as qualifications and the possibility of transfer between HEIs. Further, the Interstate Treaty established basic principles and standards, three different kinds of procedures (system accreditation, programme accreditation, alternative procedures), and also specified major features of the GAC organization and operations.

The Specimen decree provides further details on the organization of a joint accreditation system and academic criteria (both to study programmes and quality management systems), also rules of procedure for three kinds of accreditation. The period of validity for both the initial accreditation and the re-accreditation has been set at a standard eight years (earlier on, there would be four different periods). The purpose of this was to simplify matters, to reduce the costs, and also take into account the interest of HEIs in legal certainty as well as the goal of continuous and reliable QA.

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https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-06-Hochschulsystem/Statistik/2020-08-27 Statistikfaltblatt Deutsch 2020 Hochschulen in Zahlen.pdf

³ Full title – the Convention on the Recognition of Qualifications Concerning Higher Education in the European Region, drafted by the Council of Europe and UNESCO, ETS No. 165

The key feature of the new system is the altered status of the GAC and the role of other QA agencies. The "Law on the Accreditation Council Foundation (Accreditation Council Act)" – governing activities of the GAC – requires that all QA agencies active in Germany are reliably capable of performing the tasks of the assessment and the preparation of the assessment; in the case of the agencies registered with the EQAR, this condition is presumed to be fulfilled. The GAC is a QA market regulator and effectively authorises agency activities within Germany based on their listing in EQAR.

Another function of the GAC as a public administration institution is to issue legally binding decisions on accreditation in Germany; agencies (which do not have a status of public authorities) can no longer do this, their responsibility is limited to organization of procedures, preparation of external QA reports and forwarding them to HEIs, which then supply them for the consideration of the GAC, who by law is now empowered to make final decisions and publish the results. In this respect, the GAC acts as a "super-agency" processing hundreds of external QA reports. Although the GAC and QA agencies would have annual rounds of discussions, otherwise there would not be direct relations between them, rather HEIs would be at the centre of communication with QA agencies and the GAC respectively.

ACQUIN operates in a tight market of QA agencies in Germany: in addition to local agencies (total eight including ACQUIN), there are foreign national agencies registered as operating locally (currently – from Austria, Switzerland) and a number of subject-specific European agencies. Although traditionally there used to be the "earmarked" regions where German agencies would serve HEIs, in the most recent years the practice is to choose a QA agency by a way of tendering procedures, where a number of factors interplay (quality, timing, price etc.). HEIs have a right to choose from any EQAR registered agency, including for programme accreditation of joint degrees using the European Approach, except for joint programmes leading to double or multiple degrees.

ACQUIN

ACQUIN e.V. was established on 26th January 2001, by a joint initiative of universities from Bavaria, Baden-Würtemberg, Saxony, and Thuringia. ACQUIN is a generic agency, covering all HE disciplines. ACQUIN is one of the oldest agencies in Germany, however, unlike in case of some others, no Ministry of Education was involved in the founding process. The agency was launched with 57 members from four German federal states, and was open to new membership. As a result it grew to the current membership to include more than 150 institutions both from Germany and foreign countries, EHEA and beyond. The agency sees itself as free from state influence and independent in the spirit of academic standards and traditions. It is registered as a non-profit association with a charitable status.

The aim of ACQUIN is to contribute to shaping the EHEA and to ensure the comparability of the quality of higher education qualifications. The core task of ACQUIN's work is to promote the quality of university education and to support the establishment of a quality culture at HEIs in Germany and abroad. The implementation of all QA procedures in Germany and abroad is based on the international standards of good practice, especially on the ESG.

ACQUIN'S ORGANISATION/STRUCTURE

ACQUIN is a self-governing institution of members, primarily – HEIs, also professional associations and business companies. By reading annual reports for 2017-2019, the panel saw a fluctuating total number of members per year and per country; currently there are more than 150 of them. They come mainly from Germany (all Federal states represented) and also from abroad (Lebanon, Lichtenstein, and Switzerland), as demonstrated in the map, produced by the agency itself, published on its website.

Members of ACQUIN convene once a year into the general assembly. The latter is responsible for:

- the election of the board members;
- the appointment of the auditor;
- the election of members of other advisory institutions (the AC and CAC);
- the acceptance of the annual report of the Board as well as the discharge of the Board;
- the determination of membership fees;
- the resolution on the business plan;
- the decision on objections of expelled members;
- the confirmation of the evaluation criteria and procedural principles approved by the AC (the
 general assembly may submit proposals for the evaluation criteria and procedural principles
 to the AC);
- the resolution on the amendments to the Statute and the dissolution of the association;
- the resolutions on other matters submitted by the Board.

The Board has the following duties:

- preparation of the business plan;
- recruitment of members (associations and institutions that are relevant for accreditation), as well as resolution of membership issues;
- conclusion of agreements with other accreditation bodies;
- appointment of the executive management of the secretariat of the association.

The Accreditation Commission (AC) has the following duties:

- resolution on the evaluation criteria and procedural principles (taking into account the proposals of the general assembly);
- definition of guidelines for the self-assessment documentation of HEIs;
- designation of expert groups for the evaluation procedures;
- consultation and determination of evaluation outcomes in procedures within the scope of the Interstate treaty;
- resolutions on the accreditation of procedures outside the scope of the Interstate treaty on the basis of the reports of the expert groups;
- resolutions on the accreditation of national procedures based on the reports of the expert groups and the statements of the expert committees for procedures (as per the legal situation up to 31st December 2017);
- resolution on certifications.

The Complaints and Appeals Commission (CAC) deals with objections against assessment procedures and decisions of the AC.

With the advent of the new accreditation system, brought by the decisions made regarding implementation of the Constitutional Court ruling of 2016, some of ACQUIN's structures, which were there from the foundation of the agency – namely, the nine standing expert committees on different disciplines – after consultation with the GAC in 2019 were abolished in 2020. At the time of the ENQA panel visit to the agency, it appeared ACQUIN was still looking for ways to utilize the expertise of former expert committee members, most probably transforming them into a network of experts who may serve the agency in procedures.

A particular feature of ACQUIN's secretariat is maintaining a structure with two managing directors dividing responsibility and jointly co-leading the organization. This innovation came into being after discussion with the Board at the end of 2017.

Organisational Chart of ACQUIN

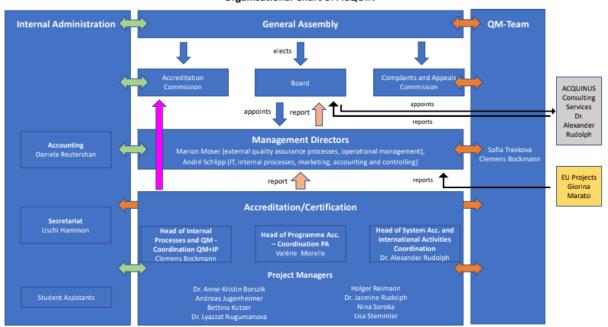


Fig. 1 organisational chart of ACQUIN, provided by the agency

ACQUIN'S FUNCTIONS, ACTIVITIES, PROCEDURES

ACQUIN's goal is to carry out nationwide and cross-university accreditations of Bachelor's and Master's degree programmes in all disciplines in order to ensure a high quality of degree programmes, to create market transparency, to increase the attractiveness of HEIs for foreign students and to promote the comparability of academic degrees. ACQUIN regards itself as a partner for HEIs, supporting them in achieving high quality in teaching and learning as well as on an institutional level.

ACQUIN implements the following six types of procedures⁴ (all subject to the present review):

- <u>Programme assessment in Germany</u> (following the interstate study accreditation treaty, program accreditation refers to the quality assurance and quality development of courses with external participation. Academic criteria are applied, and the professional relevance of the qualifications should be guaranteed. HEIs can ask for a single programme evaluation or cluster evaluation, up to ten study programmes. According to the new German rules, the final accreditation decision is taken by the GAC);
- Assessment of quality management systems (so-called system accreditation) in Germany (the subject of the system accreditation is the internal control and quality assurance system of a HEI in the field of teaching and learning. The final accreditation decision is taken by the GAC. Having successfully undergone the system accreditation, the HEI receives the right to award the seal of the Accreditation Council itself for the study programmes it has examined, no need to undergo external evaluation by a QA agency of choice.);
- Assessment of joint programmes in Germany (joint programmes between a German HEI and a HEI abroad) [this procedure follows the goals and requirements of the programme assessment procedure];
- International institutional accreditation (to date done in Lebanon, Bulgaria, Kazakhstan, Turks and Caicos Islands) [this procedure focuses on the organisation and functioning of the entire HEI, the areas of teaching and learning, research and internal HEI self-management are included

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⁴ For the process descriptions – see under ESG 2.3; for decisions' criteria see under ESG 2.5

- into the assessment procedure, observing requirements of ESG Part 1. Decisions taken by ACQUIN];
- International programme accreditation (to date done mainly in Egypt, Kazakhstan, Oman, Russia) [it aims both at assessing the study programmes' existing quality and at recommending improvements, following the standards of the ESG; decisions taken by ACQUIN];
- <u>Certification of continuing education programmes</u> (both within Germany and abroad) [this
 includes assessment and certification of university and non-university continuing education
 programmes with the overall objective of examining such programmes with regard to their
 compatibility with higher education programmes, the comparability of competencies and their
 classification in the European Qualifications Framework. Assessment criteria are the ESG.
 Decisions made by ACQUIN].

ACQUIN e.V. fully owns a subsidiary company – the ACQUINUS GmbH, established in 2006, with a purpose to provide consulting services to HEIs. It was explained to the panel that ACQUINUS does not implement external quality assurance procedures that lead towards accreditation decisions but rather offers consultancy services on strategic development and preparation for the system accreditation. Accreditation is done by ACQUIN, though never in cases when previously a HEI was consulted by ACQUINUS. While there are ideas for expansion of services, currently, there is just one staff member in ACQUINUS, who is simultaneously staff of ACQUIN.

ACQUIN'S FUNDING

ACQUIN operates on a non-profit basis and does not strive to make a profit for its own economic interests. According to the Statutes, its members pay fees, established by the general assembly; the Board is authorized to grade them (by size of an institution). Members do not receive allowances from the funds of the association, and upon leaving the association no claims of a financial nature towards the assets of the association can be made. The means of the association may only be used for the purposes defined in the Statutes. The Board, AC, CAC all work on a voluntary basis, and only receive reimbursement of costs incurred related to the activity for ACQUIN.

To date ACQUIN has not had a service and funding contract with any public authority. The agency's income is generated almost 100 % from its external QA activities (fees for external evaluation procedures) and membership fees. In most recent years, the European Union (EU) project funding became an additional source of income, making 3-5 % per year. The agency may also receive donations.

The financial year of the agency is the calendar year.

FINDINGS: COMPLIANCE OF ACQUIN WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

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

2016 review recommendation

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

Evidence

The aim of ACQUIN is twofold: to contribute to shaping the EHEA, and to ensure the comparability of the quality of HE qualifications. The core task of ACQUIN's work is to promote the quality of university education and to support the establishment of a quality culture at HEIs in Germany and abroad. The purpose of the association is "to establish and to apply instruments for the accreditation of study programmes as well as to develop further methods for evaluation and assurance of quality processes in higher education. The activities of the association are aimed at ensuring a high quality of education and promoting internationally recognized high-quality degrees". Adherence to the procedural principles of applicable laws and regulations on accreditation, and ESG is mentioned.

The Statutes (the latest version re-registered on 20th July 2020) declare multidisciplinary and transnational nature of ACQUIN, and inclusion of various types of HEIs, cooperation with professional associations, commercial enterprises, and institutes serving the same purpose in Germany and abroad. In the SAR, ACQUIN defines stakeholders as "members of agency committees and bodies, which represent HEIs, labour market and students". The agency said there were no working contacts with the Bavarian Ministry of Education.

The Code of Ethics lists the core values of the agency being excellent quality, independence, integrity, and legality. Strategic planning period is two years, the panel analysed the current plan extending for 2020-2021. The agency keeps very detailed yearly work plans on implementation of accreditation procedures, employee workload is also recorded there and is separately monitored as well. The strategy and the yearly work plans are not publicly available; the panel received them upon request. The panel could not find a formulated vision of ACQUIN through all documents made available to it and on the website as well. At the time of the panel visit to the agency, the activity report for 2020 was still being drafted, while activity reports for 2017 and 2018 were published on the website, and the annual report for 2019 (in English) was also made available upon request.

The Statutes, the mission statement and the Code of Ethics (applicable to staff and everybody with whom ACQUIN has relationships) are communicated through the website of ACQUIN, maintained in three languages (German, English, Russian, https://www.acquin.org). The agency is also present on

(https://www.facebook.com/ACQUINeV).

In between the previous and the current external review of the agency, ACQUIN has carried out eight types of procedures, two additional types remaining potential⁵. Procedures were conducted not only in Germany, but also abroad (mostly in Kazakhstan and Russia).

Time of nuccedime	Number of study programmes / audits					
Type of procedure	2016	2017	2018	2019	2020	In total
National study programme accreditation (according to the rules of the GAC)	498	466	376	301	78	1719
National system accreditation (according to the rules of the GAC)	3	5	3	1	3	15
National certification of continuing education programmes	2	0	10	0	1	13
National programme assessment procedures (according to the rules of the Specimen Decree)	0	0	0	206	268	474
National assessment of quality management systems (according to the rules of the Specimen Decree)	0	0	0	0	2	2
International study programme accreditation	104	58	58	6	1	227
International institutional accreditation	0	- 1	0	2	0	3
Audits of quality management systems in Austria	0	0	0	0	0	0
Institutional accreditation in Switzerland	0	0	0	0	0	0
International certification of programmes	0	I	4	7	2	14
Subtotal	607	531	451	523	376	2488

Fig. 2, Statistics on procedures, provided by ACQUIN, based on data in SAR and communication during the visit

In addition to external QA procedures, the SAR alludes to EU Erasmus+ projects as an important activity area. Some, very brief, information on the project activity can be found in the annual reports. On the website, nine current projects are listed; four of them have dedicated project websites developed. The panel noticed communication on projects actively done via ACQUIN's LinkedIn account, also separate dedicated project websites, but publication of news and other reporting on current activities via the main agency website is absent.

Members hold a general assembly once a year, where decisions on statutes, appointment of the structures (the Board, AC, CAC) and other statutory matters are taken. Members of ACQUIN are published on the website in the form of a map. The panel met a diverse group of institutional representatives from membership of the agency.

The Board makes decisions on staff and nominates management of the secretariat. Usually, the Board holds meetings four times a year, only 2019 was less intensive, with two meeting held. The current Board was newly elected in 2019 for a term of three years, re-election is permitted. There is a first Chairperson, the Second Chairperson, a Treasurer and two Members. Out of five persons on the Board, two are representatives each from the universities and universities of applied sciences, as well as one representative from professional practice. The panel met with three of the current Board members (including Chairman, Treasurer and member who is a labour market representative).

The AC decides on external QA procedures, criteria and results (insofar it is the realm of responsibility of ACQUIN under the new legislation). As a rule, the AC meets four times a year. It was last newly elected at the general assembly of ACQUIN on 5th June 2019 for a period of two years. It is comprised of the first Chairperson of the Board (ex-officio), four university and university of applied

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⁵ At the time of the visit, the procedure in Switzerland has not been concluded yet

sciences representatives, one representative from the art and music colleges, two representatives from professional practice and from the student body (total 14 members and additional eight substitute members in the event permanent members cannot attend).

The panel met with seven members of the AC.

The CAC was last elected at the ACQUIN's General Assembly on 23rd July 2020 for a term of three years. Re-election is permitted. On this commission one member comes from the group of universities of applied sciences, from universities, from art and music colleges, from professional practice, and from the student representation body. It is forbidden at the same time to be a member of the CAC and to serve either on the Board or the AC. This advisory institution hears appeals in relation to resolutions and decisions of the AC and the expert groups; it also acts as a decision-making body in the event of complaints about the implementation of the agency procedures. The panel met four out of five serving members.

Personal composition of all advisory structures is made public on the website of ACQUIN.

It was explained to the panel that ACQUINUS GmbH was established by the initiative of the founding chairman of ACQUIN with the idea to offer services beyond accreditation. The Advisory Board of ACQUINUS was absent for the last two years and currently is reconstituted. The panel requested and received a full package of documents pertaining to the work of ACQUINUS. Initially, ACQUINUS areas of activity included (a) planning, implementation and evaluation of evaluations and audits, (b) preparation and implementation of portfolio analyses, and (c) preparation for institutional accreditation. On 31st October 2008, the AC passed a resolution on "Standards for the Design of System Accreditation and Consulting Services". The latter excluded the possibility that system accreditation procedure could be done by ACQUIN if prior advice from ACQUIN or ACQUINUS was obtained, but no mention of the programme accreditation procedure was made on that account. Further, on 21st February 2011, the Board issued a generic resolution that "accreditation" and "consulting" should be separated altogether (no specific reference to programme or system accreditation). Current areas of ACQUINUS activities, as per their website, include: (a) consulting and coaching in quality management, (b) organizational development, (c) evaluation, (d) workshops and training. The panel requested and read all services agreements to date concluded by ACQUINUS. The company maintains a separate website (in German, available at http://www.acquinus.de/).

Analysis

External quality assurance is the principal of the agency activities from the establishment, now already 20 years in operation. It is a regular activity of ACQUIN, although the workload during the period of five years fluctuated considerably. This happened primarily because of phasing-out of the old type procedures (following the rules of the GAC) and switching to the new type procedures (as determined by the post-Constitutional Court framework, regulated by the Specimen Decree). Another visible trend is a diminishing number of procedures implemented abroad. It was explained to the panel that in the last strategic development session with the Board, it was decided that while procedures abroad provide income for activities, still operation on foreign soils requires caution because of political and economic reasons, and that the primary focus of ACQUIN should stay within Germany. The Statutes clearly position ACQUIN within the German framework stating that in programme and system accreditation procedures, the agency's accreditation reports are further serving for resolutions and evaluation recommendations made by the GAC.

The reason for re-registration of ACQUIN's Statutes in 2020 was related to the abolishment of the standing expert committees. However, the panel was puzzled to still find the expert committees listed in the English version of the Statutes under other bodies in article 6, clause 2, point (b). After checking the text in German, the panel concluded that English translation of the Statutes contained inaccuracy as expert groups (panels) were meant instead. The agency later informed having amended the Statutes

(in English). At the time of the ENQA panel visiting the agency, the website also still cited the membership of expert committees (as of June 2019), and alluded to expert committees in the general description of the agency. If in fact the decision made in 2020 to transform the standing expert committees into the more informal network of experts is final, it would be advisable to have an appropriate wording in the English version of the Statutes and correspondingly clear information on the website.

ACQUIN's mission visibly splits into two parts. The comparability of the quality of HE qualifications is ensured by external QA procedures, primarily through bachelor and master degree programme evaluation and system accreditation, since certification of continuing education programmes and evaluation of doctoral studies remain less frequent. One project in particular - DEQAR CONNECT - also serves for promotion of visibility of HE quality and trust. The agency appears to be very focused on implementation of accreditation procedures and technicalities of EQA. In the SAR, in the Strategic plan, and through the website, the panel missed a clear explanation on how exactly another part of the mission – contribution to building of the EHEA – was implemented. When asked about this during the visit, the agency gave several examples. Firstly, active participation in a dialogue within organizations in Germany was mentioned (primarily other local QA agencies, the GAC, also the German Student Accreditation Pool [GSAP] and HRK). Secondly, the international networks were cited (on Boards, where a former CEO and current member of ACQUIN CAC's has served - in case of ENQA, or still participates - in case of CEENQA). Thirdly, numerous EU funded projects were mentioned for the past periods (such as "DataPRO", "GDPR4H", "EldiCare"), and the new ones extending from 2020 up to 2024 ("MENTORme", "CHAISE", "KAZDUAL ", VETEntre, RegAgri4Europe). The agency staff in particular stressed that projects were the means to implement ACQUIN's wider mission.

There is brief information on these projects on ACQUIN's website, for some of them there are links to designated project websites. Information posting on LinkedIn is rather frequent recently; however, Facebook usage appears to be irregular. Not limited to the projects communication aspect, the panel suggests to develop a clear overall external communication strategy (going beyond a brief description of the process in the Quality Manual (QM), which, among other, would allow streamlined usage of various channels for specific target audiences with a continuous and versatile presentation of ACQUIN's work.

ACQUIN's Strategic Plan 2020-2021 does not follow a usual template for these kind of documents: starting with the citation of the organization's mission, vision, values, SWOT, identifying key objectives for the period in question, which would be followed by clearly named activity lines / initiatives, and would bear key performance indicators with a timeline allowing to measure progress in achievement. Having read the Strategic Plan, the panel understands why this document is not made public: some of contextual analysis and key considerations as recorded at present are not fit for publishing. Currently, the strategic plan reads more like a record of strategic considerations, minutes from the Board meeting and does not have the above-mentioned structural parts. Consequently, the plan lacks clear focus on two parts of ACQUIN's mission and commitments per each part with measurable indicators of success. In addition, the panel found a two-year plan being too short to call the plan strategic and proposes the agency to consider switching to planning in medium terms (3-5 years).

The link between the strategic plan and the yearly work plans appears to be weak: the yearly work plan lacks strategic orientation (reference to mission, vision, and key objectives), is of a very technical nature, and is mainly preoccupied with the implementation of accreditation procedures. None of the other activities – as mentioned in the schedule of the Strategic Plan as well as information on providing clarity how quality of university education is promoted and how establishment of a quality culture at HEIs in Germany and abroad is supported beyond accreditation – are reflected in the yearly work plans. They do not include project activities as well. By contrast, yearly activity reports provide very

useful details on work carried out, including on partnerships and dialogue. The panel encourages the agency to live up to its mission and to relate all its work lines with the strategic aims. The agency is further advised to demonstrate the alignment of strategy and operations throughout all various phases: planning, reporting, and communication.

As to the 2016 review recommendation, the panel confirms being able to find the mission statement in the Statutes, in the Code of Ethics, and on ACQUIN's website. The mission is also cited in the thematic analysis "Quality Assurance at Universities in Kazakhstan and the Impact of ACQUIN's External Peer Reviews". Another thematic report "Deviations between Accreditation Recommendations of Expert Panels and Final Decisions of the German Accreditation Council" contains only a passing reference to the mission of ACQUIN. Also, relevant passages of text citing the mission of the agency were absent from the annual reports for the period between 2017-2019, although otherwise these reports are rather detailed and very illustrative of the work done. Overall, the recommendation of 2016 review partially still stands: no matter how well the agency itself knows what are its aims, there is always a danger to slip into the technicalities of QA (as indeed is visible from the Strategic plan and yearly work plans) and to forget the higher purpose this tool is meant to serve for, thus, worthwhile reminding both to internal and external stakeholders. As per the panel's understanding, it is not only a matter of merely simply citing the mission on the website or elsewhere, but of being able to connect and demonstrate mission through all activities and via all available channels (the website, printed documents, social media etc.), showing to all stakeholders how everything the agency does contributes to fulfilling its purposes and strategic objectives.

Stakeholders are included in the governance and work of the agency. However, the panel found ACQUIN's definition of stakeholders as in the SAR interesting: they were not defined as external free standing organisations (such as HRK, GSAP, or yet other organisations such as the German Society for International Cooperation [GIZ] or DAAD), but those persons which, to a degree, are "internalized" by the agency – come from own membership and sit on ACQUIN's committees and bodies. Consequently, ACQUIN did not propose the panel to meet with representatives of HRK or GSAP, even though during the course of the review it became clear that there were joint activities in the past (as in case with HRK or GIZ) or current contacts (as with GSAP for getting nominations of student reviewers). Given the fact that ACQUIN in itself is a membership organization, it was hard to understand the borderline between external stakeholders and members. ACQUIN needs to clearly communicate the concept of stakeholders and act accordingly, there still is a potential for further cooperation, including with various public authorities.

The membership map of ACQUIN on the website would benefit from updating (at the time of the panel visit to the agency in February 2021, information cited on the map was of April 2019).

The panel was positively impressed by dedication, engagement and knowledge of the agency matters of all three advisory bodies of ACQUIN – the Board, the AC, and the CAC – with whom the meetings were arranged. Academic members from various types of HEIs and labour market representatives are included in all three advisory bodies. There is a division of tasks among these institutions. In the panels' view, independence of the CAC from the AC would be better assured, if the latter had its own procedure approved rather than followed the one established by the AC (see also ESG 2.7). Additionally, it was noted that there is one person with considerable individual power vested: The Chairperson of the Board is also ex-officio the Chairperson of the AC. The panel recognises that the current set up works for ACQUIN, but still urges the agency to reflect on altering this in the future as it can be perceived as a structural risk, even if the integrity of the current actors is not doubted.

Students are represented on the AC and the CAC, but not on the Board. As it will be discussed later under ESG 2.4, students are part of the expert panels. This leads to conclude that students are involved in the work of ACQUIN, but not fully involved in its governance. It was explained to the panel that

due to the nature of tasks performed, it was doubtful if a student member could be capable of meaningfully contributing to the Board's work. The panel cannot concur with such an approach. Students are the single largest stakeholder group with a direct interest in quality of the HE. There are plenty of mature and bright students with an active interest in the HE quality management, the panel met truly impressive student representatives during the visit. Moreover, it is customary to invite student representatives to contribute to the Boards or Advisory Boards of many QA agencies across EHEA. Student involvement in EQA is one of the indicators how countries are measured in the Bologna Process implementation reports. To summarise, the panel is positive about the value of student participation in the governance of the agency, and wishes ACQUIN to re-examine its position.

Both the Board's and the CAC's members serve for three years and can be re-elected, however, the maximum term is not specified. Members are invited to make suggestions for the AC, from which the election list will then be drawn up. Also the GSAP is asked for nominations, to secure that it is also represented in the AC. The AC members have the shortest service time – two years and the Statutes do not mention a possibility of re-election. However, the panel learned that re-election happens in practice; therefore, the agency is advised to align stipulations of the Statutes and actual work routines adopted.

In addition, while it is customary to allow re-election of members of advisory bodies and have an extension of their mandate till the new member would be elected (as is stipulated in the Statutes of ACQUIN), it is a question of how appropriate is the unlimited number of terms of advisory bodies. Given the honorary nature of service on these bodies, and the level of commitment required, it would be beneficial both for the person and ACQUIN to have more clarity on the maximum service term. And vice versa: despite the fact that in practice there would be gradual change of membership and continuity in expertise assured, on paper it looks like stepping down of the entire members of a certain advisory body at once is possible. However unlikely this situation would be in real life (the panel was informed it never happened to date), still the panel encourages streamlining the documentation and actual practices adopted to reflect how a healthy mixture of experienced members and new members coming in, at all periods of time, is maintained.

There are no international members either on ACQUIN's Board, or the CAC. German language requirement was cited as a barrier for their inclusion. Given that German language variations are spoken in several neighbouring countries, and also the fact that German academics and business people are based not only within Germany, but abroad, the panel sees all possibilities for the international presence on ACQUIN's advisory bodies. When discussing this question with many participants in meetings during the visit, the majority of them accepted this could be a fruitful opportunity. Moreover, as ACQUIN has foreign institutions as members and is active not only within Germany, but also abroad and across several regions of the world, inclusion of internationals could serve the general purposes of ACQUIN as an association well. There is, however, one international member on the AC, coming from Lebanon and speaking German, listed as "substitute representative" for the university sector.

The argument of having two CEOs in order to assure there is always a person in the office with a legal representation powers (in case when one is away for business or personal reasons), did not fully convince the panel. For temporary substitution (in general legal terms) there is nothing preventing from delegating authority to the deputy CEO. However, the panel saw a clear division of responsibilities between the two CEOs, with a very close involvement of one of them in external quality assurance processes and the other bearing responsibility over internal matters (economic, budgetary, also IT), and understood this kind of arrangement, although quite unusual under other circumstances and rare in other QA organisations, serves ACQUIN well.

The trilingual website of ACQUIN contains useful information, however is quite static, does not give a real feel on what the agency is currently working, and would benefit from a more user friendly design,

as well as more frequent updating and elimination of broken links (e.g. when pages in English lead to documents in German and pages in Russian lead to documents in English etc.). The website lacks transparency on the agency activities and results, especially EU projects of which neither titles, nor short information on their objectives, outcomes, and partnerships is available. The panel learnt from the summary document provided that the issue of a better usage of the website for external communication was discussed between the Board and staff as long as four years ago, yet to date the website remains underutilized and not interactive, without a search function. As written above, ACQUINUS maintains a website, which is of a very similar design to ACQUIN website, yet different in regards to the dominant colour pallet. Certainly, the contents of both websites are distinct, and ultimately, for a lay person, two organizations should be distinguishable as separate.

From the contracts that the panel examined, there is no doubt that activities of ACQUIN and ACQUINUS are separated properly: in all cases ACQUINUS offered tailor-made advice to a specific entity, in none of the cases subsequently ACQUIN performed an accreditation procedure of any type. The panel further inquired with the staff member of ACQUINUS regarding consulting services and learned that some services could be provided by ACQUIN members (billed separately), in other cases they would be external experts, including (possibly) internationals; in all cases separate accounts would be maintained. ACQUINUS covers its own operating costs for the usage of ACQUIN infrastructure. It looks like for the last two years the strategic oversight of ACQUINUS was somewhat neglected in the absence of its Advisory Board, which at the time of the panel's visit was being reconstituted.

However, nowhere on the website of ACQUINUS it is explicitly mentioned that if consulted by ACQUINUS, a HEI cannot be accredited by ACQUIN and vice versa – no mention of ACQUINUS is made on ACQUIN's website. The panel is of the opinion that such a statement would be needed given that ACQUIN is the sole shareholder of ACQUINUS, and the organisations are related. Moreover, the advisory structures (both the AC and the Board) of ACQUIN addressed this issue in their resolutions in the past. Taking into account that such a separation happens in practice, it would be beneficial to clearly communicate this business ethics principle to external audiences, potential users of services of both organizations both within Germany and internationally.

Panel commendations

- The panel was positively impressed by the dedication of the two CEOs, and also the engagement and knowledge on the agency matters by the members of all three advisory bodies of ACQUIN (the Executive Board, the Accreditation Commission, and the Complaints and Appeals Commission).
- 2. Institutions seem to trust in the agency and the rate of institutions choosing ACQUIN for reaccreditations is impressive regarding the fierce competition. Relationship management with universities is strong, in particular with members, and the workshops are much appreciated.

Panel recommendations

- ACQUIN's Strategic Plan should extend beyond the two-year period and contain a clear mission, vision, values, objectives for activities, with a concrete measure of success timewise and by deliverables (following the widely accepted format of such documents). It should be published.
- 2. The Strategic Plan, yearly work plans, and yearly activity reports should all be clearly linked.
- 3. Students should be represented in the governance of the agency.

Panel suggestions for further improvement

 ACQUIN may wish to revisit its Statutes to specify the maximum terms, re-election and rotation of members in all of its advisory bodies to clearly lay out the expectations for contribution, and to assure both continuity of expertise and fresh input as well. The panel

- encourages ACQUIN to reflect on the division of roles and allocation of responsibilities between the advisory bodies and their Chairs so that there is no room for misperceptions.
- 2. The definition of stakeholders could be reflected upon, taking appropriate action for communication, and opportunities for cooperation with public authorities re-evaluated.
- 3. The agency may consider establishing a so-called "cooling" period for former members of staff to get involved as experts or members of advisory bodies.
- 4. The expertise of ACQUIN may be increased by including international members in its Board and the Complaints and Appeals Commission.
- 5. The external communication strategy must be developed. It should encompass all activities and their relationship to the mission and strategic objectives of ACQUIN, and tools, in order to achieve positive synergies between the various media, and to assure up-to-date information is provided continuously.
- 6. Both ACQUIN and ACQUINUS should communicate about separation of their activities more clearly, including through the websites.

Panel conclusion: partially compliant

ESG 3.2 OFFICIAL STATUS

Standard:

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

2016 review panel recommendation

None.

Evidence

ACQUIN e.V. is entered in the German register of associations as a not for profit organisation from 5th March 2001, its seat being in Bayreuth (No. 1323 in the Bayreuth Court Register). Each member of the board is authorized to individual representation of the board in accordance with § 26 of the German Civil Code. The executive management is appointed by the board as a special representative in accordance with § 30 of the German Civil Code. The SAR gives details that the tax office of Bayreuth audits the non-profit status (annually upon presentation of the financial statements and on *ad hoc* basis for each amendment adopted by the general assembly), and that the financial statements include the appropriation of funds that demonstrates the swift allocation of resources for privileged purposes only.

Ever since its establishment, ACQUIN was evaluated and (re)accredited by the GAC as an external quality assurance agency on a five-year basis (in 2001, 2006, 2011, and 2016). Recognition of the agency by the GAC is subject to ACQUIN satisfactorily passing the external review against its compliance to the ESG and subsequent registration on EQAR.

Since 4th March 2008, ACQUIN has been listed in EQAR. The agency's registration was twice renewed based on the GAC evaluations. On 19th June 2019, ACQUIN filed in a substantive changes report, as required by EQAR in cases when an agency's current practice differs substantially from the situation when it was reviewed against the ESG and admitted to the Register.

Since 2003, ACQUIN has been a full member of CEENQA (Central and Eastern European Network of Quality Assurance Agencies in Higher Education), ENQA (European Network for Quality Assurance) and INQAAHE (International Network of Quality Assurance Agencies in Higher

Education). The agency has associate member status with EUA (European University Association) [since 2004] and AROQA (Arab Organization for Quality Assurance in Education) [since 2007].

ACQUIN is approved as a quality assurance agency in Austria and is entitled to carry out audits at universities in accordance with Section 22 (2) of The Federal Act on External Quality Assurance in Higher Education (HS-QSG).

Since 2012, ACQUIN has been registered in the "The National Register of Accreditation Agencies in the Republic of Kazakhstan" and thereby authorized to carry out accreditation procedures in all HEIs in Kazakhstan. In addition, from 2015, ACQUIN is a member of VDW, which is a voluntary association of German companies and organizations that maintain active business relationships with Kazakhstan and are mostly present there; it works under the patronage of the German Embassy in Kazakhstan.

ACQUIN fulfils the requirements of Article 2 of the guidelines of the Swiss Accreditation Council on the recognition of agencies for accreditation according to the Federal Act on Funding and Coordination of the Swiss Higher Education (HedA) (recognition guidelines) of 11th December, 2015.

Pursuant to article 26.8 of Mongolia's Law of Education, ACQUIN is also registered locally. In April 2019, ACQUIN entered into the cooperation and partnership agreement with the Mongolian National Council for Education Accreditation (MNCEA), and to date has provided development assistance to MNCEA. The agency was also planning a joint accreditation procedure (put on hold because of the pandemic situation).

When asked about ACQUIN's status in other countries, it was explained that the agency carries out accreditation procedures in Russia as well as Egypt at the request of HEIs, but ACQUIN's accreditation is not recognised in these states by the public authorities. The HEIs are seeking voluntarily an ACQUIN accreditation, but in addition also must undergo an accreditation procedure by the national agency, as neither in Russia nor in Egypt HEIs can solely choose external QA agencies (instead of choosing a national accreditation). ACQUIN has a number of bilateral international cooperation agreements.

Analysis

ACQUIN is recognized as an external QA agency within Germany from its founding. Its non-profit status is well established and the agency fulfils corresponding requirements. To date, its activities were monitored by the GAC, which would perform a periodic external evaluation of ACQUIN and provide a mandate for it to operate as a quality assurance agency in Germany (subject to satisfactory fulfilment of conditions attached to each decision by the GAC, if any).

ACQUIN is fulfilling its duties towards external evaluation by relevant authorities. Until recently this was conducted by the GAC in Germany. Currently, the agency has to be listed on EQAR in order to perform external quality assurance procedures both in Germany and internationally.

The agency sees promotion and further development of quality assurance at universities being not limited to national borders, but as a global project. ACQUIN is recognized in some foreign countries based on its listing in EQAR (e.g., Russia, Egypt, Lithuania) and/or separate national recognition procedures (e.g., Austria, Kazakhstan, Mongolia), or simply by bilateral agreements with local institutions.

The agency is globally connected to other specialist networks either as a full or associate member.

Panel conclusion: fully compliant

ESG 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.

2016 review panel recommendation

None.

Evidence

The structure of the agency and the election/dismissal procedures of the Board, the AC, and the CAC are defined in the Statutes as an internal matter of ACQUIN, powers delegated to members solely. They in turn exercise their powers through the general assembly, where no single member has a decisive authority (and membership is diverse, as explained earlier in the introduction to the agency – not only single organizations, but also associations of organisations can be members of ACQUIN). The work of all members in the bodies and committees is provided on a voluntary basis. The agency is not formally linked to any ministry of the federal land in which the agency operates and/or has members.

By law, both ACQUIN and the GAC as organizations are subject to the arrangements as per two documents, that established the new quality assurance framework:

- The Interstate Treaty on the organization of a joint accreditation system to ensure the quality
 of teaching and learning at German HEIs (Interstate study accreditation treaty), adopted by
 the Decision of the Standing Conference of the Ministers of Education and Cultural Affairs of
 the Länder in the Federal Republic of Germany of 08/12/2016 (enacted on 1st January, 2018)
 [in English];
- The Specimen Decree pursuant to Article 4, paragraphs I-4 of the Interstate Study Accreditation Treaty (Resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany of 7th December, 2017).

These documents describe in detail the mandate and work of the GAC and also provide clarity regarding conditions for QA agencies, including ACQUIN, to act in Germany: it is subject to their registration in EQAR.

As defined by the Statutes, nomination and appointment of external experts is a task for the AC, and expert groups are in charge of drafting the evaluation reports. Experts work in their independent capacity, to that end they sign an impartiality agreement with ACQUIN. Regarding formal outcomes, in the pre-Constitutional Court set-up, the AC issued own final decisions based on expert reports and advice from the nine standing expert committees. Yet, currently this decision making authority by law is transferred to the GAC, which issues administrative acts. For international procedures, the AC retains its final decision-making powers, based on expert reports except Switzerland and Lithuania.

Representatives of HEIs with whom the panel met were confident that the agency works independently and with the same impartial attitude both towards its members and non-members. In fact, the panel learned that being a member of ACQUIN does not necessarily mean all external QA procedures would be carried out by ACQUIN solely, institutions are free to choose.

Analysis

Definition of the structure and actual election of all three advisory bodies is done by the members and is stipulated in the Statutes. There is no other external involvement, e.g. from single HEIs, associations of HEIs, the federal ministry or ministries of lands.

The panel has heard both from the GAC and ACQUIN that the two organizations work independently and autonomously. Operationally, ACQUIN is constrained by the overall legal framework in Germany and has to work in line with the provisions of the Interstate Treaty and the Specimen Decree. However, this should not be held as an argument against the agency, as this framework applies to all quality assurance agencies in Germany that implement mandatory external QA procedures (such as programme accreditation and system accreditation) or alternative procedures to an equal extent. When acting abroad, the agency is free to define the format of its procedures and has done so, on condition the local legislation permitting.

As explained both by the agency staff and CEO of the GAC, the dialogue with the GAC bears a rather structured format, where there are wide consultations including all QA agencies in Germany, and individual yearly sessions with each of them. The panel is confident that the roles of the two organizations are clearly separated and there is no interference in any way limiting the autonomy of the agency: ACQUIN is responsible for the organization of procedures and production of expert reports, and the GAC – for making accreditation decisions in teaching and learning of HEIs based on external review reports.

Organization of daily work is a matter of AQUIN's Secretariat, following the rules of procedure, decided by the Board and supported by decisions of the AC. In the pre-2018 framework, the AC would pass the decisions on accreditation. Currently the authority of AC as a final decision maker is limited to procedures outside Germany. However, this framework is general and applies to all QA agencies in Germany, and as such should not be viewed as an argument against ACQUIN's independence.

The panel is positive upon ACQUIN has complete organizational and operational independence, full independence of formal outcomes for international procedures and independence of formal outcomes within Germany as per the current legal framework.

Panel conclusion: fully compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

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

2016 review panel recommendation

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

Evidence

As thematic analysis was one of the areas in which the agency was expected to improve, in the 2019 follow-up report to ENQA, ACQUIN described its new policy towards thematic analysis. It explained that in fall 2018, the standing expert committees and the AC suggested establishing a new model of interlinking peer review teams (in programme and system accreditation procedures) and ACQUIN's standing expert committees. The plan was that members of the committees would accompany reviews in order to feed their professional and procedural experience into the review process. Then, it was envisaged that twice a year, members of the standing expert committees would present their experiences and lessons learnt from "their" procedures to the committee colleagues. Standing expert committees were expected to discuss procedural features with regard to current subject community debates, their findings would be summarised and collected by the Secretariat. The AC would discuss once a year the collected findings from an interdisciplinary perspective. It was planned that both subject related and interdisciplinary findings would be presented to the general assembly (HEIs), published on the website, and made available to the GAC, allowing both ACQUIN and the GAC to analyse procedures and to revise them, if necessary.

The SAR mentions the policy for conducting thematic analysis being recently established. When asked, where the policy is defined, the agency pointed to the QM of ACQUIN. In the QM, under thematic analysis, two types of activities are listed: workshops and thematic analysis, specifically focusing on analysis of cases when decisions by the GAC deviate from the accreditation reports and decisions by

ACQUIN's AC. No reference is made to the plans to conduct thematic analysis as was described in the follow-up report to the ENQA Board in 2019.

The policy on conducting thematic analysis is defined in the QM of ACQUIN; the SAR mentions it as being recently established. On the website of ACQUIN, the following two publications are available for downloading:

- 1. "Quality Assurance at Universities in Kazakhstan and the Impact of ACQUIN's External Peer Reviews". Editors: Handke, Stefan / Kryvko, Kateryna / Soroka, Nina / Teleuova, Saida (dated 2017, published on 3 July 2020) [in English];
- 2. "Deviations between Accreditation Recommendation of Expert Panels and Final Decision of the German Accreditation Council". A thematic analysis by Marion Moser and SofiaTreskova (dated 23 July 2020) [in English].

The first publication contains a remark that this study will be resumed once a set of additional and meaningful data will be available, presumably in a several year period. The SAR also alludes that other thematic analyses are planned in the area of the long-term impact of external quality assurance on the development of internal quality assurance system of HEIs and quality enhancement.

In addition, the SAR also provides a list of five workshops for member HEIs, which were organized yearly between 2015-2019. During these events, an overview of one or more topics had been presented, including presentations by guest speakers, and there would be discussions in parallel sections with materials of the event made available to the members of ACQUIN afterwards.

In the meeting with the CEO of the GAC, the panel has learned that the study on deviations between the ACQUIN expert recommendations and the final decisions of the GAC was of great interest to the latter.

The panel was informed about the recent publication by Prof. h.c. Dr. Sebastian Kempgen, Chairman of the Accreditation Commission and ACQUIN Board, entitled "Study Quality: Terms – Models – Analyses". The book can be downloaded for free from the website of ACQUIN, available in German language. It is understood that this book was written in a personal capacity, and is not an ACQUIN publication.

Analysis

During the last external review of ACQUIN, the agency was found partially fulfilling this standard, as annual reports, workshops and project publications were deemed not enough to meet the expectations of the ESG 3.4. During the present review, ACQUIN itself admitted (in the interviews and the SAR) that there is still quite some room for improvement.

It looks like the agency deviated from its own plans to conduct thematic analysis as was described in ACQUIN's follow-up report to ENQA in 2019; no such thematic analyses were done to date. During the visit the panel has not heard anything in relation to those previous plans and concludes that the agency has at least paused them.

The QM of ACQUIN contains descriptions of all activities and internal processes, the section on thematic analysis appears at the end of it. This process description does not follow the structure of other process descriptions in the same document: quality standards, quality assurance measures, responsibility over process steps, and tools are not defined; substantial changes (to demonstrate improvement in the process after 2016) are not recorded as it is done in case of some other processes. This leaves a feeling of the section on thematic analysis being more of an addition to an otherwise detailed QM document. ACQUIN needs to fine-tune its policy on conducting thematic analysis, including dissemination strategy (not limited to publishing on the website), so that findings of thematic analysis are known to institutions, and eventually make an impact on their work. Production of thematic analysis should be planned; this needs to be reflected in the annual work plan.

More importantly, the results produced to date – only two thematic analyses during the five year period in between the reviews – leaves to wish for much more. No major progress is seen in this area, although ACQUIN received a recommendation in their last review in 2016 to intensify its work and to publish. The panel believes that the large number of procedures conducted to date (several hundred per year) provide enough sources for findings on policies and processes in institutional, national and international contexts. To date, no single analysis is devoted to good practice examples or difficulties found within German HEIs. The panel is convinced this kind of regular analysis on a number of topics would be very interesting to local institutions which are identified as the primary market of ACQUIN. In relation to this, currently, opportunities to assist HEIs in developing their quality culture, as in ACQUIN's mission, remain largely underexploited.

The standard under ESG 3.4 calls for agencies to publish reports regularly. Yearly workshops are good means to share, discuss and learn, but no substitution for regular analytical work and publishing in its own right. The guidelines under ESG 3.4 specifically refer to structured analyses across the higher education system. Analysis on deviations between the recommendations of ACQUIN panels and decisions by the GAC provides important information regarding the consistency of decision making both to ACQUIN and the GAC. However, this analysis does not deal directly with findings within HEIs, their best practices and challenges faced, that they could learn from and improve. Notably, under this standard the agency is expected not to focus on itself and the decision making. Instead the agency should concentrate on the HEIs, just like was the study on reviews in Kazakhstan done.

The panel would particularly like to point ACQUIN's attention to the 2020 ENQA study by Carmen Tomas and Maria Kelo entitled "ESG 2015–2018 ENQA Agency Reports: Thematic Analysis". There, two effective approaches adopted by QA agencies, are cited as follows: I) creating general summaries and overviews from QA agencies' output reports of quality assurance activities, 2) creating additional thematic reports on selected specific topics (generally derived from the ESG). By contrast, examples are given what usually is not regarded as thematic analysis in the strict sense. Among them, a common mistake is to mix thematic analysis with requirements related to ESG 3.6, i.e. processes and methods in place for internal quality assurance of the agencies. In addition, agency annual reports, workshops and their reports, project reports are also mentioned among those, which do not fall into the category of proper thematic analysis.

Panel commendations

ACQUIN is commended for having done the analysis on quality assurance and its impact at universities in Kazakhstan, which contains valuable system level observations on the need to further develop the local credit system, structure of study programmes, and discussion culture among HEI's staff.

Panel recommendations

- I. ACQUIN needs to fine-tune its policy on conducting thematic analysis, and in line with this redefinition, to update the relevant part in the Quality Manual following the standard description of other processes.
- 2. Efforts on thematic analysis should be much intensified, reports should be published regularly. To show developments, as a starting point, ACQUIN should also make a working plan for the next analyses to be done within the coming 2-3 years and follow it.
- 3. Analyses should focus on trends and areas of good practice as well as persistent difficulty across the higher education system; they should pertain to institutional, national and international contexts.

Panel conclusion: partially compliant

ESG 3.5 RESOURCES

Standard:

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

2016 review panel recommendation

"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 the GAC)."

Evidence

Respecting the pandemic situation and a ban on international travel, in order to provide evidence on material resources and to introduce to its staff, ACQUIN created a short video tour of the agency.

The secretariat retains the same seat in Bayreuth as during the previous review. A total of 630 m^2 of the office space plus 150 m^2 of secondary area is available, modern infrastructure installed.

The Secretariat of ACQUIN consists of 17 staff members and three student assistants. Ms Marion Moser, CEO, has a long track record with ACQUIN and is very well versed in accreditation and process management matters; Mr André Schlipp assumed the role of the second CEO as of 1st April 2020 and takes care of IT, internal processes, marketing, accounting and controlling. There are twelve project managers (coordinators of external review processes and staff working on projects), a process manager, and two administrative staff members. Three employees work part time (this makes 1.7 full-time equivalent), four employees have temporary contracts. Among staff members, employees with English, Russian, Greek, French, Spanish, Portuguese language knowledge are present, in addition to German which is the primary language in the office.

The panel requested and received a separate explanation on employer-employee relationships. Due to the history of ACQUIN, the agency chose to apply the collective agreement of the Länder for the public service on a voluntary basis. Thus, the working conditions provided by ACQUIN follow these regulations. The staff is organized in four internal units. There is a work council to represent employees in their relations with the senior management. At the initiative of the work council, in 2019-2020, mobile working agreements with limits for remote working were introduced prior to the pandemic breaking. Respecting the current pandemic situation, staff can work from home up to 100% working time.

From the SAR and interviews with staff, the panel learned of the internal adaptation and restructuring in response to the stakeholder expectations and in order to attend the 2016 recommendation. It has been said that close monitoring of the market situation and allocation of the agency resources continues to make sure they match well. After a test phase in 2019, a digital time recording system was introduced in 2020. The agency now has a dedicated person to monitor implementation of accreditation procedures, the workload of staff and has developed appropriate software tools for that.

Reading the minutes of the Board meetings, the panel discovered they were discussing the future of the agency also in terms of the competitive market and their proposed focus on national procedures; yet there were no budgetary projections attached and it was unclear from the proposed decisions what the impact on the agency's finances would be. ACQUIN's budget shows a modest surplus, but the reserves are already factored into the budget and the reserves are not big enough to compensate for a significant loss in potential clients (should that happen). Salaries remain a stable cost factor, and the only variable cost is the cost for procedures. Currently the agency is earning less on them because of the halt in procedures in the pandemic situation. From documents provided, the panel learnt that

membership fees were decreasing. ACQUIN's own projections show a modest deficit from 2022 and in the interviews ACQUIN admitted that this was a problem, but also underscored that their experiences from 2020 show that they do better than projected and that 2020 was not a "normal year" by any means. Currently, both the Board members and CEOs of the Secretariat insisted about the stability and sufficiency of financial resources, seeing project funding and savings accumulated during the pandemic situation as primary guarantors of this. In addition, they explained that projections regarding future procedures were looking better than two years ago.

Analysis

The video introducing the agency was nice and illustrative, and although it cannot fully substitute for the physical visit to the premises and introduction to the staff, it was very useful and appreciated.

The agency said its present infrastructure and human resources capacity was sufficient with regard to the amount of work to be done. All staff of ACQUIN the panel met – working on external quality assurance procedures, administrative staff, and CEOs – seemed to be dedicated and knowledgeable of their respective areas of duty and left a very positive impression.

The panel paid particular attention to the concept of student assistants and their role in the everyday work of the agency to make sure they are not substitutes for regular staff members. It was explained that they work on a 20-hour/month basis only for supporting tasks under the supervision of the process manager. The usual length of the contract would be 6 months, extensions offered. The agency provides the possibility to try one's interest in external quality assurance to local university students, and by this way, after a trial period, some of them became regular employees of the agency. Obviously, this is not the only way to get hired at ACQUIN.

The panel received written information and heard detailed explanations during the visit on workload allocation and monitoring, and is thus confident that the 2016 review recommendation is implemented.

As mentioned, the panel requested and received several confidential documents pertaining to the budgetary situation of ACQUIN. Having analysed them, the panel in the end could not share the optimism of the Board members and the two CEOs due to several reasons. First of all, there is not only a sharp decrease in international procedures during 2019-2020 (almost two times in a row), but the last strategic planning session reiterated the primary orientation of ACQUIN towards the domestic market, due to political and economic reasons. The domestic market remains very competitive though, with other agencies being subsidised by regional governments, for example, while ACQUIN is not. Secondly, the pandemic situation caused by Covid-19 has a double effect on the agency's finances: while a recent switch to remote visits saves costs, there is far less potential for procedures to be implemented as well, especially international and initial accreditations. Once the pandemic is over, ACQUIN either has to resume the procedures as they were before; or, in order to continue saving, adapt their cost structure to the fact that online reviews are usually cheaper. There is yet another factor at play as well. According to the latest trends in Germany, HEIs are likely to use the provisions of the post-Constitutional Court framework and move away from more voluminous and costly programme accreditation procedures to the system accreditation procedures which are more holistic and save cost for institutions. Indeed, the SAR itself cites this as a fact. In the panels' view, surveying ACQUIN's own members could provide the agency with some more tangible information for future planning. The agency admitted not being the cheapest in its field and there are only so many possibilities to economize without endangering client satisfaction. Keeping costs down is not sustainable in the long term as it inhibits the development of the agency and its staff, and in particular having in mind the need for not only implementing accreditation procedures, but also other QA work, especially engagement in thematic analysis and communication which both require strong attention and some investment. As to projects, ACQUIN certainly was and is very active and successful in those partnerships, but their budgets are devoted to specific work to be done according to the project plans. While projects may keep ACQUIN's staff busy and add to the overall budget, relying on projects is a risky strategy as it depends a) on available project funds in a competitive environment and b) on the agency being able to balance its different activities without changing its identity.

Panel commendations

ACQUIN Secretariat is composed of a dedicated team of colleagues driven by passion for quality in higher education.

Panel recommendations

The panel recommends the Board and the CEOs of the agency to revisit the question of the market strategy, including the overall package of services offered by ACQUIN, as well as its developmental needs and financing in order to secure the agency's financial stability in the long run.

Panel conclusion: substantially compliant

ESG 3.6 Internal quality assurance and professional conduct

Standard:

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

2016 review panel recommendation

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

Evidence

The panel received a full text of the ACQUIN Quality Manual in English, revision No. 8, last amended 12/10/2020, total 151 page. The original version of the document in German is published on the agency's website. Responsibility over the entire quality management system is vested with the two CEOs, who are also responsible for the regular (usually annual) quality reports, and there is a designated quality manager. The agency has defined its quality goals as follows:

- to be a preferred partner of higher education institutions for procedures of programme and system accreditations as well of institutional accreditations and certifications;
- to actively participate in shaping the higher education policy debate;
- to further promote quality development and quality culture at HEIs as well as
- to further develop existing expertise in the various core areas of quality assurance in the national and international higher education sector.

The tools for quality management are divided into external and internal. Internally, feedback is gathered from project managers and administrative staff, the three advisory bodies and the GA. Internal feedback and monitoring at the Secretariat is done in several ways, to that end a position of process manager was established, also a so called internal process and quality assurance division (iPQ) created. The latter is not an organizational unit in a traditional sense, but a horizontal unit, consisting of heads of divisions plus the process manager and ACQUIN employees in changing constellations, depending on the task at hand. Their collective duty is to generally assure quality both internally and externally, which primarily concerns document management of ACQUIN and requires coordination with other divisions. Head of iPQ holds weekly meetings with the two CEOs and heads of other divisions. Externally, feedback is gathered from HEIs, experts, the GAC, and ENQA. Feedback is gathered in both quantitative and qualitative formats, also both in a structured way (feedback questionnaires) and more informally. Representatives of HEIs whom the panel met were satisfied about highly professional and ethical behaviour of both ACQUIN's staff and experts.

As mentioned earlier under ESG 3.1, the Code of Ethics is published on the website and is applicable both to Secretariat's staff, all advisory bodies, and everybody with whom ACQUIN conducts business

(currently – mainly expert groups, previously – also expert committees). The QM also contains information on how impartiality of experts should be ensured with a list of examples that lead to exclusion from the panel. Training is provided to all concerned – experts, advisory institution members, and staff during the induction period. ACQUIN supplied additional explanation how internally non-discrimination and tolerance is assured, including handling of internal conflicts.

As to communication with relevant authorities of those jurisdictions where ACQUIN operates, the QM provides evidence on cases where ACQUIN is officially recognized (like in Germany, Kazakhstan, Austria, Switzerland, Mongolia) and also information on cooperation agreements with other QA agencies. No clear information is given on communication with authorities in the rest of countries where ACQUIN's accreditation is sought for enhancement only and does not substitute local mandatory procedures (like in Oman, Egypt etc.).

For internal accreditation procedures, the QM mentions that it is a responsibility of the head office to check in advance whether the study programme is eligible for accreditation; the Anabin database⁶ is used as a source. The description of the institutional accreditation procedure in the QM is more vague regarding the jurisdiction to which this procedure applies – is it for the domestic market or international; some references are to the German context (the Science Council and seven audit areas which apply to private HEIs), while others – not.

Alignment to ESG is mentioned in descriptions under relevant procedures in the QM. There are no subcontractors who would be acting on behalf of ACQUIN, aside from expert panels.

In the SAR, the agency mentions a designated project, under which an external team from the Harz University of Applied Sciences carried out an evaluation project during 2019-2020. The results of it are expected to support the agency in its further development and enhancement of its internal processes.

Analysis

The quality policy of ACQUIN, as published on the website, is very brief, also next to it the full QM is available. In the panel's view, it would suffice to publish the general quality policy aims and list the agency's standing in relation to six headlines as expected by the guidance under ESG 3.6 and keep the long and detailed document internally.

Following the recommendation from the previous review, the QM was updated, core processes are described to the minute detail. This resulted in a very long document. However, not all chapters of QM follow the same structure: descriptions of steering processes and supporting processes are very short and do not contain clearly identified goals, quality standards, process measurement variables, process accountability, and tools. Some more general indicators of quality of the entire organization are found under chapter 7 "Quality Management". As mentioned under ESG 3.4, the QM needs yet another revision to organically incorporate the thematic analysis process, and to follow the standard description just like in the case of other core processes. Overall, the panel proposes ACQUIN to rethink the content of the QM to keep the document at reasonable length, and to make it more user-friendly (perhaps, some information could be provided in the format of flowcharts). Essential information should be provided without repetition, and key performance indicators should be clear for every process, not only external quality assurance processes.

The panel understood that responsibility over preparation of the quality reports is shared in multiple ways. The panel is positive that internal and external feedback is gathered and analysed well. Internal quality control system is elaborate and seems to work well, with the exception of the question of production of external review reports, as described under ESG 2.6. Guarding measures against intolerance and discrimination, as well as handling internal tensions are proper.

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⁶ Together with the "Recognition in Germany" portal and the "BQ-Portal", Anabin is one of the three central information offers on the subject of "Recognition of foreign professional qualifications". It is owned by KMK.

It must be said that the concept of authorities with whom the agency has to establish communication when carrying procedures abroad is not very clear in the ESG. The panel interprets it to at least include public authorities (such as Ministries of Education) and external quality assurance agencies (which may or may not have a status of a public institution). Given this ambiguity, the agency would be on the safe side to adopt the wide interpretation and act accordingly.

From the descriptions in the SAR and speaking to employees, the panel could see that the professional development of staff would benefit from a more systematic approach. Planning of it should be incorporated into the annual work plans and the overall strategy. The panel suggests not to postpone the in-house training during the lockdown because of the pandemic situation, but rather to search for innovative ways to adapt its format to suit online provision.

Panel commendations

The agency is commended for engaging with the Harz University of Applied Sciences with the aim to analyse and strengthen the development and enhancement of quality of its internal processes.

Panel suggestions for further improvement

- The concept of Quality Manual should be revised to keep the document of reasonable length and to provide a consistent approach to description and to monitoring of key performance indicators per each process.
- 2. The professional development of staff would benefit from a more systematic planning approach. Internal training of staff, previously done on site, should be adapted to the online format respecting health and safety requirements in the current pandemic situation. After the crisis, the format should be reconsidered maintaining useful and efficient practices.

Panel conclusion: fully compliant

ESG 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.

2016 review panel recommendation

None.

Evidence

ACQUIN is subject to a cyclical external review, as was explained under ESG 3.2 of the present report. After the last review by the GAC panel, the GAC issued the resolution AC 60/2016 containing three conditions that ACQUIN had to attend within the six months term. The agency has fulfilled its obligations. Consequently, ACQUIN received the status of a re-accredited agency until 30th June 2021.

When re-confirming ACQUIN's membership in the association, the ENQA Board in its final decision of 28th September, 2017 requested the agency to draft a follow-up report in two years' time, by February 2019. In response, ACQUIN sent the follow-up report, dated 31st January 2019. The agency reported that by that time, one recommendation became irrelevant, nine recommendations were implemented, one was partially addressed, and six recommendations were not implemented yet. Information was also provided on strategic planning regarding various future scenarios, reorganization in relation to expert committees, and internal changes at the Secretariat of ACQUIN. The latter included switching from the "project organisation" of programme accreditation procedures to a "batch organisation" with the aim to reduce the spectrum of diverse tasks for each employee. The ENQA Board approved the report and took note of the progress that had been made. Furthermore, the

ENQA Board encouraged ACQUIN to make use of the outcomes of the review in their strategic planning.

In the SAR for the present external review, ACQUIN provided information in 17 points, how it addressed recommendations by the GAC review panel.

Analysis

The agency undergoes regular external reviews, once every five years. ACQUIN promptly responded to conditions attached to their re-accreditation by the GAC in 2016 and submitted the follow-up report to the ENQA Board in time. The panel has heard that their results provided an opportunity for the agency to reflect and improve.

As to the substance of the GAC panel recommendations, some improvements did not take place as initially thought. In the panel's view, taking corrective actions considering changes in context is fine, as long as those abolished plans are substituted with a new clear policy and an implementation plan which is duly enacted. Obviously, the fundamental change in the entire quality assurance framework in Germany affected ACQUIN in a significant way, and time was needed for adaptation. Notwithstanding that, one area of weakness identified in the 2016 review – thematic analysis – did not depend on the external quality assurance framework, thus, could have been addressed much more swiftly and to a greater extent. Notably, in its re-admission to EQAR decision dated 3/12/2016, the RC also underlined that ACQUIN was expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.

Panel suggestions for further improvement

ACQUIN should put more efforts to address recommendations resulting from all external reviews without delay, so that by the time of the next review, not only plans can be shown, but results thereof could be demonstrated.

Panel conclusion: fully compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

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.

2016 review panel recommendation

"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."

Evidence

The Interstate Treaty starts with the principle set in Article I, point (I) that assuring and enhancing the quality of teaching and learning is the primary responsibility of HEIs, which perform this task through internal QA and enhancement measures and through external procedures (system accreditation, programme accreditation and other). States bear joint responsibility within the scope of QA and enhancement for guaranteeing the equivalence of corresponding study and examination results as well as qualifications and the possibility of transfer between HEIs (art. I, point (2)). It is further

established that procedures are carried out at request of HEIs on the basis of self-evaluation reports, and encompassing formal and academic criteria.

The Specimen Decree defines expectations and criteria in a more detailed way, e.g. it contains a clear reference to the learning outcomes, recognition of qualifications in accordance with the Lisbon Recognition Convention, recognition of prior learning, usage of ECTS, respect for diversity of the students and their needs, gender equality and compensation of disadvantages, to name just a few. The internal quality management systems at HEIs are meant to follow values and standards of general principles for teaching and to aim for continuous improvement of the quality of studies while closing the quality loop.

ACQUIN defined its mission as promotion of the quality university education and support to the establishment of a quality culture at HEIs in Germany and abroad. ACQUIN's goal is to carry out nationwide and cross-university accreditations of Bachelor's and Master's degree programmes in all disciplines in order to ensure a high quality of degree programmes, to create market transparency, to increase the attractiveness of HEIs for foreign students and to promote the comparability of academic degrees.

The agency provided a table comparing expectations of ESG 2015 with the criteria for national procedures – programme accreditation and system accreditation – listed separately, mapping done by the GAC. They list all standards of ESG Part I in slightly different aspects. Templates for expert reports and accreditation recommendations also contain references to standards within ESG Part I. In addition, the SAR of ACQUIN contains a table with a matrix of all procedures and citations how they align with ESG part I. Therefore, ACQUIN has addressed the recommendation of the 2016 review.

For certification and international study programme accreditation (except for the cases in Austria and Switzerland), ACQUIN takes ESG I standards from 1.1 to 1.10 as basic criteria; for PhD programmes Salzburg Recommendations are considered in addition. The template for the expert assessment report and the accreditation recommendation contains guiding questions under each standard.

For international institutional accreditation there are six mandatory examination areas plus an optional criterion of internationalisation, they are linked to relevant parts of ESG I (all standards covered). Similar as in the case mentioned above, the relevant template for the external assessment report and the recommendation for the AC contain guiding questions under each part.

For procedures in Austria and Switzerland, criteria defined by respective authorities of those countries are applied, which are in line with ESG, to the extent as external reviews of AQ Austria and Swiss agency AAQ demonstrate. It was explained that system accreditations, audits and institutional accreditation procedures focus on the internal quality management related to teaching and learning, and even extend to research strategies and activities.

Analysis

The federal level legislation vests primary responsibility for quality in autonomous HEIs, which is coupled with their obligation to undergo mandatory external accreditation procedures either on a programme or system level or the third alternative which is named as "other". The latter is defined as alternative procedures agreed with the GAC and the respective states as long as they satisfy jointly established formal criteria of the Interstate Treaty and the Specimen Decree, as well as principles of an appropriate involvement of academia. Within Germany, ACQUIN performs mandatory procedures of the first two types but not the third one. All procedures begin from institutional self-evaluations.

Representatives of HEIs with whom the panel met were confident that QA of teaching and learning started with their internal quality management and felt being respected in their capacity to perform that. They also conveyed a notion of being supported by recommendations of expert groups to strive for improvement. External QA results directly depend on institutional capacities and performance. Expert reports were seen as providing assurance to the public on their capacity to manage quality provision and an inspiration for enhancement. Experts who talked to the panel also assured that they operated on the principles of trust, autonomy, accountability, and improvement.

When asked about the mapping of all standards within the ESG Part I and procedures within Germany, ACQUIN expressed a view that this was not the agency's task, but of the GAC as the decision making authority, and that the agency relied on information provided. When repeatedly inquired, the agency supplied a more detailed table with quotations of the same articles and explanations, as well as guiding questions suggested to the experts in the adjacent column as an illustration. The panel selected ESG I.4 as a random sample standard and checked its mapping with the articles of the Specimen Decree. The panel found provisions on recognition of prior learning within Article 9 point (1), and the recognition of qualifications to be performed in line with the Lisbon Recognition Convention under Article I0 point (2), however neither of these articles and points are specifically mentioned under the mapping tables of the GAC and ACQUIN. This left the panel wondering about completeness of the mapping and correctness of references. Having read and analysed the Interstate Treaty and the Specimen Decree, the panel is positive that all standards of the ESG part I are covered within the programme accreditation and system accreditation procedures (addressed differently, as stipulated). Yet, ACQUIN is advised to revisit the mapping and discuss the issue with the GAC as appropriate with the aim of aligning the understanding and appropriate communication to the public.

In addition, the panel encourages ACQUIN to explore how it could contribute to the cooperation within the triangle of HEIs, the German ENIC-NARIC, and other organizations addressing fair recognition and admission as is expected in ESG I.4. ACQUIN did not mention any ongoing collaboration in this respect. Notably, guidelines under this standard call for such a multilateral engagement. Inspiration could be drawn from the results of several projects within the international ENIC-NARIC community⁷.

Panel commendations

Higher education institutions trust in ACQUIN, they feel respected and appreciated with regard to their individual profiles and approaches.

Panel suggestions for further improvement

- I. ACQUIN is advised to revisit the mapping between ESG Part I and the programme as well as system accreditation criteria and discuss the issue with the GAC with the aim to align understanding and communication to the public.
- 2. As suggested by the guidelines of ESG I.4, ACQUIN is encouraged to explore how it could contribute to the cooperation within the triangle of higher education institutions, the German ENIC-NARIC, and other organizations addressing fair recognition and admission.

Panel conclusion: fully compliant

ESG 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.

2016 review panel recommendation

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

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⁷ E.g., see https://www.enqa.eu/wp-content/uploads/LIREQA recommendations final version web.pdf

Evidence

Germany is a federal state; states came together to define a joint framework which is geared at both assurance and enhancement of HE quality. The purpose of that is to enact common standards for qualifications (considering both academic and professional aspects) and to create conditions for smooth interinstitutional and interstate mobility. Accreditation by intention is a binding, science-led procedure in which academic peers have a decisive voice. This new accreditation system implements stipulations of the Federal Constitutional Court, but also rests on the new version of the ESG and the European Approach for Quality Assurance of Joint Programmes (EA), both adopted by EHEA Ministers for education in 2015.

Background considerations for the new framework are provided in the Specimen Decree and also its accompanying document – Substantiation of the Specimen Decree. The latter sheds light on the wider context and gives interpretation to each article of the Specimen Decree. It explains that the opportunity was taken not only to revise the rules themselves, but also to adopt more flexible procedures which would be optimised on the basis of former experience with accreditation, and would contribute to cutting costs and dismantling bureaucracy. The document contains that consideration was given to results of hearings with representatives of the HRK, the GAC, the QA agencies, an association of private universities, the students, and the school authorities.

The Specimen Decree has a clause that the application and consequences thereof would be verified three years after it comes into effect, and that the Standing Conference of the Ministers of Education and Cultural Affairs of the states has to be notified of the result.

Between the 2016 and the current review, ACQUIN implemented six types of procedures:

- Programme assessment (in Germany),
- Assessment of quality management systems (so-called system accreditation) in Germany,
- Assessment of joint programmes in Germany (joint programmes between a German HEI and a HEI abroad),
- Institutional accreditation (both within Germany and abroad),
- International programme accreditation,
- Certification of continuing education programmes (both within Germany and abroad).

All these procedures are based either on the national frameworks in line with the ESG (of Germany, Austria, and Switzerland), or on the ESG themselves. As to the 2016 review recommendation, in the SAR the agency informed that conflicts between the ESG and national regulations are now mentioned in the reports, and that reports also point out if and how national standards are incommensurate with the ESG. In development of international procedures, ACQUIN consulted own advisory bodies that include stakeholder representatives.

ACQUIN is gathering feedback on its performance from members during the general assembly, through questionnaires after completion of procedures, and informally; so far the assembly is in general positive and supportive of the agency's work. Customer orientation is visible from all publications and the website of ACQUIN bearing the slogan "Your intention. Our focus.". The nature of the agency consisting of members being primarily HEIs is reiterated in another slogan, featuring both on the website and heard by the panel during the meetings, namely: "From universities for universities". Throughout documentation of the agency that is publicly available and on the website, ACQUIN emphasises wide knowledge of foreign languages and of different national contexts.

The agency informed that it is in regular contact with other German QA agencies (several times per year) and the GAC.

Analysis

When establishing the new framework for accreditation, past experiences were analysed, also joint commitments of the EHEA – the ESG and EA – integrated into the legislation. Stakeholders were consulted, ACQUIN was among them. However, during the visit at ACQUIN, the panel has heard (not once and from various stakeholder groups) regrets that in the most recent reshaping of the German external quality assurance system QA agencies and other stakeholders were not consulted to the expected degree. It is difficult for the panel to judge if that was the case, however, the sentiment is here. Perhaps this speaks to the fact that wide stakeholder forums, reflection and discussions on how the new framework works and, eventually, could possibly be improved, are very much welcome. Obviously, quality of higher education is a shared responsibility.

In ACQUIN's opinion, after an initial period of uncertainty regarding the new legal framework, both HEIs and experts are now well acquainted with the new regulations and procedures. During the visit, the panel has heard concerns that under the present framework too much focus is given for quality assurance and enhancement aspects do not feature that prominently as they could. At the same time the panel learnt of reassurances in the keen interest to see the results on the efficiency and the added-value of the current framework being assessed, as promised after three years of operations from its introduction in 2018, thus, this exercise potentially falling within 2021. However, from other discussions it appeared likely that the impact assessment would be postponed till 2022-2023 considering unequal uptake by various states. Both HEIs and QA agencies in Germany operate under the market conditions, thus, the uniform application of accreditation criteria, consistency of procedures and judgments is an important issue. And there is more to that – effects on quality of teaching and learning have to be seen.

Methodologies for institutional and programme evaluation as well as certification which ACQUIN applies abroad, are fit for purpose, as they are directly applying the ESG. Methodologies for procedures in Austria and Switzerland are also believed to serve the local HE systems well, as all foreign agencies wishing to operate there, including ACQUIN, have to apply local legislation.

The panel understands that it is not up to ACQUIN to define its approach to the programme accreditation and the system accreditation performed within Germany, and that the agency operates in a complex legal framework which is given. Nevertheless, ACQUIN is encouraged to think of ways how it could give the enhancement aspects more prominence, both within domestic and international procedures and their reports, and through other activities. It was obvious to the panel that both representatives of HEIs and students are very much looking for that. As mentioned under ESG 3.4, intensified efforts in thematic analysis and their dissemination, as well as possible additions to the template of the expert reports to underscore features of good practice found in institutions (see further under ESG 2.6) are some possible venues to pursue, but ACQUIN should not limit itself only to these and may come up with other ideas to that end.

Bureaucracy and costs for HEIs are diminished by moving from shorter and varying accreditation terms (depending upon the procedure) to the standard 8-year accreditation term under all procedures. While institutional representatives salute this extension, student representatives expressed their concern about the too long accreditation period. Making system level decisions, obviously, is a balancing act.

The option of an "accreditation with conditions" and subsequent reaccreditation allows monitoring of institutional progress without falling back to shorter accreditation terms. Moreover, it also ensures that satisfactory progress has been made and both students and the public can have confidence in the quality of HEIs. From annual activity reports of AQUIN, the panel has learned that it is quite often that institutions have accreditation with conditions imposed. For example, the 2019 activity report contains that the proportion of conditions imposed for initial accreditation procedures was less than 40 percent

for the first time in the year under review than for re-accreditations, for which the proportion of conditions increased over 50 percent. In that same year ACQUIN checked the fulfilment of the requirements for 207 study programmes. This stands towards the evidence that the system is a robust one, being reliant both on internal quality management within HEIs and balanced with rigorous external accountability procedures performed by ACQUIN (or other agencies listed on EQAR). ACQUIN was convinced that due to this elaborate monitoring in the follow-up phase after the accreditation decision, the agency ensured a significant contribution to the quality improvement of teaching and learning.

Panel suggestions for further improvement

ACQUIN is encouraged to think of ways how it could give the enhancement aspects more prominence, both within accreditation procedures and their reports, and through other activities, thus even better supporting higher education institutions and meeting student expectations.

Panel conclusion: fully compliant

ESG 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

2016 review panel recommendation

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

2016 EQAR Register Committee's flagged area

"ACQUIN's international accreditation and evaluation activities [should] take place on a clearly defined and transparent basis, within and beyond the EHEA."

Evidence

Implementation of processes is described under relevant procedure guidelines and in the QM, published on the website.

As described in the introductory part, currently procedures within Germany – programme accreditation (including joint programmes) and system accreditation – are regulated by the Interstate Treaty and the Specimen Decree. Those procedures follow the general structure of a self-assessment – a site visit – expert report – follow-up. ACQUIN explained that the GAC is responsible not only for taking accreditation decisions, but also for the follow-up part as well (in both procedures).

A particular feature of the system accreditation procedure are two site visits. During the first one, discussions with the senior management (rector/president) of the HEI, the quality management team, students, and the internal accreditation decision body are taking place. The second visit is meant for the detailed analysis of the internal quality management system, its implementation as well as gathering information on the random samples which are collected to estimate the impact that the quality management system is intended to make on the level of the study programme.

In the international programme accreditation, it is said that the standard model includes a self-assessment – a site visit – expert report – follow-up. Institutional accreditation is also arranged with the same standard model. In the event of successful outcomes, in both cases the ACQUIN label is awarded and the accreditation is valid for six years. If a programme is accredited with conditions, the HEI has to submit documents proving the condition's fulfilment within a period of 12 months; the AC is making decisions regarding thereof. The handling of recommendations is a part of the reaccreditation/follow-up procedure. Substantial changes have to be reported to the agency, should they occur.

Common smaller elements of all above mentioned procedures include: guidelines to the HEIs for the elaboration of the self-assessment report that are provided by ACQUIN; appointment of the expert group where an institution can request a change provided there are grounds for that; a schedule of the visit to a HEI agreed by ACQUIN and the HEI in question; a physical visit that is carried out during a course of several days and which includes meetings with multiple internal and external stakeholder groups and a tour around facilities; compilation of expert report; a possibility for a HEI to comment on factual correctness of reports, and their publication after the decisions have been made. A HEI may complain or appeal at any given step of the accreditation procedure. In institutional accreditation and certification procedures there is yet another element – a substantial changes report required (also see under ESG 2.5).

Institutional accreditation in Switzerland is determined by the guidelines of the Swiss agency, approved by the Swiss Accreditation Council (SAC), which is also the decision making authority, and passing judgements based on an eventual expert report by ACQUIN. Just like with system accreditation in Germany, there would be two site visits to an institution. Monitoring of fulfilment of conditions/follow-up is a shared responsibility between the SAC and ACQUIN, the protocol for that is defined. For audits in Austria, ACQUIN has the decision making power, its AC would take the final decision, and follow-up is in the hands of ACQUIN.

In a certification procedure, a physical visit is standard, but not mandatory. The QM contains that in exceptional situations, the alternative method for an online visit can be examined. In this case the onsite visit would be replaced by an online visit, with a similar procedure to the on-site visit.

Recommendations for follow-up actions are provided in the accreditation reports. Standing expert committees used to deal comprehensively with the process of the fulfilment of conditions and the resumption of suspensions (for the latter, see under ESG 2.5). Since expert committees were abolished, from mid-2020 onwards this task was transferred onto the AC. The first step in the procedure as a rule is the agency staff member examining documents and preparing a draft to determine whether the conditions have been fulfilled, and the measures implemented by a HEI are compared. In case of subject and content requirements, the expert group may again be involved (if necessary). The AC makes a decision on the basis of documents from HEIs and the draft statement on fulfilment of conditions.

Analysis

Domestically, the structure of ACQUIN activities on study programmes and in system accreditation procedures is defined by the German framework. Internationally, the agency bears responsibility for all parts of the standard model (a self-assessment – a site visit – expert report – follow-up) of external quality assurance processes except for the case of Switzerland.

Both recommendations of 2016 review are implemented – procedures are documented (except for follow-up, as is described below) and published. However, their accessibility and user friendliness could be improved. Undoubtedly, in many cases the QM contains very valuable information on procedures, yet it would be more convenient for HEIs to find all relevant details on procedures of their interest in the procedure guidelines itself, including on follow-up.

The concept of "follow-up" is not very clear, it looks intermingled with the concept of "reaccreditation". In the QM, the usage of terms related to follow-up is not very consistent: often it is

understood as "fulfilment of conditions", in other cases – "fulfilment of conditions/follow-up" (like in case of audit in Austria). Domestically, ACQUIN states that follow-up is the responsibility of the GAC because the latter takes accreditation decisions. The panel cannot concur with this view and wishes ACQUIN to establish its own systematic procedure for follow-up process in programme and system accreditation procedures irrespective of the GAC activities.

From the way follow-up is defined in the QM regarding the international programme accreditations, the panel sees that follow-ups are connected to conditional accreditation and there is no clear follow-up in case when the accreditation was issued without conditions. In the latter instance, further engagement between the HEI and the agency is absent (unless substantial changes occur, but that is a different process). In case of domestic and international institutional accreditations (except for Austria and Switzerland), the QM contains nothing on the follow-ups and this is a clear deficiency. In case of institutional reviews in Switzerland, follow-up is foreseen only in cases of conditional accreditation, while in case of accreditation without conditions the process is not defined. From the panel's view, the ESG clearly expects follow-up to be a standard feature of each external quality assurance process and it is not tied to the question if the agency itself takes final decisions or not. Therefore, ACQUIN needs to develop a transparent and coherent procedure for follow-up beyond the re-accreditation.

Considering the restrictions, imposed by the pandemic situation, procedures and visits were suspended (the agency supplied such a list). While the panel trusts ACQUIN is in good direct contact with all institutions affected, still, more general communication on the matter could also be made publicly available through the website of the agency to all stakeholders.

Panel recommendations

- I. For transparency purposes, procedure guidelines should contain more specific information on all elements of the external review model.
- 2. ACQUIN should further develop their follow-up procedures more in line with the agency's improvement oriented approach and beyond checking on whether formal requirements set by the GAC or the Accreditation Commission have been fulfilled.

Panel suggestions for further improvement

Guidance regarding suspension of procedures or virtual visits because of the current pandemic could be published.

Panel conclusion: substantially compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

2016 review panel recommendations

- I. "ACQUIN should increase the proportions of international experts in programme accreditation procedures, in particular if smaller subject communities are affected."
- 2. "ACQUIN should comprehensibly document how the impartiality of experts and members of the committees is ensured for the public."
- 3. "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."

- 4. "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."
- 5. "ACQUIN should clarify that a prior consultation of the higher education institution is excluded in the criteria for the impartiality of experts."

2016 EQAR Register Committee's flagged area

"Activities for training and preparation of experts need to be strengthened"

Evidence

Prior to the reform in Germany, ACQUIN oriented itself at the procedure and criteria for the appointment of experts (2015) approved by the resolution of the AC of ACQUIN. It was succeeded by a new version of the document (2018), which reflected the expert selection principles defined by HRK8, as the latter are binding for all agencies active in Germany. These principles pertain to the national procedures, but the agency applies the same approach to international procedures as well. The QM contains relevant information on expert selection as per latest legislation.

In the pre-Constitutional Court setup, standing expert committees were selecting experts; after the Interstate Treaty came into effect, the AC has been choosing the panel members in a written circulation procedure. As a rule, the groups include both experienced experts who have already participated in the procedures of ACQUIN, as well as new experts who were not previously involved.

The size of the expert group depends upon the procedure: for certification of continuing education the minimum size is three persons, for assessment of national study programmes (including joint programmes) the minimum possible size is four persons, for cluster accreditation procedures the number of experts is increased accordingly; in other cases the minimum size of the group is five. Following the Constitutional Court provisions, in all cases academics constitute the majority in the group. It is mandatory to have labour market representatives in all procedures but the international institutional accreditation.

The panel learned from the SAR that students are included. From expert reports the panel checked on the agency website, on the DEQAR, and also a sample (encompassing all procedures) that was requested from the agency, it was visible that students are part of the groups. There were two exceptions identified though:

- in the joint accreditation procedure with Kazakh QA agency IAAR at L.N. Gumilyov Eurasian National University (ENU) of five programmes, conducted in 2017-20189. The agency explained that it was one procedure encompassing several study programmes, but the report has been split up in three different reports because of collaboration in three different languages (Russian, English, Kazakh); two students were included in other cases and feature in the panels mentioned in those reports¹⁰;
- for certification of continuing education programmes procedure either a student or a representative of the target learner group of the programme would be invited. Indeed, from

(https://www.hrk.de/positionen/beschluss/detail/leitlinien-zu-der-benennung-von-gutachterinnen-und-gutachtern-und-der-zusammenstellung-von-gutachter/).

https://www.acquin.org/en/programmeaccreditation/completedprocedures/?land=Kazakhstand%20&order= DESC&vdsid=9974

⁸ "Binding Guide to the Appointment of Academic Teaching Stuff as Experts in accordance with the Article 3 (3) of the State Treaty on Accreditation" and "Guidelines on the Appointment of Experts and the Compilation of Expert Groups for Accreditation Procedures" in the version dated 24 April 2018

⁹ See

¹⁰ See https://www.acquin.org/programmakkreditierung/abgeschlossene-verfahren/?land=Kasachstan&order=DESC&vdsid=9981

expert reports the panel saw that in case of certification of teacher training programmes in Kazakhstan, a teacher from the target group to whom the programs are potentially applicable, was part of the panel along with academics (but not students). In another case, for certification of mathematics for students of engineering and economics in Germany, a student reviewer was present in the expert group.

Respecting the recommendation of the 2016 review, the panel was looking at the extent to which international experts are included. ACQUIN provided statistics on the diversity of experts who served for the agency during the last five years.

Year	Total number of procedures	Total number of reviewers	Internationals from all reviewers, %	Number of countries by reviewers' origin ¹¹	Male reviewers, % from all in a given year	Female reviewers, % from all in a given year
2016	607	851	2	5	75	25
2017	531	645	5	6	71	29
2018	451	728	I	7	75	25
2019	523	1005		4	69	31
2020	437	605	0.3	2	75	25

Fig. 3, summary statistics on expert group members

The agency worked with experts both from the EHEA and beyond, namely (in alphabetical order): Austria, Bosnia & Herzegovina, Bulgaria, Denmark, France, Great Britain, Kazakhstan, Morocco, Mongolia, Russia, Slovenia, Switzerland, and Ukraine. In terms of absolute numbers, the vast majority of international reviewers came from Kazakhstan, and they served for accreditation procedures in Kazakhstan. Reviewers from other countries came in very small numbers, from one to four at most.

The reviewers declare their independence and impartiality in writing for each procedure; the panel was provided with a relevant sample document they sign. This form was adjusted giving due consideration of GDPR requirements. Examples of possible bias are also given in the QM. HEIs are informed on the personal composition of the expert groups and can object (provided there are grounds), however, do not have a right of veto – final decisions in all cases are made by the agency.

ACQUIN explained that preparation of experts is done in stages for all procedures. First of all, potential experts, in a consultation phase and before they agree to take part in the procedure and are officially appointed, receive initial information on the accreditation procedure. Once agreed and confirmed as group members, they have to get acquainted with relevant documentation by themselves and can get consultation by Secretariat staff as well as the coordinator of the procedure or a former member of expert committees. The expert groups are provided with a handout containing detailed information on their roles and responsibilities within the procedure. In 2016 ACQUIN created an online training video for experts. The agency said that a preliminary meeting of the experts is always held before the on-site visit and takes between two and four hours (depending on the procedure), among the issues covered are acting as reviewer but also preparation in the group for the site visit. For international procedures, experts of relevant groups would receive information on the target country. Representatives from the Secretariat assured the panel that expert training is mandatory for all. However, some reviewers whom the panel met dismissed that they needed training or did not recall having attended one.

Student reviewers said they received training mainly via the GSAP. Both student reviewers themselves and other experts whom the panel met confirmed students being treated as equal and valued members of groups. The panel was truly impressed by the level of knowledge and reflection demonstrated by student reviewers, they are a real asset to the agency.

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¹¹ Including Germany

Analysis

The agency declared it did not maintain a database of experts, however, the panel trusts personal data is handled with care, given ACQUIN's involvement in projects that deal with data protection and GDPR.

ACQUIN has much work to do to better ensure diversity of expert groups. Involvement of internationals is marginal, they constitute less than 5% of all reviewers, and in cases when internationals are included in the expert groups, they are mainly for ACQUIN's procedures abroad. The agency is encouraged to broaden its outlook to international reviewers not to be limited only to country representatives (e.g., inviting German and Kazakh experts for procedures in Kazakhstan), but having wider representation, as was done in several instances, albeit on a very small scale. Female experts are underrepresented: they comprise between 25-33% of all reviewers on the panels in a given year.

The agency cited German language knowledge as the biggest barrier for internationalisation. As already stated in this report under ESG 3.1, the panel is not convinced by this argument. The complexity of the German external quality assurance framework was mentioned as another reason for the low levels of international presence in different procedures. The panel is positive that this issue can and should be properly addressed during the training sessions for experts. In fact, international reviewers who worked for ACQUIN and with whom the panel talked have testified that they felt well qualified and properly supported by Secretariat and prepared for the task at hand. Therefore, the panel concludes that internationalisation potential is underexploited and the recommendation of the 2016 to increase presence of internationals is not attended satisfactorily.

As to the 2016 review recommendation on documentation regarding expert selection, it can still be further improved. The procedure for expert selection should be published on the website of ACQUIN irrespective of relevant passages of the QM. Moreover, the agency admitted that selection of experts for international procedures is not documented, although in practice ACQUIN applies the same principles as to procedures within Germany. This shortcoming should be rectified.

The recommendation of the 2016 review to set out and publish criteria and responsibilities for selecting experts for the procedures of the audits in Austria is addressed: composition and naming of the expert group is included under the guide, which is uploaded on ACQUIN's website. However, the relevant passage of text is very general and does not list detailed principles for expert selection and appointment, also respecting the impartiality considerations.

As a general remark, the panel urges the agency to produce more detailed guidelines for different accreditation procedures. Those, currently uploaded on the agency website, are very generic, they do not contain specific information on the size of the panel or criteria on how the size of the panel is determined. The guidelines do not explicitly state that a prior consultancy of the HEI is excluded. Not limiting to these aspects, ACQUIN is encouraged to revisit the published descriptions of procedures and make them more specific for each procedure.

In between the reviews, ACQUIN strengthened attention to expert training. However, it still seems that a lot of materials are sent to reviewers or made available in other forms, and the agency relies on their self-preparation for the procedures, rather than providing training in groups. Briefing before the start of the procedure, which is also combined with expert discussions and preparation for the visit, once on site, may be too short for that purpose. To avoid repetition and address scepticism regarding the training needed for reviewers, ACQUIN could adopt a differentiated approach both respecting the level of experience of reviewers, and also assuring everyone is adequately prepared. For that purpose, alignment of knowledge and attitudes, and training of skills to act as a reviewer in a group is needed. In the panel's opinion, the best way to achieve this is by direct interaction between ACQUIN and experts. Also, it appears that there is still potential for improved knowledge management by facilitating the exchange of experiences between more experienced reviewers and the newly appointed ones. The agency should not rely that experts would learn from each other merely by observation during the visit, but should actively facilitate this process before the visits.

The panel is aware of the fact that there are cases (for certification of continuous learning programmes, not regular study programmes) where no students were involved in the expert group, but rather "learner representatives" in the broader sense of professional education. The panel still believes it might be advisable to rethink this policy in the light of the current ESG, but also finds no fault in this practice, considering that these are special and limited cases.

Panel commendations

- I. The panel commends the agency on the highly competent and reflective reviewers, including students, and on the way(s) ACQUIN selects them. Reviewers seem to care about quality assurance and quality improvement and are well in line with the agency's improvement-oriented spirit.
- 2. The agency is commended for collaboration with employer representatives and their active inclusion in expert groups.
- 3. The agency is commended for preparing a package of documents meant to support reviewers, which is sent in advance.

Panel recommendations

- I. Student members should be included in all panels for all procedures implemented both within Germany and abroad (including procedures done jointly with other quality assurance agencies and for certification).
- 2. The principles on selection of experts for international procedures should be documented more clearly. Principles and procedure(s) for expert selection both domestically and internationally should be published on the agency's website.

Panel suggestions for further improvement

- 1. Diversity of panels should be improved in terms of expert country of origin and gender.
- 2. The agency should further work on the training of experts, in particular providing training in groups and facilitating mutual sharing and learning by active means.

Panel conclusion: substantially compliant

ESG 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.

2016 review panel recommendations

- "In order to ensure consistency between the committees there should be institutionalized 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."
- 2. "The guidelines for the Austrian audits should be published on the agency's homepage."

2016 EQAR Register Committee's flagged area

"Measures have [to be] taken to enhance consistency in decision-making across different technical committees".

Evidence

On AQUIN's website the following documents are published:

- Manual for Self-evaluation and Program Accreditation in Germany, accompanied by Information on program accreditation basics of the accreditation procedure and procedure, (in DE)
- 2. Offer request for programme accreditation procedures
- 3. Guidelines for Programme Accreditation Procedures (in EN)¹² [international],
- 4. Guidelines for Doctoral Study Programme Accreditation Procedures (in EN)¹³ [international],
- 5. Guidelines for Institutional Accreditation Procedures (in EN) [international],
- 6. Guidelines for International Certification Procedures (in EN),
- 7. Guide to Audit According to HS-QSG Austria (in DE),
- 8. Manual for Institutional Accreditation in Switzerland (in DE),
- 9. Guide to the Accreditation of Degree Programs in Accordance with the University Promotion and Coordination Act (HFKG) and Health Professions Act (GesBG) [for procedures in Switzerland] (in DE).

For current procedures on programme level within Germany, requirements of the Interstate Treaty and the Specimen Decree apply, criteria are published by the GAC, ACQUIN publishes them as well. Decisions are made by the GAC on the basis of ACQUIN reports. The maximum accreditation term is eight years. ACQUIN has produced a document on recurring conditions and recommendations in programme accreditation that is used to assure consistency of judgments by various expert groups (a so-called book of precedents). In addition, the agency has compiled a list of guiding questions (six pages) in relation to programme accreditation, meant to assist experts in their work.

Furthermore, as mentioned under ESG 3.4 of the present report, ACQUIN has made a thematic analysis on cases of divergence between ACQUIN expert recommendations and the final decisions made by the GAC. This analysis was based on 174 decisions made by the GAC. It was discovered that the GAC has modified the accreditation recommendation of the expert panels and ACQUIN's AC in 13% of the analysed cases (for 24 study programmes). In addition, next to accreditation recommendation for the study programme, expert panels often gave recommendations for further development thereof. It has been observed that the GAC did not always consider these suggestions when taking accreditation decisions, but sometimes would issue its own proposals for improvements based on expert reports. Occurrence of these cases was not counted by ACQUIN.

For accreditation of doctoral study programmes, ESG are taken as a basis, *Salzburg principles* (13 recommendations) are also applied. Collectively, these two sets of requirements put together result in eight areas which are subject to in-depth assessment. In addition, other national and international criteria can be applied (such as qualification frameworks and ECTS). The exact scope of the evaluation is set in the contract after consultation between a HEI and ACQUIN. The maximum accreditation period is six years. Possible outcomes include such options as: unconditional accreditation (in case of compliance with standards), conditional accreditation (in case of partial compliance) with a stipulation that a condition(s) have to be fulfilled within a specified period; or refusal of accreditation if one or more standards are failed. HEIs can ask for suspension of the procedure and extension of the timeframe in order to rectify major deficiencies identified.

¹² The title on the document itself as published on the website is somewhat misleading, as it does not clearly state it is for international procedures, see https://www.acquin.org/wp-content/uploads/2021/02/ACQUIN Guidelines Programme Accreditation International v2.pdf

¹³ The title of the document is somewhat misleading, as it does not clearly state it is for international procedures, see https://www.acquin.org/wp-content/uploads/2021/02/ACQUIN Guidelines PhD accreditation v1.pdf

For all procedures on institutional level, the ESG serve as a basis for criteria, they may be supplemented with additional national criteria (e.g. in case of non-state HEIs – by German Council for Science and Humanities) or additional national and international criteria as agreed with a HEI under review. Evaluations can lead towards outcomes as follows: unconditional accreditation (in case of compliance with standards), conditional accreditation (in case of partial compliance) with a stipulation that (a) condition(s) have to be fulfilled within a specified period; or refusal of accreditation if one or more standards are failed. There is an option of suspension of the procedure when HEIs would be given time to attend flaws. During the validity period of accreditation, institutions have an obligation to report on substantial changes, should they occur. These cases are examined by the AC which makes decisions on confirmation of the audit result (in case changes are deemed not significant), or a decision to request the external re-evaluation (a schedule and costs to be agreed separately). Re-evaluation may be just a desk-based assessment, without a visit to the institution. Results of re-evaluation are forwarded to the AC which decides on the outcome (unconditional accreditation, accreditation with conditions, refusal of accreditation).

In case of international certification procedures, the ESG serve as a reference point; additional national or subject-specific requirements, but also international requirements (such as a national qualification framework, the European qualifications framework, or ECTS) can be taken into consideration. In case there is incompatibility between ESG and national standards, experts need to report on them. There are three possible outcomes: unconditional accreditation for a maximum validity period is five years; certification with conditions in case of partial compliance with the ESGs (conditions have to be fulfilled within a specified period of time, and as soon as conditions are met, the certification is given for a maximum period); refusal of certification if one or more standards are failed. Upon request, HEIs can receive a suspension of the procedure and a corresponding extension of the term to address serious weaknesses.

In the case of procedures in Austria and Switzerland, ACQUIN does not apply its own criteria, but works according to the established framework in those respective countries.

The SAR does not provide statistics with categories of outcomes per procedure. The panel wondered about the number of cases with conditions and negative outcomes and looked for information elsewhere. From ACQUIN's annual activity reports, the panel learned that the agency is monitoring the occurrence of conditional accreditation and implementation of conditions. The panel also saw that institutions are using the provision of a suspension of the accreditation procedure and that notwithstanding this option there could be rejections of accreditation in the end. For example, in the course of 2019, three HEIs asked for a suspension of the procedure in order to introduce improvements and to prepare for the procedure resumption; in one case this happened before the AC passed a decision, in another case – after an accreditation with conditions, and once after a refusal of the accreditation. The requests for suspension were granted in all cases. The report had that in another procedure two study programmes were denied accreditation. According to the annual report of 2018, the accreditation procedure was suspended for 12 study programmes which received conditional accreditation in the repeated evaluation procedure; from those, in one case, no fulfilment of the requirements could finally be proven and the accreditation period was not extended. In addition, in 2018, two degree programme accreditations resulted in a rejection; the HEIs in question requested and were granted a suspension of the procedure in order to introduce improvements and to prepare for the proceeding resumption. For five courses of study, two HEIs applied for suspension after resulting programme accreditation with conditions. The requests for suspension were granted in all cases.

There are templates for expert reports produced. ACQUIN informed that it changed the structure of its reports in 2020 following the revision of documents. This was done in order to better reflect

ESG in the procedures that do not fall within the scope of the Interstate Treaty and the Specimen Decree.

As to the first recommendation ACQUIN received in the 2016 review regarding consistency of decision making between the expert committees, it became obsolete. Under the new framework, regulated by the Interstate Treaty, ACQUIN abolished its nine standing expert committees. The second recommendation is fulfilled – guidelines for the Austrian audits are published on the agency's homepage.

Analysis

ACQUIN is clearly concerned about consistency of the decision making. The panel sees a book of precedents, a list of guiding questions to experts, and the analysis on divergence of decision making between the agency expert groups and the GAC as good examples to that end. The number of appeals (less than 1% from total number of procedures) is also regarded as a positive sign attesting to consistency.

The agency has developed documentation on procedures which contain criteria for decisions made: both the assessment criteria and possible outcomes are listed as well. For procedures within the new German framework, criteria and outcomes are set for all external quality assurance agencies, including ACQUIN, the agency has no sovereign choice there. For procedures where ACQUIN does have authority to make decisions, there is a standard set of three possible outcomes:

- unconditional accreditation (in case of compliance with the standards) for a period of six years
 for all procedures but international certification (in that case maximum validity period is five
 years);
- accreditation/certification with conditions in case of partial compliance with the ESG, conditions have to be fulfilled within a specified period of time, as soon as condition(s) are met, the accreditation is given for a maximum period;
- refusal of certification/accreditation if one or more standards are failed.

From ACQUIN annual activity reports and expert reports the panel could see that usually 12-18 months would be given to attend to conditions. Specifying those cases more clearly under procedure descriptions and in the QM would be a welcome development for the sake of clarity to everybody involved in the external quality assurance procedure of any type.

This option of suspension, although not used very often, is clearly important to institutions and should be well documented. Currently, there is just one short sentence in the descriptions of procedures. The QM does not contain relevant information. Transparency should be increased in procedure descriptions to provide clarity regarding which term in which case is given to fulfil requirements (in case of the conditional accreditation), and how requests for suspension of the accreditation procedure are dealt with.

Reasons for decisions are provided within the reports.

Panel commendations

- I. The agency is commended for developing tools for experts to assist in their work (the book of precedents, the guiding questions' list, report templates).
- 2. ACQUIN is commended for conducting a thematic analysis on deviations between decision making by the agency experts and the GAC, who found the analysis of a particular value towards consistency of the reviews and judgements passed.

Panel recommendations

- In its relevant procedure descriptions and the Quality Manual, ACQUIN should establish clearly in which cases conditional accreditation is given and how the term for a higher education institution to attend major deficiencies is established.
- 2. The possibility to ask and be granted a suspension of the accreditation procedure should be more clearly described and communicated to institutions.

Panel suggestions for further improvement

The agency is advised to check that the heading title of the procedure and the title of the relevant document uploaded on ACQUIN's website under the corresponding section fully match.

Panel conclusion: substantially compliant

ESG 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.

2016 review panel recommendations

- 1. "ACQUIN should ensure that the reports of the various procedure formats are easy to find on the homepage, for example through separate areas."
- 2. "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 THE GAC criterion 2.7 also as a condition)."

Evidence

At the beginning, the panel was concerned about ownership of the reports and the roles played by the staff of the agency and by its experts, respectively. The SAR explained that the first draft would be compiled by ACQUIN project manager in charge of the procedure from individual contributions by experts, and then sent for revision to the expert panel; should a HEI have comments regarding factual corrections needed in the finalized report, the ACQUIN project manager would be responsible to decide if these corrections are of factual nature or rather fall into the category of interpretation and are not taken into account. During the visit, the panel heard that the agency staff member would only pre-fill standard procedural information, but would not be drafting the entire body text with argumentation and judgements. Experts whom the ENQA panel met during the visit assured they felt they owned the reports. Representatives of HEIs the ENQA panel met confirmed they were given a possibility to comment on reports before final decisions were taken.

During the visit the panel learned that publishing is done manually. The panel made a random check of reports published on ACQUIN's website. They are dispersed by various procedures via the entire website. The panel also requested from ACQUIN a sample of reports, which was duly provided.

• For <u>programme accreditation procedures in Germany</u>, external QA reports are published on ACQUIN's website in German language, it encompasses a total of 2163 degree programmes.

- Searching is possible by several parameters, but not by year¹⁴. Reports are of standard structure, as suggested by the guidelines of ESG 2.6, but examples of good practice are not clearly indicated in a separate section in them. Decisions by the AC are included in the reports. The reports differ in length considerably (e.g. in engineering between 20 and 60 pages).
- For system accreditation in Germany, the website does not provide a search tool, rather institutions are listed, and by clicking onto the title, reports open. In some cases these reports are full reports (e.g. 24 pages for Technische Universität Ilmenau, procedure completed in 2020¹⁵; 67 pages for Leuphana Universität Lüneburg, procedure completed in 2020; 33 pages for Universität Potsdam, procedure completed in 2019; 37 pages for Otto-Friedrich-Universität Bamberg, in 2018¹⁶). In these cases they are of standard structure, as suggested by the guidelines of ESG 2.6, but examples of good practice are not clearly indicated. In other cases there are only summary reports available (e.g. 3 pages for Zeppelin University, Friedrichshafen procedure completed in 2017), however the agency explained that it was an interim evaluation and at the time the GAC rules allowed publishing of short summaries. In some newer cases full information on accreditation decisions is missing (e.g. the report for Universität Hohenheim is of 61 page long, procedure completed in 2020¹⁷).
- As for reports on the assessment of <u>joint programmes</u> in Germany (joint programmes between a German HEI and a HEI abroad), they do differ in length (one report on two double degree programmes between the University of Applied Sciences Lübeck and the East China University of Science and Technology is 29 pages long; a more recent report of 2020 on Folkwang Universität der Künste and Université François-Rabelais de Toursone is 54 pages long); commendations/best practices are integrated in the text (yet rather sparingly so). Overall, reports appear solid though.
- For international programme accreditation (397 programmes), summary information would be provided directly on the website¹⁸; in some cases full reports are uploaded, in others not; in some cases links to external organizations (like in the case of Switzerland) are given, but not all of them are open, some are broken links. In some cases in one report procedures for several study programmes are put together, in that case an entire document would be rather long (e.g. 68 pages for Joint accreditation procedure at L.N. Gumilyov Eurasian National University (ENU) for five study programmes done in cooperation with another Kazakh agency IAAR in 2017). Decisions are included.
- For <u>international institutional accreditation</u> procedures, some reports are found via the database on the part of the website regarding international programme accreditation, others are available via the website part containing institutional evaluation results. However, not all reports are published, e.g. the panel could not locate the report on Charisma University, based in Turks and Caicos, British West Indies (an evaluation concluded in 2019, accreditation decision made in 2020). The length of reports is varying (e.g. 17 pages for European Polytechnical University Pernik Bulgaria; 27 pages for Private Universität im Fürstentum Liechtenstein; 61 page for Université Saint-Joseph de Beyrouth, Lebanon).
- As to <u>international certification</u>, the website lists institutions by year, external review reports are provided below (e.g. for Nazarbayev Intellectual Schools, Center of Excellence Nur-Sultan

¹⁴ name of the course, country, location, subject area, type of course (undergraduate or continuing)

 $^{{\}color{red}^{15}\,\underline{https://www.acquin.org/wp-content/uploads/2020/09/IImenau\ TU\ Akkreditierungsbericht-Re-System.pdf}}$

¹⁶ https://www.acquin.org/wp-

content/uploads/2019/05/Bamberg U Akkreditierungsbericht Systemakkreditierung.pdf

¹⁷ https://www.acquin.org/wp-

content/uploads/2021/02/ACQUIN Akkreditierungsbericht System Universit%C3%A4t Hohenheim-1.pdf

¹⁸ Subject, level, type of accreditation, duration of study, type of study, university, faculty/department, membership of the expert group, date of accreditation, duration of accreditation, remarks, degree program profile, summary

and Syria Academy of Health Science, both in 2019). When clicking onto the name of the institution, it leads to the general websites of those institutions. Reports are of standard structure, decisions and recommendations included as suggested by the guidelines of ESG 2.6, but examples of good practice are not clearly indicated in a separate section like the recommendations are.

As to the publishing of negative decisions, in some cases reports contain information on the accreditation for certain study programmes being withheld, due to the points of criticism; in that case a relevant HEI was issued a term to remedy the deficits within the provided period (18 months). After a HEI has submitted documents addressing the main points of criticism (which provided the basis for the negative decision), the documents have been positively evaluated by the responsible Standing Expert Committee. Based on the statement of the Standing Expert Committee and the statement of the AC of ACQUIN, a positive decision was taken (in that particular case – for a three year period). All this information – on the journey of a HEI in terms of satisfying accreditation requirements – is available in the report.

Throughout the visit, the agency underscored that in the current legal framework the GAC is making final decisions and thus has the primary responsibility to publish the external review results, while the task of ACQUIN is to promptly transmit its own expert panel reports to the HEI. ACQUIN's website links to the GAC's website. However, this link is given at the bottom of the page, among links to other bodies with whom ACQUIN cooperates, and this link does not lead specifically to the pages where external review results would be published.

In the SAR, the agency mentioned publishing in ELIAS, which is a system owned by the GAC. From there, reports are transferred onto the DEQAR. When inquired about prompt publishing of the external review reports, as per recommendation of the last review of ACQUIN, the agency assured it is now done without delay, within six weeks. The question still remains why such a long period is needed. Additionally, the agency mentioned open questions regarding arrangements between ACQUIN and the GAC for publishing.

The panel checked publishing of the external QA reports uploaded on the DEQAR. There are entries for 220 state and privately owned institutions of both types (universities and universities of applied sciences). Reports were found encompassing both obligatory and voluntary procedures; institutional level (system accreditation) and programme level (first, second and third cycle); report validity extending to the past (expired) and currently valid; with the end result being positive or positive with conditions or restrictions. Reports are available both for German-based institutions, and also those abroad, where ACQUIN implemented procedures (mainly in Kazakhstan, also Bulgaria, Liechtenstein, Lithuania). The agency said that uploading of reports onto the DEQAR was not finished yet but is in the process, scheduled to be completed by February 2022.

Annual activity reports in German language, published on the agency's website (for 2017-2019) contain annexes with lists of procedures (total eight)¹⁹, institutions (name, location, programme title and level – if applicable), and decisions made (e.g., accreditation with or without conditions, re-accreditation upon fulfilment of conditions etc.). In English versions of 2017-2019 annual reports, there are no corresponding tables listing the accreditation results per programme/institution.

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¹⁹ First-time accreditations in Germany, Re-accreditations in Germany, First-time accreditations outside of Germany, system accreditations, Institutional accreditation, Institutional evaluation, certification, system accreditation

Analysis

During the visit, the panel learned that, according to national legislation, publishing of full reports after completion of external quality assurance procedures domestically not always was an obligation, but it changed in 2011. The panel has heard during the visit that stakeholders welcomed very much the provisions for publishing and full transparency which is for the benefit of both internal and external parties concerned.

The panel is confused about the exact role of project managers and experts serving for a particular procedure. Evidence regarding the extent to which ACQUIN's own staff drafts the reports is mixed (what is found in SAR on pages 53-54 and what the panel learned during the visit). While it is customary for the agency to develop report templates and guide experts regarding production of the reports, experts should be vested with the ultimate responsibility to produce them; there should not be mixing between the two roles.

ACQUIN has followed the recommendation of the previous external review and structured publishing of reports by various procedures, on various areas of the website. However, publishing of external review reports appears not consistent, not all reports are uploaded, for some procedures only summary information is available. The panel found that in some cases, for international procedures, reports in English would contain passages in German²⁰. As a rule, while recommendations and accreditation decisions are clearly identified, features of good practice are not listed separately, but mentioned within the body text here and there. The panel thinks this way an opportunity to praise institutions and also to have easier access to data for meta-level analysis is missed, and advises ACQUIN to revisit this approach. It was said that report templates for domestic procedures were pre-defined by the GAC. During the interview with the representative of the GAC, the panel was assured that the GAC was most concerned about ACQUIN fulfilling German legal obligations, however did not exclude the possibility of going an extra mile beyond those requirements to meet the expectations of the ESG. The panel is convinced that giving features of good practice, demonstrated by institutions more prominence in the reports would link well with the mission of ACQUIN to support HEIs in developing their quality culture.

As to the publishing of both the reports and decisions under the new system accreditation procedure, ACQUIN explained that the accreditation resolution was taken by the GAC, therefore in the report the accreditation decision was not mentioned; once the report is finalised and sent to the HEI, it has to apply for accreditation at GAC. While the ACQUIN does not know on which GAC meeting the procedure will be discussed, the agency admitted it could provide a link to the accreditation decision after the resolutions are taken.

Variation of length and the level of detail in the accreditation reports is great between HEls and across procedures; even for the most recent system accreditation procedures completed in 2020, the length of reports may differ as much as three times. The agency explained that the length of the reports especially in system accreditation procedures depends on the complexity of the internal quality management system, which has to be reflected in the report; and that there are disciplinary differences, which are reflected in the manner peers draft reports. While this partially explains the situation, still is not fully acceptable, since it raises questions about consistency of implementation of procedures and the work done by different expert groups. Providing a template for expert reports with guiding questions is very useful, however, does not completely solve the issue. ACQUIN is urged to analyse the situation and take action as appropriate.

Communicating to the agency, the panel understood ACQUIN itself was not satisfied with the current publishing of reports and search functionality on its website. The panel concurs with this view: access

²⁰ Pernik EPU AkkBericht Institutional Accreditation-1.pdf

to the reports is not easy, searching is not user-friendly, there is lack of transparency of the end results per various procedures. Currently, relevant tables in the reports following the new legal framework appear with empty lines and leaves to wonder about the final outcome of the procedure; this is not helping the potential readers to interpret findings. This way, external review reports for procedures under the new legal framework are disconnected from decisions. ACQUIN should look for a way to bridge this information gap.

Furthermore, notwithstanding the fact that under the new legal framework the GAC is publishing reports and decisions for procedures in Germany, ACQUIN retains ownership of reports for its procedures and should take all steps necessary to continue publishing the reports via its website. Also it is important to communicate the final decisions, so the agency is encouraged to find ways to inform them (as their own template suggests). In addition, some most recent reports, provided in a sample by the agency, are not found on the website of ACQUIN (e.g. the case of Leuphana Universität Lüneburg); given the way currently reports are listed by institution on the website the panel cannot understand why. In the panels' view, the GAC has its own obligation for publishing, and ACQUIN has its own obligations for publishing that could not be diverted to the GAC just because the final accreditation decisions are made by the GAC. To date, all agencies are individually externally reviewed regarding their fulfilment of the ESG, so bear not joint, but individual responsibility to comply with the standards.

While for national procedures, the templates may be predefined by the GAC, still, it would be advisable to discuss the format and to allow featuring of good practices found in institutions. This would serve at least two purposes: to recognize efforts and achievements by HEIs and to allow easier learning and sharing on the system level. The panel understands that for international procedures, ACQUIN should have full power to revise the report template as suggested by guidelines under ESG 2.6.

Annual activity reports could also give greater transparency not only on procedures conducted, but on their end result as well, in a more consistent manner. Structuring of statistics per procedures completed provided in the SAR and as in annual reports in German language for 2017-2018 differs. While it is entirely up to the agency to choose the most convenient way to arrange data for procedures completed, keeping a consistent approach to public reporting would add transparency and ease interpretation, thus, the panel advises to do so.

Panel commendations

- I. ACQUIN is commended for taking efforts and publishing its external quality assurance reports on the designated pan-European transparency tool the DEQAR.
- 2. Higher education institutions testified reports by ACQUIN were useful.

Panel recommendations

- I. The agency should take a consistent approach to drafting and publishing of all external review reports.
- 2. Despite the fact that now final decision making for procedures in Germany is vested in the GAC, ACQUIN has its own responsibilities towards publishing and transparency of reports, that should be duly attended. All reports should be published fully.

Panel suggestions for further improvement

- I. The format of the external review reports could be further refined and contain features of good practice as a standard entry. ACQUIN is advised to discuss the template with the GAC, insofar it is needed for accreditation procedures in Germany, and swiftly make modifications that are solely within powers of ACQUIN for accreditation procedures internationally.
- 2. The preparation of a summary report may be useful.

3. There should be a clear separation of roles, where the agency staff retains the organizational and support functions, and experts are performing external evaluation, report drafting, and producing judgements.

Panel conclusion: partially compliant

ESG 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.

2016 review panel recommendation

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

Evidence

The complaints, objections and appeals procedure is defined by the AC (last revised 29/09/2020). Information is posted on the agency's website²¹. The document covers procedures as follows:

- national evaluation procedures for programmes and institutional accreditation procedures (in those cases appeals on decisions should be filed to the GAC, and for any other aspects of the evaluation procedure – to ACQUIN);
- national evaluation procedures outside the scope of the Interstate study accreditation treaty
 and international accreditation and certification procedures (in those cases first the AC, then
 the CAC would be involved in the scrutiny of the case).

The QM contains the same descriptions classified under two categories as above. Thus, the recommendation of 2016 review is attended.

The responsibility over scrutiny of cases is divided between the AC and the CAC. The way appeals, objections and complaints processes are all defined by the AC. If there is an issue raised by a HEI, firstly the AC is looking into it, and only in the event the HEI is still not satisfied with the result and does not agree with the reasoning provided by the AC, the file will be passed onto another advisory body – the CAC.

The panel requested ACQUIN to provide information regarding the amount of appeals in relation to procedures conducted and their outcome. It was explained that appeals constitute a very small percentage from all accreditations and certifications, no appeals were received regarding procedures carried outside of Germany. In the first instance, complaints are dealt within the AC. If a HEI disagrees with the decision of the AC on the complaint, it has the right to appeal against that decision within a month. These matters are then discussed within the CAC. The CAC may convene for a meeting or can provide an opinion in a written circulation procedure.

Year	Total number of procedures conducted	Appeals received	Appeals granted fully	Appeals granted partially	Appeals rejected
2016	607	I	I	0	0
2017	531	4	3	I	0

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²¹ https://www.acquin.org/wp-content/uploads/2020/10/ACQUIN Beschwerdeverfahren 29.09.2020 EN.pdf

2018	45 I	4	3	0	I
2019	523	2	2	0	0
2020	376	0	0	0	0

Fig. 4, summary statistics on appeals provided by ACQUIN

Requests to change an expert panel member are rare: no such requests were received in relation to the system accreditation, all requests pertained to programme accreditations only. Under all procedures, HEIs may raise objections to the nomination of members of the expert committee in writing within two weeks upon receipt of a list of experts. Such requests are considered by the AC, which is in charge of expert panel appointment. In the procedure, there is no clear term by which requests should be dealt with.

Year	Total number of procedures conducted	requests received	requests granted	requests dismissed
2016	607	0	0	0
2017	531	I	I	0
2018	451	3	2	I
2019	523	3	3	0
2020	376	I		0

Fig. 5, summary statistics on requests to change experts, provided by ACQUIN

The number of concerns raised by institutions regarding the procedure and/or the draft report is even smaller. Such issues are discussed in the AC as well. The timeframe in which a HEI should point to factual correctness of the draft report is not specified under procedures.

Year	Total number of procedures conducted	concerns raised	outcome
2016	607	I	Factual corrections in the report made
2017	531	0	-
2018	451	0	-
2019	523	I	Consideration of further information
2020	376	0	-

Fig. 6, summary statistics on concerns provided by ACQUIN

During the period between the past and the present external review of ACQUIN, a substantial change in the way appeals are handled has happened. In the pre-Constitutional Court setup, according to the old procedures, the AC of ACQUIN would be passing the decisions. Consequently, appeals would be dealt within the agency's advisory institution for that purpose (first – by the AC, then by the CAC). Currently, following provisions of the Interstate Treaty, for national procedures the decision-making authority is vested with the GAC, therefore, objections regarding accreditation decisions would be addressed to the GAC itself.

Analysis

The small number of complaints, objections and appeals show HEIs in general are satisfied with procedures implemented by ACQUIN. The outcomes of those cases demonstrate that in a small number of cases concerns by HEIs had a valid basis. Representatives of institutions with whom the panel met, conveyed their trust both in how ACQUIN managed procedures, and how the agency dealt with conflict cases.

The panel wonders why the CAC does not establish its own procedure for the scrutiny of cases but is subject to procedures defined by the AC. Notably, following bylaws of ACQUIN, the CAC is required to define their own procedures irrespective of the other bodies.

The panel was concerned about the proper division of responsibilities between the Board and the AC. In the "Complaints, Objections, and Appeals Procedures" document, the following stipulation is found: "The ACQUIN board chairperson decides on it [complaints due to possible formal and legal errors as well as regarding contractual matters] within a month and informs of it as the chairperson of the accreditation commission". The agency explained that the CAC in concerned with objections regarding decisions made by the AC, while the Chair of the Board in concerned only with contractual matters between the agency and HEIs, and contractual matters are not discussed within the AC. It was said that the Chair of the Board can never decide upon any decisions made by the AC and this way division of roles are therefore strictly followed. The panel understands that not a single person is making a decision, but rather the relevant body in its entire membership, however, still encourages ACQUIN to reconsider the present allocation of responsibilities when the Chair of the Board is also the Chair of the AC and to avoid any misperception of roles (as also mentioned under ESG 3.1).

Some deadlines are clearly established, yet others are not. While the procedure states that "the complainants are informed of the outcome without undue delay", it remains to guess what the "undue" delay means and how quickly cases are analysed and resolved in practice. The panel could not find in a procedure a clearly defined term by which a HEI should communicate to ACQUIN their dissatisfaction regarding the draft panel report, and how quickly the agency would resolve those cases.

As to the recommendation of the previous review, it is partly addressed. Complaints and appeals are now included in the QM and under descriptions of procedures. However, some information is lacking: in some cases no clear deadlines (under which all parties concerned should act) are available.

Panel suggestions for further improvement

- All deadlines for resolution of cases should be clearly defined and communicated both in the documentation of each external evaluation procedure and the document with the description of the complaints, objections, and appeals procedures.
- 2. The Complaints and Appeals Commission is expected to define their own procedures irrespective of the other bodies.

Panel conclusion: fully compliant

ADDITIONAL OBSERVATIONS

QUALITY ASSURANCE FRAMEWORK

The panel met many stakeholders and actors who were not too happy with the most recent system level changes. The panel is well aware, of course, that amending system level flaws is not in the hands of ACQUIN. It was also noted, though, that the agency seems to be largely accepting the status quo and is little inclined to pursue potential degrees of freedom. The panel, thus, advises ACQUIN to make the agency's voice heard more on the national and international stage, on its own behalf and on behalf of developing quality assurance. ACQUIN could take a more (pro)active role in lobbying for its position regarding the national quality framework and the importance of supporting institutional quality cultures.

The European dimension in higher education and quality assurance will only be further strengthened through the Bologna Process and such recent initiatives as the European University Alliances, microcredentials and various joint programmes, and will challenge a very German-centric approach. The panel wishes to look at internationalisation as a potential not a threat for institutions, learners, and quality assurance agencies.

The revised version of the ESG, adopted in 2015, contains a separate standard on student-centred learning, teaching and assessment. The panel could see that parts of it are integrated into the current legislation, however, not always very prominently. Students whom the panel met, expressed a view that student-centred learning could be given more importance both in internal and external quality assurance. The panel concurs with their view.

CONCLUSION

SUMMARY OF COMMENDATIONS

Overall, the panel commends ACQUIN for a strong culture of reflection, participation, and openness for suggestions across all actors and committees. Below is a list of commendations in relation to each ESG standard (if applicable).

- The panel was positively impressed by dedication of the two CEOs, and also engagement and knowledge of the agency matters by members of all three advisory bodies of ACQUIN (the Executive Board, the Accreditation Commission, and the Complaints and Appeals Commission). [ESG 3.1]
- Institutions seem to trust in the agency and the rate of institutions choosing ACQUIN for reaccreditations is impressive regarding the fierce competition. Relationship management with
 universities is strong, in particular members, and the workshops are much appreciated. [ESG
 3.1]
- 3. ACQUIN is commended for having done the analysis on quality assurance and its impact at universities in Kazakhstan, which contains valuable system level observations on the need to further develop the local credit system, structure of study programmes, and discussion culture among HEI's staff. [ESG 3.4]
- 4. ACQUIN Secretariat is composed of a dedicated team of colleagues driven by passion for quality in higher education. [ESG 3.5]
- 5. The agency is commended for engaging with the Harz University of Applied Sciences with the aim to analyse and strengthen the development and enhancement of quality of its internal processes. [ESG 3.6]
- 6. Higher education institutions trust in ACQUIN, they feel respected and appreciated with regard to their individual profiles and approaches. [ESG 2.1]
- 7. The panel commends the agency on their highly competent and reflective reviewers, including students, and on the way(s) ACQUIN selects them. Reviewers seem to care about quality assurance and quality improvement and are well in line with the agency's improvement-oriented spirit. [ESG 2.4]
- 8. The agency is commended for collaboration with employer representatives and their active inclusion in expert groups. [ESG 2.4]
- 9. The agency is commended for preparing a package of documents meant to support reviewers, which is sent in advance. [ESG 2.4]
- 10. The agency is commended for developing tools for experts to assist in their work (the book of precedents, the guiding questions' list, report templates). [ESG 2.5]
- II. ACQUIN is commended for conducting a thematic analysis on deviations between decision making by the agency experts and the GAC, who found the analysis of a particular value towards consistency of the reviews and judgements passed. [ESG 2.5]
- 12. ACQUIN is commended for taking efforts and publishing its external quality assurance reports on the designated pan-European transparency tool the DEQAR. [ESG 2.6]
- 13. Higher education institutions testified reports by ACQUIN were useful. [ESG 2.6]

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

Below is a list of judgements and recommendations in relation to each ESG standard.

ESG 3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE - Partially compliant

I. ACQUIN's Strategic Plan should extend beyond the two year period and contain a clear mission, vision, values, objectives for activities with a concrete measure of success timewise

- and by deliverables (follow the widely accepted format of such documents). It should be published.
- 2. The Strategic Plan, yearly work plans, and yearly activity reports should all be clearly linked.
- 3. Students should be represented in the governance of the agency.
- 4. The definition of stakeholders could be reflected upon, taking appropriate action for communication, and opportunities for cooperation with public authorities re-evaluated.

ESG 3.2 OFFICIAL STATUS - Fully compliant

ESG 3.3 INDEPENDENCE - Fully compliant

ESG 3.4 THEMATIC ANALYSIS – Partially compliant

- I. ACQUIN needs to fine-tune its policy on conducting thematic analysis and in line with this redefinition, to update the relevant part in the Quality Manual following the standard description of other processes.
- 2. Efforts on thematic analysis should be much intensified, reports should be published regularly. To show developments, as a starting point, ACQUIN should make a working plan for the next analyses to be done within the coming 2-3 years and follow it.
- 3. Analyses should focus on trends and areas of good practice as well as persistent difficulty across the higher education system; they should pertain to institutional, national and international contexts.

ESG 3.5 RESOURCES – Substantially compliant

 The panel recommends the Board and the CEOs of the agency to revisit the question of the market strategy, including the overall package of services offered by ACQUIN, as well as its developmental needs, and financing in order to secure the agency's financial stability in the long run.

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT - Fully compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES – Fully compliant

ESG 2.I CONSIDERATION OF INTERNAL QUALITY ASSURANCE - Fully compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE – Fully compliant

ESG 2.3 IMPLEMENTING PROCESSES – Substantially compliant

- I. For transparency purposes, procedure guidelines should contain more specific information on all elements of the external review model.
- 2. ACQUIN should further develop their follow-up procedures more in line with the agency's improvement oriented approach and beyond checking on whether formal requirements set by the GAC or the Accreditation Commission have been fulfilled.

ESG 2.4 PEER-REVIEW EXPERTS – Substantially compliant

- 1. Student members should be included in all panels for all procedures implemented both within Germany and abroad (including procedures done jointly with other quality assurance agencies and in certification).
- 2. The principles on selection of experts for international procedures should be documented more clearly. Principles and procedure(s) for expert selection both domestically and internationally should be published on the agency's website.

ESG 2.5 CRITERIA FOR OUTCOMES - Substantially compliant

- I. In its relevant procedure descriptions and the Quality Manual, ACQUIN should establish clearly in which cases conditional accreditation is given and how the term for a higher education institution to attend major deficiencies is established.
- 2. The possibility to ask and be granted a suspension of the accreditation procedure should be more clearly described and communicated to institutions.

ESG 2.6 REPORTING - Partially compliant

- I. The agency should take a consistent approach to drafting and publishing of all external review reports.
- 2. Despite the fact that now final decision making for procedures in Germany is vested in the GAC, ACQUIN has its own responsibilities towards publishing of reports and transparency that should be duly attended. All reports should be published fully.

ESG 2.7 COMPLAINTS AND APPEALS - Fully compliant

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, ACQUIN is in compliance with the ESG.

SUGGESTIONS FOR FURTHER DEVELOPMENT

Hopefully, both recommendations and suggestions of the present report provided in the spirit of critical friends will be helpful on this road. The complete list is below.

- 1. ACQUIN may wish to revisit its Statutes to specify the maximum terms, re-election and rotation of members in all of its advisory institutions to clearly lay out the expectations for contribution, and to assure both continuity of expertise and fresh input as well. The panel encourages ACQUIN to reflect on the division of roles and allocation of responsibilities between the advisory bodies and their Chairs so that there is no room for misperceptions. [ESG 3.1]
- 2. The definition of stakeholders could be reflected upon, taking appropriate action for communication, and opportunities for cooperation with public authorities re-evaluated.
- 3. The agency should consider establishing a so-called "cooling" period for former members of staff to get involved as experts or members of advisory institutions. [ESG 3.1]
- 4. The expertise of ACQUIN may be increased by including international members in its Board and the Complaints and Appeals Commission. [ESG 3.1]
- 5. The external communication strategy must be developed. It should encompass all activities and their relationship to the mission and strategic objectives of ACQUIN, and tools, in order to achieve positive synergies between the various media, and to assure up-to-date information is provided continuously. [ESG 3.1]
- 6. Both ACQUIN and ACQUINUS should communicate about separation of their activities more clearly, including through the websites. [ESG 3.1]
- 7. The concept of Quality Manual should be revised to keep the document of reasonable length and to provide a consistent approach to description and to monitoring of key performance indicators per each process. [ESG 3.6]
- 8. The professional development of staff would benefit from a more systematic planning approach. Internal training of staff, previously done on site, should be adapted to the online format respecting health and safety requirements in the current pandemic situation. After the crisis, the format should be reconsidered maintaining useful and efficient practices. [ESG 3.6]

- 9. ACQUIN should put more efforts to address recommendations resulting from all external reviews without delay, so that by the time of the next review, not only plans can be shown, but results thereof could be demonstrated. [ESG 3.7]
- 10. ACQUIN is advised to revisit the mapping between ESG Part 1 and the programme as well as system accreditation criteria and discuss the issue with the GAC as appropriate with the aim to align understanding and communication to the public. [ESG 2.1]
- 11. As suggested by the guidelines of ESG 1.4, ACQUIN is encouraged to explore how it could contribute to the cooperation within the triangle of higher education institutions, the German ENIC-NARIC, and other organizations addressing fair recognition and admission. [ESG 2.1]
- 12. ACQUIN is encouraged to think of ways how it could give the enhancement aspects more prominence, both within accreditation procedures and their reports, and through other activities, thus even better supporting higher education institutions and meeting student expectations. [ESG 2.2]
- 13. Guidance regarding suspension of procedures or virtual visits because of the current pandemic could be published. [ESG 2.3]
- 14. Diversity of panels should be improved in terms of expert country of origin and gender. [ESG 2.4]
- 15. The agency should further work on the training of experts, in particular providing training in groups and facilitating mutual sharing and learning by active means. [ESG 2.4]
- 16. The agency is advised to check that the heading title of the procedure and the title of the relevant document uploaded on ACQUIN's website under the corresponding section fully match. [ESG 2.5]
- 17. The format of the external review reports could be further refined and contain features of good practice as a standard entry. ACQUIN is advised to discuss the template with the GAC, insofar it is needed for accreditation procedures in Germany, and swiftly make modifications that are solely within powers of ACQUIN for accreditation procedures internationally. [ESG 2.6]
- 18. The preparation of a summary report may be useful. [ESG 2.6]
- 19. There should be a clear separation of roles, where the agency staff retains the organizational and support functions, and experts are performing external evaluation, report drafting, and producing judgements. [ESG 2.6]
- 20. All deadlines for resolution of cases should be clearly defined and communicated both in the documentation of each external evaluation procedure and the document with the description of the complaints, objections, and appeals procedures. [ESG 2.7]
- 21. The Complaints and Appeals Commission is expected to define their own procedures irrespective of the other bodies. [ESG 2.7]

ANNEXES



ANNEX I: PROGRAMME OF THE SITE VISIT



ENQA Review of ACQUIN Remote visit schedule I-4 February 2021

			I FEBRUARY 2021 (MONDAY)		
SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED	LEAD PANEL MEMBER
	11.45 – 12.00 (15 min)	Connection set-up	Ms. Anaïs Gourdin, ENQA review coordinator		
	12.00 – 13.30 (90 min)	Review panel's kick-off meeting	 Dr. Oliver Vettori, Dean of Accreditation and Quality Management at Vienna University of Business and Economics (Austria), Academic, chair, EUA nominee Ms. Aurelija Valeikienė, Deputy Director of the Center for Quality Assessment in Higher Education (SKVC) [Lithuania], Quality assurance expert, secretary, ENQA nominee Dr. Esther Huertas, Head of QA department at the Catalan University Quality Assurance Agency (AQU Catalunya) [Spain], Quality assurance expert, panel member, ENQA nominee Mr. Damian Michalik, PhD in physics at Warsaw University [Poland], Student, panel member, ESU nominee 	Reflection on SAR of ACQUIN and any other additional documentation, Preparations for upcoming meetings in terms of issues to be explored; division of responsibilities over leading the sessions.	Oliver Vettori
	13.30 – 13.45 (15 min)	Break			

0-1	13.45 – 15.15 (90 min)	A pre-visit meeting with the agency contact person (Interpreter Mrs. Anja Peschel as backup)	Ms. Marion Moser, Managing Director of ACQUIN	Learning about the agency's context, factual check exercise, updates from the submission of SER. ESG 3.5. Mapping of ACQUIN activities against ESG Part 1.	Oliver Vettori
	15.15 – 15.30 (15 min)	Break			
	15.30 – 16.30 (60 min)	Review panel's kick-off meeting continued			Oliver Vettori
	16.30 – 16.45 (15 min)	Break			
I	16.45 – 17.30 (45 min)	Meeting with the German Accreditation Council representative	Dr. Olaf Bartz, The GAC Managing Director	Mapping of the GAC criteria against ESG Part I. ESG 3.3; ESG 3.7	Oliver Vettori / Esther Huertas / Damian Michalik
	17.30 – 17.45 (15 min)	Break			
	17.45 – 18.45 (60 min)	Review panel's private meeting		Wrap-up of the day and reflection, preparation for Day 2	Oliver Vettori
			2 FEBRUARY 2021 (TUESDAY)		
SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED	LEAD PANEL MEMBER
	8.30 – 9.00 (30 min)	Connection set-up and Review panel's private meeting			Oliver Vettori

2	9.00 – 9.50 (50 min)	Meeting with the CEOs (Interpreter Mrs. Anja Peschel and Anthony Glass as backup)	•	Ms. Marion Moser Mr. André Schlipp	Context of ACQUIN operations; all aspects of compliance towards ESG Part 2 and Part 3	Oliver Vettori / Esther Huertas
	9.50 – 10.05 (15 min)	Break				
	10.05 – 10.35 (30 min)	Review panel's private meeting and connection set-up				Oliver Vettori
3	10.35 – 11.25 (50 min)	Meeting with the Executive Board (Interpreter Mrs. Anja Peschel and Anthony Glass as backup)	•	Prof. em. Dr. Sebastian Kempgen, Chair of the executive board, University Bamberg, Emeritus Professor of Slavic Linguistics Prof. Dr. Folker Roland, Treasurer of the executive board, University of Applied Sciences Harz, professor for business administration Dr. Andreas Dold, Representative of the professional practice, managing director ALDI Sued	To discuss the legal, institutional, academic and other contexts pertaining to operations of ACQUIN; compliance to ESG 3.1, ESG 3.2, ESG 3.3, ESG 3.5, ESG 3.6, ESG 3.7, ESG 2.2	Oliver Vettori / Damian Michalik
	11.25 – 11.35 (15 min)	Break				
4	11.35 – 12.20 (45 min)	Meeting with the team responsible for preparation of the self-assessment report (Interpreter Mrs. Anja Peschel and Anthony Glass as backup)	•	Ms. Marion Moser (QM/evaluation, SAR) Dr. Alexander Rudolph (SAR) Mrs. Sofia Treskova (QM/evaluation, SAR)	ESG Part 2 and Part 3, ESG 3.4; ESG 3.6	Esther Huertas / Aurelija Valeikienė
	12.20 – 13.10 (50 min)	Lunch break				

	13.10 – 13.40 (30 min)	Review panel's private discussion (and connection set-up)			Oliver Vettori
5	13.40 – 14.30 (50 min)	Meeting with the key body of the agency – part I (Interpreter Mrs. Anja Peschel and Anthony Glass as backup)	 Dr. Alexander Rudolph (head system accreditation and international activities, carrying out system accreditation procedures and international accreditation procedures) Valérie Morelle (head programme accreditation, coordination national programme assessment procedures and carrying out national programme assessment procedures, international accreditation procedures in French) Andreas Jugenheimer (organising and carrying out national programme assessment procedures, IT support) Nina Soroka (organising national programme assessment procedures, carrying out national programme assessment procedures and organising and carrying out accreditation procedures in Kazakhstan) Lisa Stemmler (organising and carrying out national and international programme assessment procedures) Lyazzat Nugumanova (organising assessment procedures and carrying out national programme assessment procedures and carrying out national programme assessment procedures and accreditation procedures in Kazakhstan 	ESG Part 2, ESG 3.1, ESG 3.4, ESG 3.5, ESG 3.6	Oliver Vettori / Esther Huertas
	14.30 – 14.45 (15 min)	Break			
6	14.45 – 15.30 (45 min)	Meeting with the key body of the agency – part 2 (Interpreter Mrs. Anja Peschel and Anthony Glass as backup)	 Clemens Bockmann (head iPQ, member team QM, carrying out national programme and system assessment procedures, international programme accreditation procedures) Bettina Kutzer (organising national assessment procedures, support of colleagues in 62ecturing reports, publishing reports in the database of the German Acc. Council and the website of ACQUIN) Holger Reimann (organising and carrying out national programme assessment procedures, IT support) 	ESG Part 2, ESG 3.1, ESG 3.4, ESG 3.5, ESG 3.6	Esther Huertas / Damian Milachik

			 Dr. Jasmine Rudolph (carrying out national and international programme assessment procedures but started also with system accreditation procedures) Giorina Maratsi (conducting projects (third-party funds)) Dr. Anne-Kristin Borszik (organising national assessment procedures, support of colleagues in 63ecturing reports) 		
7	15.30 – 16.00 (30 min)	Meeting with administrative-staff of ACQUIN (Interpreter Mrs. Anja Peschel and Anthony Glass as backup)	 Mrs. Daniela Reutershan (accounting) Mrs. Sofia Treskova (process management) 	ESG 3.5, ESG 3.6	Esther Huertas
	16.00 – 16.15 (15 min)	Break			
	16.15 – 16.30 (15 min)	Review panel's private discussion (and connection set-up)			Oliver Vettori
8	16.30 – 17.15 (45 min)	Meeting with representatives from the reviewers' pool (professional practice, professors) – national system assessment procedures	 Prof Dr. Roger Erb, Goethe Universität Frankfurt, professor for didactic on physics, vice-president for teaching and learning, Reviewer in the system accreditation procedure at Erfurt University (not yet completed, old law), Reviewer in the ongoing system assessment procedure at Technical University Kaiserslautern (new regulations) Prof. Dr. Beatrix Busse, University Cologne, vice-president for teaching and learning, former vice president University Heidelberg, (Reviewer in the system accreditation procedure at University Hamburg 2019/2020, not yet completed) Prof. Dr. Nikolaus Korber, University Regensburg, professor for inorganic chemistry, vice-president teaching and learning (Reviewer in the system accreditation procedure at Leuphana University Lueneburg (new regulations, completed by ACQUIN, resolution not yet taken by the GAC, decision expected in January 2021) [Reviewer in the system 	ESG 2.2, ESG 2.3, ESG 2.4, ESG 2.5, ESG 2.6, ESG 2.7 ESG 3.1, ESG	Damian Michalik

			 accreditation procedure at University Duisburg-Essen 2016 (old regulations), also reviewer in the re-accreditation procedure starting 2021] Prof. Dr. Alyos Krieg, Technical University Aachen, vice rector for teaching and learning (Reviewer in the system accreditation procedure at Technical University Dresden 2015 (old regulations), also reviewer in the ongoing re-accreditation procedure) [Reviewer in the system accreditation procedure at University Hannover 2017 (old regulations, completed)] Alexander Zeitelhack, Media management consulting, peer of the professional practice in the system accreditation procedure at University of Hohenheim (new regulations, completed by the GAC) 		
	17.15 – 17.45 (30 min)	Break			
9	17.45 – 18.45 (60 minutes)	Review panel's private discussion		Wrap-up meeting and preparations for Day 3	Oliver Vettori
			3 FEBRUARY 2021 (WEDNESDAY)		
SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED	LEAD PANEL MEMBER
	8.45 – 9.30 (45 min)	Connection set-up and Review panel's private meeting			Oliver Vettori
10	9.30 – 10.15 (45 min)	Meeting with representatives of the reviewers pool - national programme assessment procedures (professors, professional practice,)	 Prof. Stefanie Krahnenfeld, Professor for Singing at University of Music Mannheim (Reviewer for the study programmes "Singing" (B.A.), Music Theatre" (B.A.) "Opera" (M.A.) at University of the Arts Berlin, 2019 Prof. Dr. Michael Hochgeschwender (Professor of North American Cultural History, Empirical Cultural Research and Cultural Anthropology at Ludwigs-Maximilian University Munich, Reviewer in programme assessment procedure at University Marburg study programme cluster "American, British, and Canadian Studies" (B.A.), "North American 	ESG 2.2., ESG 2.3, ESG 2.4, ESG 2.5, ESG 2.6	Esther Huertas

	10.15 – 10.30 (15 min)	Break / Connection set-up	Studies" (M.A.), "Romance Cultures: Communication, Language, Literature" (B.A.), "Romance Cultures: Communication, Language, Literature" (M.A.), 2020 • Prof. DrIng. Habil Martin Wolther, Chair of Electric Power Networks and Renewable Energy at University Magdeburg (Reviewer in the study programme accreditation "Renewable Energy Systems" (M.Eng.) and "Energy systems" (M.Eng.) at Nordhausen University of Applied Sciences, 2019) • Prof. Doris Fetscher, Dean of the Faculty of Languages and Intercultural Communication at University of Applied Sciences Zwickau (Professor for Intercultural Training with a focus on the Romance Cultural Area and International Business Administration, Reviewer in the accreditation of the study programme "Intercultural Management" (B. A.) at University of Applied Sciences Ansbach, 2018 and 2020 (old regulations), Reviewer in the accreditation of the study programmes "International Communication and Business" (B.A.), "Intercultural Communication" (M.A.), "Modern Chinese Studies" (B.A.), "Translation Chinese" (B.A.), "Digital Media Manager" (M.A. DMM), "Interpreting" (M.A.), "Translation" (M.A.) at International University SDI Munich, 2019) • Dr. Robert Butscher, Computer Scientist, DATEV, Nuernberg (Reviewer of the professional practice in the study programme assessment procedure "Digital Business and Information Technologies" (M.Sc.), "Media Computer Science" (M.Sc.), "Human-Computer-Interaction" (M.Sc.), "Business Informatics" (M.Sc.) at Wilhelm Buechner University of Applied Sciences Darmstadt)		
11	10.30 – 11.15 (45 min)	Meeting with representatives of the reviewers pool – international programme and institutional accreditation	 Prof. Dr. Martin Löffelholz, Former president of the Swiss German University, Indonesia (Director, Institute of Media and Communication Science, Ilmenau University of Technology, Professor of Media Studies; Reviewer in the institutional accreditation procedure at Charisma University, Turks and Caicos Islands, 2018) 	ESG 2.1, ESG 2.2, ESG 2.3, ESG 2.4, ESG 2.5, ESG 2.6	Oliver Vettori

		procedures (professors, professional practice)	 Prof. (em.) Dr. Volker Linneweber, Former president University Saarland, Professor (emeritus) of Psychology (Reviewer in the institutional accreditation procedure at University St. Joseph, Beirut, Lebanon, 2018 Fred Haertelt, Engineer at Bosch Engineering, Heilbronn, Germany (Reviewer of the professional practice in the accreditation procedure of the study programmes "Standardization and Certification" (BA/MA), "Mechanical Engineering" (BA/MA/PhD), "Metallurgy" (BA/MA/PhD), "Materials Science and Technology of New Materials" (BA/MA/PhD), "Transport, Transport Equipment and Technology" (BA/MA/PhD), "Logistics" (Transport) (BA), at Karaganda State Technical University, 2019) Prof. Dr. Peter Purg, University of Nova Gorica's School of Arts, president of the Slovenian Quality Assurance Agency for Higher Education (NAKVIS) Council (Reviewer in the accreditation procedure "Design" ((Bachelor/Master), "Choreographie", (Bachelor/Master), "Traditional Music Art" (Bachelor/Master) at TT.K. Zhurgenov Kazakh National Academy of Arts, 2017) Dr. Makhabbat Kenzhegaliyeva, Research employee in School Pedagogy / School Development Research at University Leipzig (Reviewer in the accreditation procedure "Foreign Philology" (BA/MA/PhD), "Translation Studies" (BA/MA/PhD), "Foreign Language" (BA/MA/PhD), "Pedagogy and Psychology" (MA) at the Ablai Khan University, Almaty, Kazakhstan, 2016) 		
	11.15 – 12.10 (55 min)	Lunch			
	12.10 – 12.40 (30 min)	Review panel's private meeting (and connection set-up)			Oliver Vettori
12	12.40 – 13.35 (55 min)	Meeting with students reviewers and representatives of reviewed	 Joshua Weygant, Student member of the Accreditation Commission of ACQUIN, student in the Master programme "Microsystems Technology" (M.Sc.) at University Freiburg Philipp Schulz, Student industrial engineering at RWTH Aachen (Student reviewer in the accreditation procedure 	ESG 2.1, ESG2.2., ESG 2.3, ESG 2.4, ESG 2.5, ESG 2.6	Damian Michalik

13.35 – 13.50	institutions (national and international procedures, institutional and system accreditation)	"Civil Engineering" (B.Sc./M.Sc.), "Management [Construction Real Estate Infrastructure]", "Environmental Engineering (B.Sc./M.Sc.)", "Water and Environment" (M.Sc.), "Building Physics and Energetic Building Optimization" (M.Sc.) at Bauhaus University Weimar, 2019; Reviewer in the international accreditation procedure of the study programmes "Information Systems: Business Informatics" (B.Eng. and Technology), "Logistics" (B.Sc./M.Sc.), "Thermal Energy: Energy and Environmental Technology" (B.Eng. and Technology) at the German Kazakh University, winter semester 2017/18) Sebastian Neufeld, Student in the Master study programme Neurosciences at University of Freiburg (Reviewer in system accreditation at Leuphana University Lüneburg 2019/2020)) Helmut Büttner, Student in "Social Sciences" (B.A.) at Alice Salomon University Berlin (Reviewer in the Bachelor programme "Social Sciences" at Erfurt University of Applied Sciences (old regulations), 2019; Reviewer in the Bachelor programme "Social Sciences" at AKAD University of Applied Sciences Stuttgart, 2020)) Philipp Hemmers, Student in "Production Engineering" (M.Sc.) at RWTH Aachen (Reviewer in the Bachelor programme "Green Engineering" at University of Applied Sciences Merseburg, 2019) Students from ACQUIN accredited study programmes: Christian Netzpal, Former student in the Master programme "Security Management" at Northern Business School Hamburg, graduated November 2020 (programme was accredited by ACQUIN 2018/2019) Midshipman Maximilian Helfrich, Student in the Bachelor programme "Technical Informatics and Communication Technology" (B.Sc.) at University of the German Armed Forces, Munich (programme was assessed by ACQUIN winter semester 2019/2020, decision by the GAC 2020)	
(15 min)	рг'еак		
13.50 – 14.05 (15 min)	Review panel's private meeting		Oliver Vettori

		(and connection set-up)			
13	14.05 – 15.00 (55 min)	Meeting with heads of HEIs and quality assurance officers of some reviewed HEIs of system assessment procedures	 Dr. Lisa Strübel, QM-department University Hannover Prof. Elfriede Billmann-Mahecha, Former vice-president for teaching and learning, University Hannover Prof. Dr. Roland Brünken, Vice-president for teaching and learning, University Saarland Dr. Sonja Mikeska, QM-department University Saarland Prof. Dr. Markus Reihlen, Former vice-president (graduate school, junior scientists, entrepreneurship) Leuphana University Lueneburg Gisa Heuser, Head of the QM-unit Leuphana University Lueneburg Dr. Sonja Kiko, Head of the QM-department at University Heidelberg 	ESG 2.1, ESG 2.2, ESG 2.3, ESG 2.4, ESG 2.5, ESG 2.6, ESG 2.7 ESG 3.3	Oliver Vettori
	15.00 – 15.15 (30 min)	Break			
	15.15 – 15.30 (15 min)	Review panel's private meeting (and connection set-up)			Oliver Vettori
14	15.30 – 16.30 (60 min)	Meeting with members of the Accreditation Commission of ACQUIN	 Prof. Dr. Sebastian Kempgen, University Bamberg, Emeritus Professor of Slavic Linguistics, chairman of the board and the accreditation commission Prof. Dr. Tobias Scheytt, University of the Federal Forces Hamburg, Professor of Economics Prof. Dr. Robert Seckler, Vice-president for research and junior academics University Potsdam, Professor of Physical Biochemistry Prof. Dr. Reinhard Schäfertöns, Rector of the University of Music and Theater Rostock, Professor of Church Music, Musicology Prof. Dr. Bodo Wiegand Hoffmeister, Rector of the University of Applied Sciences Wismar, Professor of Constitutional law, General and Special Administrative Law 	ESG 2.1, ESG 2.2, ESG 2.3, ESG 2.4, ESG 2.5, ESG 2.6, ESG 2.7 ESG 3.3, ESG 3.4, ESG 3.7	Esther Huertas

			 Prof. Dr. Hans Gruber, Professor of Educational Science at the University of Regensburg Brankica Assenmacher M.A., Quality Management & Accreditation, University of Applied Sciences Fresenius 		
	16.30 – 16.45 (15 min)	Break			
15	16.45 – 17.15 (30 min)	Meeting with ACQUINUS staff	Dr. Alexander Rudolph	ESG 3.1, ESG 3.6	Oliver Vettori
	17.15 – 17.30 (15 min)	Break			
	17.30 – 18.30 (60 min)	Meeting among panel members		Wrap-up and preparation for day 3	Oliver Vettori
			4 FEBRUARY 2021 (THURSDAY)		
SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	ISSUES TO BE DISCUSSED	LEAD PANEL MEMBER
	8.45 – 9.30 (45 min)	Connection set-up and Review panel's private meeting			Oliver Vettori
16	9.30 – 10.15 (45 min)	International: Meeting with heads of study programmes and QA officers of some reviewed HEIs / international accreditation procedures (programme and institutional accreditation procedures)	 Prof. Dr. Armin Eberlein, Deputy Rector for Academic Affairs, German University of Technology Oman Prof. Nada Moghaizel-Nasr, University St. Joseph, Lebanon, Honorary Dean of Faculty of Education, Professor (Rector's Delegate for Quality Assurance and Pedagogy) Prof. Barbara Gant, Rector of the Private University Liechtenstein Mrs. Gulden Manarbek, Head of Division for accreditation and licensing, Al-Farabi Kazakh National University Irina Orynbassarova QM-department at German-Kazakh University Dr. Marina Petkova, Former head of the Master study programme "Vocational Education and Training" (M.Sc.) at the Swiss Federal Institute for Vocational Education and Training 	ESG 2.1, ESG 2.2, ESG 2.3, ESG 2.4, ESG 2.5, ESG 2.6, ESG 2.7 ESG 3.3	Oliver Vettori

	10.15 – 10.30 (15 min)	(Interpreter Mrs. Anja Peschel) Break and connection set-up			Oliver Vettori
17	10.30 – 11.15 (45 min)	National: Meeting with heads of study programmes and quality assurance officers of some national reviewed HEIs/HEI – national programme assessment procedures (Interpreter Mrs. Anja Peschel as backup)	 Prof. Dr. Christoph Weiser, Professor for economics at University of Halle-Wittenberg, head of the Master study programme "Management of Educational Institutions" Eva Peters, University Bonn, department study programme and capacity matters including accreditation Prof Dr. Thomas Schneidewind, Professor of Public Management, head of the study programme "Public Management" at Harz University of Applied Sciences Mrs. Kerstin Schnelle, Head of the Centre for Quality at Erfurt University of Applied Sciences Prof. Christoph Brandt, Professor of Guitar and Methodology and Director of Education Instrumental Pedagogy at University of Music and Performing Arts Frankfurt, head of the study programme "Instrumental Pedagogy" Prof. DrIng. Dierk Schoen, Dean of the Faculty of Engineering at Wilhelm Buechner University Darmstadt 	ESG 2.1, ESG 2.2, ESG 2.3, ESG 2.4, ESG 2.5, ESG 2.6, ESG 2.7 ESG 3.3	Esther Huertas
	11.15 – 11.45 (30 min)	Review panel's private meeting			Oliver Vettori
	11.45 – 12.35 (50 min)	Lunch			
18	12.35 – 13.20 (45 min)	Meeting with members of the complaints and appeals commission	 Dr. Stefan Handke, Professor for Administrative Management at University of Applied Sciences Dresden (Chairman of the Appeals and Complaints Commission) Christopher Bohlens, Student in the Master programme Management & Business Development at Leuphana University Lueneburg (Deputy chairman of the complaints and appeals commission) Prof. Gero Schmidt Oberländer, Director of the Institute of Music Pedagogy at University of Music FRANZ LISZT Weimar, Professor for Piano 		Damian Michalik

	13.20 – 13.35 (15 min)	Break	Prof. Dr. Reinhard Zintl, Emeritus of excellence, Professor for Political Sciences, Trimberg Research Academy, University of Bamberg (Since 2013 mandate of the accreditation agencies as their representative in the Accreditation Council with advisory vote)		
19	13.35 – 14.10 (35 min)	Meeting with members of HEIs regarding complaints and appeals (Interpreter Mrs. Anja Peschel as backup)	 Judith Amler, Ref. VIII. I – university structure, strategic reporting, Ludwigs-Maximilian University Munich, Ludwigs-Maximilian University Munich Peter Linsenmann, Quality management officer, Catholic University of Applied Sciences, Munich Dr. Julia Eichhoff. Head of Statutory Affairs and Bologna Coordination, University of the German Armed Forces, Munich 	ESG 2.7	Damian Michalik
	14.10 – 14.25 (15 min)	Break			
	14.25 – 15.00 (35 min)	Meeting among panel members		To agree on final issues to clarify	Oliver Vettori
20	15.00 – 16.00 (60 min)	Meeting with CEOs	Ms. Marion MoserMr. André Schlipp	To clarify any pending issues	Aurelija Valeikienė
	16.00 – 17.00 (60 min)	Private meeting among panel members and connection set-up		To agree on the main findings per each ESG	
21	17:00 – 17.30 (30 min)	Final de-briefing meeting	CEOs and key staff of the agency, Prof. em. Dr. Sebastian Kempgen, Chairman of the Board	To inform about preliminary findings	Oliver Vettori
	17.30 – 18.00 (30 min)	Panel members and ENQA review coordinator		Feedback and reflection on the visit, discussion on further work to be done	All Panel members & Anaïs Gourdin

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the Accreditation, Certification and Quality Assurance Institute (ACQUIN) by the European Association for Quality Assurance in Higher Education (ENQA)

TRIPARTITE TERMS OF REFERENCE BETWEEN ACQUIN, ENQA AND EQAR September 2020

I. Background and context

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 about setting up an independent agency for the accreditation of study programmes with Bachelor's and Master's degrees laid the cornerstone for that. The initiative of the Bavarian universities was supported by representatives of research universities and universities of applied sciences from Baden-Wuerttemberg, Bavaria, Austria, Saxony and Thuringia. ACQUIN is a registered non-profit association. Its members include science related professional and trade associations along with more than 160 higher education institutions in Germany, Austria, Switzerland and Lebanon.

The core competence of ACQUIN is the evaluation of study programmes for different types of Higher Education Institutions (HEIs) in Germany and the evaluation and accreditation of study programmes abroad as well as evaluation of quality management systems in HEIs (system accreditation) in Germany. ACQUIN's central concern is to promote and anchor quality culture in higher education and therefore assure through its activities a high quality standard in higher education. In addition, ACQUIN carries out certification procedures of continuous education programmes related to higher education, nationally and internationally, to foster lifelong learning.

ACQUINUS GmbH is a subsidiary company fully owned by ACQUIN. It offers consultancy services to higher education institutions.

ACQUIN has been a member of ENQA since 2003 and is applying for the renewal of ENQA membership.

ACQUIN has been registered in the European Quality Assurance Register for Higher Education (EQAR) since 2008 and is applying for a renewal of the EQAR registration.

2. Purpose and scope of the evaluation

This review will evaluate the extent to which ACQUIN fulfils the requirements of Parts 2 and 3 of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of ACQUIN should be reconfirmed and to EQAR to support ACQUIN application to the register.

The review should give specific attention to those standards where the EQAR Register Committee concluded in its last decision that the agency complied only partially with the ESG, namely standards 2.3, 2.4, 2.5 and 3.4, as well as to issues flagged in Substantive Change Reports since ACQUIN's last renewal; all decisions can be found at https://data.deqar.eu/agency/5-acquin

2.1 Activities of ACQUIN within the scope of the ESG

In order for ACQUIN to apply for ENQA membership and for registration in EQAR, this review will analyse all activities of ACQUIN that are within the scope of the ESG, i.e. reviews, audits, evaluations

or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is independent of whether the activities are carried out within or outside the EHEA and whether they are obligatory or voluntary in nature.

The following activities of ACQUIN have to be addressed in the external review:

- Programme assessment in Germany (according to the new German rules the final accreditation decision is taken by the Accreditation Council)
- Assessment of quality management systems (so-called system accreditation) in Germany (according to the new German legislation the final accreditation decision is taken by the Accreditation Council)
- · Assessment of joint programmes in Germany
- International institutional accreditation
- International programme accreditation
- · Certification of continuing education programmes

Given that ACQUINUS is fully owned by ACQUIN and its staff overlap, its activities need to be taken into account in the review according to Annex 2 (item 11) of the EQAR Policy on the Use and Interpretation of the ESG.

While the consultancy activities are not external quality assurance activities, the review should address the way in which the agency ensures a clear separation and prevents conflicts of interest between (ACQUIN) quality assurance activities and (ACQUINUS) consultancy services, taking into account Annex 2 of the Policy on the Use and Interpretation of the ESG.

3. The review process

The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with the Guidelines for ENQA Agency Reviews and the requirements of the EQAR Procedures for Applications.

The evaluation procedure consists of the following steps:

- Formulation and agreement on the Terms of Reference for the review between ACQUIN, ENQA and EQAR;
- Nomination and appointment of the review panel by ENQA;
- Notification of EQAR about the appointed panel;
- Self-assessment by ACQUIN including the preparation and publication of a self-assessment report;
- A site visit by the review panel to ACQUIN;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Decision making by the EQAR Register Committee on the agency's registration on EQAR;
- Follow-up of the panel's and/or the ENQA Board's recommendations by the agency, including a voluntary progress visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts (at least one of which is currently employed by an ENQA member agency), an academic employed by a higher education institution, a student member, and eventually a labour market representative (if requested). One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the

European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency under review. In this case, an additional fee to cover the reviewer's fee and travel expenses is applied.

The panel will be supported by the ENQA Review Coordinator who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The ENQA staff member will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide ACQUIN with the list of suggested experts and their respective curricula vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards the ACQUIN review.

3.2 Self-assessment by ACQUIN, including the preparation of a self-assessment report

ACQUIN is responsible for the execution and finalized on of its own self-assessment process and shall take into account the following guidance:

- Self-assessment is finalized as a project with a clearly defined schedule and includes all relevant internal and external stakeholders:
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part 2 and 3) addressed individually, and considerations of how the agency has addressed the recommendations as noted in the ENQA Board's membership decision letter and the instances of partial compliance noted in the previous EQAR Register Committee decision of inclusion/renewal. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates
 the extent to which ACQUIN fulfils its tasks of external quality assurance and meets the ESG.
- The self-assessment report is submitted to the ENQA Secretariat which has four weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within two weeks. In such cases, an additional fee of 1000 EUR will be charged to the agency.
- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule which shall be submitted to the agency at least two months before the planned dates of the visit. The schedule is to include an indicative

timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is usually 2,5 days. The approved schedule shall be given to ACQUIN at least one month before the site visit, in order to properly finalize the requested interviews.

The review panel will be assisted in a site visit by the ENQA Review Coordinator.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency or the granting or reconfirmation of ENQA membership.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings concerning each standard of part 2 and 3 of the ESG. A draft will be first submitted to the ENQA Review Coordinator who will check the report for consistency, clarity and language, and it will be then submitted to ACQUIN usually within 10 weeks of the site visit for comment on factual accuracy. If ACQUIN chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter, the review panel will take into account the statement by ACQUIN and finalise and submit the document to ENQA.

The report is to be finalized within three months of the site visit and will normally not exceed 40 pages in length.

When preparing the report, the review panel should also bear in mind the EQAR Policy on the Use and Interpretation of the ESG to ensure that the report will contain sufficient information for the consideration of the Register Committee of the agency's application to EQAR.

For the purpose of applying for ENQA membership, ACQUIN is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which ACQUIN expects to contribute to the work and objectives of ENQA during its membership. This letter will be taken into consideration by the Board together with the final evaluation report when deciding on the agency's membership.

4. Follow-up process and publication of the report

ACQUIN will receive the expert panel's report and publish it on its website once the ENQA Board has approved the report. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. As part of ENQA Agency Review follow-up activities, ACQUIN commits to react on the review recommendations and submit a follow-up report to the ENQA Board within the timeframe indicated in the Board's decision on membership. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

The follow-up report could be complemented by a small-scale progress visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered to be of particular importance or a challenge to ACQUIN. Its purpose is entirely developmental and has no impact on the judgement of membership and/or judgment of compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

5. Use of the report

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.

The review report is used by the ENQA Board for the purpose of reaching a conclusion on whether ACQUIN can be admitted/reconfirmed as a member of ENQA. The report is also used as a basis for the Register Committee's decision on the agency's registration on EQAR. The review process is thus designed to serve these two purposes. However, the review report is to be considered final only after being approved by ENQA. Once submitted to ENQA and until it is approved by its Board, the report may not be used or relied upon by ACQUIN, the panel, or any third party and may not be disclosed without the prior written consent of ENQA. The approval of the report is independent of the decision of the ENQA Board on membership.

For the purposes of EQAR registration, the agency will submit the review report (once approved by the ENQA Board) via email to EQAR before expiry of the agency's registration on EQAR. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, full curriculum vitae (CVs) of all review panel members and any other relevant documents to the application (i.e. annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency's application at its Register Committee meeting in October/November 2021.

6. Indicative schedule of the review

Agreement on Terms of Reference	March 2020
Appointment of review panel members	May 2020
Self-assessment completed	October 2020
Pre-screening of SAR by ENQA Review Coordinator	October 2020
Preparation of site visit schedule and indicative timetable	November 2020
Briefing of review panel members	December 2020
Review panel site visit	February 2021
Draft of evaluation report and submitting it to ENQA Review	Mid-March 2021
Coordinator for pre-screening	
Draft of evaluation report to ACQUIN	April 2021
Statement of ACQUIN to review panel if necessary	End-April 2021
Submission of final report to ENQA	May 2021
Consideration of the report by ENQA Board	June 2021
Publication of report	July 2021
EQAR Register Committee meeting	October/November 2021

ANNEX 3: GLOSSARY

AC Accreditation Commission of ACQUIN

ACC Appeals and Complaints Commission of ACQUIN

ACQUIN Accreditation, Certification and Quality Assurance Institute
AROQA Arab Organization for Quality Assurance in Education

Board Executive Board of ACQUIN

CEENQA Central and Eastern European Network of Quality Assurance Agencies in

Higher Education

Constitutional

Court

Federal Constitutional Court of Germany

DE German language

DEQAR Database of External Quality Assurance Results

ENQA European Association for Quality Assurance in Higher Education

EN English language

EQAR European Quality Assurance Register for Higher Education

ESG Standards and Guidelines for Quality Assurance in the European Higher

Education Area, 2015 (http://enqa.eu/wp-content/uploads/2015/11/ESG 2015.pdf)

EU European Union

EUA European University Association

THE GAC German Accreditation Council (Foundation for the Accreditation of Study

Programmes in Germany, https://www.akkreditierungsrat.de/hrk.de)

GDPR General Data Protection Regulation, 2016/679 EU law on data protection

and privacy in the European Union and the European Economic Area

GIZ German Society for International Cooperation

GSAP German Student Accreditation Pool, established on 20 August 2020

HE higher education

HEI higher education institution

HRK Germans Rector's Conference (https://www.hrk.de/hrk-at-a-glance/)

INQAAHE International Network of Quality Assurance Agencies in Higher Education Interstate Treaty Interstate Treaty on the organization of a joint accreditation system to

ensure the quality of teaching and learning at German higher education institutions, adopted by the Decision of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal

Republic of Germany of 08/12/2016, enacted on 01/01/2018

KMK Standing Conference of the Ministers of Education and Cultural Affairs of

the Länder (https://www.kmk.org/kmk/information-in-english.html)

MNCEA Mongolian National Council for Education Accreditation

QA quality assurance QM Quality Manual

RC Register Committee of the European Quality Assurance Register for

Higher Education

SAC Swiss Accreditation Council SAR self-assessment report

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY ACQUIN

- 1. Comparison ESG Specimen Decree (made by THE GAC) (in English)
- 2. The Interstate Treaty on the organization of a joint accreditation system to ensure the quality of teaching and learning at German higher education institutions (Interstate study accreditation treaty), adopted by the Decision of the Standing Conference of the Minsters of of Education and Cultural Affairs of the Länder in the Federal Republic of Germany of 08/12/2016 (enacted on January 1, 2018) [in English]
- 3. The Specimen decree pursuant to Article 4, paragraphs I-4 of the Interstate study accreditation Treaty (Resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany of December 7, 2017 (in English)
- 4. Impartiality agreement (in English)
- 5. Guiding questions for national programme assessment procedures (in English)
- 6. Template expert report international study programme procedures (in English)
- 7. Template expert report institutional accreditation (in English)
- 8. Template expert report international certification procedures (in English)
- 9. Catalogue Conditions Recommendations 2020 (in English)
- 10. Statutes of ACQUIN (in English)
- 11. ACQUIN's Strategic Plan 2020-2021 (in English)
- 12. Annual report 2019 (in English)
- 13. Annual tasks at ACQUIN and workload 2017-2020 (in English)
- 14. Organizational chart of ACQUIN (in English)
- 15. Several pieces of information on budgets (confidential, in German and English)
- 16. Short summary of internal meeting between Chairman of the Executive Board and agency staff (of 24 November 2017) [in English]
- 17. Board meeting minutes (in German)
- 18. Quality Manual (in English)
- 19. An explanation on employer-employee relationships at ACQUIN (in English)
- 20. Results of ACQUIN member survey (in German)
- 21. Results of ACQUIN and peer survey (in German)
- 22. Procedure and criteria for the appointment of experts (in German)
- 23. Statistics and explanation on expert inclusion (in English)
- 24. Statistics and information regarding appeals cases against accreditation resolutions (in English)
- 25. Information regarding concerns raised by HEIS and statistics on request to change an expert panel member (in English)
- 26. An explanation on ACQUIN's status in Russia and Egypt (in English)
- 27. Updated statistics on procedures completed in 2016-2020 (in English)
- 28. 17 sample reports per various procedures and an explanation to them (some in German, some in English)
- 29. A table mapping all ACQUIN procedures in Germany and abroad to ESG (in English)
- 30. Rules of procedure of ACQUINUS GmbH
- 31. Resolution of the Executive Board regarding ACQUINUS GmbH (in German) [of 21 February 2011]
- 32. Rules of procedure for ACQUINUS GmbH advisory board
- 33. All contracts ACQUINUS GmbH signed to date (confidential) (in German)

OTHER SOURCES USED BY THE REVIEW PANEL

- 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). Submitted on 02/06/2016.
- Resolution on the application by the Accreditation, Certification and Quality Assurance Institute (ACQUIN e.V.) from 15 September 2015 for accreditation and for assessment of compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Resolution by the German Accreditation Council dated 22 June 2016.
- 3. Letter to Managing Director of ACQUIN by President of ENQA regarding Membership of ACQUIN in ENQA. Dublin, 3 March 2017.
- 4. Letter to Acting Managing Director of ACQUIN by President of ENQA regarding ACQUIN's appeal to ENQA and decision on ACQUIN's membership in ENQA. Dublin, 28 September 2017.
- 5. ACQUIN. ENQA Follow-Up Report. 31 January 2019.
- 6. Letter to Managing Director of ACQUIN by President of ENQA regarding follow-up report to the 2017 ENQA review. Bern, 17 May 2019.
- 7. Approval of the Application by Accreditation, Certification and Quality Assurance Institute (ACQUIN) for Renewal of Inclusion on the Register by the Register Committee. Ref. RC18/2016. Dated 3/12/2016.

