

Approval of the Application by Central Evaluation and Accreditation Agency (ZEvA) for Renewal of Inclusion on the Register

Register Committee

14 March 2022

Ref. RC32/A98
Ver. 1.0
Date 21/03/2022
Page 1 / 7

Application of:	2020-07-23
Agency registered since:	2009-04-08
External review report of:	2021-09-13
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)
Review panel members:	Melita Kovacevic (chair), Dan Dericott (academic), Mark Frederiks, Marija Vasilevska (student)
Decision of:	2022-03-14
Registration until:	2026-09-30
Absented themselves from decision-making:	n/a
Attachments:	<ol style="list-style-type: none"> 1. Confirmation of eligibility, 2020-09-07 2. External Review Report, 2021-09-13 (separate file) 3. ZEvA's statement on the report, 14/07/2021 4. Request to the Review Panel, 01/10/2021 5. Clarification by the Review Panel 6. Additional representation by ZEvA

1. The application of 2020-07-23 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2020-09-07, having considered clarification received from ZEvA on 28/08/2020.
3. The Register Committee considered the external review report of 2021-09-13 on the compliance of ZEvA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version). The Register Committee further considered ZEvA's response to the external review report, dated 14/07/2021.
4. The Register Committee sought and received clarification from the chair of the review panel.

5. The Register Committee invited ZEvA to make additional representation on the grounds for possible rejection on 14/12/2021. The Register Committee considered ZEvA's additional representation of 11/02/2022.

Register Committee

14 March 2022

Analysis:

6. In considering ZEvA's compliance with the ESG, the Register Committee took into account:

Ref. RC32/A98
Ver. 1.0
Date 21/03/2022
Page 2 / 7

- *Programme accreditation in Germany (remaining procedures)*
- *Systems accreditation in Germany (remaining procedures)*
- *Programme accreditation in Germany (from 2018 onwards)*
- *Systems accreditation in Germany (from 2018 onwards)*
- *Evaluation (institutional, programme, subject level and thematic evaluation)*
- *Certification of further education*
- *International accreditation (programme and institutional)*
- *Quality audits in Austria*
- *Accreditation of Joint Degree Programmes according to the European Approach*
- *Accreditation of study programmes outside of the Bachelor/Master-system*
- *Accreditation of Doctoral programmes*

7. *Consultations to higher education institutions, Project application reviews, Validation of modules taught by non-higher education providers, and the Seminar programme* are not within the scope of the ESG and, thus, not pertinent to the application.

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

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

ESG 2.2 – Designing methodologies fit for purpose

10. The panel report noted that there are various interactions to ensure fitness for purpose, but that there was no process to periodically review each methodology (p. 35). In addition, there was a lack of clarity who in ZEvA finally approves or signs off a new methodology.

11. In its additional representation, ZEvA explained how the agency reviews its methodologies regularly and the process of signing of new or revised methodologies.

12. The panel commented on the fact that there is no distinctive procedure for the accreditation of doctoral education. The fact that ZEvA uses the same

procedural rules as for Ba/Ma programmes has not changed since the last review and renewal of registration; it was accepted as suitable by the Register Committee then.

13. ZEvA introduced a Quality Improvement Process as a new feature in light of the change of the German accreditation system. Its full impact cannot be judged yet. The Register Committee noted that this should be considered in a future review, including whether the process bears a risk of “mixing” assessment and consultancy.

14. The Register Committee concurred with the panel's conclusion that ZEvA complies with the standard.

Register Committee

14 March 2022

Ref. RC32/A98
Ver. 1.0
Date 21/03/2022
Page 3 / 7

ESG 2.4 – Peer-review experts

15. The review panel noted that the composition of ZEvA expert panels “varies according to the activity, but broadly they all comprise academic, industry and student members” (p. 37).

16. In its 2016 decision to renew ZEvA's registration, the Register Committee found that ZEvA was only partially compliant with ESG 2.4 due to the lack of consistent involvement of students, in particular in the certification procedures.

17. While the panel commented that the material it considered raised “no concerns in relation to student involvement in expert panels” (p. 39), it did not provide further detail, especially with regard to the certification procedures that were in question previously. The Register Committee was therefore not fully convinced that this matter was resolved.

18. In its additional representation, ZEvA explained how the involvement of students was ensured in its certification procedures within the scope of the ESG. The Register Committee welcomed that this was ensured in all recent procedures and that ZEvA reflected on the role of students/learners in the further education programmes it certifies; the Committee welcomed that ZEvA found an appropriate way.

19. In addition, the review panel noted that the proportion of experts who take part in training had increased, but not sufficiently in the panel's view. The panel also considered that the process for recruitment and selection of experts was largely informal.

20. The Register Committee welcomed the newly introduced systematic monitoring of experts' training and prior experience, as explained in ZEvA's representation. The Committee agreed that ZEvA may of course rely on experts who were previously trained by other agencies operating in Germany.

21. At the same time, the Committee considered that 50% was not a very ambitious goal for the share of formally trained experts. Moreover, the Committee had some doubts whether prior experience should be considered entirely equal to a formal training.

22. While the Register Committee welcomed that the involvement of students was now ensured and that ZEvA is taking steps to enhance the formal training of experts, the Committee considered that the level of formal expert training remained weak to date. The Register Committee was therefore unable to concur with the panel, but considered that ZEvA only partially complies with the standard.

Register Committee

14 March 2022

Ref. RC32/A98

Ver. 1.0

Date 21/03/2022

Page 4 / 7

ESG 2.6 – Reporting

23. The Register Committee concurred with the panel's conclusion that ZEvA complies with the standard; the Committee further underlined that ZEvA 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 2.7 – Complaints and appeals

24. The panel recognised that there was progress regarding the coverage of all activities by ZEvA's appeals process. At the same time, it was not clear whether decisions of the Standing Evaluation Commission were open to appeal (p. 43). Hence, it remained unclear whether the appeals process extended to all external quality assurance activities.

25. The Committee underlined that any report is a formal outcome and thus needs to be open to appeal, even if it does not result in a yes/no decision.

26. In its additional representation, ZEvA clarified matters for evaluation reports. At the same time, it remained unclear whether and how institutions can appeal accreditation reports *before* submitting those to GAC. Even though GAC offers an appeals possibility, presumably GAC's process cannot fully investigate matters that are rooted in the report produced outside of GAC's direct control. Moreover, it would be unreasonable that institutions are forced to first submit to GAC a report against which they have strong objections before they can appeal against that report.

27. The Committee further recognised that ZEvA and the panel held different views as to whether the appeals system was well established and fully clear to all relevant actors. While ZEvA used the representation to challenge the panel's analysis, the Committee considered that no substantially new facts or arguments were brought up.

28. The Register Committee concurred with the panel's conclusion that ZEvA partially complies with the standard, while recognising that improvements have been made with regard to reports from all external quality assurance activities being open to appeal.

ESG 3.1 – Activities, policy and processes for quality assurance

29. With regard to the distinction between external quality assurance and consultancy, the report pointed out that these were carried out by different departments and different experts.

Register Committee

14 March 2022

Ref. RC32/A98
Ver. 1.0
Date 21/03/2022
Page 5 / 7

30. As it remained unclear whether an institution could be offered consultation and afterwards accreditation, the Register Committee sought and received clarification from the review panel on this issue.

31. The panel clarified that ZEvA had reported on the separation of QA and consultancy in the SAR, and that this was further discussed during the site-visit. The panel had checked the list of accredited HE institutions as well as ongoing *systems* accreditation processes, and verified that the two universities consulted by ZEvA in the period 2017 – 2021 were neither accredited, nor were in the process of accreditation. According to DEQAR, ZEvA carried out two programme accreditations each at the University of Oldenburg and the University of Hildesheim in the period 2017 – 2019.

32. The Register Committee understood well that ZEvA approaches consultancy differently in Lower Saxony, where it is free of charge, while it is a paid service elsewhere.

33. While the panel commented on the practice during the 2017 – 2021 period it remained unclear what exactly is ZEvA's published policy with regard to not carrying out accreditation at institutions that were consulted, and where this policy is set out.

34. In its additional representation, ZEvA provided further explanations and reported that it had amended its various manuals to now explicitly stipulate its already-practiced policy. The Register Committee welcomed the clarity provided.

35. According to the panel's report, ZEvA had no overarching strategic planning for the entire organisation. Having considered ZEvA's comment on the review report, the Register Committee sought further clarification from the panel and understood that ZEvA's strategic planning took place separately by business area.

36. In its additional representation, ZEvA provided clear evidence that there are also overarching strategies for the entire organisation. The Register Committee acknowledged that the combination of an overarching strategy combined with more in-depth strategic planning and monitoring per business area seemed appropriate for ZEvA's needs.

37. Having considered the additional representation and the clarifications as to the clear separation of external quality assurance and consultancy, the Register Committee concurred with the panel's conclusion that ZEvA complies with the standard.

ESG 3.4 – Thematic analysis

38. The review report analyses that there were only some limited, small-scale activities in the area of thematic analyses. These did not cover all of ZEvA's activity and there was no clear, achievable plan in place for regular thematic analyses.

39. In its additional representation, ZEvA presented its work so far and its future concept for thematic analyses in more detail. The Register Committee

acknowledged that ZEvA has identified the need for action clearly and has started to develop this area further.

40. At the same time, what has been completed so far has not changed materially and the Register Committee therefore concurred with the panel's conclusion that ZEvA partially complies with the standard.

ESG 3.6 – Internal quality assurance and professional conduct

41. The report pointed out that reviews of ZEvA's internal QA processes were not systematic and following a defined schedule (see also ESG 2.2 above). The report further pointed out that feedback was collected, but not fully systematically and sometimes informally.

42. In its additional representation, ZEvA explained more clearly that it had a systematic and regular approach to reviewing its methodologies.

43. While the training of experts was still an area of concern (see also 2.4 above), the Register Committee recognised that the recommendation made during the last external review was taken up by introducing a systematic monitoring of the experts' level of training.

44. Having considered the additional representation, the Register Committee concurred with the panel's conclusion that ZEvA complies with the standard.

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

Conclusion:

46. Based on the external review report and the considerations above, the Register Committee concluded that ZEvA 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	Substantial compliance	Compliance
2.3	Full compliance	Compliance
2.4	Substantial compliance	Partial compliance
2.5	Full compliance	Compliance
2.6	Full compliance	Compliance
2.7	Partial compliance	Partial compliance
3.1	Substantial compliance	Compliance
3.2	Full compliance	Compliance
3.3	Full compliance	Compliance
3.4	Partial compliance	Partial compliance

Register Committee

14 March 2022

Ref. RC32/A98

Ver. 1.0

Date 21/03/2022

Page 6 / 7

3.5	Full compliance	Compliance
3.6	Substantial compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

Register Committee

14 March 2022

Ref. RC32/A98
Ver. 1.0
Date 21/03/2022
Page 7 / 7

47. The Register Committee considered that ZEvA only achieved partial compliance with some standards. In its holistic judgement, the Register Committee took into account that tangible improvements have already been made with regard to appeals (ESG 2.7) and that ZEvA is actively working to address the training of experts (ESG 2.4) and thematic analysis (ESG 3.4).

48. The Committee thus concluded that ZEvA continues to comply substantially with the ESG as a whole and renewed ZEvA's inclusion on the Register. ZEvA's renewed inclusion shall be valid until 30/09/2026.

49. The Register Committee further underlined that ZEvA is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.

EQAR | Aarlenstraat 22 Rue d'Arlon 22 | BE-1050 Brussels

Central Evaluation and Accreditation Agency (ZEvA)

Lilienthalstrasse 1

Henning Schäfer

30179 Hannover

Germany

Brussels, 7 September 2020

Confirmation of Eligibility: Application for Renewal of Inclusion on the Register

Application no. A98 of 23/07/2020

Dear Henning,

We hereby confirm that the application by ZEvA for renewal of registration is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by European Association for Quality Assurance of Higher Education (ENQA) fulfils the requirements of the EQAR Procedures for Applications.

We confirm that the following activities of ZEvA are within the scope of the ESG:

- *Programme accreditation in Germany (remaining procedures)*
- *Systems accreditation in Germany (remaining procedures)*
- *Programme accreditation in Germany (from 2018 onwards)*
- *Systems accreditation in Germany (from 2018 onwards)*
- *Evaluation (institutional, programme, subject level and thematic evaluation)*
- *Certification*
- *International accreditation (programme and institutional)*
- *Quality audits in Austria*
- *Accreditation of Joint Degree Programmes according to the European Approach*
- *Accreditation of study programmes outside of the Bachelor/Master-system*

European Quality Assurance
Register for Higher Education
(EQAR) aisbl

Aarlenstraat 22 Rue d'Arlon
1050 Brussels – Belgium

Phone: +32 2 234 39 12
Fax: +32 2 230 33 47

info@eqar.eu
www.eqar.eu

VAT BE 0897.690.557

EQAR Founding Members:

enqa.

EURASHE

eua
EUROPEAN
UNIVERSITY
ASSOCIATION

esu
EUROPEAN
STUDENT
UNION

Based on the information in the application form and the additional information provided (see minuted phone conversation attached), we confirm that the following activities are not within the scope of the ESG:

- *consultations to higher education institutions; the external review should, however, address the measures in place to separate clearly between quality assurance activities carried out by ZEvA and its consultations to higher education institutions, taking into account Annex 5 to the Policy on the Use and Interpretation of the ESG¹.*

Please ensure that ZEvA's self-evaluation report covers all the aforementioned activities.

We also confirm that the following activities are not within the scope of the ESG and are not relevant to your application. It is ZEvA's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel:

- *project application reviews;*
- *validation of modules taught by non-higher education providers;*
- *seminar programme.*

We further remind you that ZEvA was found to comply only partially with the following standards when ZEvA's registration was last renewed; the issues related thereto should be specifically addressed in your self-evaluation report and the external review report:

ESG 2.4 Peer-review experts

The Register Committee noted that while the agency has involved students in most of its reviews it has not done so for any of its certification procedures and at least one programme accreditation (i.e. PhD in World Maritime University).

The Register Committee also noted that certification procedures lacked clear statements regarding the processes and responsibilities for the selection, nomination and appointment of experts.

ESG 2.7 Complaints and appeals

The Register Committee underlined the panel's recommendation that the agency should allow for objections to formal decisions as well as complaints about the way procedures are conducted for all external quality assurance activities and ensure they are clearly communicated to higher education institutions.

ESG 3.6: Internal quality assurance and professional conduct

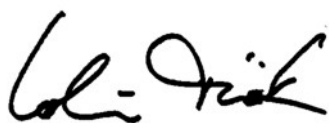
¹ <https://www.eqar.eu/kb/official-documents/#use-and-interpretation-of-the-esg>

The Register Committee underlined that a number of gaps have been identified in the agency's internal quality assurance system i.e. out-dated aspects within the Guidelines for Internal Quality Assurance as well as insufficient presentation of the (newer) internationally oriented procedures and thus should be considered as part of the agency's renewal for registration.

We will forward this letter to European Association for Quality Assurance of Higher Education (ENQA) in its capacity of the coordinator of the external review. At the same time we underline that it is ZEvA's responsibility to ensure that the coordinator and review panel take account of the present confirmation, so as to ensure that all activities mentioned are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. ZEvA has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision.

Yours sincerely,



Colin Tück
(Director)

Cc: ENQA (coordinator)

Application by Central Evaluation and Accreditation Agency (ZEvA) for Renewal of Registration

Minutes of Telephone Conversation

Register Committee

Ref. A98
Date 2020-09-01
Page 1 / 2

Date of the conversation:	28/08/2020
Representative of ZEvA:	Henning Schäfer
Representative of EQAR:	Melinda Szabó

1. ZEvA has submitted on 23/07/2020 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 ZEvA's activities within the scope of the ESG, EQAR contacted ZEvA via telephone to clarify the matters below.
3. ZEvA agreed to clarify the following matters by means of a telephone conversation.
4. In the application form, ZEvA did not include among its listed activities *Programme accreditation in Switzerland*. ZEvA explained that the activity has been phased out before its previous external review (in 2015).
5. Considering the *consultation* activities in matters of study and teaching in higher education, ZEvA explained that the agency has been carrying out this activity as part of its agreement with the Ministry of Science and Culture and the State conference of Higher education Institutions in Lower Saxony. For state universities the costs of the consultation are covered by the Ministry of Lower Saxony. The offer of ZEvA's consultation services include organizational development, curriculum development, internal evaluation, project management and evaluation procedures.
6. As part of its *project application reviews*, the agency explained that it is responsible for organising the assessment of project applications prepared by higher education institutions i.e. nomination of experts, review of projects. The projects are funded by the state and the decision of which projects to fund also lies with the state (the Ministry of science and culture).
7. In carrying out the *validation of modules taught by non-higher education providers* ZEvA organises an assessment process through which it supports the recognition of prior learning in higher education. ZEvA assists higher education institutions in their recognitions process and

those who have acquired knowledge and skills via non-higher education providers to establish their equivalency level.

Register Committee

Ref. A98
Date 2020-09-01
Page 2 / 2

Response to Review Panel Regarding Factual Accuracy of the Review Report

July 14th 2021

We thank the review panel for their extensive report and for their commendations and overall positive assessment of ZEvA as an institution. We also thank the review panel for their recommendations concerning some issues to be addressed, which will help us to improve our work even further. We are grateful to the review panel's thorough work, their professional conduct and the very constructive and friendly atmosphere during the entire procedure, even and especially in their criticism. We are already on the way of implementing some changes based on the recommendations by the expert group (e.g. a thematic analysis on digital site visits), and we will discuss the report and the suggestions for improvement in our upcoming corporate retreat in September.

For the most part, we have no factual errors to report except for two areas in which the assessment is to our mind based on factually incorrect or misleading information given by some of the attending interview partners at the site visit, for which we apologize, and one minor point. In the following, we will try and correct these wrong impressions given in the hope to avoid a negative impact on the review panel's assessment and ENQA's judgment. We ask you to take into consideration that a site visit is stressful and that there is limited time to address all issues in depth, so it is understandable that some confusion may arise and that some of the facts are not entirely present to all interviewees in that moment and misunderstandings are possible, especially since the interviews were not held in the interviewees native language.

We have corrected some orthographic errors as well, and the passages we have commented on in the following are marked in yellow in the report.

1. If the members of the Foundation Board have implied or that could be interpreted in a way that suggests that they have not received or approved any overarching strategic plans from the executive board, this is factually incorrect, and we can provide evidence to support this (e.g. the strategy papers themselves and the minutes of the three board meetings in question). For the 2nd, 11th and 22nd meeting of the Foundation Board, in 2009, 2014 and 2019, the Executive Board has provided overarching strategic plans with a scope of five years each for the Foundation Board to review and approve. In each case, the Foundation Board has approved of the strategic plans and was able to review ZEvA's progress through the Executive Board's yearly report. We apologize for misleading information given and ask to consider that since the establishment of the Foundation Board, the composition has changed several times, so not all current members may be aware of the instances in which strategic plans have been discussed on the board. Furthermore, even since the last discussion of an overall strategy, some time has passed, and a tumultuous time at that, so not everybody may have this information readily available.

2. The review report states that there appeared to be confusion among the members of ZEvA's commissions regarding the procedures for complaints and appeals and that the responsibilities of the commissions especially for complaints was unclear. Again, it would appear, the interviewees have given incorrect or misleading information. We would ask the review panel to consider the documentation of our procedures, as evidenced in the Rules of Procedure for the Appeals Commission and the ZEvA Commission and information provided in each of our manuals, which state clearly that the Appeals Commission is responsible for all complaints and appeals and formulates a recommendation for the ZEvA Commission which then reaches a decision. We can only attribute this apparent confusion to the fact that appeals and especially complaints are a rare occurrence, and appeals will get even scarcer in the future since the number of formal decisions ZEvA takes has been reduced drastically by the new accreditation system. We kindly ask the review panel not to hold ZEvA to account for an understandable misake on the part of individual members of the commissions, to whom the information regarding the procedures was readily available, both in the form of the rules of procedure as well as the SAR, and not to base their assessment on what we feel is very anecdotal and unreliable evidence received during the site visit that clearly contradicts ZEvA's documentation. Regarding ZEvA as only partially compliant based on some confusion among the interviewees seems to us a rather harsh and unfair judgment. Additionally, we have to clarify that the Standing Evaluation Commission takes no formal decisions and is thus not subject to appeals, so naturally this is not included in our descriptions of the appeals process. The SEK decides on the workplan for evaluations in Lower Saxony and approves the reports. A formal decision is not part of the evaluation procedure.

3. A minor point is that the third sentence of the first full paragraph on page 10 is a bit imprecise, as even after 2018, our ZEvA commission took decisions on accreditation in Germany and will continue to do so in a few cases. If one wanted to be more exact, one could say something like "...deciding on the formal outcomes of accreditations in Germany that are subject to the new accreditation system established in 2018, where the German Accreditation Council takes the decision". But as said before, it is only a minor point.

We kindly ask to consider these corrections and are looking forward to the final report.

Kind regards

Henning Schäfer
Managing Director

Brussels, 1 October 2021

Application by ZEvA for Renewal of Registration on EQAR

Dear Melita,

ZEvA - Central Evaluation and Accreditation Agency has made an application for renewal of its registration on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of 13/09/2021 on which ZEvA's application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members as necessary, some matters in order to contribute to the consideration of ZEvA's application:

1. The report discussed ZEvA's consultancy projects and noted that these were "viewed and managed by the agency separately to the external quality assurance activities".

While the review team concluded that it was "satisfied that ZEvA takes a careful and considered approach to conducting its consultancy work separately to its external quality assurance activities" (p. 17, ESG 3.1), the report does not explain in detail ZEvA's approach to separating these areas.

In particular, the report does not specify whether ZEvA ensures that no external quality assurance (accreditation, audit, etc.) is carried at the same institution/faculty to which ZEvA has provided consultancy during the past six years¹.

Could you please clarify whether that is the case or, otherwise, elaborate on how the panel came to the conclusion that ZEvA's approach is sufficient to avoid any conflicts of interest between external quality assurance and consultancy?

European Quality Assurance
Register for Higher Education
(EQAR) aisbl

Aarlenstraat 22 rue d'Arlon
1050 Brussels
Belgium

Phone: +32 2 234 39 12
Fax: +32 2 230 33 47

info@eqar.eu
www.eqar.eu

VAT BE 0897.690.557

¹See [Policy on the Use and Interpretation of the ESG](#), Annex 2, Item 8

2. While the report noted that “no overall document setting out strategic and operational plans currently existed or was in use” (p. 14, ESG 3.1), ZEvA held – in its statement of 14 July 2021 – that its Executive Board had proposed overarching strategic plans with a scope of five years each, which the Foundation Board had approved and reviewed.

Could you please clarify whether the panel knew the document(s) referred to in ZEvA's statement and, if so, explain why they cannot be considered overall strategic documents?

We would be grateful if it was possible for you to respond **by 10 October 2021**, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on ZEvA's application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

We acknowledge that it might not be possible to clarify all of the above. However, we appreciate your assistance and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,



Colin Tück
(Director)

Cc: Dan Dericott (secretary)
ENQA (coordinator)
ZEvA

Colin Tück
Director
EQAR

Tuesday 12 October 2021

Dear Colin,

Thank you for your letter regarding the EQAR Register Committee's scrutiny of our External Review Report for ZEvA, the Central Evaluation and Accreditation Agency. Please find our response to your two queries below.

"1. The report discussed ZEvA's consultancy projects and noted that these were "viewed and managed by the agency separately to the external quality assurance activities".

While the review team concluded that it was "satisfied that ZEvA takes a careful and considered approach to conducting its consultancy work separately to its external quality assurance activities" (p. 17, ESG 3.1), the report does not explain in detail ZEvA's approach to separating these areas.

In particular, the report does not specify whether ZEvA ensures that no external quality assurance (accreditation, audit, etc.) is carried at the same institution/faculty to which ZEvA has provided consultancy during the past six years¹.

Could you please clarify whether that is the case or, otherwise, elaborate on how the panel came to the conclusion that ZEvA's approach is sufficient to avoid any conflicts of interest between external quality assurance and consultancy?"

Considering the SAR and information we gathered during the interviews, we concluded that ZEvA keeps consultancy out of Lower Saxony separate from accreditation, certification and audits. Although the agency has not stated explicitly in their documents that consultancy and accreditation are separate activities, the separation has been reported in SAR and further discussed and confirmed during the site-visit. According to ZEvA's position, consultation for HEIs in Lower Saxony is a part of ZEvA's mandate given by the state government.

According to the SAR, ZEvA reported:

"In the state of Lower Saxony, ZEvA's task as an evaluation agency is not only to carry out evaluations but also to counsel and support the public HEIs in Lower Saxony. These tasks are not easily distinguishable as the evaluations themselves also serve as external support of the HEIs and their main purpose is in generating recommendations for further improvement. Both in evaluations and consultancy, the HEIs in Lower Saxony receive these services free of charge, since they encompass ZEvA's mission for which it receives state funding, so no conflict of interest arises.

For consultancy outside of Lower Saxony, which only happens on rare occasions and is not an ongoing task which ZEvA promotes actively, ZEvA keeps these activities separate from its accreditation, certification and audits. These procedures are not combined with consultancy activities, and experts involved in consultancy will not be employed in external quality assurance activities at the same institution, if such cases would arise, which so far they have not."

The Review Panel requested additional information regarding ZEvA's consultancy work in the period 2017-2021 and received the list with three consultancies, two being done (University of Hildesheim and University Oldenburg) and one in the process (University Oldenburg). We checked the list of accredited HEIs as well as ongoing systems accreditation processes and verified that the two universities were neither accredited nor have been in the process of accreditation.

"2. While the report noted that "no overall document setting out strategic and operational plans currently existed or was in use" (p. 14, ESG 3.1), ZEvA held – in its statement of 14 July 2021 – that its Executive Board had proposed overarching strategic plans with a scope of five years each, which the Foundation Board had approved and reviewed.

Could you please clarify whether the panel knew the document(s) referred to in ZEvA's statement and, if so, explain why they cannot be considered overall strategic documents?"

Following this comment from ZEvA, we made small but significant revisions to the report text to emphasise that it is an overarching strategic plan that appeared not to have been considered by the Board of Trustees recently. While we saw evidence of the Board of Trustees considering strategic priorities in particular areas of activity (for example, on internationalisation and system accreditation), this did not go as far as an overarching strategic plan for the organisation.

This concurs with the position initially set out by ZEvA in March 2021 when the Review Panel asked for additional documentary evidence in the form of "ZEvA's strategic and operational plans, and any evaluation or monitoring of their implementation." ZEvA's written response to the Review Panel was:

"ZEvA discusses strategic and operational plans in the annual retreats and documents them through the minutes of these retreats. The progress of these plans is monitored in Jour Fixe meetings and following retreats. There is no overall document describing ZEvA's strategic and operational plans as yet and, as far as ZEvA's German programme accreditation business is concerned, this has not been necessary in the past. As a reaction to recent developments (the ongoing implementation of the accreditation system, Covid 19), ZEvA is in the process of formulating a strategic and operational plan for the next years. This is an ongoing process that will take most of 2021 to complete.

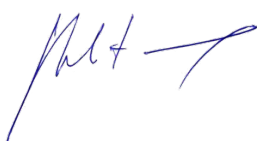
There are already strategic plans for individual areas of business. In 2017, ZEvA has formulated a strategy specifically for the international area, which was subject to a mid-term evaluation in 2019 and is scheduled for renewal in the second half of 2021, following the annual retreat in September. Likewise, a strategy for system accreditation was devised in 2017 which is also due for renewal in 2021. In both cases, the strategies have led to a significant increase in procedures. In 2020, ZEvA has started to draft a strategy for the area of evaluation in Lower Saxony, which is to be discussed with representatives of the state rector's conference in March and to be finalised in the first half of 2021.

Annex 1: Internationalisation Strategy

Annex 2: Minutes of annual retreat 2019 for the internationalisation strategy

Annex 3: Strategy Systems Accreditation"

Kind regards,



Melita Kovacevic
Chair of the Review Panel

ZEvA's EQAR Application

Additional Representation

In Reponse to EQAR's deferral letter, December 24th 2021

We thank the Register Committee and EQAR for the opportunity to hand in additional representation and for their suggestions for improvement. We apologize if our self-assessment-report was not conclusive enough regarding some important points and led to some misunderstandings. We also apologize for further misunderstandings based on misleading information given during the site visit. In the following, we would like to provide clarification on points where the evidence remained unclear or incomplete. Some of these issues were also part of our response to the review report, but we would like to support our statements therein with additional documents as evidence.

Furthermore, we would like to present improvements that we have already made based on the expert team's assessment for your consideration. We have held a corporate retreat in September 2021, in which we discussed the recommendations by the expert panel and installed several working groups to enhance our procedures further.

We hope that, with this additional representation, the Register Committee will get a better picture of ZEvA's compliance with the ESG and will then be able to approve of ZEvA's application for continued inclusion in the EQAR. We wish to state that inclusion in the EQAR is of seminal importance to ZEvA, as it is the basis for almost all of our activities and thus indispensable for our generation of income and the agency's survival. Furthermore, ZEvA has been a fervent supporter of the development of a European Higher Education Area and common standards for quality assurance for a long time, as a founding member of ENQA and ECA and an active participant in the Joint Quality Initiative, and we are more than willing to continue doing our part for our common goals in the future.

In the following, we will respond to the issues raised in EQAR's deferral letter in their given order and provide further evidence under each point. We will include additional documents referenced as appendices. Furthermore, at the end of the document, we have included links to all relevant manuals cited in the text. If you have further questions, please do not hesitate to contact us

Hannover, February 11th, 2022



Henning Schäfer, Managing Director

Contents

Contents	2
ESG 2.2 – Designing Methodologies Fit for Purpose	2
ESG 2.4 – Peer-Review Experts	3
ESG 2.6 – Reporting	5
ESG 2.7 – Complaints and Appeals	6
ESG 3.1 – Activities, Policy and Processes for Quality Assurance	7
ESG 3.4 – Thematic Analysis.....	9
ESG 3.6 – Internal Quality Assurance and Professional Conduct.....	9
List of Appendices.....	10
ZEvA’s Manuals	11

ESG 2.2 – Designing Methodologies Fit for Purpose

10.: For clarification purposes, we wish to state that ZEvA’s methodologies are constantly under review and amended where necessary. This is done via discussions during the regular Jour Fixe meetings (monthly general Jour Fixe meetings plus divisional Jour Fixe meetings) and during the annual corporate retreats. All meetings are recorded in writing. Approval of changes to these methodologies is the task of the Foundation Board. If new methodologies are to be introduced or if a major overhaul of methodologies is necessary, these are presented to the ZEvA Commission (ZEKo) or the Standing Evaluation Commission (SEK) for approval before the Foundation Board approves their implementation. If these changes require amendments to the Foundation Charter, the final decision is taken by the Foundation Council. A good example is the implementation of the accreditation system in Germany which led to changes to ZEvA’s methodology (see ZEvA’s substantive change report 2019). ZEvA decided to merge three of its bodies into one and then had to change the foundation charter, which had to be approved by the Foundation Council. The implementation of the new system was discussed in a ZEvA corporate retreat and then presented to the newly formed ZEKo for approval. After a while, ZEvA had to change that methodology slightly with regard to the involvement of the ZEKo and again presented it to the ZEKo for approval.

Generally speaking, ZEvA’s methodologies remain relatively stable as they are well-trying and proven. Especially in the German accreditation system, the rules of procedure tend to be rather strict and do not leave much room for change apart from the changes made to the German system itself. The above-mentioned case was an unprecedented reform that led to significant changes, but in effect the system became as rigid again as it had been before or possibly even more so. With ZEvA’s international and certification procedures, we have more freedom, and we are reviewing our procedures regularly. In ZEvA’s evaluation procedures, each new procedure may require a slightly different approach, which will be presented to the SEK for approval.

11.: ZEvA thanks the Register Committee for confirming that ZEvA's approach to the accreditation of doctoral programmes remains suitable and ESG-compliant.

12.: The Quality Improvement Process is subject to much controversy in Germany, but we would like to state that it does not include elements of consultancy. ZEvA approaches this process as a follow-up in the same way we would assess the fulfilment of conditions in other procedures. The HEI is given time to revise their concept with no involvement of ZEvA or the experts involved, and the changes are assessed by the review team to see whether deficiencies have been remedied.

ESG 2.4 – Peer-Review Experts

14.-16.: It is a standing principle of ZEvA's work that students are an integral part of expert teams in ESG-based external quality assurance. This principle can be found in all of ZEvA's manuals.¹ As for the procedure of certification, our current manual also contains this principle:

The expert group usually consists of four to five persons:

- two to three (professorial) lecturers from higher education institutions who cover the subject spectrum to be assessed
- one person from professional practice
- one student (students are sometimes not helpful for validations. In this case, this position may be dispensed with, cf. chapter 3.5). (translated with DeepL)

"Leitfaden Zertifizierung und Validierung", p. 15

The manual only mentions a possible exception for the case of validation, where student involvement might not always be possible or necessary, but this is not an ESG-based procedure and thus not eligible for EQAR registration.

In the past, for some of our certification procedures, it could be difficult to define the possible "students" of these programmes, as they may be indistinguishable from other status groups. This was especially the case for the certification of higher education didactic programmes (discontinued since), which are aimed at and taught by university lecturers (e.g., professors or assistants) and the representatives from professional practice would also be university lecturers (e.g. rectors or deans). Thus, university professors could act as higher education experts, as experts from professional practice or as student experts. Likewise, for the assessment of further education programmes aimed at professionals with a full university education and years of professional experience, the student experts could be recruited from the same group as the experts of professional practice. Thus, sometimes experts could have fulfilled dual roles in the procedures. That being said, all our Certification procedures begun after the last ESG review have included students in the classical sense,² and our manuals were amended after the last review to demonstrate that student involvement is mandatory.

¹ Cf. for example „Manual External Assessment of Study Programmes“, p. 8, „Leitfaden Evaluation von Studiengängen“, p. 5, or „Leitfaden Programmakkreditierung“, p. 7.

² Cf. <https://www.zeva.org/fileadmin/Downloads/Zertifizierung/MusikakademieKasselZertifizierungJungstudium.pdf>, <https://www.zeva.org/fileadmin/Downloads/Zertifizierung/2018.09.27.9971-1-1Zertifizierungsberichtfinal.pdf>, <https://www.zeva.org/fileadmin/Downloads/Zertifizierung/ZertifizierungsberichtKeGL.pdf>.

17.: The issue of training experts has to be viewed in the light of the German Accreditation System. The German accreditation rules require the agencies to involve a majority of experienced experts, but it is not possible to make the participation in training seminars mandatory. 11 agencies are sharing the load of accreditation procedures, acting under the same procedural rules and criteria and thus with almost identical methodologies, and they all offer training. Thus, expert training has to be seen as a collective effort of all agencies. Additionally, other organisations, such as the student accreditation pool or the trade union expert network, also offer training seminars. If experts already have undergone training with one of these organisations, they will certainly be well trained for procedures at all agencies active in Germany. Also, many experts already have ample experience with accreditation procedures, either as experts or as coordinators on the side of the institution to be assessed, and do not require further training. All individual procedures already involve an element of training, as they always include an extensive briefing on the tasks and responsibilities of the experts and on the interpretation of the rules and criteria. For ZEvA, it is thus a question of supply and demand³. An increase in the number of seminars would not necessarily result in a higher rate of participants p.a., as experienced or trained experts often have limited interest in our training seminars or webinars.

It also has to be said that the corona pandemic has hindered the implementation of our new training concept with mainly face-to face seminars supplemented by Webinars. All our seminars with physical attendance had to be cancelled and our webinar-tool Adobe Connect stopped being functional with the start of the pandemic. With the newly elaborated concept and the switch to Zoom as webinar-tool we can regularly offer training seminars, either as webinars or with physical attendance, and with these, we amply satisfy the demand.

To illustrate the current situation, we have conducted a survey among all experts of the last two years regarding their training and experience prior to their recent expert activities with ZEvA. The results show a high percentage of trained and/or experienced experts. 41 % had attended a training seminar or webinar from 10 different organisations before their last procedure with ZEvA. 90 % had served as experts before, 74 % in 3 or more accreditation procedures. Additionally, 60 % had been coordinators of accreditation procedures at their HEI. Overall, only 4 % of the experts had no prior experience with accreditation.

The challenge is thus rather in the documentation of the individual expert's experience and training from other agencies and institutions, information about which is not freely available. ZEvA has formed a working group on expert training, which has put together a new strategy for training and for the collection of information on the experts' prior training and experience. This information will be documented in our expert database, and thus we can gather statistical information on the percentage of trained experts and have a clear view of their training and expertise before including them in another expert team (See Appendix 1).

<https://www.zeva.org/fileadmin/Downloads/Zertifizierung/ValidierungChemieLiseMeitner2020.pdf>, <https://www.zeva.org/fileadmin/Downloads/Zertifizierung/ValidierungBTA9955-2.pdf>

³ We have offered 3 webinars in 2021 with a total of 62 participants, which aptly represents the current demand.

As for the statement that recruitment and selection of experts is informal, this is not the case. ZEvA has a formalised procedure for the recruitment of experts, as documented in Appendix 2. This procedure had been formalized initially by ZEvA's former Standing Accreditation Commission (SAK) in 2011 and has been adopted in an amended form by the ZEvA-Commission in their 4th meeting on November 20th, 2018. Suggestions for experts are provided by our programme officers. Their search for suitable candidates starts in our expert database, and if no suitable candidate is found, they search for similar procedures conducted by other agencies in the GAC's database to find experienced experts. If this again proves unsuccessful, they can contact scientific or professional societies and as a last step google suitable candidates. Student experts are most often recruited through the German Student Accreditation Pool or (in international procedures) the ESU (all of whom have undergone training). The programme officers present their suggestions to the ZEKo with information about the qualification of all experts, and the ZEKo officially installs the expert group. The HEI can raise objections but does not have vetoing rights. The experts then enter a contract with ZEvA, wherein they agree to carry out the assessment according to the relevant rules and criteria, confirm their impartiality and agree to our code of conduct (See Appendix 3).

This procedure is also in accordance with the "Binding Guidelines for the Appointment of University Teachers for Expert Groups pursuant to Art. 3 Para. 3 of the State Accreditation Treaty on Higher Education" of the German Rectors' Conference (HRK), 2018⁴. ZEvA therefore does not have the freedom to act "informally" without running the risk of a procedure being rejected by the Accreditation Council due to procedural errors. It is therefore of utmost importance for ZEvA and in our own interest to always adhere to these prescribed rules.

18.: In conclusion, we are strongly convinced that ZEvA fulfils Standard 2.4. We see room for improvement in the documentation of the experts' training and experience but consider our training activities as sufficient. Furthermore, we always involve students in our expert teams in all ESG-relevant procedures as documented above.

ESG 2.6 – Reporting

19.: ZEvA thanks the Register Committee for the confirmation of ZEvA's compliance with ESG 2.6., and we can assure the Register Committee that we are indeed publishing all our ESG-based reports on our website in addition to databases such as the DEQAR or the GAC's ELIAS database. As for the publication of reports in the German Accreditation system in procedures that have never been handed in at the GAC, this is perhaps a discussion to be had with all relevant actors in the German system. While it is true that the agency itself has fulfilled its task when handing in a review report, the actual accreditation procedure is only complete once the GAC has reached a decision, as confirmed by the Specimen Decree.⁵ Thus, we would consider a procedure where the HEI does not send its application to the GAC as aborted, in analogy to the old accreditation system where the HEI could withdraw at any time until the agency itself had reached a formal decision. ZEvA knows of no such case within the new system so far, but making

⁴ <https://www.akkreditierungsrat.de/de/media/65>

⁵ <https://www.akkreditierungsrat.de/de/media/152>

publication of these “abandoned” reports, should they occur in the future, mandatory is bound to meet resistance from HEIs.

ESG 2.7 – Complaints and Appeals

20./23.: As already stated in our response to the review report, the SEK does not take any formal decisions that could be appealed. The SEK’s tasks are defined in § 1 of the SEK’s rules of procedure (Annex 6 of the SAR):

The Commission manages the evaluation process as a whole. To this end, it adopts a two-year work schedule. The commission receives reports on current evaluation procedures and adopts the evaluation reports with their recommendations for quality assurance. It adopts the procedural principles and monitors compliance with them.

Evaluation procedures do not end in a formal decision but with a review report containing recommendations. In the past, ZEvA has not seen an evaluation report as a formal outcome, so we used to consider objections against review reports rather as a complaint. Nevertheless, complaints are the task of the Appeals Commission, as stated in its rules of procedure (Annex 7 of the SAR):

The Appeals Commission accepts complaints from applicants regarding procedural proceedings and appeals against committee decisions, enclosing a statement from the office, and makes recommendations to the ZEvA Commission as to whether and to what extent the complaints should be upheld. The decision on this is made by the ZEvA Commission. (§ 1 (2))

In our manuals, this has also been made clear, as e.g., in the Manual for External Assessment of Study Programmes, Ch. 7:⁶

ZEvA’s clients may lodge complaints against any procedural step if they consider it not to have been properly carried out in accordance with the contract and the procedural rules. This may concern, for example, the conduction of the site visit or the preparation of the assessment report.

and further on:

Complaints on the course of the procedure can result in a repetition, modification or supplementation of a procedural step, e.g., a renewed site-visit, a revision of an evaluation report or a supplementary opinion by an additional expert.

Thus, it becomes clear that all review reports are appealable, regardless of the categorization as appeal or complaint. Furthermore, even before an appeals process, objections against the report can be stated in the formal response to the report which may contain not only factual corrections but also objections against assessments. These objections will be communicated to the experts who decide whether the report needs to be amended. In almost all cases, this step is sufficient to solve any potential conflicts, which is why the Appeals Commission only had to handle one complaint so far.

21.: As already stated in our response to the review report, we strongly object to this assessment, based only on misleading information given by some interviewees during

⁶ This is cited from the version available to the experts at the time of the site-visit. The passage has since been amended (see our comments for 22. below). The new version can be found in ch. 7 of the current manual.

the site visit. The complaints and appeals process is well established. Between 2017 and 2020, the Appeals Commission has handled 15 appeals and one complaint, and all members of the Commission are aware of their tasks and have performed them according to our pre-defined process. During the site visit, interviewees apparently have stated that they are not responsible for handling complaints against the conduct of ZEvA's employees, which is untrue, but as this happened only once, the interviewees' incorrect answer may be understandable. ZEvA has never had any problems with the appeals process, ZEvA's customers are well aware of it and are also being informed of it with all formal decisions. The letters containing the outcome of each procedure always include the following statement:

Notification of extraordinary legal remedy:

Appeals against this decision can be filed within a period of one month after receipt of the decision. The appeal must be made in writing and must state the reasons therefor. It is to be addressed towards: Geschäftsstelle der ZEvA, - Revisionskommission -, Lilienthalstraße 1, 30179 Hannover.

22.: As stated above, we see ZEvA in compliance with ESG 2.7 and cannot concur with the assessment of partial compliance, which for us is based on disproportionate weight given to anecdotal evidence and misleading statements during the site visit. Our appeals process is well established and has been applied regularly. Nevertheless, we strive to increase transparency even further by describing the process in more detail on our homepage and in our manuals. And since the Register Committee considers evaluation reports also as formal outcomes, we will in the future file them under appeals and not complaints. For this updated description, which is now part of all our manuals (amended to fit the respective procedure) and our website⁷, see Appendix 4.

ESG 3.1 – Activities, Policy and Processes for Quality Assurance

24-28.: ZEvA is tasked by the Ministry of Science and Culture of Lower Saxony with quality assurance and enhancement in the area of study and teaching in all public HEIs in Lower Saxony. This may take the form of evaluation or of advice and support. The HEIs receive these services for free, as they are financed through the institutional grant by the government of Lower Saxony, so ZEvA receives no financial gain from individual projects. Given also the fact that both evaluation and counselling are being handled exclusively by our project officers financed through the institutional grant and overseen by a separate commission, the SEK, conflicts of interest are highly unlikely.

As for our consultations, calling them “consulting” is overstating the matter, as they mainly consist in advice on how to interpret certain rules and regulations. Since the last ESG review, three such consultations have been conducted. One at the University of Hildesheim aimed at helping the University understand the requirements for extra-occupational study programmes. ZEvA was not consulted on the actual composition of a study programme, so no conflict of interest has arisen. Another project at the University of Oldenburg was a consultation on a university-wide project on the assessment and recognition of prior learning and also aimed at helping the university understand the necessary requirements. Again, no conflict of interest ensued, as the project was not

⁷ <https://www.zeva.org/ueber-die-zeva/revisionskommission>

connected to any accreditation procedure conducted afterwards, and again, ZEvA was not involved in the composition of any study programmes. The third project at the University of Oldenburg aims to help the university prepare for a systems accreditation. As the actual accreditation is conducted by another agency, this also presents no conflict of interest.

It has always been ZEvA's policy to avoid conflicts of interest between consultancy or counselling and quality assessments, and thus, no such conflicts have arisen in the past. To further clarify the matter, however, we have included a new passage in each of our manuals and on our homepage, in two versions, one from the side of consultancy and one from the assessment side:

It should be noted that consultancy assignments must not be combined with a quality assessment on the same subject matter. If ZEvA is commissioned with consulting, it is therefore fundamentally ruled out that the subject matter of the consultation subsequently becomes the subject matter of ZEvA's assessment procedure.

If, for example, ZEvA provides advice on the content of the conception or the further development of a curriculum or an internal university QA system, it cannot assess this in the context of a subsequent accreditation or certification procedure. (Leitfaden Beratung, p. 5, translated by DeepL)

It should be noted that a quality assessment in the form of an accreditation or certification may not be combined with consultancy on the same subject matter. If, for example, ZEvA provides content-related counselling with regard to the conception or the further development of a curriculum or of an institution's internal QA system, it cannot assess the same educational programme or QA system in the context of a subsequent accreditation or certification procedure. (Manual Accreditation of Study Programmes, p. 7)

29.-30.: The assessment that ZEvA has no overarching strategic planning is demonstrably untrue, as we have already stated in our response to the review report. We apologise for the confusion caused by statements made during and after the site visit. ZEvA's strategic planning is done on two levels, an operational level and a management level. During the site visit, we only referred to the operational level. On this level, all employees at ZEvA are involved in devising strategies for the individual areas of activity. This is one of the main tasks of our annual corporate retreats, where ZEvA's processes are analysed and reformed where necessary. These also resulted in strategy papers on individual areas of activity such as international procedures or systems accreditation. The retreats may result in the formation of working groups and the progress made is monitored through the regular jour fixe meetings.

On the management level, the Foundation Board is responsible for designing an overarching strategy for ZEvA and presenting it to the Foundation Council for approval. Overarching strategic plans have been approved by the Foundation Council on their 2nd, 13th and 22nd meeting in 2009, 2015 and 2019. Each had a scope of five years, so the current strategic plan is not due for a renewal until 2024. Furthermore, the Foundation Council is monitoring ZEvA's operations closely and receives reports on the progress on the strategic plans, through our annual report and orally during the Council meetings, and where necessary, these strategies will be amended. We are including the minutes for the relevant Council meetings and translations of the respective strategic plans in Appendix 5 to demonstrate that ZEvA does indeed devise overarching strategic plans in compliance with ESG 3.1. In particular, the strategic goals that are summarized in the

concluding chapter of the current Strategy clearly depict the results of the bottom-up process starting at the individual business units and going up to the strategic management level.

31.: As stated above, we are fully convinced that ZEvA complies with ESG 3.1. We apologise for the confusion in some matters and the lack of information on the part of our separation of counselling and assessment and hope that our additional evidence will clarify these issues.

ESG 3.4 – Thematic Analysis

32./33.: We admit freely that, since the last ESG review, ZEvA has been less successful in the area of thematic analysis, due mainly to significant changes and challenges during that time, as e.g., the new accreditation system, changes in ZEvA's management and the Corona pandemic. Thematic Analyses offer a particular challenge, as they require a high workload that has to be financed through ZEvA's procedures which are subject to a very competitive market. However, since the review team's site visit, ZEvA has devised a new strategy for the publication of thematic analyses which has already yielded a new thematic analysis published on ZEvA's website. ZEvA has installed a permanent working group which will oversee the handling of thematic analyses. Two kinds of analyses will be put forward in the future. On the one hand, ZEvA will annually analyse the outcomes and findings of their procedures, to be published in the form of an annual report, secondly, ZEvA will provide more elaborate analyses to a variety of different topics in a new series of publications called "Studien zum Qualitätsmanagement im Hochschulwesen" (Studies on Quality Management in Higher Education). The first publication in this series is a study on the use of online site visits in programme accreditation and can be found on ZEvA's website.⁸ We include ZEvA's new concept for Thematic Analyses in Appendix 6 for the Register Committee's consideration.

ESG 3.6 – Internal Quality Assurance and Professional Conduct

34.: We cannot concur with the assessment that ZEvA's quality insurance is not systematic. ZEvA's processes are under constant review (see our comments on 10. above). During Jour Fixe meetings, the functionality of ZEvA's processes is discussed, and during the annual corporate retreats, important aspects are discussed in more detail, measures are agreed upon and the responsibility of carrying out these measures is distributed among ZEvA's staff. As stated before, for the most part, ZEvA's processes remain relatively stable, as they have been tried and tested and, as far as the German system goes, heavily regulated and standardized. As we had also explained to the expert group, we have developed strategies for individual areas of activity such as international procedures and systems accreditation with a scope of five years, which are due in 2022 and are already under review. Similarly, ZEvA's overall strategy as presented to the Foundation Council is also being renewed every five years (see our comments to 29-31 above). Thus, in addition to our continuing discussion of our processes, we also have pre-defined schedules for reviews of our processes.

⁸ <https://www.zeva.org/thematische-analysen>

Furthermore, ZEvA's quality assurance procedures are well documented in our quality management handbook (Annex 9 of the SAR). As stated in the SAR, Feedback is collected systematically through questionnaires sent out through SurveyMonkey to all experts and HEIs involved. The accumulated results are sent to the management and presented to the entire staff.⁹ Each staff member receives their individual results. The outcome of these surveys is being analysed and discussed with staff during corporate retreats, at which point, measures are being defined if necessary. The informal collection of feedback pertains only to certain evaluation procedures that, due to their singular design, are not comparable to other evaluation procedures, and thus, instead of a quantitative evaluation, qualitative feedback is collected by interviewing the experts and HEI representatives involved.

Despite the already existing and functioning evaluation system, ZEvA has discussed the panel's recommendations at our corporate retreat in September 2021 and installed a working group to review our quality assurance procedures and enhance them further. The working group has already worked on further improve our questionnaires, which are applicable to all business areas and products of ZEvA. In addition, the content of the questionnaires was adapted so that the evaluators themselves assess the overall expertise available in their evaluation group.

35.: See also our comments to 17. above. In particular, Appendix 1 explains how we are improving recruitment and documentation of trained and experienced experts through our expert database. This will enable ZEvA to provide a clearer picture on the percentage of trained or experienced experts and on their type of training and expertise before including them in another expert team.

36.-37.: In light of the internal measures of quality assurance described, we hope to document that ZEvA indeed has a well-established internal quality assurance system, and thus we are convinced that ZEvA is in compliance with ESG 3.6. However, we are grateful for the panel's recommendations for improvement on our quality assurance procedures and their documentation, and our working group on internal quality assurance is in the process of implementing them and enhancing our processes further.

List of Appendices

- Appendix 1: Concept Training of Experts (DeepL Translation)
- Appendix 2: Selection of Experts (DeepL Translation)
- Appendix 3: Agreement with Experts Programme Accreditation
- Appendix 4: Appeals and Complaints Process (Revised)
- Appendix 5: Minutes Foundation Council with Strategy Papers (DeepL Translations)
- Appendix 6: Concept Thematic Analyses (DeepL Translation)

⁹ See Annex 12 of the SAR.

ZEVA's Manuals

Programme Accreditation (Germany):

https://www.zeva.org/fileadmin/Downloads/Leitfaden/Leitfaden_Programmakkreditierung_Feb_2022.pdf

System Accreditation (Germany):

https://www.zeva.org/fileadmin/Downloads/Leitfaden/Leitfaden_Systemakkreditierung_MRVO_Fassung_Februar_2022.pdf

Certification/Validation:

https://www.zeva.org/fileadmin/Downloads/Leitfaden/Leitfaden_Zertifizierung_und_Validierung_2022.pdf

International Programme Accreditation:

https://www.zeva.org/fileadmin/Downloads/Leitfaden/ZEVA_Manual_External_Assessment_of_Study_Programmes_February_2022.pdf

International Institutional Accreditation:

https://www.zeva.org/fileadmin/Downloads/Leitfaden/ZEVA_Manual_Institutional_Accreditation_February_2022.pdf

Quality Audits Austria:

https://www.zeva.org/fileadmin/Downloads/Leitfaden/Leitfaden_ZEVA_Qualitaetsaudit_Oesterreich_Januar_2022.pdf

Evaluation of Study Programmes:

https://www.zeva.org/fileadmin/Downloads/Leitfaden/Leitfaden_Evaluation_von_Studiengaengen_2022.pdf

Quality Audit/Institutional Evaluation:

https://www.zeva.org/fileadmin/Downloads/Leitfaden/Leitfaden_zum_institutionellen_Qualitaetsaudit_2022.pdf

Evaluation Exam Systems:

https://www.zeva.org/fileadmin/Downloads/Leitfaden/Leitfaden_zur_Evaluation_des_Pruefungswesens_2022.pdf

Evaluation Dual Study-Programmes:

https://www.zeva.org/fileadmin/Downloads/Leitfaden/Leitfaden_zur_Evaluation_dualer_Studienkonzepte_2022.pdf

Evaluation MINT-Programmes:

https://www.zeva.org/fileadmin/Downloads/Leitfaden/Leitfaden_Evaluation_der_Massnahmen_zur_Foerderung_der_MINT-Studienabschluesse_2022.pdf

Consultancy:

https://www.zeva.org/fileadmin/Downloads/Leitfaden/Leitfaden_Beratung_2022.pdf