

**Approval of Application**  
**by Accreditation, Certification and Quality Assurance**  
**Institute (ACQUIN)**  
**for Renewal of Inclusion on the Register**

**Register Committee**  
13/12/21

**Ref.** RC32/A99  
**Ver.** 1.0  
**Date** 2021-12-13  
**Page** 1 / 6

<b>Application of:</b>	03/08/2020
<b>Agency registered since:</b>	04/03/2008
<b>External review report of:</b>	24/06/2021
<b>Review coordinated by:</b>	European Association for Quality Assurance of Higher Education (ENQA)
<b>Review panel members:</b>	Oliver Vettori (chair), Aurelija Valeikienė (secretary), Esther Huertas, Damian Michalik (student)
<b>Decision of:</b>	13/12/2021
<b>Registration until:</b>	30/06/2026
<b>Absented themselves from decision-making:</b>	N/a
<b>Attachments:</b>	<p>1. <a href="#">Minutes of telephone conversation on application for renewal of registration by ACQUIN, 29/10/2020</a></p> <p>2. External Review Report (separate file), 24/06/2021</p> <p>3. <a href="#">Applicant's statement on the report, 28/09/21</a></p>

1. The application of 03/08/2020 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 06/11/2020 having considered clarification received from ACQUIN on 29/10/20.
3. The Register Committee considered the external review report of 24/06/2021 on the compliance of ACQUIN with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered applicant's statement on the report of 28/09/21.

## Analysis:

## Register Committee

13/12/21

**Ref.** RC32/A99  
**Ver.** 1.0  
**Date** 2021-12-13  
**Page** 2 / 6

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

- Programme assessment in Germany
- Assessment of quality management systems (so-called system accreditation) in Germany
- Assessment of Joint programme evaluation in Germany
- International institutional accreditation
- International programme accreditation
- Certification of continuing education programmes

6. Consultancy activities (performed by ACQUINUS) are not within the scope of the ESG and, thus, not pertinent to the application inclusion on the Register. The Register Committee underlined that any other future activities carried out by ACQUINUS are generally to be considered as if they were carried out by ACQUIN itself, given that ACQUINUS is fully owned by ACQUIN.

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

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

### ESG 2.2 – Designing methodologies fit for purpose

9. ACQUIN operates under a complex national legal framework. The overarching methodologies are defined by the German Interstate Treaty and the German Accreditation Council (further GAC); the agency has a body that decides on its own evaluation criteria and procedural principles. **While the Committee was able to concur with the panel's conclusion, it considered that the interaction between the agency and GAC in regards to the involvement of the agency in the creation and updating of the methodologies could be better defined and clarified.**

### ESG 2.3 – Implementing processes

10. Since the renewal of registration of the agency in 2011, the Committee flagged for attention the necessity of clarity and transparency in all of ACQUIN's international accreditation and evaluation activities. The panel noted that now all the procedures, including the institutional audits performed in Austria, are well documented and published. The Committee therefore found that the flag has been addressed.

11. The Committee learned that the responsibility for implementing the follow up in the external quality assurance activities taking place in Germany now lies with the GAC for decisions with conditions attached. **The Register Committee, however, found that the interaction between the agency and the GAC in regards to this part of the procedure is not always clear. The Committee highlighted the panel's recommendation that the agency's guidelines should include more information on all elements of the review process.**

## ESG 2.4 – Peer-review experts

12. When the agency was registered on EQAR, the Committee flagged for attention the lack of systematised training for experts. The panel noted that the agency has made some improvements, but that the training for experts still relies mainly on sending materials to the experts and their self-preparation and group briefings at the beginning of the review.

13. The Register Committee concluded that the status quo in regards to the training of experts has changed little since the last renewal of registration on EQAR, and thus remains a critical point. **The Committee was therefore unable to concur with panel's conclusion and found the agency to be only partially compliant with the standard.**

## ESG 2.5 – Criteria for outcomes

14. The agency has introduced several tools for enabling consistency in decision making: a book of precedents, a list with guiding questions for experts, analysis of divergence in decision making between the experts groups and GAC and report templates.

15. **The Committee welcomed the efforts made by the agency and found that ACQUN has addressed earlier concerns raised in the renewal of the registration in 2011. The Committee found the agency is now compliant with the standard.**

## ESG 2.6 – Reporting

16. The agency publishes its reports on the website. The panel noted that, however, the structure of the reports and their publishing was not always consistent and that for some procedures the reports included summary information only.

17. In their response to the review report, the agency explained that it now uses a template provided by GAC which enables a better structured and standardised reporting. The agency is currently updating its database and tackling the technical issues leading to an inconsistent report publishing.

18. **The Register Committee found that the agency has taken concrete steps to address the issues related to the consistent drafting and publishing of its reports. Following this, the Committee found the agency to now be compliant with the standard. The Committee, however, highlighted**

the panel's recommendation that the agency should continue ensuring the publication of all of its reports.

**19. The Committee further underlined that ACQUIN 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**

20. The agency has a two year strategic plan and annual working plans. The panel noted that, however, the documents lacked "strategic orientation" and focus, and that the link between them was rather weak.

21. The Committee learned that the governing body (i.e. the Board) of the agency does not involve student representatives. In the response to the review, the agency explained that 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 the student members in case of unfavourable events. The Register Committee, however, found that the agency could still consider alternative ways to include students in the governing structures.

**22. Taking in consideration the necessity for better defined goals and objectives that will effectively translate into the work plans of the agency, and the lack of involvement of students in the governance of the agency, the Register Committee concurred with the panel's conclusion that the agency is partially compliant with the standard.**

### **ESG 3.4 – Thematic analysis**

23. ACQUIN created a policy for thematic analysis. The panel noted that, however, the practice did not follow the envisioned plans. The publication of the thematic analyses was rather accidental; since the last renewal of registration in 2016, the agency had published only two thematic analyses.

**24. The Register Committee recognised the agency's efforts to create a better structured approach to thematic analysis and to publish the reports. While these improvements tackle the concerns raised in the last renewal of the agency's registration, the Committee agreed with the panel's views that the publication of thematic analyses should be regular and systematic. Following this, the Committee concurred with the panel's conclusion that the agency is only partially compliant with the standard.**

### **ESG 3.5 – Resources**

25. The panel raised concerns on the sustainability of financial resources in the agency: the domestic higher education institutions could seek less programme-based EQA in the near future, and at the same time the agency is intentionally reducing the number of cross-border activities.

26. The Committee learned that agency was rather confident about its sustainability despite the expected drop in the number of applications and

#### **Register Committee**

13/12/21

**Ref.** RC32/A99

**Ver.** 1.0

**Date** 2021-12-13

**Page** 4 / 6

relies its future planning mainly on the current savings and project funds. **While the Committee was able to concur with the panel's conclusion, it also highlighted the panel's concern whether ACQUIN has a fully feasible plan that guarantees that the agency will remain operational in the long-term future.**

## Register Committee

13/12/21

**Ref.** RC32/A99

**Ver.** 1.0

**Date** 2021-12-13

**Page** 5 / 6

### ESG 3.6 – Internal quality assurance and professional conduct

27. The agency has a quality manual and a designated quality manager. The panel was positive about the internal quality assurance system of the agency, with the exception of the professional development of the staff; the current approach lacked systematic planning.

28. The Committee noted that the agency has not fully addressed the instances of partial compliance from the previous renewals of the registration: the training of experts (ESG 2.4) is still weak (a concern raised in 2011) and the publication of thematic analyses (ESG 3.4) remains not systematic (a concern raised in 2016).

29. Taking into consideration the need for a more structured management of the professional development of the staff and the lack of a comprehensive response to the issues raised in the previous external reviews, the Register Committee was unable to concur with panel's conclusion and found the agency to be partially compliant with the standard.

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

### Conclusion:

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

Standard	Review panel conclusion	Register Committee conclusion
<b>2.1</b>	Full compliance	<b>Compliance</b>
<b>2.2</b>	Full compliance	<b>Compliance</b>
<b>2.3</b>	Substantial compliance	<b>Compliance</b>
<b>2.4</b>	Substantial compliance	<b>Partial compliance</b>
<b>2.5</b>	Substantial compliance	<b>Compliance</b>
<b>2.6</b>	Partial compliance	<b>Compliance</b>
<b>2.7</b>	Full compliance	<b>Compliance</b>
<b>3.1</b>	Partial compliance	<b>Partial compliance</b>
<b>3.2</b>	Full compliance	<b>Compliance</b>
<b>3.3</b>	Full compliance	<b>Compliance</b>
<b>3.4</b>	Partial compliance	<b>Partial Compliance</b>

<b>3.5</b>	Substantial compliance	<b>Compliance</b>
<b>3.6</b>	Full compliance	<b>Partial compliance</b>
<b>3.7</b>	(not expected)	<b>Compliance</b> (by virtue of applying)

**Register Committee**  
13/12/21

**Ref.** RC32/A99  
**Ver.** 1.0  
**Date** 2021-12-13  
**Page** 6 / 6

32. The Register Committee considered that ACQUIN only achieved partial compliance with some standards. The Committee considered that the agency offered self-preparatory training before the reviews despite still not ensuring a formal training of all review experts (ESG 2.4) and that the agency already developed a plan for thematic analyses that should be put in practice (ESG 3.4). Moreover, the Register Committee recognised that the absence of students from the Board did not seem to stem from a lack of appreciation of student opinions (ESG 3.1). In its holistic judgement, the Register Committee therefore concluded that these are specific and limited issues, but that ACQUIN continues to comply substantially with the ESG as a whole.

33. The Register Committee therefore renewed ACQUIN's inclusion on the Register. ACQUIN's renewed inclusion shall be valid until 30/06/2026<sup>1</sup>.

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

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<sup>1</sup> Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

# Application by the Accreditation, Certification and Quality Assurance Institute (ACQUIN) for Renewal of Registration

## Minutes of Telephone Conversation

Register Committee

Ref. A99  
Date 2020-10-29  
Page 1 / 1

Date of the conversation:	29 October 2020
Representative of ACQUIN:	Marion Moser
Representative of EQAR:	Colin Tück

1. ACQUIN has submitted on 03/08/2020 an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).
2. EQAR received the draft tripartite Terms of Reference on 19/10/2020.
3. In order to prepare the deliberations of the Register Committee on the eligibility of the application and ACQUIN's activities within the scope of the ESG, EQAR contacted ACQUIN via telephone to clarify the matter(s) below. ACQUIN agreed to clarify the matter(s) by means of a telephone conversation.
4. The company ACQUINUS GmbH continues to be a fully owned by ACQUIN, but maintains its own accounts; the ownership remains the same as at the time of the previous review. ACQUINUS has one staff member, who is also staff of ACQUIN.
5. ACQUINUS' activities include consultancy and similar services, but ACQUINUS does not carry out external quality assurance activities.
6. Certification by ACQUIN is offered only for courses/modules at higher education levels.

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Bayreuth, 28 September 2021

## **Reaccreditation of ACQUIN** **Statement of ACQUIN on the ENQA external review report**

Dear Mr. Tück,

The external ACQUIN review 2021 has been the fifth review of the agency, but simultaneously the first one conducted exclusively by ENQA. Some aspects have been evaluated differently during the most recent review. We would like to give some further information on specific aspects and circumstances of our work with this statement. We hope that this information will contribute to a further understanding of ACQUIN's work.

The Review Panel has done a tremendous work working through all the documents and discussing the past, present and prospects of ACQUIN with multiple stakeholders to compile diligently all information necessary to evaluate the work of ACQUIN.

However, documents can lead to misunderstandings that discussions cannot correct entirely. Although the report is overall favourable with very helpful suggestions for ACQUIN's future work, would like to take this opportunity to comment on some aspects on the report, especially on the criteria 3.1, 3.4, 2.4, and 2.6.

### **Criterion 3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE**

All ACQUIN activities follow its mission statement: "The objective of the Accreditation, Certification and Quality Assurance Institute (ACQUIN) is to contribute to the shaping of the European Higher Education



Area, to ensure the comparability of the quality of HEI degrees, to promote the quality of higher education programmes and to support the establishment of a culture of quality at HEIs.”

ACQUIN regrets that it has not yet been able to make its activities sufficiently clear in the discussion with the Review Panel and it will take up the panel's suggestions for the further improvement of its work. ACQUIN is a member-based organisation with mainly German HEIs as members, therefore one focus of ACQUIN's work is the national context, which is already stated in the ACQUIN's Executive Board decision.

In addition, ACQUIN is also committed to promoting the EHEA internationally, not only through external quality assurance procedures, but also through participation in specific EU projects. In addition, ACQUIN regularly conducts national and international workshops for higher education institutions on current topics of quality development, for example, two workshops are held annually during ACQUIN's General Assembly. ACQUIN also offers tailor-made workshops for national and international higher education institutions. This is per se part of ACQUIN's daily work and has therefore not been mentioned separately.

The Review Panel missed a strategic planning "beyond the two-year period". Given the scope and speed of the changes to the legal framework for accreditation in Germany and the impact on many stakeholders, it was only possible to plan in short periods (2017-2019, 2019-2021). During this time, the agency held numerous talks with the stakeholders in different constellations and discussed various future scenarios for the agency. All stakeholders, including the agencies, had to and must adapt to the new conditions. The first evaluation of the new accreditation system in Germany will now begin at the end of 2021. It remains to be seen whether there will be changes in the system again, which will then also influence ACQUIN's work. Against this background, it initially seemed advisable to plan in smaller time periods.

In addition to the two-year plan, ACQUIN reports annually to its members at the General Assembly on the activities of the past year and the planned activities for the current year. This is also underpinned with relevant key figures. This annual plan is drawn up before the start of each year and approved by the Executive Board, considering the two-year plan. ACQUIN takes up the suggestion of the Review Panel to further concretise the plan regarding ACQUIN's mission and vision with a suitable structure and format.

The Review Panel also recommended to nominate a student in the governance of the agency. This point has to be discussed with the members of ACQUIN, as they elect the Executive Board. In this context, ACQUIN would like to point out that due to ACQUIN's legal form as a registered association, the members of the Executive Board are personally liable for all activities of the agency, including financial aspects. This could be a risk for students. The Executive Board is mainly responsible for financial, staff and strategic planning. All activities of ACQUIN in the area of quality assurance and ESG related activities are discussed and only approved by our accreditation commission, including e.g. procedural aspects, guidelines and decisions on quality assurance procedures. Since the founding of ACQUIN students have been always involved here as well as in all other committees on a regular basis.

Concerning the stakeholders of ACQUIN it seems that ACQUIN could not clarify in the discussions with the Review Panel ACQUIN's main stakeholders. Stakeholders of ACQUIN are not persons which are internalized by the agency. So far, the main stakeholders of ACQUIN are higher education institutions and their members, labour market representatives (employers as well as employees and their representative organisations), students, scientific communities etc. So far, there is no borderline between

stakeholders and members. ACQUIN seeks to attract relevant organizations and institutions as members. All ACQUIN's members are free to suggest specific persons to be involved in the ACQUIN's committees and bodies, therefore the relevant stakeholders are represented in its committees and bodies. For example, members of the German Student Accreditation Pool (GSAP) are also active within the committees of ACQUIN and involved in ACQUIN's work. During the on-site visit, members of the GSAP were also involved in the discussion with the expert group. This may not have become clear because these persons are also members of ACQUIN's panels.

In addition, there is a regular communication with the GSAP, at least once per year through a common meeting between the GSAP and the agencies. State-funded higher education institutions are usually members of the Germans Rectors Conference HRK, through its higher education institution members ACQUIN has also a connection to the HRK.

ACQUIN regrets that it did not sufficiently clarify the role of the Chairman of the Board and his/her role and powers in the Accreditation Commission. This person is not vested with any special powers. His/her task regarding the ACQUIN Accreditation Commission is merely to moderate the meeting without having any special decision-making powers here.

### **Criterion 3.4 THEMATIC ANALYSIS**

ACQUIN has conducted two thematic analyses since its last review in 2016. The first analysis in 2017 followed by an analysis in 2020.

In 2017 ACQUIN has conducted an analysis devoted to „Quality Assurance at Universities in Kazakhstan and the Impact of ACQUIN's External Peer Reviews“, which focused on the impact of external peer reviews at HEIs and whether and how established assessment procedures help to improve the quality at HEIs and in specific study programmes in particular.

Starting 2018 ACQUIN has been working on an analysis devoted among other things to the changes in the external quality assurance system in the national higher educational system. The analysis devoted to the current difficulties which are associated with the current period of the ongoing system change and adaptation of the stakeholders to it. This makes the analysis crucially important for all the stakeholders involved. For the evaluation of the new system and the applicability of the new criteria a certain number of data was required, which, due to the structure of the new accreditation system, could not be available until the beginning of 2020.

In the thematic analysis paper „Deviations between Accreditation Recommendation of Expert Panels and Final Decision of the German Accreditation Council“ (23 July 2020), the purposes and the scope of the project is stated: “Thus, the purpose of this analysis is, on the one hand, to see how well ACQUIN is fulfilling the role it has been assigned in the new framework, as well as its role as the partner of HEIs. On the other hand, a bigger, long-term purpose is to provide a systemic overview and analysis of the new framework's functioning, identify tendencies, good practices, potential problems and their implications for the complete system. This paper presents the first step of this analysis.”

At the end of the paper is mentioned: “The analysis presented in this paper is the first step of a long-term project. The data available gave a first overview on a general level. ACQUIN will continue this thematic analysis in order to further reflect on its own work, but also to gain further insights into the applicability of the criteria.”

This analysis is not only related to the agency and its work but has implications for the entire national higher education sector and for the design of study programmes. This is also against the background that there is room for interpretation in the criteria which can, however, be viewed from different perspectives.

The starting point of the project – the identification and analysis of the cases in which the GAC has taken a decision, deviating from the recommendation of the expert group – has much deeper implication than a rate-of-success of any specific agency. Rather, a set of system-level questions and interrelated issues follow that need to be examined:

- clarity of the criteria to the stakeholders,
- decision-making practice of the GAC,
- the possible consequences of the layout- and framework-change for the higher education system in Germany,
- the overall general applicability of criteria as such.

This analysis is intended to be a long-term project, but it is not intended that this will be the only analysis conducted by ACQUIN in the future. At the suggestion of the Review Panel, the ACQUIN Executive Board decided on a concept for thematic analyses with initial possible topics in spring 2021. From each of these, the Executive Board will select a topic with a corresponding timetable for implementation. ACQUIN will take up the suggestion of the Review Committee to further specify the thematic analysis in ACQUIN's QM manual.

## **Criterion 2.4 PEER-REVIEW EXPERTS**

ACQUIN will take up the recommendation of the Review Panel to present the procedure for the appointment of expert groups on the ACQUIN website. The ACQUIN national guidelines, which are published on the website, already contain information on the composition and appointment of the expert groups; these also include a reference to the binding HRK guidelines. The number of reviewers appointed per procedure is defined by the number of degree programmes or the subject of the review; the minimum size of a review group is four persons, as already specified in the specimen decree. ACQUIN will also take up the recommendation for the international procedures to describe the procedure for the appointment of reviewers in more detail.

Students are always part of the expert panels. In the mentioned accreditation procedure at the Eurasian National University, which was a joint bundled accreditation procedure, two students were involved: one doctoral student in the second year of study programme International Law, Kazakh Humanitarian and Law University and one second year Master student of the study programme Management at Kazakh University of Economics, Finance and International Trade, Kazakhstan:

<https://www.acquin.org/programmakkreditierung/abgeschlossene-verfahren/?land=Kasachstan&order=DESC&vdsid=9985>

<https://www.acquin.org/programmakkreditierung/abgeschlossene-verfahren/?land=Kasachstan&order=DESC&vdsid=9977>

Three separate reports were prepared for this joint bundle accreditation procedure due to language reasons and in one report the student was not mentioned in the report by mistake

(<https://www.acquin.org/en/programmeaccreditation/completedprocedures/?land=Kazakhstan%20&order=DESC&vdsid=9974>).

With regard to the certification of programmes which are designed for a specific target group, it can be more useful in individual cases to involve a member of the desired target group as an expert instead of a student member, especially for programmes that are offered for target groups with many years of professional experience. A member of the desired target group knows the needs of this potential student group best and is therefore able to give an important contribution in the assessment of the respective programme.

### **Criterion 2.6 REPORTING**

ACQUIN regrets that it was not able to make the process of preparing the expert report sufficiently clear to the Review Panel, as it had the impression that the reports were not written by the experts. The preparation of the expert report is carried out by the members of the expert group with divided responsibilities. The role of the project manager, therefore, is only supportive.

The project managers are only responsible for integrating the individual expert contributions into the template, checking for consistency, and pointing out aspects that need further elaboration and evidence. The report is not finalised until it has been finally approved by the entire expert group, so the overall responsibility always lies with the experts. The project managers do not make any modifications regarding the assessment of the expert group; the assessment of the study programme is solely the task of the experts.

The Review Panel discussed the quality of the reports produced by the expert groups due to the different lengths, which in their opinion "raises questions about the coherence of the implementation of the procedures and the work of the different expert groups".

In the opinion of the Review Panel using guiding questions "is very useful, however, does not completely solve the issue" of the different length of the reports. To focus more strongly on the relevant accreditation criteria ACQUIN has re-evaluated the guiding questions in 2020. Thus, ACQUIN has already taken action to align the reports' lengths without compromising on the experts' individual contribution.

Reports differ in length due to different factors in the evaluation process, whereby all criteria must always be assessed in a comprehensible and evidence-based manner. On the one hand, the length of report is determined by the object of assessment, i.e. just one study programme or several study programmes and their complexity. In system accreditation, the degree of complexity of the higher education institution's internal QM system also plays a role regarding the length of the report. On the other hand, the length of an expert report is also influenced by whether expert groups have identified several critical aspects and or whether the object of assessment is designed in complete accordance with the criteria also various reporting styles by experts from different (academic) fields and disciplinary cultures influence the length of a report.

The more recent template by the German Accreditation Council (GAC) provides for a clear differentiation between "documentation" and "evaluation" in smaller chapters compared to the former template used by ACQUIN. As the documentary part has been standardized as much as possible the length of the evaluation report per study programme does not differ any more in the way the reviewers describe the situation in their report based on older reports. The template for the international procedures of ACQUIN has been adapted accordingly.

The Review Panel suggested to include examples of good practise in the reports, this is already possible under the chapter "summary" in the GAC template. Short summaries of national accreditation reports are already published on the website of the GAC.

The Review Panel mentioned that accreditation decisions of the GAC were not published on the ACQUIN website, and the reports should be published fully. ACQUIN discussed with the Review Panel that ACQUIN will publish all reports in full length combined with a link to the decision of the GAC, so that the accreditation decision will be directly linked to the report.

Unfortunately, ACQUIN had a major technical problem with its internal database and several attempts to solve this problem failed. Therefore, ACQUIN had to start from scratch and is currently programming a complete new database, this led to some inconsistencies in publishing reports. ACQUIN is now running a testing phase of the new database. At the end of the year the publications of the reports should be automatically possible without any problems again at the latest.

ACQUIN hopes that this additional information will be helpful in evaluating the agency's work.

With best regards



Prof. Dr. Sebastian Kempgen  
Chairman of the Executive Board