

**Approval of the Application  
by Agency for Quality Assurance through Accreditation of  
Study Programmes (AQAS)  
for Renewal of Inclusion on the Register**

**Register Committee**  
14-03-2022

**Ref.** RC34/A112  
**Ver.** 1.0  
**Date** 2022-03-14  
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<b>Application of:</b>	2021-04-27
<b>Agency registered since:</b>	2010-05-25
<b>External review report of:</b>	2021-12-07
<b>Review coordinated by:</b>	European Association for Quality Assurance of Higher Education (ENQA)
<b>Review panel members:</b>	Aurelia Valeikiene, Simona Lache, Alastair Delaney, Joshua Weygant
<b>Decision of:</b>	2022-03-14
<b>Registration until:</b>	2027-12-31
<b>Absented themselves from decision-making:</b>	
<b>Attachments:</b>	<ol style="list-style-type: none"> <li>1. <a href="#">Minutes from the telephone conversation, 10/05/2021 &amp; 18/05/2021</a></li> <li>2. External Review Report, 2021-12-07 (separate file)</li> <li>3. <a href="#">Applicant's statement on the report, 25/02/2022</a></li> </ol>

1. The application of 2021-04-27 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2021-05-28 having considered clarification received from AQAS on the 10/05/2021 and 18/05/2021.
3. The Register Committee considered the external review report of 2021-12-07 on the compliance of AQAS with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered agency's statement on the report received on 25/02/2022.

## Analysis:

5. In considering AQAS's compliance with the ESG, the Register Committee took into account the following activities:

- Programme Review (BA/MA) in Germany, including review of joint programmes involving German universities
- Review of Joint Programmes based on the European Approach
- PhD-accreditations in Germany (using criteria set in the MRVO).
- Institutional (System) Review in Germany
- Programme Accreditation (BA/MA/PhD) international
- Institutional Accreditation international
- Alternative evaluation (considering its ad-hoc character and that this activity has only taken place once)

6. *Assessment of further education on national level and the evaluation of a programme of vocational training* are activities, *workshops on QA topics and the consultancy activities* are not within the scope of the ESG and, thus, were not considered to be pertinent to the application for renewal of the inclusion on the Register.

7. The Register Committee underlined that any current and future activities carried out by AQAS' spin off AQAS ARCH are generally considered as if they were carried out by AQAS itself, given that AQAS ARCH is owned by AQAS and shares both staff and material resources.

8. The Register Committee found that the report provides sufficient evidence and analysis on AQAS's level of compliance with the ESG.

9. With regard to the specific European Standards, the Register Committee considered the following:

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## ESG 2.6 – Reporting

10. The Committee found the agency compliant with the standard. The Committee, however, highlighted that AQAS is responsible to ensure that all reports are ultimately published on its own website and on DEQAR, including those that are never submitted to GAC by the institution under review.

## ESG 3.1 – Activities, policy and processes for quality assurance

11. The Committee learned that the governing body (i.e. the Managing Board) of the agency does not involve other stakeholders than academics. The Committee was aware that according to the legislation in Germany, the members of the Board are personally liable for the work of the agency, including the financial matters, and that this arrangement may put at risk especially the student members in case of unfavourable events. The Register Committee, however, agreed with the panel's view that the agency could still consider alternative ways to include students and other stakeholders in the governing structures.

12. In regard to the separation of the EQA (performed by AQAS e.V.) and consultancy activities (performed by the agency's spin off, AQAS ARCH GmbH) the panel found that it was clear for the agency representatives that an institution that undergoes an EQA procedure could not be provided consultancy at within 6 years since the review has taken place, the agency lacks an explicit policy on this. The agency has not published any policy or statements in regards to the separation of activities and preventing conflicts of interest between them on its website.

13. In their response to the report, AQAS explained that they are planning to make the distinction between activities clear on both entities' websites, but the Committee found that the agency has not done so yet.

**14. Taking in consideration the lack of involvement of students and other stakeholders in the governance of the agency and the necessity of clear and publicly available policy on the separation of EQA from consultancy activities, the Register Committee could not concur with panel's conclusion and found that the agency remains partially compliant with the standard.**

### **ESG 3.4 – Thematic analysis**

15. The Committee learned that the agency made progress in regard to the frequency of publishing reports - a concern raised in the renewals of the inclusion since 2012.

16. The Committee further learned that the content of the thematic publications mainly involved reflections on the agency's own experiences in conducting EQA rather than analysis of the results of the EQA (an analysis which could be more appropriate to serve the internal quality assurance processes, ESG 3.6). The Committee highlights the panel's recommendation that the agency should widen its approach in topics by using general findings of its EQA as basis for analysis of trends in the domestic and international HE systems.

**17. The Register Committee recognised the agency's efforts to publish more frequently. While this improvement tackles a concern raised in the last renewal of the agency's registration, the Committee agreed with the panel's views that the agency could improve the content of the analyses so they are more meaningful for the wider academic and QA community. Due to this the Register Committee was not able to concur with the panel's conclusion and found the agency only partially compliant with the standard.**

18. For the remaining standards, the Register Committee was able to concur with the review panel's analysis and conclusion without further comments.

### **Conclusion:**

19. Based on the external review report and the considerations above, the Register Committee concluded that AQAS demonstrated compliance with the ESG (Parts 2 and 3) as follows:

Standard	Review panel conclusion	Register Committee conclusion
2.1	Full compliance	Compliance
2.2	Full compliance	Compliance
2.3	Substantial compliance	Compliance
2.4	Full compliance	Compliance
2.5	Full compliance	Compliance
2.6	Full compliance	Compliance
2.7	Full compliance	Compliance
3.1	Substantial compliance	Partial compliance
3.2	Full compliance	Compliance
3.3	Full compliance	Compliance
3.4	Substantial compliance	Partial compliance
3.5	Substantial compliance	Compliance
3.6	Substantial compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

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20. The Register Committee considered that AQAS only achieved partial compliance with some standards. The Committee considered that the agency in practice prevents conflict of interest between the EQA and non-EQA activities, even though there are no written policies in place yet (ESG 3.1) and that the agency publishes thematic analyses frequently, even though (ESG 3.4).

21. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that AQAS continues to comply substantially with the ESG as a whole.

22. The Register Committee therefore renewed AQAS's inclusion on the Register. AQAS's renewed inclusion shall be valid until 31/01/2027.

23. The Committee further underlined that the agency has not fully addressed the instances of partial compliance from the previous renewals of the registration (i.e. ESG 3.1 (a concern raised in 2017) and ESG 3.4 (a concern raised in 2012)) and encouraged the agency to take these issues in consideration at the earliest convenience.

# Application by Agency for Quality Assurance through Accreditation of Study Programmes (AQAS) for Renewal of Registration

## Minutes of Telephone Conversation

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Date of the conversations:	10/05/2021 & 18/05/2021
Representative of AQAS:	Doris Herrmman
Representative of EQAR:	Aleksandra Zhivkovikj, Colin Tück

1. AQAS has submitted on 27/04/2021 an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).
2. In order to prepare the deliberations of the Register Committee on the eligibility of the application and AQAS's activities within the scope of the ESG, EQAR contacted AQAS via telephone to clarify the matters below.
3. AQAS agreed to clarify the matters by means of a telephone conversation.

### Institutional accreditation in Oman and Program accreditation in Oman

4. During the call, AQAS explained that the agency does not have country-specific procedures for international evaluations. The institutional and program evaluations in Oman fall under the activities *International Institutional Accreditation* and *International Programme Accreditation* included in the ToR; they were never actually separate.

### Distinction between joint programme activities

5. The agency clarified that when evaluating joint programmes, two different approaches are used depending on whether European Approach is applied:
6. In cases when the European Approach is not applied, the agency uses the procedures of the activity *National Programme Accreditation*; this is thus a special case of this activity.
7. On the other hand, the agency also reviews programmes using the European Approach as a separate procedure; this includes cases both with or without German higher education institutions as partners.

## PhD accreditations in Germany

8. AQAS and EQAR agreed that the number of times an ESG activity has been implemented should not be in its name; the number in the title of the activity “PhD accreditations in Germany” will thus be excluded.

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## Alternative procedures

9. In regards to the activity “Alternative Procedures”, AQAS’ representative explained that this was a so far one-time activity in which the agency evaluated the work of a HEI following a tailor made procedure, according to the respective provisions of the German legal framework for alternative/experimental procedures. The process followed the ESG.

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## Evaluation pursuant to Section 27b of the HS-QSG

10. AQAS performed the activity *Evaluation pursuant to Section 27b of the Austrian Act on Quality Assurance in Higher Education* (HS-QSG) once and the report addressed the specific requirements of the Austrian legislation on HE.
11. AQAS clarified that such a report was drawn up in conjunction with an *International Programme Accreditation*, which covered the general, ESG-aligned AQAS criteria. It was drafted after the “main” report, by the same expert group and based on the same site visit.
12. AQAS does not offer evaluations pursuant to Section 27b as a stand-alone procedure.

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## Statement by AQAS on ENQA report (ERR) for the agency review

Dear Aleksandra,

thank you for giving us the opportunity to hand in a statement on the review report provided by ENQA. In general, we appreciate the report (EER) as very balanced and fair. We were very pleased by the review team's positive appreciation of our work.

In the report there are several issues mentioned how to enhance the work of our agency further. At the begin of 2022 we started setting up several working groups which will develop concepts and papers how to address the recommendations and suggestions mentioned in the ERR. The AQAS team is convinced that many of the aspects will support our agency in its development and can contribute to the further enhancement.

Due to the fact that AQAS is overall satisfied with the ERR, we would only provide further explanation on a few aspects mentioned in the report to clarify our position.

### Statement on specific aspects of the ERR

p. 9/68, 1 paragraph	The statement regarding the <b>compositions of the Commissions</b> reflects the status when the SAR was finalized. Since then 2021 two new members have been appointed. For our Standing Commission another student member (male) is nominated and a representative of the labour market (female). This means that the two positions (students and business area) are covered by one female and one male representative. The newly elected chairman of the Commission is a lady.
p. 13/68	<p>Due to the fact, that Germany has decided to put in place a very competitive system of agencies 20 years back, strategy papers or workplans cannot be <b>published on the website</b> because of plagiarism and unfair competition. To support transparency, AQAS decided in some case to publish a short paper on the website (e. g. our QA policy).</p> <p>As already mentioned, AQAS e.V., the association, carries out activities related to external quality assurance, while its spin-off, <b>AQAS ARCH GmbH</b>, is in charge of all the other types of activities,</p>



	including assessments that do not fall under the ESG. AQAS is fully aware of the requirement of not conducting assessment/accreditation procedures and providing consultancy at the same time for the same institution. The website of AQAS ARCH offers only short information because of the small number of activities. We will provide more information on the separation of activities between both institutions immediately on their websites.
p. 15/68, 1. recommendation	The recommendation to better <b>align the strategy with the annual planning</b> is appreciated and helpful for the enhancement of AQAS' work. But AQAS would like highlight that – other than for national bodies - for an agency which works in a competitive market and with national and international clients there are limits on planning its work because you cannot foresee which mandates, new contracts and new clients will come up soon.
p. 20/68, 6. recommendation	If articles by AQAS (and others) are <b>published in journals</b> , which is good for our reputation and outreach, AQAS has no influence on the publishing house to install a paywall or not. It is not in our hands.
p. 23, 7. recommendation	<b>Planning ahead</b> is crucial for any organization and therefore the advice is welcomed. However, working in a market driven environment makes planning much more difficult because upcoming projects and new clients cannot be anticipated.
p. 25/68, 2. paragraph	AQAS has a <b>planning of HR and finances</b> which covers the business year. Moreover, a monthly monitoring of the financial data is done by the management of the agency and the Board.
p. 29/68	The requirements of the <b>Lisbon Convention</b> are checked by AQAS because the aspect of recognition is integrated in the template for the reports provided by GAC which has to be used by all agencies. It is correct that the LRC could be made more explicit in the MRVO.
p. 35/68, 3. paragraph and 9. recommendation	The German accreditation system regulates that recommendations given in a review process are discussed and checked in the next re-accreditation. A single agency cannot define a <b>follow-up process</b> beside the national regulation because it is neither the agency which takes a decision on the outcome and formulates the recommendations nor has it a mandate to do so.  On the international level AQAS can and does offer an “intermediate evaluation” to its clients.
p. 36/68, paragraph 6	Topic related <b>training sessions</b> are provided by AQAS for <u>all</u> <b>potential members of experts panels</b> (e.g. dual programmes, joint programmes).
p. 37/68, 11. suggestion	AQAS is sensitive to the <b>gender balance</b> in the expert panels and managed to reach an involvement of more than 30% of female representatives in the panels. Our experience is that due to the variety of duties, the willingness to participate in external QA procedures of female professors/stakeholders is usually lower than expected.



If you have any questions, please don't hesitate to contact us.

Sincerely Yours



Doris Herrmann

Managing Director