

ENQA AGENCY REVIEW

# AGENCY FOR QUALITY ASSURANCE AND ACCREDITATION OF CANONICAL PROGRAMMES OF STUDIES IN GERMANY (AKAST)

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25 OCTOBER 2023

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## EXECUTIVE SUMMARY

This report is the outcome of the review of the *Agentur für Qualitätssicherung und Akkreditierung kanonischer Studiengänge (AKAST)* against the ESG. The review was performed following the methodology described in the Guidelines for ENQA Agency Reviews and took place between February - September 2023 with the site visit on 19 - 21 June 2023.

The purpose of this review is the renewal of AKAST's registration on the European Quality Assurance Register. AKAST is neither an affiliate nor member of ENQA and is not aiming for ENQA membership following this review.

According to its vision statement, AKAST is “dedicated to assuring and developing the quality of academic teaching and learning of canonical study programmes, in particular Catholic theology as well as to enhancing the development of the European Higher Education Area” and “accreditation is designed to facilitate the national, international and ecclesiastical certification of canonical study programmes and degrees. Simultaneously it aims at providing orientation for universities, students, employers, and responsible Church authorities”.

AKAST performs programme evaluation only and distinguishes between two types of assessments:

- Programme accreditation of canonical study programmes and non-canonical study programmes with Catholic Theology/Religion according to the Interstate Treaty (listed on the EQAR website as “Programme accreditation in Germany”);
- Peer review of other study programmes with canonical effect that are not covered by the Interstate Treaty (listed on the EQAR website as “Programme accreditation (AKAST quality seal)).

The 2022 review found that AKAST has made a significant progress since its previous full review against the ESG 2015. In particular, the new developments are related to strengthening the formal independence of AKAST from the Catholic Church and revising the complaints and appeals procedure. The review panel appreciates these developments, particularly in the light of external quality assurance system changes in Germany. However, there is still a room for improvement in regard to ensuring AKAST's independence in the long term both from the Church and also between the internal structures of AKAST. Another issue where the review panel considers that AKAST could make a faster progress is the thematic analysis that has been in the focus of attention for EQAR since the initial attempt for registration.

AKAST was found to be compliant with the ESG 3.1, 3.2, 3.5, 3.6, 3.7, 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7 and partially compliant with ESG 3.3 and ESG 3.4. Based on the analysis provided, the review panel concludes that AKAST is overall compliant with the ESG.

# INTRODUCTION

This report analyses the compliance of the Agency for Quality Assurance and Accreditation of Canonical Study Programmes in Germany e.V. (*Agentur für Qualitätssicherung und Akkreditierung kanonischer Studiengänge in Deutschland*, AKAST) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in February - September, 2023. The review was commissioned in order to renew AKAST's registration on EQAR.

## BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

### BACKGROUND OF THE REVIEW

AKAST is a quality assurance agency operating solely in Germany. Until the beginning of 2018, the German Accreditation Council (GAC) was responsible for the evaluation and authorisation of all German agencies. AKAST underwent two reviews coordinated by GAC in 2008 and 2013 and did not seek any international recognition.

With the Interstate Treaty coming into force in 2018, all quality assurance agencies operating in Germany are required to be listed in the European Quality Assurance Register for Higher Education (EQAR) and authorised by the GAC.

Subsequently, the first review of AKAST in this new system and also against the ESG 2015 took place in 2018 and was coordinated by the GAC. However, the EQAR Register Committee found AKAST not to be overall compliant with the ESG with particular deficiencies in compliance with ESG 2.7, 3.3 and 3.4. Several changes in the AKAST structure and way of operation were initiated and another review against the ESG, this time a focused one, took place in 2021 which looked specifically at the three standards where AKAST was previously judged to be either non-compliant or partially compliant. In 2021 it was concluded by the EQAR Register Committee that now AKAST complied with the ESG substantially and subsequently AKAST was listed on EQAR.

As this is AKAST's second full review against the ESG 2015, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies. The panel used the reviews conducted in 2018 and 2021 and coordinated by the GAC as the point of reference.

While this is the first external review of AKAST coordinated by ENQA, it should be noted that AKAST is currently not an affiliate or member of ENQA and is not seeking for ENQA membership following this review.

### SCOPE OF THE REVIEW

This review focuses on the two assessment procedures currently conducted by AKAST and included in the Terms of Reference for the review:

- Programme Accreditation : Execution of peer review process of study programmes of involving catholic theology and of canonical study programmes in accordance with the Interstate Treaty;
- Evaluation Procedure : Execution of evaluation procedures of canonical study programmes which are not recorded by the Interstate Treaty.

In February 2023, shortly before completing the Terms of Reference for this review, the EQAR Register Committee took a note on the discontinuation of the third assessment procedure previously offered by AKAST - peer review institutional evaluation.

The review panel confirms that during the site visit there was no evidence of possible renewal of this procedure in the foreseeable future and there were also no completed procedures of this type neither in the period 2018 - 2022 or before.

The review panel did not identify any additional external quality assurance activities that should be covered within this review.

## MAIN FINDINGS OF THE 2018 REVIEW

The previous full review of AKAST took place in 2018. During this review the panel concluded that AKAST overall is in compliance with the ESG and only three standards were judged as substantially compliant. However, the EQAR Register Committee requested clarification from the panel and additional representation by AKAST and after considering the additional representation concluded that AKAST did not comply with the ESG 3.3 as it stands. The Register Committee therefore was unable to conclude that AKAST complied substantially with the ESG as a whole, given that non-compliance with one standard prevents a positive overall judgement.

The focused review of AKAST took place in 2021 and focused specifically on the three standards where AKAST was judged to be non-compliant or partially compliant by the EQAR Register Committee, namely the ESG 2.7, 3.3 and 3.4.

The full list of the previous compliance statements is presented below:

<b>ESG standard</b>	<b>Compliance in 2018 (review panel -&gt; EQAR RC)</b>	<b>Compliance in 2021 (review panel -&gt; EQAR RC)</b>
3.1 Activities, policy and processes for quality assurance	Full compliance → Compliance	-
3.2 Official status	Full compliance → Compliance	-
3.3 Independence	Substantial compliance → Non-compliance	Substantial compliance → Compliance
3.4 Thematic analysis	Substantial compliance → Partial compliance	Partial compliance → Partial compliance
3.5 Resources	Full compliance → Compliance	-
3.6 Internal quality assurance and professional conduct	Substantial compliance → Compliance	-
3.7 Cyclical external review of agencies	[not expected] → Compliance (by virtue of applying)	-
2.1 Consideration of internal quality assurance	Full compliance → Compliance	-
2.2 Designing methodologies	Full compliance → Compliance	-

fit for purpose		
2.3 Implementing processes	Full compliance → Compliance	-
2.4 Peer-review experts	Full compliance → Compliance	-
2.5 Criteria for outcomes	Full compliance → Compliance	-
2.6 Reporting	Full compliance → Compliance	-
2.7 Complaints and appeals	Full compliance → Partial compliance	Substantial compliance → Compliance

The review panel in 2018 formulated the following recommendations:

- AKAST should publish more findings from analyses of its own work in future. At the same time, the neutral observer viewpoint should be preserved in a tried and tested manner in order to avoid pre-empting university policy bodies such as the Association of Faculties of Catholic Theology. (ESG 3.4);
- In the forthcoming revision of the Agency’s basic documents, either the Statutes should be brought into line with the Advisory Board’s working practices or the Advisory Board should also hold meetings as a separate body. (ESG 3.6);
- AKAST should commence the process of revising the relevant documents in line with the new statutory and canon law framework as soon as possible and should combine this with the revision of the website. (ESG 2.2);
- When nominating the second representative from professional practice, AKAST should include theologians from a greater variety of non-ecclesiastical professions. (ESG 2.4).

The 2018 review also addressed a significant number of recommendations that were formulated in 2013. There were no specific recommendations by the focused review panel in 2021.

As both reviews (in 2018 and 2021) took place after the system changes in Germany in 2018, all recommendations of the previous panels are considered valid by the current review panel. The review panel, however, would like to note that none of the recommendations by the 2018 review panel were related to the standards ESG 3.3 and ESG 2.7 that were later flagged by EQAR. Despite the fact that there were no formal recommendations on these standards neither in 2018 nor in 2021, the review panel has analysed the findings of the previous reviews and the reasoning of EQAR and relevant statements are referenced under the respective standards.

## REVIEW PROCESS

The 2023 external review of AKAST was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of AKAST was appointed by ENQA and composed of the following members:

- Mark Frederiks (Chair), Coordinator international policy (Flanders), Accreditation Organisation of the Netherlands and Flanders (NVAO), The Netherlands;
- Asnate Upmace (Kazoka) (Secretary), Head of Development and International Cooperation Unit, Quality Agency for Higher Education (AIC), Latvia;

- Tomaž Deželan, PhD, Full Professor, Jean Monnet Professor, President of the Employability Working Group of the Slovenian Rectors' Conference, Member of the Republic of Slovenia Quality Council, University of Ljubljana, Faculty of Social Sciences and Faculty of Education, Slovenia, academic (EUA nominee);
- Bogdan-Marius Negrea, PhD candidate in Theology, Babeş-Bolyai University, Romania, student (Member of the European Students' Union Quality Assurance Student Experts Pool).

Fiona Crozier, independent consultant commissioned by ENQA to coordinate the review of AKAST, acted as the review coordinator.

The review panel started its work at the end of March 2023. The self-assessment report (SAR) was received at the end of April and the briefing meeting took place on 8th May. It was followed by a kick-off meeting on 2nd June, combined with a meeting with the resource person. In the meantime, the panel members exchanged opinions on the SAR and the site visit schedule was drafted and agreed with AKAST.

The site visit took place from 19th - 21st June in Ingolstadt, Germany where the AKAST office is located. While all members of the review panel and the coordinator were present in Ingolstadt, a considerable part of the site visit took place in a hybrid mode. Six out of fourteen meetings were held in hybrid mode, 6 meetings took place on site and 2 meetings were fully online. Also, 11 meetings out of 14 took place in German with simultaneous interpretation. The review panel confirms that the mode of the site visit did not affect the quality of evidence obtained. However, both the hybrid mode and the required level of interpretation resulted in technical requirements that, at times, caused delays in the overall smooth execution of the site visit.

The review report was produced between the end of June and beginning of August and sent to AKAST for factual check on 28th August.

The final review report was submitted to ENQA on 26th September.

The review panel was able to obtain the necessary evidence for performing the review against the ESG. However, initially a number of annexes and additional evidence were available in German only and the review coordinator and review panel had to request the English translations. The review panel included two members that were able to read in German and therefore was careful not to create a significant additional burden for AKAST. However, the translations performed by the AKAST office itself or a professional translator were crucial in understanding some of the most complex issues.

The review panel was able to reach a consensus on all statements on compliance. Additionally, the panel secretary facilitated an exchange of opinions on the commendations, recommendations and suggestions for further improvement. All panel members contributed to the development of the report by providing their notes and commenting on the draft report.

The review panel would like to thank Fiona Crozier for her support throughout the review process.

### **Self-assessment report**

The draft of the self-assessment report was produced by the AKAST Administrator in the first quarter of 2023 with the assistance from the secretary and a student assistant hired specifically for this purpose.

A draft of the SAR was submitted to the AKAST Executive Board on 7 March 2023, and to the Accreditation Committee and the Advisory Board on 16 March 2023 for discussion and consent.



AKAST specifically states in the SAR that the members of AKAST (higher education institutions and other stakeholders outside the bodies of AKAST) were not involved in the preparation of the SAR.

The SAR provided well-structured information both on AKAST and also the environment in which AKAST operates. The SAR followed the Guide of the Content for the SAR, as approved by ENQA in 2021. The SAR was clear and concise but informative. It was complemented with all the main regulatory documents and other documents important for AKAST operation. The review panel would like to complement AKAST on the quality of the SAR and recognise that all details included in the SAR were accurately presented. The review panel, however, would like to suggest that in future, AKAST seeks the views of more of its stakeholders on the SAR.

The review panel requested 17 different items of additional information. These requests were related to specific ESG standards and the review panel did not expect most of this information to be provided in advance. Also, most of the requests were related to information that was found to be already existent based on the SAR and AKAST did not need to prepare it specifically for the review panel.

### **Site visit**

The site visit took place on 19th - 21st June 2023 in Ingolstadt.

The review panel met the following groups:

- AKAST Executive Board;
- AKAST staff;
- AKAST General Meeting;
- AKAST Accreditation Committee;
- Catholic University of Eichstätt- Ingolstadt (KUE) foundation;
- ACQUIN;
- AVEPRO;
- German Accreditation Council;
- Representatives of reviewed study programmes;
- Representatives from the reviewers pool, excluding students;
- Student reviewers;
- Students included in the governance structures of AKAST;
- AKAST Advisory Board;
- AKAST Complaints Committee.

Interviews with the KUE foundation, ACQUIN and AVEPRO were included in the site visit schedule due to the fact that AKAST has certain cooperation agreements with all these organisations, affecting the core activities of AKAST that fall under the scope of the ESG.

At the end of the site visit, the review panel took the opportunity to clarify a number of issues with the AKAST Chairperson and Administrator.

The review panel can conclude that the overall atmosphere during the site visit was good. However, due to the complexity of the site visit (hybrid mode for a significant number of meetings, heavy interpretation, no previous experience with a review coordinated by ENQA for AKAST), the review panel is of the opinion that the setup was not ideal and the site visit would have benefitted from more fully on site meetings and fully on-line meetings with hybrid meetings used only in exceptional cases. The review panel, however, accepts that in the case of stakeholders coming from various parts of a large country the communication of the draft agenda a month before the site visit, as considered a usual practice in most of the reviews, might not be sufficient to ensure fully on site participation.

The review panel would like to thank AKASt and particularly the AKASt office led by the Administrator and the AKASt Chairperson for the warm welcome in Ingolstadt and the readiness to accommodate all requests made by the review panel.

## HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

### HIGHER EDUCATION SYSTEM

In Germany the responsibility for education, including higher education, lies with the individual federal states. Each of the sixteen federal states has its own laws governing higher education. The Standing Conference of the Ministers of Education and Cultural Affairs of the Lands in the Federal Republic of Germany (Kultusministerkonferenz – KMK) is an important coordination body in this context.

The overall higher education system includes state and state-recognised higher education institutions which also include ecclesiastical higher education institutions.

Higher education institutions are categorised as follows:

- *Universitäten* (universities and equivalent higher education institutions (technical universities, pedagogical higher education institutions, theological colleges, etc.));
- *Kunst- and Musikhochschulen* (universities of fine arts and music);
- *Fachhochschulen/Hochschulen für Angewandte Wissenschaften* (universities of applied sciences/research).

In 2022 there were 423 higher education institutions in Germany with a total of around 2.9 million students. 120 of them are universities, 246 are universities of applied sciences, 57 are universities of fine arts/music.

150 of the higher education institutions are state-recognised institutions, including 112 private and 38 ecclesiastical state-recognised higher education institutions.

In order to facilitate mobility between the federal states and to ensure equal treatment of students and quality and comparability of qualifications, the Standing Conference of the Ministers of Education and Cultural Affairs of the Federal States in the Federal Republic of Germany (KMK) has agreed on several principles and regulations, in particular the Interstate Study Accreditation Treaty and the Specimen Decree.

The Interstate Study Accreditation Treaty regulates the accreditation system according to the new law. The treaty states that the study programmes which have been quality assured on the basis of this treaty will be recognised in all states as being equivalent under higher education law. There are separate paragraphs that define the formal criteria for accreditation and the academic criteria. The Interstate Treaty states that in order to assure and enhance the quality of teaching and learning, the states specify the details concerning the formal criteria, the academic criteria and the accreditation procedure through decrees. This in turn is the focus of the Specimen Decree.

The main principles for study programmes related to theology/ religion are set by the Key Points for the Structure of Studies in Study Courses Involving Catholic and Protestant Theology/Religion (“Key Points for the Structure of Studies in Study Courses Involving Catholic and Protestant Theology/Religion”), resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Countries (KMK) of 13 December 2007.

When setting up all courses of study with Catholic or Protestant theology/religion in Germany, in addition to the requirements of state university law, the requirements of state church law, including the relevant church regulations named in the concordats or state church agreements, must be observed. These requirements are part of the Key Points mentioned above.

Theological faculties and educational institutions in Germany are the joint responsibility of the state and church. The framework for their operation is therefore set jointly by the KMK, the Evangelical Church in Germany and the German Bishop's Conference, the latter with the approval of the Apostolic (Holy) See.

There are several types of programmes/ courses related to theology/religion:

- theological courses of study that qualify for the office of pastor, priest and the profession of lay pastor ("full theological study course") can be completed after a standard period of study of a total of 5 years with an academic or church examination. The Diploma Supplement explains the canonical effects associated with both degrees and the academic degree "Magister Theologiae" is awarded;
- bachelor's and master's degree courses, with which the requirements for a teaching position in the Protestant or Catholic religion are conveyed. In these courses, the titles Bachelor of Education (B.Ed.) and Master of Education (M.Ed.) are awarded and the Diploma Supplement explains whether the acquisition of degrees has effects under canon law;
- for all other bachelor's and master's degree courses with Catholic or Protestant theology/religion, the titles Bachelor of Arts (B.A.) and Master of Arts (M.A.) are awarded;
- for continuing education courses and non-consecutive master's courses, master's degrees that deviate from the aforementioned designations may also be used and the Diploma Supplement explains whether the acquisition of degrees has effects under canon law.

## QUALITY ASSURANCE

The German external quality assurance system is based on the "Interstate Treaty on the Organization of a joint accreditation system to ensure the quality of teaching and learning at German higher education institutions" (Interstate Treaty) and the "Specimen decree pursuant to Article 4 Paragraphs 1 - 4 of the Interstate Treaty, resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of December 7, 2017" (Specimen Decree; *Musterrechtsverordnung* in German). The Interstate Treaty and the Specimen Decree define the three types of accreditation - system accreditation, programme accreditation and alternative accreditation procedures.

The Specimen Decree defines that the accreditation of Catholic-theological study programmes that qualify students for the office of priest and the profession of lay pastor ("full-time theology course") takes place exclusively as a programme accreditation. The decision of the accreditation council requires the approval of the relevant church offices for full-time and part-time study programmes in theology.

Since 1<sup>st</sup> January 2018 the overall responsibility for quality assurance in teaching and learning at German higher education institutions lies with the German Accreditation Council, a joint institution of the federal states.

The German Accreditation Council is responsible for taking accreditation decisions on the basis of review reports on programme accreditation and on the accreditation of quality management systems,

while the responsibility for peer review processes (both programme and system accreditation) still lies with the quality assurance agencies.

The prerequisite for a quality assurance agency operating in Germany is EQAR registration and, based on that, an authorisation by GAC. The Interstate Treaty defines that higher education institutions must use the assistance of QA agencies listed in EQAR and authorised by the GAC.

In July 2023 there were in total eleven agencies authorised by the GAC to operate in Germany. This list includes both “comprehensive agencies”, which offer peer review of study programmes in all subject areas and quality assurance systems and “specialised agencies” which operate exclusively in a specific subject area.

The Specimen Decree states that for Catholic-theological study programmes that qualify students for the office of pastor, priest and the profession of lay pastor (“full-time theology course”), the higher education institutions have to use the services of AKAST. In addition to that, AKAST is qualified to carry out the assessments of other study programmes related to Catholic theology/religion.

## **AGENCY FOR QUALITY ASSURANCE AND ACCREDITATION OF CANONICAL STUDY PROGRAMMES IN GERMANY (AKAST)**

The Agency for Quality Assurance and Accreditation of Canonical Study Programmes in Germany (AKAST) was established in 2008 by representatives of the Association of Faculties of Catholic Theology (KThF), the Association of the workgroups of Catholic Theology and ten faculties of Theology and philosophical-theological colleges as the “Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany e. V.” It was entered in the Register of associations at the Bonn Local Court and established by the DBK as a public association under ecclesiastical law with legal capacity in accordance with cc. 116, 301 § 3 and 312 Codex Iuris Canonici (CIC). The establishment of AKAST took place in consultation with the Holy See.

The foundation of AKAST was a consequence of the KMK “Key Points for the Structure of Studies in Study Programmes with Catholic or Protestant Theology/Religion” of 13 December 2007.

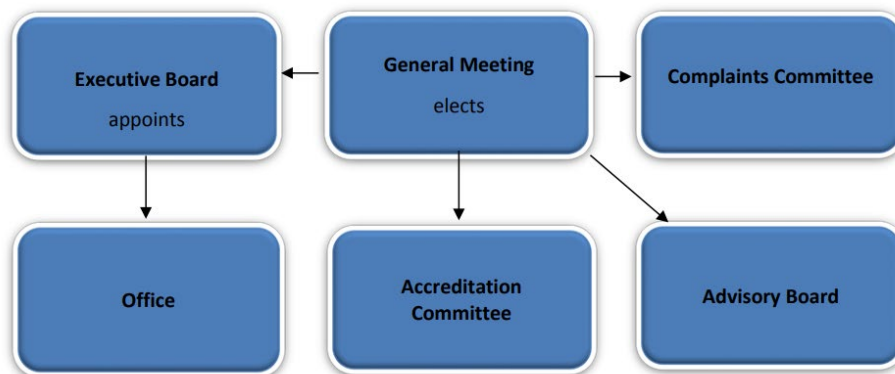
Since its establishment in 2008, AKAST has benefited from cooperation agreements with the Catholic University of Eichstätt-Ingolstadt (KUE) and the “Accreditation, Certification and Quality Assurance Institute” (ACQUIN) that provide administrative support and human resources if necessary.

According to its mission statement, AKAST is “dedicated to assuring and developing the quality of academic teaching and learning of canonical study programmes, in particular Catholic theology as well as to enhancing the development of the European Higher Education Area” and “accreditation is designed to facilitate the national, international and ecclesiastical certification of canonical study programmes and degrees. Simultaneously it aims at providing orientation for universities, students, employers, and responsible Church authorities”. Also, in its mission statement AKAST states that “the basic responsibility for quality assurance is in the hands of the Higher Education Institutions and individual faculties”. The panel did see evidence of the implementation of the mission statement during the course of the review, both through the documentation provided and also during the discussions with AKAST representatives and stakeholders.

AKAST does not have a specific vision statement.

## AKAST'S ORGANISATION/STRUCTURE

The organisational structure of AKAST consists of 6 elements - General Meeting, Executive Board, Accreditation Committee, Complaints Committee, Advisory Board and AKAST office (see the chart below).



Organisational chart of AKAST (source: SAR)

The central element is the General Meeting that consists of physical persons who are members of the Catholic Church or legal entities, primarily theological universities and facilities, which apply for admission and are admitted by the General Meeting itself. There is no membership fee. The ex-officio members of the General Meeting are: six representatives of the assembly of the Faculties and Institutes of Catholic Theology in Germany (KThF) (Chairperson, Vice Chairperson and the four members of the council of the KThF, for the duration of their term of office), the Chairperson of the association of the workgroups of Catholic Theology, for the duration of his or her term of office, and two representatives of the German (arch-)dioceses, appointed by the German Bishops' Conference. The General Meeting convenes at least once a year.

In July 2023 the AKAST General Meeting was composed of 21 universities and faculties, in addition to the ex-officio members listed above.

It is the responsibility of the General Meeting to make decisions on the guidelines for the implementation of the aims of the association, on the budget and the balance of the year and on changes in the statutes and the dissolution of the association; elect the AKAST Executive Board, Advisory Board, Complaints Committee and those members of the Accreditation Committee who are not members ex officio; accept the annual audit report, formally approve the actions of the Executive Board and accept the report of the Executive Board and of the Administrator.

The AKAST Executive Board is elected by the General Meeting for a term of 5 years. It consists of the Chairperson, the First Vice Chairperson and the Second Vice Chairperson. The Chairperson must be a professor or retired professor of a faculty of Catholic Theology. The AKAST Chairperson also chairs the Accreditation Committee and the Advisory Board. A representative appointed by the Commission for Science and Arts (Commission VIII) of the DBK attends the Executive Board meetings in an advisory capacity. The Executive Board manages the day-to-day business of the association within the framework of the resolutions of the General Meeting. The Executive Board reports to the General Meeting; it presents the budget and the balance for the year. The meetings of the Executive Board take place at least twice a year.

The AKAST Accreditation Committee is elected by the General Meeting in consultation with the Association of Faculties of Catholic Theology (KThF), the Association of the workgroups of Catholic Theology, the German Seminary Rectors' Conference and the Association of Theology Students (AGT). In practice "in consultation" means that the institutions are required to nominate their

representatives and the AKAST General Meeting votes for each particular position of the Accreditation Committee (i.e. student member, persons of professional practice etc.) The Accreditation Committee consists of 10 members:

- AKAST Chairperson;
- four professors (one of whom should be from abroad) and, in case of unavailability, two professors as substitute members;
- one expert in quality assurance and accreditation matters;
- two persons of professional practice, of whom one is rector of a seminary;
- one student member and, in case of unavailability, one substitute student member;
- the episcopal commissioner of the DBK (advisory role).

All members of the Accreditation Committee are elected for 5 years, except the student member and substitute student member who are elected for 2 years. It is possible to be re-elected for one further term. The Accreditation Committee meets twice a year and the meeting dates are fixed well in advance.

The Complaints Committee consists of two academics representing different types of theological higher education institutions, one representative of professional practice, one student member and one representative of an accreditation agency. The Complaints Committee was established in 2021, following the remarks by the EQAR Register Committee.

The Advisory Board consists of the Chairperson and four experts in quality assurance and accreditation matters, including international experts. The members of the Advisory Board are elected for 5 years and re-election for one further term is possible. The Advisory Board meets twice a year and the meetings are aligned with those of the Accreditation Committee.

The AKAST's staff consists of 1.5 FTE. The full time AKAST Administrator carries out both managerial duties and coordination of assessment procedures and is supported by 0.5 FTE Secretary. Specifically for the purpose of AKAST's external review, a temporary student assistant was hired in 2023. The Administrator prepares and implements the resolutions of the Executive Board, the General Meeting and the Accreditation Committee. She takes part in the meetings in an advisory role. The Administrator is appointed by the Executive Board.

## AKAST'S FUNCTIONS, ACTIVITIES, PROCEDURES

AKAST is a specialised agency performing the assessment of religion/theology study programmes in Germany according to the Paragraph 24 of the Specimen Decree of the Interstate Treaty, as explained in the earlier sections. In addition, AKAST may carry out the assessment of other religion/theology related study programmes.

The task of AKAST is regulated in the Statutes (cf. § 2). In the field of external quality assurance in higher education, it focuses primarily on:

- promotion of the Faculties and Institutes of Catholic Theology;
- quality assurance of canonical and non-canonical study programmes with Catholic theology within the meaning of the Universal Church Higher Education Law in its currently valid version and its national application;
- implementation of peer review processes of canonical and non-canonical study programmes with Catholic theology in accordance with the Interstate Treaty;
- implementation of peer review and evaluation procedures of canonical study programmes not covered by the Interstate Treaty.

Following the EQAR registration, AKAST is currently eligible to carry out two assessment procedures:

- Programme accreditation in accordance with the Interstate Treaty (“Programme accreditation in Germany” as listed on the EQAR website);
- Programme accreditation of other canonical study programmes (“Programme accreditation (AKAST quality seal)” as listed on the EQAR website).

Until 2023 AKAST was eligible to carry out “peer review institutional evaluation” but no such activities took place. In early 2023 AKAST reported to the EQAR that this activity had been discontinued. The review panel did not learn of any intentions to relaunch it in the future.

AKAST does not carry out any activities outside the scope of the ESG.

## AKAST'S FUNDING

AKAST is financed primarily by an annual subsidy from the Association of German Dioceses (VDD), the legal entity of the DBK.

The draft annual budget is planned by the AKAST Executive Board and Administrator and approved by the AKAST General Meeting. It is then sent to the VDD in a grant application.

The VDD subsidy accounts for approximately 75% of the total annual income. The rest of the budget is composed of income from the assessment procedures and some small additional income, for example, from ACQUIN.

The main items of expenditure are - personnel expenses, costs for carrying out assessment procedures, workshops for reviewers and administrative/ operating costs. In 2023 a significant part of the budget was devoted to the review for EQAR registration (registration fee, review fee, translations) that shows as a one-time payment in the reporting period.

In 2022 the full revenue amounted to EUR 220 379,56 while the total expenditure was EUR 189 900,73. The revenue target for 2023 was higher (EUR 254 862,50) and so was the expenditure target (EUR 254 862, 50). Both the revenue and expenditure for 2024 are predicted to be EUR 205.507,50. These changes are related to the number of assessments carried out and one-off activities like ENQA review. The 2022 budget expenditure was also heavily affected by COVID-19 period as the reviews and workshops took place in an online mode.

AKAST e.V. was founded as a non-profit association. The non-profit status of AKAST is reviewed by the tax office every three years, most recently on 15 February 2023.

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

## ESG PART 3: QUALITY ASSURANCE AGENCIES

### ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

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

#### Evidence

According to AKAST's Statutes (last updated on 27 January 2022), the aim of AKAST is "*promotion of the Faculties and other Institutes of Catholic Theology and the quality assurance of the canonical programmes of studies in accordance with the universal ecclesiastical Higher Education Law in its currently valid version and its national application within the framework of the process directed towards the development of a European Higher Education Area, in which the Holy See also participates.*"

AKAST was established with support by the DBK and intended to operate in Germany only. The international perspective to AKAST's work is provided by the international members of AKAST's Advisory Board and Accreditation Committee and the networking with those German agencies that are active internationally.

AKAST's main area of operation is the programme accreditation of canonical study programmes, especially the study programmes Catholic Theology (full study programmes awarding "*Magister Theologiae*" degree and qualifying for the office of pastor, priest and the profession of lay pastor), which are covered by the Interstate Treaty. As a result of the legal framework that has been in force since 2018, the range of activities of AKAST is also extended to programme accreditation for non-canonical study programmes with Catholic Theology, which are covered by the Interstate Treaty (bachelor's, master's). In regard to assessment of these study programmes, AKAST competes with other quality assurance agencies that operate in Germany and have experience in this area. In addition to that, the AKAST's area of activity also includes peer review processes for further canonical study programmes which are not covered by the Interstate Treaty, for example, ecclesiastical degrees such as Baccalaureate, Licentiate and Doctorate as stipulated in Article 47 of the Apostolic Constitution *Sapientia Christiana*. For these programmes AKAST can only award the agency seal. The core activities of AKAST are concentrated on the full study programmes in Catholic Theology and the AKAST resources, as explained further under the ESG 3.5, have been estimated for covering this specific area.

In the period 2018 - 2023 AKAST carried out 15 assessment procedures:



<b>Year</b>	<b>Programme accreditation (according to the law valid until 2017)</b>	<b>Programme accreditation (according to the law valid since 2018)</b>	<b>Peer review process (not according to the Interstate Treaty)</b>
2018	3		
2019		3	
2020		3	
2021		4	1
2022		1	

Overall, since its establishment in 2008, AKAST has performed 52 reviews, only two of these reviews were for canonical study programmes not covered by the Interstate Treaty. The AKAST Accreditation Committee has taken 61 decisions. There is a difference between the number of reviews and decisions, as some of these reviews were for clusters (groups) of study programmes (*Bündelverfahren*).

AKAST fulfils its mission in close collaboration with two major external stakeholders - German Bishops' Conference (DBK) and the German Accreditation Council (GAC). The continuity of AKAST's operations is ensured by two other stakeholders - the Catholic University of Eichstätt-Ingolstadt (KUE) and Accreditation, Certification and Quality Assurance Institute (ACQUIN). The KUE that hosts AKAST is, although largely funded by the state, run by a self-governing public church trust set up by Bavarian Catholic bishops on the basis of a concordat between the Holy See and the Free State of Bavaria.

As mentioned earlier in the report, Catholic education in Germany is the joint responsibility of the church and the state. While GAC is the end user of AKAST's review reports and takes decisions on accreditation of study programmes in Germany, the DBK, in particular the Commission for Science and Arts (Commission VIII), is consulted and informed at several stages, including the obligation to give the ecclesiastical consent at the end of the assessment procedure. In its Internal Quality Manual AKAST explicitly emphasises that it is free from both the state and church influence.

Since 2013 AKAST is recognised by the Congregation for Catholic Education as an "articolazione territoriale" (independent regional agency - the term used by the 2018 review panel) of AVEPRO and therefore eligible to perform quality assessments of Catholic Theology study programmes without direct interference by AVEPRO. The communication with AVEPRO is, however, maintained on a regular basis via the minutes of AKAST's meetings. In addition, a member of the AVEPRO Scientific Advisory Board is a member of the AKAST's Advisory Board.

As mentioned earlier in the report, AKAST is a membership organisation and the General Meeting, AKAST's main governing body, primarily consists of universities and faculties of Catholic theology. These are also the institutions that undergo assessments coordinated by AKAST. According to AKAST, the differentiation between a higher education institution/faculty as a shareholder and as an institution under review is ensured through the multi-layer structure of AKAST and also through a rigorous policy of declaring conflict of interest whenever applicable.

All other bodies of AKAST are elected by the General Meeting. This includes the Executive Board, Accreditation Committee, Complaints Committee and Advisory Board. The section on AKAST's organisation/ structure explains their detailed composition.

The most diverse bodies of AKAST, in terms of representation, are the Accreditation Committee and Complaints Committee. However, the student representatives are currently part of the Accreditation Committee and Complaints Committee only. All members of the Accreditation Committee, except the experts in quality assurance and accreditation and representatives of professional practice, have substitute members.

## **Analysis**

In its Statutes AKAST states that its aim is “*promotion of the Faculties and other Institutes of Catholic Theology*”. The purpose of AKAST is outlined in § 2 of the Statutes. The members of AKAST’s General Meeting (primarily theological universities and faculties) are also the institutions reviewed by AKAST. As explained above, the impartiality of AKAST from the institutions under review is ensured through the structure of AKAST where the General Meeting does not have any influence on the actual assessment procedures and the representatives involved in one of the institutions do not participate in any decisions regarding their institutions.

The mission of AKAST is very clear and specific. AKAST can be clearly distinguished from other quality assurance agencies operating in Germany and is also unique in the international context. During the site visit the review panel became convinced that the operation of AKAST is crucial for study programmes related to Catholic theology in Germany and that the sector benefits from this very focused and tailored approach. The review panel, however, understands that apart from assessing the full programmes in Catholic Theology, AKAST theoretically is in open competition with other German quality assurance agencies that have previous experience in assessing programmes related to Catholic Theology, ACQUIN and AQAS in particular. However, there is a solid track record of AKAST collaboration with the potential competitors.

The review panel was impressed by the universal observation by all representatives of the higher education institutions that it met that they value AKAST as a high quality service provider and acknowledge and appreciate its balanced scrutiny of accredited programmes.

The review panel appreciates that the composition of AKAST’s governing bodies takes into account the diversity of stakeholders that AKAST works with. The composition of the Accreditation Committee and Complaints Committee are outstanding examples of this diversity. The review panel would like to especially highlight the role and contribution of students on these committees, as confirmed both by the student representatives and the AKAST’s office. In the opinion of the review panel, the Accreditation Committee would benefit from additional expertise in quality assurance and accreditation matters, not necessarily covered by additional committee members. In line with the representatives of academics and students, the review panel would suggest that the expert in quality assurance and accreditation matters and the experts of professional practice also have substitute members.

The Executive Board, however, is not that diverse. Judging from the list of former members of the Executive Board published on the AKAST’s website, its members have only ever been academics. AKAST’s Statutes state conditions for the Chairperson only but do not elaborate on whether a representative of professional practice or a student member could become a member of the Executive Board. Given that AKAST is an association of higher education institutions, the review panel can understand the rationale of composing the Executive Board from academics only. However, in the opinion of the review panel, AKAST would benefit from a more diverse Executive Board that includes a student representative in particular. Also, the General Meeting is said to represent all the relevant interest groups but students are not represented in that forum. In the opinion of the review panel, the General Meeting would also benefit from the student perspective, for example, through the formal representation of the Association of Theology Students (AGT).

The review panel acknowledges that AKAST is not active internationally and that this has not been an objective for the agency. However, in the opinion of the review panel, networking internationally and input from an international perspective is very important for further development and the ability to critically self-assess AKAST's own performance, even without intention to expand beyond borders. While a very clear and specific focus is an advantage, during the site visit, the review panel believed that there are some areas where AKAST is constrained by its setup and by the way it currently operates. The most thought provoking and inspiring discussions were the ones with students and international members of AKAST's bodies; therefore the review panel believes that AKAST could make more use of their experience and could possibly benefit from additional international members in various bodies as well as an increase in international collaboration with other relevant organisations (agencies) and bodies in the form of e.g. staff mobilities, joint developmental projects, benchmarking etc.

The review panel learned that AKAST is currently not planning to expand its activities, either within or beyond Germany. In early 2023 AKAST removed from its portfolio the activity "peer review institutional evaluation" that was developed but for which there was no demand by higher education institutions. Several representatives interviewed by the panel reported the conclusions of internal discussions in this regard, stating that the mission of AKAST would need to change if new activities within Germany were to be developed. With regard to expanding internationally, representatives stated that, whilst such a possibility formally exists in the German speaking countries (Austria, Switzerland), the accreditation system of theology study programmes there is different from the one in Germany and AKAST's services would not be required. With regard to assessing bachelor's and master's study programmes in which theology is combined with other subjects, such accreditation procedures are currently performed under the cooperation agreement with ACQUIN. In addition to the procedures with canonical study programmes and the procedures in cooperation with ACQUIN, since 2018 it is possible for AKAST to conduct procedures for non-canonical degree programmes with theology. AKAST has already made use of this possibility and conducted two procedures with non-canonical study programmes according to the State Treaty on its own, which can be found on AKAST's website.

Based on the interviews with various stakeholders and acquired documentation the panel concludes that this, more focused approach, takes relevant contextual constraints into account and presents a step forward towards realisation of AKAST's mission.

AKAST has signed a cooperation agreement with ACQUIN to ensure the sustainability of AKAST's operations. ACQUIN is based in Bayreuth, Germany. Although ACQUIN now provides services across Germany and beyond, it was initially established as an independent agency for the Bavarian region. It also has previous experience in assessing study programmes related to Catholic theology.

### **Panel commendations**

1. The review panel commends the visible and active student participation in the AKAST's work, including the Accreditation Committee, and meaningful participation of other stakeholders, including the representatives of professional practice, in the governance and accreditation processes.
2. The review panel commends the considerate inclusion of other relevant quality assurance bodies into the work of the agency, in particular, the AVEPRO representative as a member of advisory board and the close collaboration with ACQUIN.

## Panel recommendations

1. Diversify the Executive Board by including a student member, as well as include a student representative in the Advisory Board and include the Association of Theology Students to the AKAST General Meeting.

## Panel suggestions for further improvement

1. The review panel suggests expanding the portfolio of activities of AKAST by developing other quality assurance procedures relevant to its aims.
2. The review panel suggests strengthening the international perspective by introducing additional international representatives in AKAST governing bodies and pursuing more opportunities related to various dimensions of internationalisation, in particular with similar agencies and bodies abroad.
3. The review panel suggests balancing the representation of different stakeholders in the AKAST Accreditation Committee, by ensuring additional expertise in quality assurance and accreditation matters as well as by introducing substitute members for the experts in quality assurance and accreditation and representatives of professional practice.

## Panel conclusion: compliant

## ESG 3.2 OFFICIAL STATUS

Standard:

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

## Evidence

AKAST was established as a public association with legal capacity under ecclesiastical law. It is a specialised agency that is authorised to operate in Germany.

As already explained in the introductory sections, the founding of AKAST as an ecclesiastical agency was a consequence of the resolution of the KMK “Key Points for the Structure of Studies in Study Programmes with Catholic or Protestant Theology/Religion” of 13 December 2007. This resolution provides, with the consent of the Holy See, that study programmes qualifying for the pastorate, the priesthood and the profession of lay pastor (“full study programme”) shall be accredited by an ecclesiastical accreditation agency.

Subsequently, by the resolution of the plenary meeting of the DBK on 22 to 25 September 2008 and in agreement with the Holy See it was decided to establish AKAST as the “Agency for Quality assurance and Accreditation of Canonical Study Programmes in Germany e. V.” The official seat of AKAST is Bonn where the secretariat of the DBK is located.

AKAST was first accredited by the German Accreditation Council in 2008 for a period of five years and authorised to accredit canonical study programmes covered by the “KMK Key Points” and to award them the seal of the GAC.

By letter of 9 August 2013, AKAST was recognised by the Congregation for Catholic Education as an “articolazione territoriale” (independent regional agency) of AVEPRO, thus fully recognising the status of AKAST’s accreditation in the Catholic Church.

The section 24 of the Specimen Decree pursuant to Article 4, paragraphs 1 – 4 of the Interstate Treaty (December 7, 2017) states that for Catholic-theological study programmes that qualify students for the office of priest and the profession of lay pastor (“full-time theology course”), the assessment is carried out by the Agency for Quality Assurance and Accreditation of Canonical Study Programmes in Germany (AKAST), which is authorised by the German Accreditation Council.

To date AKAST has been reaccredited twice by the GAC. The current authorization of GAC to operate in Germany is valid until 31 December 2023 and it is linked to the EQAR registration that is valid until 30 November 2023.

### **Analysis**

AKAST is recognised as a quality assurance agency responsible for the assessment of specific study programmes in Germany. The previous review panels have concluded that AKAST’s legal status is secure for the long term and that AKAST is formally recognised by the competent ecclesiastical and state bodies. The specific role of AKAST is defined by the German legal framework in terms of the state recognition, while the ecclesiastical recognition is ensured by the Congregation for Catholic Education. Being established as a public association under canon law enables AKAST institutionally to make decisions on behalf of the Roman Catholic Church.

In order to receive GAC authorisation and maintain the rights to operate in Germany, AKAST is required to be listed on EQAR and renew its registration on a regular basis. The review panel acknowledges the condition that AKAST must be registered on EQAR in order to maintain its special niche, as this is an indicator of compliance with the ESG. However, the review panel notes that a failure to renew registration on EQAR would result in termination of GAC authorisation and consequently operation in Germany under the Interstate Treaty and, as confirmed by the GAC, there would be no formal mechanisms to bypass this regulation.

### **Panel conclusion: compliant**

## ESG 3.3 INDEPENDENCE

Standard:

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

### **Evidence**

#### **Organisational independence**

AKAST is an association primarily composed of theological faculties and institutes that form the AKAST General Meeting. According to AKAST Statutes, the membership of the General Meeting ends with the end of the work period, through death or dissolution of the legal entity, or through a written notice of resignation presented by the member to the Executive Board, a statement made by the competent Church authority or with expulsion pronounced by the General Meeting on important reason.

AKAST operates according to its Statutes. According to the “KMK Key Points”, AKAST exercises ecclesiastical sovereign rights and is subject to the supervision of the DBK in accordance with canon law.

At the time of reviewing AKAST's application to EQAR in 2020, when the EQAR registration was rejected, the DBK had the following main powers:

- gives consent for the admission of members of the association,
- confirms the members of the Accreditation Committee,
- confirms the Chairperson of the Executive Board who also serves as the Chairperson of the Accreditation Committee and the Advisory Board,
- a member of the Commission for Science and Arts (Commission VIII) of the German Bishops' Conference approves each accreditation decision as a full member of the Accreditation Committee.

Moreover, AKAST is also co-financed through an annual grant from the Association of German Dioceses (VDD), the legal entity for the German Bishops' Conference. The EQAR Register Committee regarded the situation where one single actor or stakeholder has a "controlling stake" in an agency as incompatible with the requirements of the standard and the various veto rights and consent requirements as constraining the AKAST's independence in all three dimensions of independence - organisational, operational and independence of formal outcomes.

Currently DBK has the following role in the governance of AKAST (section of the Statutes quoted):

- receives information on the admission of members to the association (section 3 (1));
- appoints two representatives of the German (arch-)dioceses as ex-officio members of the General Meeting (section 3 (2));
- Confirms the Chairperson of the Executive Board who also serves as the chairperson for the Accreditation Committee and Advisory Board (section 5 (1));
- Commission for Science and Arts (VIII) of the German Bishops' Conference appoints a representative that participates in the Executive Board meetings in advisory capacity (section 5 (3));
- The representative of the Commission for Science and Arts (VIII) of the German Bishops' Conference takes part in the General Meeting in an advisory capacity (section 6(3));
- Approves resolutions regarding a change in the statutes or a dissolution of the association (section 6(4));
- The episcopal representative participates in the Accreditation Committee in advisory role (section 7(2));
- Receives information on the election of Accreditation Committee (section 7 (3));
- The episcopal representative approves the accreditation report and the resolution and assessment recommendation to the German Accreditation Council in peer review processes that follow the Interstate Treaty (section 7 (6)).

In 2021 the role of the representative sent by Commission VIII of the DBK in the AKAST Accreditation Committee was changed from a full member to an advisory member without voting rights. AKAST in the SAR states that the ecclesiastical approval requirement is now also explicitly decoupled from the accreditation decision and makes clear for the public that these are two different responsibilities.

In the SAR AKAST states that, when designing the structure of AKAST, care was taken to ensure that the AKAST members that are all part of the General Meeting can have a say in the strategic orientation of AKAST but have no influence on the implementation of the individual procedures. This is reflected in the composition of the different governing and decision-making bodies that is clearly defined in the AKAST Statutes, in particular, the Accreditation Committee and Complaints Committee. When entering into a relationship with AKAST, each individual is required to sign a statement on confidentiality and impartiality and declare that he/she will not represent the interests of his/her home

institution. This applies both to elected members of different AKAST's structures and to the reviewers. The templates of these statements were provided to the review panel.

The AKAST Executive Board, Accreditation Committee, Advisory Board and Complaints Committee are elected by the AKAST General Meeting. The AKAST Statutes specify the term of office for all elected representatives. Revocation by the General Meeting is possible for the members of the Accreditation Committee, Advisory Board and Complaints Committee. However, for the Executive Committee such possibility is not foreseen and the Executive Board remains in office until the next election. The Executive Board meets at least twice a year according to the Statutes.

With regard to operational independence and also independence of formal outcomes, AKAST is subject to the German legal framework that strictly separates the responsibilities of the different bodies and states that accreditation decisions are taken by GAC based on the outcomes (reports) of reviews coordinated by independent quality assurance agencies. The overall principles for assessment by all quality assurance agencies operating in Germany and accreditation are defined in the Interstate Treaty and the Specimen Decree.

### **Operational independence**

AKAST staff is recruited by the AKAST's Executive Board, following the standard internal procedures of the KUE Foundation and the KUE Foundation serves as the employer and provides support regarding all technical aspects of employment.

The procedure for nominating and appointing reviewers is documented and available publicly on AKAST's website. The proposal for each review panel is developed by AKAST office and submitted for approval to the Accreditation Committee. The overall composition of the panels takes into account the rights of different AKAST stakeholders to nominate their representatives. However, the final decision is made autonomously by the Accreditation Committee.

Members of the Accreditation Committee are not allowed to take part in decision making if they have been involved with the particular higher education institution within the past five years or are currently involved.

The procedural rules and evaluation criteria for programme accreditation of canonical study programmes and non-canonical study programmes with Catholic Theology covered by the Interstate Treaty are defined in the Interstate Treaty and the Specimen Decree. Procedural rules and evaluation criteria for peer review processes for canonical study programmes not covered by the Interstate Treaty are based on the same criteria and procedures that apply to peer reviews of study programmes covered by the Interstate Treaty in Germany. This has been a deliberate decision by AKAST in order to align the principles for the two accreditation processes as much as possible.

### **Independence of formal outcomes**

With the changes in force since 2018, AKAST decided to keep its own Accreditation Committee as an internal body for ensuring consistency of reviews and decisions and internal feedback loop. The added value of the AKAST's Accreditation Committee is its discipline-specific focus.

The AKAST Accreditation Committee makes its decision on the basis of the available documents (reviewer report with expert accreditation recommendation, statement of the higher education institution on the review report, statement of the rapporteur). For study programmes covered by the Interstate Treaty, the AKAST Accreditation Committee serves as an additional internal quality assurance mechanism, as the final decision is taken by GAC based on the application by the higher education institution itself. For study programmes not covered by the Interstate Treaty, the AKAST Accreditation Committee is the one that takes the final decision and awards the AKAST Quality Seal.

The members of the Accreditation Committee do not participate in consultations and resolutions concerning their own organisation.

A specific feature of the assessments coordinated by AKAST is the participation of a rapporteur, in addition to AKAST Administrator that coordinates the assessment procedures. The rapporteur is appointed by the Accreditation Committee and can be a member of either the Accreditation Committee itself or the Advisory Board. The role of the rapporteur is to observe proper conduct of the procedure and comment on the procedure for the Accreditation Committee. From the 2018 review report the review panel learned that in the past the role of the Accreditation Committee's observer (rapporteur) was to verify programme's compliance with conditions. In the 2018 review report the panel reports that AKAST trained the observers to be as neutral as possible.

The Register Committee found in 2020 the requirement that each accreditation decision requires the consent of the representative of the German Bishops' Conference (member of the Accreditation Committee) to be in contrast with the requirement of the ESG that the responsibility for the final outcomes of the quality assurance processes remain the responsibility of the quality assurance agency. The Register Committee considered that, as a result of the current arrangements, no AKAST decision or report could be published without the Bishops' Conference's approval, which remains an actor external to the agency. Hence, the separation of the AKAST decision/report and the ecclesiastical approval was not clearly visible to the public.

In preparation for the focused review, AKAST made a number of changes to its Statutes. Firstly, the role of the representative sent by Commission VIII of the DBK to the Accreditation Committee was changed from a full member to an advisory member without voting rights. The ecclesiastical approval requirement was also explicitly decoupled from the accreditation decision, making it clear that these are two different responsibilities, which are considered independently of each other. The consultation with the German Bishops' Conference was no longer required for the election of the members of the Accreditation Committee and the representative of the German Bishops' Conference attended the Executive Board meetings in an advisory capacity only.

The focused review panel in 2020 concluded that the separation of ecclesiastical consent by the advisory member of the Accreditation Committee on the one hand and the accreditation decision on the other hand ensures that the full responsibility for the results of its own quality assurance procedures lies with AKAST. It should be noted that in the assessment procedures following the Interstate Treaty, the review result and the expert evaluation recommendation are subject to the final decision by GAC and require the consent of the episcopal commissioner of the DBK.

In addition, the decisions on the admission of members to the Association AKAST are only to be notified to the DBK and finally, the election of the members of the Accreditation Committee is no longer subject to consultation with the DBK, but the result notified in writing.

In December 2021 compliance with ESG 3.3 was approved by the EQAR Register Committee.

## **Analysis**

Compliance with the ESG 3.3 was the major issue in rejecting the AKAST registration on EQAR in 2020 and was thus the key area for coverage in the focused review in 2021 that followed the rejection. However, there were no formal recommendations by the EQAR Registration Committee or the focused review panel that the 2023 ENQA review panel should follow up on. The EQAR Register Committee acknowledged that AKAST is subject to the supervision of the DBK according to canon law and that it is financed by an annual subsidy from the Association of German Dioceses (VDD), the legal entity of the DBK.



The review panel therefore covered all dimensions of independence and focused specifically on those where concerns by EQAR were expressed before. Moreover, while the review panel agrees with the concerns expressed previously and considers that they have been addressed by AKAST properly, there are a number of other arrangements that are critical for ensuring the sustainability of AKAST's independence in the long-term but which were not judged as critical in the past.

### **Organisational independence**

The review panel learned that the DBK is AKAST's main stakeholder both in terms of supporting the need for AKAST as a discipline-specific organisation and also in playing a strong role in AKAST's governance and funding. Both in the SAR and in the discussions during the site visit, AKAST recognised DBK as its main founder and as the main contributor.

Since 2020 AKAST has achieved significant progress in strengthening the formal independence from DBK. However, in the 2023 SAR (p. 49) AKAST states that "A constant challenge is to ensure the church's rights of participation and approval in the accreditation and peer review of canonical and non-canonical study programmes with Catholic Theology without endangering the operational independence of the Agency".

The review panel discussed this and similar statements in the SAR with several groups of interviewees and learned that including DBK representatives in an advisory role, whenever possible, ensures that the communication channels between AKAST and the Church are open, thus ensuring that, though communication, issues do not escalate. The review panel, however, also saw a disadvantage to constant communication in that it can be regarded as a tool for control rather than exchange of information. During the site visit several stakeholders pointed out that the orientation of the Church depends on the personalities in its leadership. Although no problems have yet occurred, it is possible that changes in the Church leadership could lead to change in the attitude and expectations towards AKAST, with increasing pressure. The review panel noticed such potential in the way the AKAST Accreditation Committee operates, since the episcopal commissioner of the DBK participates in the committee meeting in an advisory role and also provides ecclesiastical approval that will be provided separately in writing but could also be alluded to during the Accreditation Committee meeting.

The review panel also points to the fact, as outlined in the Evidence section on organisational independence, that there are still nine organisational responsibilities for the DBK in the governance of AKAST stated in the Statutes. Therefore, the DBK still plays a significant role in the organisational structures of AKAST. In the opinion of the review panel, the roles of the DBK can still be reduced, for example, the information requirements in section 3 (1) and section 7 (3) of the Statutes as the DBK is already informed about the admission of new members and the election of the Accreditation Committee through its representatives in the General Meeting and the Accreditation Committee.

### **Operational independence**

AKAST was regarded by the representatives of higher education institutions as operating completely independently. However, it has been noted by the review panels in the past that the status of AKAST as "public association under canon law" means that the DBK is able to exercise its influence in various ways despite AKAST being an independent legal personality. The review panel discussed this setup with various stakeholders and was told that until now it has never resulted in any conflicts between AKAST and the Church.

In terms of AKAST's operation, the review panel noticed the relatively large workload of the AKAST Chairperson that is to a large extent caused by his participation in almost all organisational structures of AKAST, i.e. the mandate of the AKAST Chairperson currently also includes the position of Chairperson of both the Accreditation Committee and the Advisory Board. According to the AKAST Chairperson and given the resources limitations of AKAST, this setup could also be seen as a tool for

exchanging information and ensuring consistency of different actions. However, in the opinion of the review panel this approach concentrates too much power in one place and, while the review panel appreciates the commitment and integrity of the current Chairperson, the continuity of AKAST would be better served if such powers were to be more distributed throughout the agency's organisational structure. This would also enable position holders of these different roles to devote more time and attention to each of the roles as well as the opportunity for more varied opinions and thinking (e.g., the Advisory Board's views on internationalisation, fresh ideas on quality assurance and quality enhancement/improvement).

The review panel found that the AKAST Chairperson is at the same time employed as a chair holder (*Lehrstuhlinhaber*) at the Catholic University of Eichstätt-Ingolstadt. This university provides study programmes of Catholic Theology that are reviewed by AKAST. As noted before, the AKAST Chairperson who currently works for KUE is also the Chairperson of the Accreditation Committee. This is the consequence of the Statutes, stating that the General Assembly elects from among its members, i.e. from the theological institutions. The Chairperson will therefore always belong to a university evaluated by AKAST.

While the policy on impartiality ensures that there is no conflict of interest, transparency and independence would be further safeguarded if the positions of Chairperson of the Accreditation Committee and Chairperson of the Executive Board were separated. This would reduce the chance of diminished credibility of AKAST from the view of external observers. The review panel was impressed by the input to discussions by the international members in AKAST's committees. If the position of Chairperson of the Accreditation Committee and possibly also the Advisory Board were filled by an international member then, particularly in this small field, the independence of the Accreditation Committee from the universities under review would be further strengthened.

### **Independence of formal outcomes**

The main user of outcomes is the GAC. However, there is a clear separation between study programmes covered by the Interstate Treaty and programmes not covered by the Interstate Treaty.

While the Focused Review panel in 2021 concluded that AKAST now has full responsibility for the results of its own quality assurance procedures, the 2023 ENQA review panel believes that there is still room for interpretation. From the discussions with the AKAST stakeholders it was not completely clear if in practice the procedure for providing episcopal consent on study programmes is really fully separated from the decision by the Accreditation Committee. During the meeting with the DBK episcopal commissioner, the review panel learned that consent could not only be expressed in writing but also in person during the AC meeting and with the possibility to participate in discussions, thus possibly influencing the outcome of the meeting. It also seems possible that the episcopal commissioner could express, even unintentionally, a preliminary opinion on particular study programmes, not necessarily based on the findings of the expert panel. Therefore, in the opinion of the review panel, the advisory role of the episcopal commissioner in the meetings of the Accreditation Committee should be further clarified. In the opinion of the review panel, it is also crucial that the consent by the Church is fully based on the outcomes of the review report and/or evidence that has been available to the expert panel.

### **Panel recommendations**

- I. Consider a distribution of the formal positions that are currently held by the AKAST Chairperson, by introducing a separation of these positions in the Statutes, as well as consider the appointment of international members as the Chairperson of the Accreditation Committee and Advisory Board, thus further strengthening the independence of the agency,

further safeguarding the independence of the universities under review and also bringing in valuable external, international perspectives into the discussions.

2. Strengthen the independence from DBK in the governance of DBK, e.g. by defining the advisory role of the episcopal commissioner of the German Bishops' Conference in the Accreditation Commission more clearly and codifying this through adding the description of the advisory role in § 7 of the AKAST Statutes.

### **Panel conclusion: partially compliant**

## ESG 3.4 THEMATIC ANALYSIS

Standard:

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

### **2018 review recommendation**

AKAST should publish more findings from analyses of its own work in future. At the same time, the neutral observer viewpoint should be preserved in tried and tested manner in order to avoid pre-empting university policy bodies such as the Association of Faculties of Catholic Theology.

### **Evidence**

In the SAR AKAST states that its high level of professional competence resulting from its specific construction and special position serves as a basis for structured analyses for the further development of the study quality of the canonical study programmes in the national context.

The recommendation made by the review panel in 2018 was also maintained by the targeted review panel in 2021. In its initial decision of 22 June 2020, the EQAR Register Committee acknowledged that AKAST presents analyses of its own work within the framework of conferences, working groups and other event formats but notes that these formats do not fully meet the standard requirement of regular publication of reports or thematic analyses. Due to a lack of regular activities that can be considered as thematic analysis, the Register Committee concluded that AKAST complies partially with the ESG 3.4.

In the 2021 focused review report the review panel noted that AKAST reliably contributes the experience gained from its own quality assurance procedures to the regular evaluation of the Key Points and that the agency is documenting the results of its ongoing student survey on its website. The review panel recommended AKAST to additionally develop smaller report formats such as “spotlights” on current problems related to the study programmes in Catholic Theology. The Register Committee in 2021 welcomed AKAST’s plan to further develop a thematic analysis after an appropriate number of programme accreditation procedures have been completed, but underlined that such an analysis has not been finalised.

The 2023 SAR lists two examples of such “spotlights” that have since been produced by AKAST. The SAR states that, as part of the Federal General Meeting of the AGT, AKAST conducted a survey of participating students in the summer semester of 2021 on their experiences with online teaching during the pandemic or the past three semesters of study. In the following summer semester 2022, a collection of guiding questions for (not only student) reviewers in accreditation procedures in the times of digital teaching was developed on this basis. The outcomes of both analyses are available on

AKAST's website. For the regular and comprehensive feedback of its experiences from its own quality assurance procedures, AKAST suggests that reference should be made to the active participation in the regular (5-year) evaluation of the "KMK Key Points", for the third time in 2021.

Since its foundation, AKAST has regularly held one-day information events and workshop discussions on the topic of study reform in Catholic Theology. In the reporting period, AKAST offered seven "workshop discussions for students".

Both in the SAR and during the site visit AKAST expressed its intention to develop and publish joint thematic analyses together with the GAC, as an initiative supported by a number of German agencies. The ENQA external review report on GAC from 2022 states that *"It should also be noted that in a number of ENQA review reports German agencies express the opinion that GAC should produce the bulk of the thematic analyses in the German system, as it issues the final decisions and is also the only organisation that has an overview of the whole system."* The GAC review panel from 2022 also notes that GAC administers ELIAS, the German database of accredited programmes and institutions, which is used as a source for other databases. The review panel therefore concludes that this understanding and expectation is common for German agencies. However, in the case of AKAST the review panel considers that its main field of operation is very specific and that it is best placed to understand themes relating to its own area and stakeholders.

The latest analyses on the review outcomes by AKAST dates back to the period of summer semester 2014 to summer semester 2016.

The SAR also states that in the course of the winter semester 2022/23, an evaluation of the peer review processes carried out by AKAST since the Interstate Treaty came into force was initiated. However, no results are available yet.

### **Analysis**

In the SAR AKAST refers to "structured analysis for the further development of the study quality" as a task that it dedicates itself to in different ways. The review panel, however, discovered that no examples that could be considered as thematic analyses in the current interpretation of the ESG (analysis of the "general findings of their external quality assurance activities") have been published in the reporting period (2018-2023). The standard specifically requires the abovementioned focus and that there is a certain regularity for conducting such analysis.

The latest sample where the findings of external quality assurance activities were analysed dates back to 2016 and another similar evaluation of the peer review processes carried out by AKAST was carried out in the winter semester 2022/ 2023 but no results are available yet. Although the review panel was not able to see the results, from the discussions with AKAST staff and other evidence presented it assumes that this evaluation follows the requirements of the ESG 3.4.

As recommended by the review panel in 2021, AKAST did develop two "spotlights" as described above. However, this student survey and the guiding questions for reviewers do not focus on the outcomes of AKAST assessment procedures therefore cannot be considered thematic analysis as defined by the ESG 3.4.

The review panel is aware that the number of assessment procedures carried out by AKAST is small. However, this is the area in which AKAST operates and the assessments are performed on a cyclical basis. Therefore, AKAST would be able to see and evaluate the progress and also compare the performance of different institutions.

The review panel in 2018 stated that AKAST should give greater weight in future to documenting outcomes of thematic analyses for the public. This could take the form, for example, of position papers

by Agency committees or the written outcomes of workshops where, as is indeed the case, they include description and analysis of findings from AKAST's own accreditation work. AKAST could also make use of the oversight of individual accreditations by a member of the Accreditation Committee or the Advisory Board to gather and record findings on cross-institutional higher education matters and to collect topics for cross-sectional analysis.

The review panel appreciates the joint initiative to develop thematic analyses with GAC. However, in the opinion of the review panel this initiative alone, which is still being discussed, might not fulfil the requirement of the standard as it is not sufficiently agency-specific. The review panel is confident that AKAST as a subject-specific agency and also its stakeholders would benefit the most from analysis based on the outcomes in its specific area of operation rather than a broad overview on the whole German higher education sector. This was confirmed during the interviews when representatives of higher education institutions indicated that they would be interested in comparative studies and main findings from the review of other institutions offering studies of Catholic Theology.

The review panel is aware that the small size of the AKAST office poses a certain limitation due to human resources. On the other hand, the review panel heard from the Executive Board that human resources are not an issue and there is no need for more. A viewpoint was also expressed that thematic analysis should be the responsibility of the different governing bodies (Accreditation Committee, Advisory Board) rather than the office and there is an issue of allocating time as the members of these bodies are volunteers. The review panel would like to emphasise that producing a thematic analysis does not require an advanced research capacity and the format and volume of analysis can be different depending on the number of assessment procedures carried out. Moreover, a thematic analysis in the format as proposed by the 2021 review panel and supported by the current review panel, does not require extensive resources, especially given the number of assessment procedures coordinated by AKAST in a year (6 on average) and the fact that the AKAST Administrator is always present at and coordinates all AKAST review procedures.

### **Panel recommendations**

1. Develop a plan for producing thematic analysis that would be based solely on the information and resources gathered by AKAST. Decide upon the type of thematic analysis that would be the most useful for AKAST and its stakeholders, taking into account that the thematic analysis has to be focused on the outcomes of external assessment procedures.
2. Allocate sufficient human resources for performing the tasks related to thematic analysis. Plan for stable resources (human, financial) allocated to thematic analysis that do not solely rest on members of different bodies further volunteering in a role that is already voluntary.
3. Adapt the methodology of the thematic analysis to the available human resources and context (small number of processes, dialogical culture of feedback) and appropriately take advantage of the opportunities offered by qualitative methodology with in-depth examination of individual cases.

### **Panel conclusion: partially compliant**

## ESG 3.5 RESOURCES

Standard:

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

## Evidence

AKAST was founded as a non-profit association and the members of the Executive Board, the Accreditation Committee, the Advisory Board and the Complaints Committee are volunteers.

AKAST generates income primarily from the grant from the VDD and the fees that universities pay for the procedures. The amount of the grant is defined and accounts for approximately 75% of the total annual income. With this income, AKAST covers its annual expenses. More detailed information on the AKAST budget is available in the section "AKAST's funding".

AKAST maintains an office in Ingolstadt with administrative support from the Catholic University of Eichstätt-Ingolstadt under a cooperation agreement. The AKAST's office is staffed by two permanent employees - an administrator and a part-time (0,5 FTE) secretary. A student assistant was hired to provide support before and during the ENQA review. The KUE Foundation serves as employer for the AKAST's staff but the employment contracts are signed off by the AKAST's Chairperson.

The AKAST's Administrator is responsible for:

- running the Office and conducting the day-to-day business in consultation with the Executive Board;
- technical processing (coordination) of peer review procedures;
- accompanying and supporting the work of all the decision-making bodies, in particular preparing their meetings and resolutions;
- keeping the decision-making bodies continuously informed about national, international and ecclesiastical developments relevant to the work of AKAST.

During the site visit the review panel learned that AKAST itself estimates its capacity as sufficient for coordinating six assessment procedures per year. With this number of assessments AKAST is able to forecast and plan the workload - the reviews take place on a cyclical basis and the study programmes that fall under the responsibility of AKAST are fixed and known to AKAST.

A major issue, also highlighted in the SWOT and SAR is the sustainability of AKAST's human resources with the retirement of the Administrator expected in the foreseeable future. The Administrator herself and the AKAST's team was confident that transmission of knowledge and tasks would take place by gradually reducing the workload of the Administrator. However, the concerns of AKAST include the significant number of tasks currently performed by one person and the need for deep and very specific background knowledge and experience. Also, the interviewees expressed worries in relation to the competitive nature of Administrator's remuneration.

Since its establishment in 2008, AKAST has benefited from a cooperation agreement with the "Accreditation, Certification and Quality Assurance Institute" (ACQUIN). The cooperation agreement with ACQUIN ensures that temporary workloads at AKAST can be absorbed and administrative support can be provided for the conduct of accreditation. The cooperation agreement is of five years duration and is evaluated before renewal for a further five years. The current agreement ends in 2023. Each accreditation agreement that AKAST concludes with a higher education institution contains an obligatory clause stating that ACQUIN can be commissioned by AKAST to carry out individual procedural steps, with the exception of reviewer nomination and the preparation of the accreditation report with decision and evaluation recommendation. At staff level, regular working discussions take place between both agencies. As a rule, an exchange of information and experience between AKAST and ACQUIN takes place once a year at management level, in which the appointed representative of the DBK participates if necessary.

AKAST maintains an office at the KUE, which is supported administratively by the KUE in accordance with the AKAST/KUE cooperation agreement. In practice this means that the AKAST office space in

Ingolstadt is rented by KUE and used by AKAST. If needed, AKAST can also use the KUE premises for workshops, meetings etc. The KUE Foundation provides the necessary material and spatial requirements for the maintenance of the office and arranges the necessary services (rent, cleaning, post, telephone, etc.) The cooperation agreement defines that AKAST itself pays for the goods and services it uses while the KUE provides all administrative support free of charge. The current cooperation agreement with the KUE Foundation is valid until December 2023. Another cooperation agreement exists between the VDD and the KU Eichstätt-Ingolstadt for administrative support of the AKAST office. It states that the staffing costs are refunded to KUE directly by VDD.

The AKAST's website is hosted and maintained by a professional company. The content design is the responsibility of the AKAST Office.

## **Analysis**

The review panel was impressed to learn that AKAST's operation is managed by 1.5 FTE staff. In addition to that, the Executive Board and members of all other AKAST's bodies are volunteers. The continuity of AKAST's operation is ensured by the cooperation agreements with ACQUIN and KUE Foundation.

Based on the evidence presented above, the review panel concludes that the available resources are sufficient for operation in a very efficient manner and that the major workload is covered by the very experienced AKAST Administrator and the voluntary role of AKAST Chairperson. The review panel learned that the cooperation between AKAST and ACQUIN has a long history and both agencies are well connected with each other, therefore the core object of the agreement is mutual cooperation. However, the services provided by ACQUIN cannot adequately replace the role of the Administrator in the long run.

The AKAST's SWOT analysis highlights the issue of human resources and the fact that the current AKAST's Administrator will retire in the near future, thus leaving an open question about the replacement. The review panel clearly saw that with the current amount of obligations it would not be possible to find a new person who could fulfil all these tasks right away. The review panel was assured that the Executive Board and the DBK are actively looking into the need for a replacement and that a handover period with the current Administrator is foreseen.

The review panel learned that both the agreement with ACQUIN and KUE Foundation expire this year and discussed the risks of not prolonging these agreements. The review panel was assured both by ACQUIN and the KUE Foundation that such risks do not exist. Relationships with both institutions are close and long-standing. Both institutions were clear in their motivation to support AKAST.

Also, in regard to the cooperation agreement with ACQUIN, the review panel learned that the possibility of using ACQUIN's human resources is treated as an emergency solution rather than a frequent practice. As described in the evidence section and also under ESG 3.6, the role of ACQUIN is clearly defined in the cooperation agreement and strictly limited to certain tasks. In the opinion of the review panel, the nature of cooperation and the role of ACQUIN does not pose any threats to AKAST's compliance with the ESG and this is also ensured by AKAST's internal quality assurance system.

The review panel explored the opinion of AKAST regarding securing additional resources through further activities that are not developed/identified yet. While AKAST admits in the SWOT analysis that the resources are scarce, it was surprising to the panel that no dissatisfaction with the current resources or ambition for more was expressed during the site visit. From the viewpoint of the panel there are clearly some areas that would benefit from additional resources, for example thematic analysis. Additional human resources might also be needed in the light of the future retirement of the Administrator who, according to interviewees, "does the work of several people". Hence, the review

panel encourages AKAST to consider new sources for additional funding to mitigate personnel risks and take on necessary activities such as thematic analysis.

### **Panel commendations**

1. The panel was impressed by the universal praise from the stakeholders for the work of the office, and in particular for the Administrator.

### **Panel recommendations**

1. Perform robust and forward-looking planning of human resources and financial resources in order to accommodate the foreseen transitions in the office as well as additional intellectual capacity needed to perform important internal quality assurance and developmental processes and processes/products stipulated by the relevant quality standards (ESG).
2. Diversify the funding to prevent excessive financial dependency on one stream of funding.

### **Panel conclusion: compliant**

## **ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT**

Standard:

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

### **2018 review recommendation**

In the forthcoming revision of the Agency's basic documents, either the Statutes should be brought into line with the Advisory Board's working practices or the Advisory Board should also hold meetings as a separate body.

### **Evidence**

AKAST's understanding of quality, as formulated in the Mission Statement, is based on the principles of academic freedom and university autonomy and thus on the responsibility of the universities and faculties for the quality of the study programmes and the measurement and validation of the universities' objectives. AKAST's understanding of quality is bound to the requirements of national state higher education law, and to the requirements of state-church law, including the relevant church regulations mentioned in the concordats or state-church treaties.

The basic principles are summarised in the document "*Das System der internen Qualitätssicherung von AKAST e.V.*" (AKAST e.V. internal quality assurance system). The document in German is available publicly on AKAST's website. This concept was adopted by the Executive Board on 26 May 2014 after prior consultation of the Accreditation Committee and was editorially revised for the last time in February 2023. AKAST claims that its system of internal quality assurance is suitable for assessing the effectiveness of the internal control processes.

According to the Internal Quality Manual (IQM), the assessment of the quality of the study programmes is oriented towards:

- the goals set by the higher education institution within the framework of an overarching strategy,
- to the national and international standards to be met at the same time,



- on the validity of the study objective and study design in connection with the possibility of fulfilling the objective.

AKAST has defined 11 quality standards (requirements) and related measures in four areas. The four areas are:

- Ensure long-term establishment as a professionally competent quality assurance agency in the national context through authorisation by the Accreditation Council based on successful registration on EQAR (European Quality Assurance Register for Higher Education);
- Ensuring and further developing the high quality of the quality assurance procedures carried out by AKAST;
- Promotion of the Faculties and Institutions of Catholic Theology through the high level of professional competence of AKAST resulting from its specific construction and special position;
- Ensure adequate sustainable staffing and equipment in all areas

AKAST has developed a welcome letter and information package for newly elected members of the Accreditation Committee, the Advisory Board and the Complaints Committee. These letters are provided to all newly elected members.

The elected members of AKAST's bodies and the members of the review panels declare their impartiality to AKAST and sign a Declaration of Impartiality, Confidentiality and Data Protection. There is a separate template for Executive Board, Accreditation Committee, Advisory Board and Complaints Committee. The review panel was provided templates for all such declarations.

In the IQM AKAST states that higher education institutions as well as the reviewers are asked for their feedback in writing through anonymous questionnaires. According to the IQM, the results of these questionnaires are presented to the Executive Board, the Accreditation Committee and the Advisory Board. The SAR emphasises several times that through regular surveys of the higher education institutions and review panels, AKAST receives feedback on the procedures' fitness for purpose and for their improvement. However, the representatives of the review panels and higher education institutions interviewed by the review panel did not recall filling any written questionnaires. From the interviews with AKAST office the review panel learned that the feedback is in practice gathered through individual conversations with each higher education institution and each reviewer and the office is currently considering survey tools for anonymous feedback.

The AKAST SAR states that after the peer review processes have been completed, they are regularly evaluated, based on the feedback collected for a number of reviews, and a summary report is compiled. However, as explained under the ESG 3.4, the latest evaluation (summary report) available is the one from summer semester 2014 to summer semester 2016. There is another evaluation initiated in the course of the winter semester 2022/23 of which the results are still pending.

Another internal tool for ensuring the consistency and quality of review processes, is the appointment of rapporteurs from the Accreditation Committee or the Advisory Board. There is a rapporteur for almost every assessment procedure by AKAST and it can come from either of the two bodies.

According to the cooperation agreement with ACQUIN, the agency ACQUIN can be commissioned to carry out procedural steps, with the exception of reviewer nomination and the preparation of the accreditation report with decision and evaluation recommendation. These steps would normally be carried out according to the operating principles of AKAST. While the methodologies of AKAST would be used, ACQUIN is also listed on EQAR and authorised by GAC, thus ensuring that both agencies act in line with the ESG.

In the SAR AKAST reports that, according to the recommendations from the 2018 review, it now holds meetings of the Advisory Board as a separate body. This takes place in rotation, while maintaining the proven and appreciated practice of joint meetings with the Accreditation Committee.

From the SAR and the IQM the review panel learned that the feedback mechanisms are mostly related to execution of accreditation procedures and not the general operation of AKAST (performance of different AKAST bodies, external opinion on AKAST etc.)

The AKAST's office is entitled to standard professional development opportunities that are provided to KUE staff. In this case the activities are planned and also covered by the KUE. The AKAST's Secretary reported the use of some courses related to her work duties. The AKAST's Administrator attends the meetings and conferences available to the staff of quality assurance agencies in Germany and there is a possibility to include additional activities in the AKAST budget.

## **Analysis**

The review panel appreciated the well-developed documentation on the internal quality assurance system that clearly defines the different objectives and measures. However, the review panel questions the complexity of several processes, for example surveying the reviewers and the higher education institutions that have taken part in reviews.

In the opinion of the review panel, surveying the reviewers and higher education institutions is one of the most important tools for a quality assurance agency. While the AKAST IQM states that written feedback is asked after each assessment procedure, the review panel learned that this practice has not been applied. None of the interviewed experts or representatives of reviewed institutions recalled any written interaction with AKAST in this regard. On the contrary, all experts and higher education institutions highly praised the communication with the AKAST office, in particular, the Administrator, and stated that feedback is collected and considered on a daily basis therefore making the interaction with AKAST pleasant and very efficient. The review panel also notes that the representatives interviewed were not able to express even the slightest criticism towards AKAST.

The review panel fully understands the scope of AKAST and considers that written surveys might not be the best tool for AKAST. Still, AKAST has chosen to document that it carries out written surveys in which case the review panel believes that the IQM should align with actual practice. It is also not clear what happens with the results of questionnaires as the review panel did not find any evidence that the point 6 of the internal quality assurance system (Feedback: analysis and improvement) is implemented in practice.

The review panel notes that currently only one summary report on the feedback is available and another one is still pending. Based on the discussions with the experts and representatives of reviewed institutions, the review panel suggests that an aggregated feedback for a number of reviews (instead of an individual discussion with each institution and reviewer) could contribute to a more active and dynamic dialogue between AKAST and its stakeholders.

Also, the review panel considers that it is important to collect stakeholder feedback on the general operation of AKAST and its structures on a regular basis. This could provide valuable input for the future SWOT analysis and ensure that a wider range of stakeholders is involved in AKAST's performance evaluation.

AKAST itself refers to the rapporteurs as a tool to ensure consistency of reviews. While the review panel agrees that it is a valuable tool, it questions the necessity to have both the AKAST Administrator and a rapporteur accompanying all review panels. Based on the discussions during the site visit, the

review panel also concludes that the understanding of the rapporteur's role varies somewhat depending on individual rapporteurs.

Consistency is guaranteed in the case that ACQUIN takes over parts of the assessment procedures, as the procedural steps included in the cooperation agreement are aligned with the ESG and ACQUIN is also listed on EQAR and authorised by GAC.

The AKAST's staff seemed content with the professional development opportunities that they have. However, the question of continuous and appropriate professional development will become very valid with the gradual retirement of the Administrator and a realistic assumption that it will take years of professional development for a new employee to reach the level of preparedness of the current Administrator.

The *Use and Interpretation of the ESG for the EQAR* for ESG 3.6 also imply that instances of partial compliance and recommendations (raised in a previous external review by a panel or by the Register Committee) should be responded to appropriately. The review panel acknowledges that AKAST has, overall, been effective in addressing the issues raised by the previous review panel. Of the four recommendations made in the 2018 review (please see the relevant sections of the expert report for evidence and analysis), AKAST has implemented all but the recommendation that "AKAST should publish more findings from analyses of its own work in future", as the AKAST's plan to further develop a thematic analysis after an appropriate number of programme accreditation, as presented to the EQAR Register Committee in 2021, still has not been finalised. The issue of thematic analysis is further elaborated under the ESG 3.4.

In February 2023 AKAST submitted a substantive change report regarding the discontinuation of the institutional evaluation procedures. The review panel concludes that AKAST is committed to reporting substantive changes which is an important element in monitoring continued compliance to the standards.

### **Panel commendations**

1. The review panel commends the practice of feedback provision and discussion about individual accreditation processes.

### **Panel recommendations**

1. Align the internal quality manual not only with the procedures of feedback collection already in place, but also in line with the qualitative methodological conventions (e.g., transcripts, minutes, interview notes etc.).
2. Analyse AKAST operations in an aggregate rather than individual manner (annual, bi-annual) and present them in a single document/ report.
3. Introduce tools and processes that would encompass operations beyond regular accreditation processes (e.g., satisfaction with the performance of different bodies etc.)
4. Codify the role of a rapporteur and the level (if at all) of his/her active intervention during the visit/ procedure.

### **Panel conclusion: compliant**

## ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

## Evidence

According to the requirements for agencies operating in Germany that are in force since 2018, it is necessary to obtain authorisation by GAC. This authorisation is granted permanently on the basis of an agency's registration with the European Quality Assurance Register (EQAR), with the possibility of revocation.

In order to renew the registration on EQAR, AKAST is obliged to undergo an external peer review against the ESG every five years.

Since its foundation AKAST has been externally reviewed by the GAC three times. AKAST was accredited as an accreditation agency for the first time in October 2008. In 2013 and 2018, AKAST was reaccredited by the GAC for five years in accordance with the "Rules for the Accreditation of Agencies" of the GAC in the respective valid version and authorised to operate in Germany. The current term of authorisation ends in 2023.

Since 2018 the authorisation by GAC is linked to registration on EQAR and any agency operating in Germany must be registered on EQAR. This implies that the agency has to comply with the ESG as the ESG compliance is the fundamental requirement for registration on EQAR and subsequent authorisation of the EQAR-listed agency by the GAC.

## Analysis

AKAST has to take both the accreditation requirements of the Interstate Treaty including the ESG and the special Church regulations for the reviewed programmes into account. The recognition of AKAST by AVEPRO (as an agency connected to the Holy See) is also crucial for the operation of AKAST. The agency has demonstrated its commitment to compliance with the ESG by undergoing reviews against the ESG since its establishment. The commitment of AKAST is to a large extent related to the formal requirements for quality assurance agencies operating in Germany. Registration on EQAR is a necessary requirement for authorisation by the GAC which is in turn a condition for the accreditation of the programmes that fall under the remit of AKAST. Over the years the agency has proven its capacity to balance these multiple requirements from different organisations and find its own space as an independent agency. Although the review against the ESG and EQAR registration could be seen as another hurdle to take in order to operate in this complex landscape, AKAST has proven its commitment to the cyclical ESG reviews. This is also evident by the investment of AKAST in the preparation for the review against the ESG which is not a light burden for a small agency.

**Panel conclusion: compliant**

## ESG PART 2: EXTERNAL QUALITY ASSURANCE

### ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part I of the ESG.

## Evidence

AKAST carries out two assessment procedures:

- Programme accreditation of canonical study programmes and non-canonical study programmes with Catholic Theology/Religion according to the Interstate Treaty;
- Peer review of other study programmes with canonical effect that are not covered by the Interstate Treaty.

The assessment criteria used for external quality assurance in Germany are developed on the national level. These criteria are binding for all German quality assurance agencies operating in Germany within the Interstate Treaty.

Although AKAST takes part in the regular meetings of all agencies authorised in Germany by the Accreditation Council, it is not able to and does not perform any independent work in regard to updating and improving the national standards. The review panel notes that in the German system, the agencies do not have the competence to set the standards. The 2023 SAR and also the 2018 review report, however, note that AKAST has participated in updating the “KMK Key Points” within the working group by DBK and has also been involved in evaluating the ecclesiastical requirements.

AKAST has chosen to use the same assessment criteria for both the assessments within the Interstate Treaty (GAC accreditation) and for the assessments not regulated by the Interstate Treaty (AKAST Quality Seal). The assessment criteria are presented in the AKAST guidelines for higher education institutions on preparation of the self-assessment report.

AKAST focuses on programme assessment only, therefore it is not able to evaluate the internal quality assurance system of an institution as a whole. In each specific case, the focus of the programme accreditation should be considered together with other procedures that the higher education institution undergoes.

Also, the Section 22 (4) of the Specimen Decree states that single-subject Catholic theology study programmes are solely accredited by way of programme accreditation so it is not legally possible to incorporate this accreditation into system accreditation.

The Interstate Treaty (specifically, paragraphs 1- 4) defines the formal criteria for assessing the quality of study programmes, their structure, duration and profiles of study, admission requirements and student transitions, qualifications, modularisation, mobility and the credit points system, as well as measures to recognise outcomes achieved outside higher education. Among the academic criteria, it lists qualification goals, programme coherence, equality and academic success measures, and the concept of quality management and the measures through which it is implemented. The formal and academic criteria are then further defined and specified in the Specimen Decree.

The mapping of the Specimen Decree standards (sections) against the ESG Part I was carried out by the GAC in 2018 and the grid as the template for the expert report is binding for all quality assurance agencies operating in Germany. The mapping is demonstrated in Table I.

Table I

Mapping of standards against the ESG

<b>ESG 2015</b>	<b>Programme accreditation</b>	<b>System accreditation</b>
I.1 Policy for quality assurance	§ 14 Academic success	§ 17 Concept of the quality management system (goals, processes, instruments)

<p>1.2 Design and approval of programmes</p>	<p>§ 11 Qualification goals and qualification level;</p> <p>§ 12 Coherent study programme concept and adequate implementation;</p> <p>§ 13 Subject-content organisation of the study programmes</p>	<p>§ 17 Concept of the quality management system (goals, processes, instruments)</p>
<p>1.3 Student-centered learning, teaching and assessment</p>	<p>§ 12 Coherent study programme concept and adequate implementation (paragraph 1);</p> <p>§ 15 Gender equality and compensation of disadvantages</p>	<p>§ 17 Concept of the quality management system (goals, processes, instruments)</p>
<p>1.4 Student admission, progression, recognition and certification</p>	<p>§ 5 Admission requirements and transitions between different courses;</p> <p>§ 6 Qualifications and qualification designations;</p> <p>§ 12 Coherent study programme concept and adequate implementation (paragraph 1);</p> <p>§ 14 Academic success</p>	<p>§ 17 Concept of the quality management system (goals, processes, instruments)</p>
<p>1.5 Teaching staff</p>	<p>§ 12 Coherent study programme concept and adequate implementation (paragraph 2)</p>	<p>§ 17 Concept of the quality management system (goals, processes, instruments)</p>
<p>1.6 Learning resources and student support</p>	<p>§ 12 Coherent study programme concept and adequate implementation (paragraph 3)</p>	<p>§ 17 Concept of the quality management system (goals, processes, instruments)</p>
<p>1.7 Information management</p>	<p>§ 14 Academic success</p>	<p>§ 18 Measures to implement the quality management concept, see paragraph 3</p>

1.8 Public information	Publication of examination regulations which contain information on study programmes is obligatory according to the higher education acts of the German states	§ 18 (paragraph 4); Publication of examination regulations which contain information on study programmes is obligatory according to the higher education acts of the German states
1.9 On-going monitoring and periodic review of programme	§ 14 Academic success	§ 18 Measures to implement the quality management concept
1.10 Cyclical external quality assurance	§ 26 Period of validity for the accreditation; extension	§ 26 Period of validity for the accreditation; extension

AKAST is an ecclesiastical agency and, in addition to state requirements, it is also guided by ecclesiastical law. In the SAR AKAST states that the amended ecclesiastical higher education law of the Apostolic Constitution “Veritatis Gaudium” (published on 29 January 2018) concerns ecclesiastical universities and faculties as well as degrees with canonical effect. Due to the coordination between state and church in Germany required under state-church law, the “Accommodation Decree on Faculties of Catholic Theology in the State Faculties in the Area of the German Bishops’ Conference” of 1 January 1983 on the adoption of the provisions of the Apostolic Constitution “Sapientia Christiana” and the “Ordinationes” annexed to it remains in force until it is revised in cooperation with the DBK.

In terms of the programme structure, the legally binding document is the “Key Points for the Study Structure in Study Programmes with Catholic or Protestant Theology/Religion”, the Decision of the Standing Conference of the Ministers of Education and Cultural Affairs of the federal states of the Federal Republic of Germany, adopted on 13 December 2007 and with the current version in force since 08 September 2022. It defines the types/levels of study programmes, degrees to be awarded and the ecclesiastical effects.

In the SAR AKAST states that it organises one-day information events and workshops on the topic of study reform in Catholic Theology. In 2018 the review panel noted that these events are directed at a wide audience, including heads of faculties and higher education institutions, and those in charge of study programme and quality development at Catholic theology faculties and ecclesiastical higher education institutions. However, in 2023 AKAST notes in the SAR that in the reporting period such events have been organised for students only.

### Analysis

The specific setup of external quality assurance in Germany defines that the assessment criteria are agreed on the national level.

The review panel learned that it was the expectation of the higher education institutions that they themselves are the ones that are responsible for their quality. This is also included in the mission statement of AKAST and is how the Interstate Treaty starts, stating that “Assuring and enhancing the

quality of teaching and learning is the primary responsibility of higher education institutions”. The notion of primary responsibility of the higher education institutions has been emphasised by the ESG but it is not always well understood or implemented in many other countries and contexts therefore the review panel considers this as a crucial and very valuable element of AKAST’s work.

There is a uniform template for the expert reports developed by GAC. According to the GAC, the agencies are required to fully cover the grid approved by GAC. They cannot remove any sections but they are able to include additional elements that they would like to emphasise. During the discussions with experts the review panel learned that the template has been considered as restrictive as it does not easily allow demonstration of the specifics of each study programme and institution under review.

In regard to the remark above, the review panel questioned the degree to which AKAST and the higher education institutions feel that the assessment criteria used by AKAST and its stakeholders are actually “owned” by them, rather than externally imposed. The review panel heard in the interviews that it is more the latter and that the institutions and the agency have a rather accepting attitude in this respect. Clearly the aim of AKAST is to ensure that the study programmes it works with comply with both the state requirements and fulfil the expectations by the Church. This is done both with the help of standards and the extensive expert panels that AKAST uses.

The review panel compared the mapping grid (see the Table 1) to the actual content of the Specimen Decree and concluded that the standards are the same. The review panel noted that the mapping grid as provided by AKAST correctly summarises the coverage of all 10 standards in the ESG Part I in AKAST’s criteria for its evaluation procedures. Furthermore, the review panel verified that the review criteria applied by AKAST and included in the “Guidance for Programme Accreditation” for the programme accreditation of canonical study programmes and non-canonical study programmes with Catholic Theology/Religion according to the Interstate Treaty, as legally laid down in the Interstate Treaty and the Specimen Decree, are in compliance with Part I of the ESG. The review panel also verified that the criteria applied by AKAST for peer review of the canonical programmes not covered by the Interstate Treaty are in compliance of the ESG Part I as these essentially follow the criteria for the Interstate Treaty procedures, insofar these are relevant for those specific study programmes (e.g. *Lizentiat*), as outlined in the “Guidance of the peer review of further canonical study programmes”.

The verification of the review panel is supported by the findings of the GAC review in 2021 when the GAC panel carried out a comprehensive analysis of the ESG alignment of the criteria used for the accreditation procedures under the Interstate Treaty. The GAC review's conclusion, also accepted by the EQAR Register Committee was "that the ESG part I are fully encompassed by the Specimen Decree criteria and the way the agencies and GAC take them into account".

**Panel conclusion: compliant**

**ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE**

Standard:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.



## 2018 review recommendation

AKAST should commence the process of revising the relevant documents in line with the new statutory and canon law framework as soon as possible and should combine this with the revision of the website.

### Evidence

AKAST has developed two separate documents with procedural rules and review criteria (valid since 2018) and published them on the website:

- Guidance for Programme Accreditation - programme accreditation of canonical study programmes and non-canonical study programmes with Catholic Theology/Religion according to the Interstate Treaty;
- Guidance of the peer review of further canonical study programmes - peer review processes for canonical study programmes not covered by the Interstate Treaty.

According to the SAR, the revision and updating of the relevant documents was completed in January 2019 (presented and approved by the AKAST's General Meeting on 31 January 2019). The revision of the AKAST website was completed on 23 December 2019.

The overall quality assurance framework (accreditation criteria, procedure and organisation of accreditation) is defined by the states (*Länder*) and further used by all German agencies, including AKAST. The related information published on the AKAST's website also includes the template of the site visit schedule, grid for the expert report, procedure and criteria for appointing experts, complaints procedure and template/guidelines for the self-assessment report. This is the case both for the assessments under the Interstate Treaty and those that are not covered by the treaty.

According to its internal quality manual, in assessing the quality of the study programmes, AKAST is guided by:

- the goals set by the higher education institution within the framework of an overarching strategy,
- national and international and universal church standards to be met at the same time,
- validity of the study objective and study concept in connection with the possibility of fulfilling the objective.

AKAST differentiates the two procedures for obtaining the accreditation by GAC and seal by AKAST. However, in terms of the methodology (procedural reviews and evaluation criteria), both procedures use review criteria that are based, in addition to the ESG, on the Interstate Treaty and the Specimen Decree as well as the relevant church specifications according to the "KMK Key Points".

AKAST also offers a possibility to organise assessments of canonical and non-canonical study programmes jointly with ACQUIN and these are greatly appreciated by the higher education institutions, as confirmed during the site visit.

While AKAST operates within a strictly defined framework that is applicable to all quality assurance agencies operating in Germany, it has chosen to add a number of specific elements to its processes, in particular, enlarged review panels and the appointment of a rapporteur. The review panel composition and the concept of rapporteurs have been described and analysed under the standard ESG 2.4. While the overall assessment framework in Germany is strict and making changes is a slow and complex process, in the past AKAST has been involved in several activities that have impacted on its operation - for example, the evaluation of the guidelines by the KThF, KMK Key Points resolution, evaluation by the DBK of the ecclesiastical requirements where the areas where there is a conflict in accreditation

between the ecclesiastical requirements and the Rules for the Accreditation of Study Programmes were identified.

AKAST operates in a very small community. Thanks to the small number of assessment procedures, the AKAST Administrator is able to support all higher education institutions and review panels in their work. At the request of a faculty or higher education institution, AKAST offers information meetings on the content, rules, criteria and procedure of a peer review process. Before the start of the site visit, an obligatory internal peer review meeting takes place, in which the AKAST Administrator prepares the reviewer panel for its role and task in the specific procedure and discusses open questions about the study programme to be reviewed. In addition to that, AKAST makes use of “rapporteurs” that are members of the Accreditation Committee or Advisory Board and assigned to each review panel with the aim to observe it. The AKAST Administrator also takes notes during the site visit.

The SAR states that the AKAST Office informs the responsible persons at the higher education institutions about important developments in the accreditation system by means of circular letters. From the 2018 review report the 2023 review panel learned that there have been one-day workshops or information events aimed at the higher education institutions, among other stakeholders, but the 2023 SAR does not report any such events.

Despite the fact that the accreditation decisions are taken by GAC, the AKAST Accreditation Committee serves as a gate-keeper, appoints the reviewers and ensures that the review reports produced under the responsibility of AKAST are of high quality and consistent.

### **Analysis**

The external quality assurance system in Germany is highly prescriptive and all the major elements of the methodology are already predefined by the Interstate Treaty and the Specimen Decree that is legally binding for all quality assurance agencies.

AKAST, however, has managed to impact the ecclesiastical dimension of reviews, in particular through evaluation of the guidelines by the KThF, KMK Key Points resolution and evaluation by the DBK of the ecclesiastical requirements. The review panel notes that formal recognition of qualifications by the Catholic Church is inherent in study programmes that have canonical value, therefore the design of methodologies with this in mind is particularly valid. The review panel, however, notes that most of these activities took place in the previous reporting period (2013 - 2018).

While AKAST does not clearly demonstrate that it uses tailored and unique methodologies, the review panel did find proof that there is space for an individual approach, even within the heavily restrictive framework. In particular, AKAST has decided to use enlarged review panels and appoint internal rapporteurs for each review panel. The enlarged review panels were appreciated by all representatives of the higher education institutions, as they cover a wide range of competencies. The role of rapporteur, though, the review panel found to be a little ambiguous because of the impact that the rapporteur could have on the review panel despite his/her observing role. During the site visit the review panel learned that each review panel would be accompanied both by the AKAST Administrator and rapporteur, thus forming a group of 9 people in total for the assessment of a single study programme. In the opinion of the review panel such a group of people is unusually large and could be intimidating, especially for smaller institutions/study programmes.

AKAST has chosen to align the voluntary accreditation (AKAST Quality Seal) with the assessments that fall under the Interstate Treaty by essentially using the same procedures and criteria. It was understood by the review panel that the possibility to ask for the voluntary accreditation is used by those higher education institutions that value the specific expertise of AKAST in the field of Catholic theology. If the same methodologies are used, these assessments are comparable with those

performed under the Interstate Treaty and the requirements of the Catholic Church are integrated in the review process.

### **Panel commendations**

- I. Composition of strong (sub-)disciplinary teams, including members of the world of work, assures balanced and high-quality feedback to the assessed programmes.

### **Panel recommendations**

- I. The role of the accompanying member/observer to the already large accreditation panel should be reconsidered due to the observers' presence throughout the accreditation process (site-visit, preparatory meetings) as well as their possibility to actively intervene.

### **Panel suggestions for further improvement**

- I. Appointment of a panel chair prior to the site visit and broadening his current responsibilities could improve stability of the work and reduce possible unforeseen instances. This could also reduce the burden of the AKAST Administrator.

### **Panel conclusion: compliant**

## **ESG 2.3 IMPLEMENTING PROCESSES**

Standard:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up

### **Evidence**

All procedures carried out by AKAST include:

- a review of the self-assessment or self-documentation submitted to AKAST, in which the higher education institution describes its compliance with the pre-defined and published assessment criteria;
- a site visit (time duration usually 1.5 days) by a panel of experts, based in particular on the examination of the submitted documents and separate interviews with programme managers, university lecturers, students and the institution's management and administrators;
- a report – including an expert decision recommendation – on the external peer review, which, together with the statement of the higher education institution, forms the basis for the decision by the GAC or the Accreditation Committee of AKAST;
- consistent follow-up measures after the final decision.

Each assessment procedure starts with a contract with AKAST. The contract stipulates the overall setup of an assessment procedure, the possibility for the higher education institution to complain, the costs, the format of the external review report, the tasks of the Accreditation Committee and the possibility of the higher education institution to withdraw from the contract. As the number of

procedures that AKAST carries out is relatively small, the AKAST Administrator provides personalised and continuous support to all institutions that AKAST works with throughout the assessment procedure.

### **Self-evaluation report**

When receiving the self-evaluation report (SER), AKAST checks its completeness regarding the standards to be covered. There is a requirement that the SER should not exceed 20 pages for one study programme and 50 pages for a group of study programmes.

### **Site-visit**

The duration of the site visit is usually 1.5 days. The site visit includes discussions with teaching staff, programme managers, students, the institution's management and administrators and, if necessary, a tour of the premises. The AKAST Administrator takes notes of all meetings.

The SER is provided to the expert team at least 4 weeks before the site visit at the same time with documents explaining the tasks and the role of the reviewers as well as the context of the accreditation procedures and the evaluation criteria. There is a mandatory internal peer review (preparatory) meeting led by the AKAST Administrator before each site visit.

The site visit is monitored (observed) by a rapporteur - a designated member of the Accreditation Committee or the Advisory Board.

### **Review report**

In the SAR AKAST states that the review report is prepared by the reviewers and edited and finalised by the Administrator.

The review report is prepared according to the grid set up by GAC. The report contains the evaluation of the binding criteria and a recommendation for decision. The higher education institution has the opportunity to comment on the review reports and to propose corrections.

### **Follow-up**

In the SAR AKAST states that in the peer review processes, according to the Interstate Treaty the follow-up is performed by GAC as the decision making institution. The decision of GAC on "fulfilment of the conditions" also requires an approval of the Church. The responsibility of the AKAST Accreditation Committee is to determine the fulfilment of the conditions on the basis of the evidence provided by the higher education institution and obtain the approval of the Church.

Once the review report is complete, the higher education institution uses the ELIAS application system to submit the SER and the report with annexes, possibly accompanied with a letter commenting on the report, to GAC. Starting from this point, the accreditation procedure is fully implemented by GAC, without participation of the accreditation agency.

The report of the review of the GAC against the ESG from 2022 states that "The follow-up is performed only if there are accreditation conditions imposed, to check on the basis of the documents if they have been met, normally within a year after the accreditation procedure. As noted, the conditions often seem to relate to formalities, or very detailed aspects of the programme and/or system design, and rarely seem to be connected with major issues of quality development. If no conditions are imposed, no follow-up is performed."

In peer review processes of study programmes not covered by the Interstate Treaty, if the assessment result includes any deficiencies, there is an obligatory follow-up. The higher education institution must

react within 12 months after receiving the assessment result and the AKAST Accreditation Committee decides on rectification of the deficiency.

Both from the SAR and during the site visit the review panel learned that ACQUIN could be commissioned to perform certain parts of the assessment procedures, except the appointment of experts and the preparation of the accreditation report with resolution and evaluation recommendation. This disclaimer is also included in all AKAST contracts with the higher education institutions. The review panel learned that in practice ACQUIN would only be involved if the AKAST Administrator was not physically able to perform the relevant tasks.

### **Analysis**

The review panel considers that the review processes by AKAST are implemented consistently and with great care.

As noted earlier, AKAST implements two types of assessments, both for separate study programmes and for groups of study programmes, although the latter rarely takes place. Both types of assessments follow similar methodology and include the same procedural steps - analysis of the self-evaluation report, appointment of an external panel of experts, site visit, decision making by GAC or by the AKAST Accreditation Committee if the programmes are not covered under the Interstate Treaty, and the follow-up.

The AKAST Administrator has a crucial role in ensuring consistency of reviews. The Administrator assists both the higher education institutions and expert panels throughout the assessment process and takes part in all procedural steps.

During the site visit AKAST clearly communicated to the review panel that it is responsible for follow-up only for the assessment procedures not covered by the Interstate Treaty. According to AKAST, as it is the responsibility of the GAC to take decisions on study programmes that fall under the Interstate Treaty, it is also the responsibility of the GAC to perform the follow-up. The review panel also learned that there is no formal interaction between AKAST and GAC after the expert report has been completed and GAC has taken its decision, neither regarding the accreditation of study programmes covered by the Interstate Treaty, nor regarding the subsequent follow-up.

The review panel also notes that the follow-up in AKAST procedures is in general associated with fulfilment of the conditions rather than monitoring of long-term improvements that would not necessarily be related to formal compliance with the standards. By studying the review reports of other German agencies, the review panel notes that this approach to follow-up is a common feature for the German context. In the opinion of the review panel, this, however, does not limit the possibility of the review panels to define long-term developmental recommendations and the ability of AKAST to follow-up on the related developments.

With regard to the current formal setup for follow-up, the review panel did not learn of any actual cases where AKAST had performed follow-up as all procedures outside the Interstate Treaty had concluded with "Positive assessment without deficiencies". However, the review panel was assured that the Accreditation Committee would be able to carry out follow-up measures if necessary.

### **Panel commendations**

- I. AKAST's stakeholders recognise the high quality of AKAST's work in executing assessment procedures and appreciate all the guidance and support provided during the process.

### **Panel suggestions for further improvement**

- I. AKAST could improve the follow-up to its procedures by monitoring the long-term improvements that are not necessarily related to compliance with the standards. This could be done both for the assessments covered by the Interstate Treaty and those not covered.

**Panel conclusion: compliant**

## ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

### 2018 review recommendation

When nominating the second representative from professional practice, AKAST should include theologians from a greater variety of non-ecclesiastical professions.

#### Evidence

All AKAST' expert panels are approved by the Accreditation Committee. The expert selection follows the guidelines for the appointment of reviewers of the German Rectors' Conference (HRK) General Assembly of 24 April 2018, which was adopted by the Foundation Council of the GAC in accordance with Article 3 (3) of the Interstate Treaty. The criteria and procedure are further defined by AKAST in the "Procedure and criteria of the appointment of reviewers at AKAST" that is publicly available on the AKAST website.

First, the Accreditation Committee shortlists experts for a certain procedure from the AKAST expert pool. Then, the office requests the willingness of the proposed reviewers by e-mail or telephone and checks these persons for possible conflicts of interest. The Accreditation Committee decides on the final composition of the expert panel based on the proposal made by the office.

The Interstate Treaty specifies that accreditations must be implemented by external experts, the majority of whom are academics. The Specimen Decree further specifies that in programme accreditations, the panels are composed of 2 academics, a student and a representative of professional practice. Because of the specific area in which it operates, AKAST has chosen to use considerably larger review panels. The AKAST expert panels for the peer review of the study programmes in Catholic Theology (full study programme) generally include four professors from the four sub-fields of Theology, one student representative and two representatives of professional practice, including a rector of a seminary. The panel thus consists of 7 experts. As a response to the 2018 recommendation, AKAST states that it continually strives to take into account the diversity of extra-church professional fields when appointing the second person from professional experience. The spectrum of professional fields now ranges from adult education, journalism, publishing, radio, television, library to associations and organisations. The 2018 review panel in particular suggested the inclusion of theologians in the charities, non-profit or policy consulting sectors.

The expert panel for the peer review or accreditation of other study programmes with canonical effect, includes at least two professorial representatives, one student representative and one person of professional experience.

The professorial representatives must have, in addition to the relevant professional expertise, reviewer competence in accreditation and/or evaluation procedures (in particular knowledge of the

procedure and the church and state regulations, knowledge of the German higher education system and the Bologna Process) and competence in the areas of study programme development and quality assurance.

The reviewers must declare in writing their independence, impartiality and confidentiality beyond the end of the procedure. They also declare their willingness to have their names published together with the decision and the review report following the procedure.

The AKAST office informs the higher education institution about the panel composition as approved by the Accreditation Committee. The higher education institution can submit justified objections within 10 working days. The higher education institution may submit proposals for the subject profile of the review panel but it has no right of proposal or veto of certain experts.

AKAST maintains a pool of professorial representatives and representatives from professional experience. According to the "Procedure and criteria of the appointment of reviewers", the reviewers shall be nominated by the Association of Faculties of Catholic Theology, by the Association of the workgroups of Catholic Theology, by other academic societies and by the German Seminary Rectors' Conference and other professional fields (including the Conference of Mentors and Training Directors for Pastoral Ministers, media, association work).

The student reviewer pool of AKAST is managed by the Association of Theology Students (AGT) in close cooperation with the office. Student members are nominated by the AGT during its General Meeting separately for each review procedure.

Overall, the AKAST pool of reviewers currently has 221 members - 129 professorial representatives, 52 professional experience representatives, including 15 rectors of seminary, and 40 student representatives. In the SAR AKAST states that since its founding, AKAST has conducted 52 peer review and accreditation procedures, which were carried out by a total of 221 reviewers. Also, twenty-one reviewers with foreign expertise have been deployed (as of February 2023).

The AKAST Administrator prepares the reviewers intensively for their work and for the specific peer review process. For this purpose, the Administrator offers special information events that are advertised on the AKAST's website or allows sufficient time for a comprehensive and detailed preliminary discussion for the procedure-related preparation of the review panel in the context of concrete site visits.

In addition, each review panel receives separate instructions together with the self-evaluation report of the higher education institution, a report prepared by AKAST on compliance with the formal criteria, information materials on accreditation with the relevant state and ecclesiastical requirements, and documents of an organisational nature.

### **Analysis**

The review panel considers that the comparatively large review panels (four professors, two people from professional experience, one student representative) is a definitive feature of AKAST's work and ensures a high level of professional competence and acceptance. During the interviews, the review panel received confirmation that the size and composition of the review panels is greatly valued by the higher education institutions.

Regarding the recommendation from 2018, the review panel learned that the background of reviewers with professional experience is very diverse and the reviewers are invited based on the specific features of each study programme. The review panel therefore concludes that the recommendation from 2018 is fulfilled.

The review panel notes that AKAST is very active in networking with its stakeholders in regard to reviewer nomination. In particular, the cooperation with the AGT is successful and long lasting. The student representatives met by the review panel were very satisfied with the communication with AKAST. The workshops for students are delivered both during the AGT general assemblies and separately in the online format. AGT has the mandate to nominate representatives both to the Accreditation Committee and the Complaints Committee and also to provide a specific nomination for each assessment procedure.

The review panel understands that AKAST operates in a specific area and the expert selection is a complex and time-consuming process where in the result the size and diversity of review panels is very much appreciated by the higher education institutions. The review panel, however, considers that AKAST could benefit from publishing an open call for experts on the AKAST website with clear instructions on who the nominating organisations are. This could further strengthen the diversity of extra-church professional fields, as recommended by the review panels in the past, and possibly open AKAST up for new networking opportunities.

The review panel also observed that AKAST has a long-standing cooperation agreement with ACQUIN, an agency that has significantly more staff members than AKAST (20 employees in 2021) and which carries out a comparably larger number of assessment procedures. As required for compliance with the ESG, ACQUIN carries out training for its reviewers. In the opinion of the review panel, the AKAST pool of experts could benefit from a general training offered by ACQUIN and this would reduce the amount of human resources required from AKAST for training its reviewers. The review panel noted that organising joint training events is mentioned as an activity in the cooperation agreement with ACQUIN but learned that no joint training has been held thus far.

The review panel understands that the specific composition of the review panel is tailored to the specific study programme and the number of active experts on a yearly basis is very small compared to the size of AKAST's reviewers' pool. The reviewers met by the review panel generally indicated that they feel well prepared for the task. However, only few were able to recall specific training, in addition to instructions provided right before the site visit. The review panel therefore considers that AKAST would benefit from the requirement for reviewers included in the AKAST pool to undergo general training on a regular basis. This is now made easier because of the online tools.

### **Panel commendations**

1. Review panels include a large variety of stakeholders.
2. The reviewers showed great commitment to AKAST and the review panel was particularly impressed by the cooperation with the student union and also by the professionalism of the student reviewers the panel met.

### **Panel recommendations**

1. Ensure that all potential review panel members receive consistent training before engaging in a review procedure.
2. Publish an open call for experts on the AKAST website.

### **Panel conclusion: compliant**



## ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

### Evidence

There is a clear separation on how the outcome is determined for peer review processes according to the Interstate Treaty and peer review processes of study programmes not covered by the Interstate Treaty.

The designated body of AKAST in relation to assessment outcomes is the Accreditation Committee. The structure of AKAST and composition of its decision-making bodies enable the agency to undertake accreditation procedures that meet the approval of the Catholic Church.

### Peer review processes under the Interstate Treaty

In the German accreditation system regulated by the Interstate Treaty there is a clear differentiation between the compliance with the formal criteria and academic criteria. The final decision of the German Accreditation Council (GAC) comprises the determination of compliance with the **formal criteria** pursuant to Article 2 paragraph 2 of the Interstate Treaty (such as the Bologna three cycle structure, awarding a correct number of ECTS and issuing the correct qualification) and the determination of compliance with the **academic criteria** pursuant to Article 2 paragraph 3 of the Interstate Treaty. The Interstate Treaty and related regulations set the standards for decision on compliance with the formal criteria, and the decision itself is an administrative act according to the German Administrative Procedure Act. The decision on the compliance with academic criteria is taken on the basis of the review report and a justified deviation is possible.

This setup is reflected in two separate parts of the report - one for compliance with the formal criteria and another one for compliance with the academic criteria. For both parts of the report there is a template provided by GAC that is not allowed to define any criteria in addition to those in the Specimen Decree but is allowed to issue guidelines and interpretations.

Decisions in programme accreditation procedures according to the Interstate Treaty lead to a formal decision (accreditation or non-accreditation) by the GAC. Accreditation can be linked to conditions, the fulfilment of which must be proven within a certain period of time. In these peer review processes, the reviewer's decision recommendation (proposal on determining compliance with the applicable criteria) is determined by the AKAST Accreditation Committee, taking into account the statement of the higher education institution where the higher education institution can indicate any factual errors identified in the report. The applicant higher education institution receives the accreditation or review report, which contains the reviewers' decision recommendation, for comment before the decision is made. It should be noted that this opportunity for factual comments on the review report is not foreseen by the Interstate Treaty or the Specimen Decree but is added by AKAST for its procedures. The review panel perceives this to be in line with international good practice.

Subsequently, the approval of the relevant Church office required for the accreditation decision is obtained. Both processes are documented in the accreditation report and the accreditation report is handed over to the higher education institution. It is then the responsibility of the higher education institution to submit the review report, including the approval by the Church, to the GAC - both for

accreditation purpose and at a later stage, if applicable, also for determining the fulfilment of the conditions.

### **Peer review processes not covered by the Interstate Treaty**

In the case of peer review processes of study programmes not covered by the Interstate Treaty, the Accreditation Committee of AKAST makes the decision on the assessment result on the basis of the final report and the statement of the higher education institution, similar to the procedures carried out under the Interstate Treaty. As mentioned in earlier sections of the report, these review processes also use the review criteria based on the Interstate Treaty and the Specimen Decree as well as the relevant Church specifications according to the "KMK Key Points". Deviations from the review report's decision recommendation must be comprehensively justified by the Accreditation Committee. Since these procedures are not accreditation procedures according to the Interstate Treaty, the consent by the relevant Church office does not have to be obtained.

AKAST states in the SAR that the consistent application of the criteria is ensured in particular by the multi-stage procedure, with the peer review by the review panel and resolution or proposal for the determination of compliance with the relevant criteria by the Accreditation Committee of AKAST. A specific feature of AKAST is the discipline-specific focus of the Accreditation Committee that adds to the consistency of decisions, as the committee deals with theology or theology related study programmes only. Another specific feature for ensuring the consistency of outcomes is the involvement of members of the Accreditation Committee or Advisory Board as rapporteurs as they could advise the expert panel. The AKAST Administrator has organisationally supervised all AKAST peer review processes and therefore can support the panels.

The applicant higher education institution will be informed of the outcome of the procedure by means of a decision letter shortly after the meeting of the Accreditation Committee. Also the reviewers that have taken part in the assessment are informed of the outcome of the procedure promptly after the meeting of the Accreditation Committee by means of a decision letter.

As explained under ESG 2.2, the review criteria are defined by the Guidance for Programme Accreditation and Guidance of the Peer Review of Further Canonical Study Programmes that are both based on the Interstate Treaty and Specimen Decree and published on the AKAST website.

### **Analysis**

AKAST clearly separates the two procedures - under the Interstate Treaty and not covered by the Interstate Treaty - in terms of AKAST's mandate. However, the basis for decision making is identical in both cases - a formal report produced by AKAST and a review report produced by the expert team that is followed by a statement of the higher education institution on any factual errors identified in the review report and is further considered by the AKAST Accreditation Committee.

Based on the evidence available, the review panel concludes that the legally binding criteria for outcomes are defined by the Interstate Treaty and Specimen Decree and incorporated in the guidance documentation by AKAST (Guidance for Programme Accreditation and Guidance of the Peer Review of Further Canonical Study Programmes). According to the interviews during the site-visit, AKAST Administrator provides exceptional guidance both for the higher education institutions and review panels, also in regard to finding all the relevant information on how the outcome is formed.

As already explained under ESG 3.3 the assessment procedures of canonical study programmes covered by the Interstate Treaty require the consent of the relevant Church authorities. The consent is not necessarily aligned with the findings of the expert team; it is a separate outcome by itself and cannot be considered an outcome of the AKAST procedure. The review panel understands the need to have the Church consent for such highly specific and professionalised study programmes with the

main employer of the graduates, the Church in this regard. It is important that the Church representative, if not a member of the expert team, does not externally affect the outcome of the assessment procedure coordinated by AKAST. While the 2018 setup of decision making was problematic and a reason for the initial rejection by the EQAR Register Committee, the review panel considers that the current situation regarding the outcome is optimal with the condition that the review outcome proposed by the expert team is not challenged by the Church but a consent is provided in parallel. In the opinion of the review panel, in case the Church possesses evidence that could be crucial in defining the review outcome, there should be a way to provide it to the expert team at an earlier stage for their consideration.

**Panel conclusion: compliant**

## ESG 2.6 REPORTING

Standard:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

### Evidence

As mentioned previously AKAST produces a report on the fulfilment of formal conditions (written by the agency staff) and a report on the fulfilment of academic conditions (written by the review panel). Both reports are made with a template provided by the German Accreditation Council (GAC) and submitted to GAC by the higher education institution being accredited.

The review reports, including the AKAST decision, are published both on the AKAST website and, since 2018, can also be found on the Electronic Information and Application System (ELIAS database) maintained by GAC (<https://antrag.akkreditierungsrat.de/>) and in the rubric “Accredited programmes and HEIs” on the GAC public website. This also concerns negative decisions.

The AKAST’s website contains a list of the assessment procedures performed and all review reports, including the decisions, are published. The GAC system also shows the full composition of the expert panel, a short profile of the study programme and a summary of the assessment as well as the history of previous assessments. In peer review processes of study programmes not covered by the Interstate Treaty, the full expert reports are published on the AKAST website.

Since 2021, when AKAST was registered on EQAR, it has uploaded 6 review reports to DEQAR. All 6 reports date to 2021 and 2022, after AKAST was listed on EQAR and was eligible to upload its reports.

In the German accreditation system (cf. Section 24 Specimen Decree), the accreditation reports (consisting of the formal report and the reviewer report) must be prepared in the structure specified by the GAC. The GAC has adopted a total of four different templates for the different procedure models in the German system: Programme Accreditation Single, Programme Accreditation Bundle, Programme Accreditation Combined Study Programme and System Accreditation.

AKAST has so far used two of these templates - Programme Accreditation Single (both for procedures covered by the Interstate Treaty and for procedures not covered by it), and Programme Accreditation Bundle (for procedures covered by the Interstate Treaty).

AKAST states that the deviations or additions to the report templates are only possible in justified cases and are to be explained in the specially provided chapter 3.1. There are no specifications for the length of the expert reports. The chapters on the individual criteria each contain a descriptive part and an evaluative part. AKAST pays attention to plausibility and to the fact that the respective expert report is so clear that the higher education institution and GAC can understand it.

In the opinion of AKAST, the fact that the GAC has not yet referred any accreditation reports prepared by AKAST back to the higher education institutions due to deficiencies in content is an indication that the accreditation reports prepared by AKAST are clearly formulated and of sufficient quality. During the site visit, the reviewers and representatives of higher education institutions also expressed their satisfaction with the reports, although there were some opinions voiced that the GAC templates are quite strict and more flexibility could benefit the reports.

### **Analysis**

The review panel concludes that all of AKAST reports and decisions are duly published and accessible to the academic community. The publication on the AKAST website follows the publication by the GAC for accreditation procedures under the Interstate Treaty, as agreed within the German accreditation system. Negative decisions and accompanying reports will also be published but there have not been any negative decisions yet. The AKAST reports follow the GAC requirements and templates, to the satisfaction of the GAC. The review panel notes that the templates provide a structure which is generally appreciated by the stakeholders, although some stakeholders advocated more flexibility in the reports.

The review panel compared the information available on the AKAST website, ELIAS and the DEQAR and can confirm that all reports have been published according to the requirements. As the reports produced since 2018 follow a uniform structure, it is easy to navigate through the reports and find the necessary information.

The AKAST website lists the reports resulting from its accreditation procedures conducted since 2018 on one website page and the archive with reports preceding the 2018 accreditation system on a separate webpage. With regard to the current post-2018 procedures the information is accessible and searchable because of the small number of procedures. However, when the number of reviewed programmes increases it will become more difficult to navigate the webpage, especially since there is no search function or structuring according to the year of publication.

### **Panel suggestions for further improvement**

1. In order to facilitate easier navigation, include the year of review or a search function, when publishing the review reports on the AKAST website.

### **Panel conclusion: compliant**

## **ESG 2.7 COMPLAINTS AND APPEALS**

Standard:

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

## Evidence

In the procedures following the Interstate Treaty, the higher education institution is free to contest the decision of the German Accreditation Council (GAC) through recourse to the administrative courts. Appeals against the decisions of the GAC do not concern AKAST. Therefore, the review panel only looked into appeals and complaints processes that fall within the remit of AKAST.

In 2018, when the first review of AKAST against the ESG 2015 took place, complaints and appeals were covered by a single procedure. Complaints were reviewed on a case-by-case basis by the AKAST Executive Board, while appeals were decided upon by the Accreditation Committee that had earlier taken a decision that was now appealed against.

In January 2020, during AKAST's registration process on EQAR, AKAST agreed to revise its procedure and to establish a complaints committee consisting of independent members. The Complaints Committee was established by the General Meeting of AKAST on 28 January 2021. The Complaints Committee constituted itself and approved its Rules of Procedure at its first meeting on 10 March 2021. Accordingly, the Complaints and Appeals Regulations were revised.

In 2021 the focused review panel noted that AKAST had indeed revised the complaints and appeals regulations and had elected a Complaints Committee. It was concluded by the EQAR Register Committee that AKAST complied with the standard.

The regulations concerning complaints and appeals are currently the following:

- The Statutes regulate that a Complaints Committee shall be established consisting of the following five members: two academics representing different types of theological higher education institutions, one representative from professional experience, one student member and one representative from an accreditation agency (i.e. external to AKAST). The members of the Complaints Committee are elected by the General Meeting (§8 (5)). Further details are governed by the Complaints and Appeals Regulations.
- The Complaints and Appeals Regulations as adopted by resolution of the General Meeting on 28 January 2021 are published on the AKAST website. Higher education institutions have the right to lodge a complaint in writing against measures, resolutions and decisions of the Accreditation Committee or the review panel within two weeks of becoming aware of them. A distinction is made between complaints lodged by the higher education institution related to procedural violations (e.g. technical procedural issues such as deadlines or fees) which, if the complaint cannot be resolved by the AKAST office, are handled by the Executive Board and complaints related to the formal results of procedures which are dealt with by the Accreditation Committee. Regarding the latter complaints it is specified that complaints may be directed against the appointment of reviewers, the assessment procedure or the assessment result (here the factual comments and statement of the higher education institution are mentioned) or the factual and technical assessment by the Accreditation Committee (as the basis for its decision). All complaints should be sent by post to the AKAST Office. If the higher education institution does not agree with the decision of the Executive Board or the Accreditation Committee regarding the complaints, it has the right within one month to lodge an appeal against this decision. In this case, the appeal and the relevant facts will be handed over to the AKAST Complaints Committee. Regarding the composition of the Complaints Committee it is stated that members of the Executive Board or the Accreditation Committee are excluded, that the student member is elected for two years and that other members are elected for five years. It is further specified that the statement of the Complaints Committee is to be taken into account in the final decision of the Executive Board or the Accreditation Committee and that further details shall be regulated in rules of procedure issued by the Complaints Committee and approved by the Executive Board.

- The Rules of Procedure of the Complaints Committee as adopted on 9 May 2021 and approved by the Executive Board on 9 June 2021 repeat the regulations of the Statutes and the Regulations regarding complaints and Complaints Committee and give further details regarding: the resignation and re-election of members of the Complaints Committee; the election of a spokesperson and deputy spokesperson from amongst its members; its meetings (which are held as necessary); quorum (at least three members); the possibility of a hearing and decision-making rules. It is also specified that the AKAST Administrator shall attend the meetings in an advisory capacity.

A complaint or an objection regarding the implementation of procedure shall be submitted to the Executive Board, which shall decide on the matter within one month. If the Executive Board considers the complaint or objection to be well-founded, it shall uphold it. If the Executive Board does not resolve the complaint or the objection, the AKAST office shall submit it to the Complaints Committee. The statement of the Complaints Committee shall then be taken into account in the final decision of the Executive Board.

A complaint or an objection regarding the outcome of the procedure is submitted to the Accreditation Committee. If the Accreditation Committee considers the complaint or the objection to be well-founded, it shall resolve it. In the case of quality assurance procedures which are not covered by the Interstate Treaty, it decides and resolves on the result of the procedure again on this basis. If the Accreditation Committee is not able to solve the complaint or the objection, the AKAST Office submits it to the Complaints Committee. The statement of the Complaints Committee shall be taken into account in the final decision of the Accreditation Committee.

The possibility to lodge a complaint or appeal is also defined in each contract between AKAST and higher education institutions. In addition, the AKAST Internal Quality Manual states that the higher education institutions have the right to lodge a complaint in writing against measures, resolutions and decisions of the Accreditation Committee or the review panel within two weeks of becoming aware of them.

AKAST notes in the SAR that, since AKAST was founded, there has been one appeal/complaint and it was resolved. There have been no complaints or appeals in the period of review. According to AKAST, the very low number of appeals/complaints since its foundation can be seen as an indicator of consistent application of the criteria for outcomes.

## **Analysis**

The review panel acknowledges AKAST's commitment and progress achieved in fulfilling the requirements of this standard since 2018, especially in regard to establishing a Complaints Committee and separating the appeals and complaints on the process from those on the outcomes. Although there have not been any cases of appeals and complaints in the reporting period, both the representative of the Complaints Committee and the AKAST management were able to explain the setup and model different scenarios on how the committee would work. This, according to the review panel, shows that AKAST is well aware of its complaints and appeals procedures.

However, the review panel has noted a few issues that have an impact on the clarity of processes. They have not caused any issues when dealing with appeals and complaints so far, as there have been none but they could potentially affect the ability of the higher education institutions to complain or appeal.

Whilst the Complaints and Appeals Regulations are published on AKAST's website, the Rules of Procedure of the Complaints Committee are not published on AKAST's website. One could assume that while the Complaints and Appeals Regulations define the overall approach to complaints and appeals, the Rules of Procedure of the Complaints Committee define the exact role and duties of the

committee. However, both documents are repetitive to some extent, in particular with regard to explaining the process for handling complaints and appeals and the responsibilities of different bodies. There are also some details of the complaints and appeals procedure that are relevant for higher education institutions but are only included in the Rules of Procedure of the Complaints Committee which is not published on the website and therefore not directly accessible for higher education institutions. In the opinion of the review panel, these documents could be consolidated in one document or at least both documents should be published on the AKAST website. Also, the § 6 of the Rules of Procedure of the Complaints Committee state that in case of complaints and objections to decisions, the higher education institution may lodge a complaint/objection/opposition in writing within two weeks of becoming aware of the decision and the complaint must be submitted to AKAST office (not the Executive Board as in § 7 (1) or the Accreditation Committee as in § 7 (2)). This creates a confusion on what exactly is the role of AKAST office in handling the complaints.

An issue which is currently not foreseen by the regulations is the possibility of complaints related to the work of the AKAST office. According to the Regulations complaints should be submitted to the office but in the opinion of the review panel there should be another procedure if the AKAST office itself is subject of the complaint, e.g. submitting the complaint to the Executive Board and providing an email address of the Executive Board for the submission would be better. In such cases it is also problematic that the AKAST Administrator attends the meetings of the Complaints Committee in an advisory capacity and draws up the minutes of these meetings as stated in the Rules of Procedure of the Complaints Committee. In the view of the review panel, the Rules should state that the Administrator will not attend the meetings of the Complaints Committee when the office is the subject of the complaint.

#### **Panel recommendations**

1. Clarify what happens if the complaint involves the work of the AKAST's office.
2. Publish both the latest version of the Complaints and Appeals Regulations and the Rules of Procedure of the Complaints and Appeals Committee on the website so that the right to lodge a complaint or appeal and the explanation for the procedure are as clear as possible.

#### **Panel suggestions for further improvement**

1. The review panel suggests consolidating the Complaints and Appeals Regulation and the Rules of Procedure of the Complaints and Appeals Committee in one document.

#### **Panel conclusion: compliant**

# CONCLUSION

## SUMMARY OF COMMENDATIONS

1. The review panel commends the visible and active student participation in the AKAST's work, including the Accreditation Committee, and meaningful participation of other stakeholders, including the representatives of professional practice, in the governance and accreditation processes. (ESG 3.1)
2. The review panel commends the considerate inclusion of other relevant quality assurance bodies into the work of the agency, in particular, the AVEPRO representative as a member of advisory board and the close collaboration with ACQUIN. (ESG 3.1)
3. The review panel was impressed by the universal praise from the stakeholders for the work of the office, and in particular for the Administrator. (ESG 3.5)
4. The review panel commends the practice of feedback provision and discussion about individual accreditation processes. (ESG 3.6)
5. Composition of strong (sub-)disciplinary teams, including members of the world of work, assures balanced and high-quality feedback to the assessed programmes. (ESG 2.2)
6. AKAST's stakeholders recognise the high quality of AKAST's work in executing assessment procedures and appreciate all the guidance and support provided during the process (ESG 2.3).
7. Review panels include a large variety of stakeholders (ESG 2.4).
8. The reviewers showed great commitment to AKAST and the review panel was particularly impressed by the cooperation with the student union and also by the professionalism of the student reviewers the panel met (ESG 2.4).

## OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

1. Diversify the Executive Board by including a student member, as well as include a student representative in the Advisory Board and include the Association of Theology Students to the AKAST General Meeting. (ESG 3.1)
2. Consider a distribution of the formal positions that are currently held by the AKAST Chairperson, by introducing a separation of these positions in the Statutes, as well as consider the appointment of international members as the Chairperson of the Accreditation Committee and Advisory Board, thus further strengthening the independence of the agency, further safeguarding the independence of the universities under review and also bringing in valuable external, international perspectives into the discussions. (ESG 3.2)
3. Strengthen the independence from DBK in the governance of DBK, e.g. by defining the advisory role of the episcopal commissioner of the German Bishops' Conference in the Accreditation Commission more clearly and codifying this through adding the description of the advisory role in § 7 of the AKAST Statutes. (ESG 3.2)
4. Develop a plan for producing thematic analysis that would be based solely on the information and resources gathered by AKAST. Decide upon the type of thematic analysis that would be the most useful for AKAST and its stakeholders, taking into account that the thematic analysis has to be focused on the outcomes of external assessment procedures. (ESG 3.4)
5. Allocate sufficient human resources for performing the tasks related to thematic analysis. Plan for stable resources (human, financial) allocated to thematic analysis that do not solely rest on members of different bodies further volunteering in a role that is already voluntary. (ESG 3.4)
6. Adapt the methodology of the thematic analysis to the available human resources and context (small number of processes, dialogical culture of feedback) and appropriately take advantage of the opportunities offered by qualitative methodology with in-depth examination of individual cases. (ESG 3.4)
7. Perform robust and forward-looking planning of human resources and financial resources in order to accommodate the foreseen transitions in the office as well as additional intellectual capacity needed



to perform important internal quality assurance and developmental processes and processes/products stipulated by the relevant quality standards (ESG). (ESG 3.5)

8. Diversify the funding to prevent excessive financial dependency on one stream of funding. (ESG 3.5)
9. Align the internal quality manual not only with the procedures of feedback collection already in place, but also in line with the qualitative methodological conventions (e.g., transcripts, minutes, interview notes etc.). (ESG 3.6)
10. Analyse AKAST operations in an aggregate rather than individual manner (annual, bi-annual) and present them in a single document/ report. (ESG 3.6)
11. Introduce tools and processes that would encompass operations beyond regular accreditation processes (e.g., satisfaction with the performance of different bodies etc.) (ESG 3.6)
12. Codify the role of a rapporteur and the level (if at all) of his/her active intervention during the visit/ procedure. (ESG 3.6)
13. The role of the accompanying member/observer to the already large accreditation panel should be reconsidered due to the observers' presence throughout the accreditation process (site-visit, preparatory meetings) as well as their possibility to actively intervene. (ESG 2.2)
14. Ensure that all potential review panel members receive consistent training before engaging in a review procedure. (ESG 2.4)
15. Publish an open call for experts on the AKAST website. (ESG 2.4)
16. Clarify what happens if the complaint involves the work of the AKAST's office (ESG 2.7).
17. Publish both the latest version of the Complaints and Appeals Regulations and the Rules of Procedure of the Complaints and Appeals Committee on the website so that the right to lodge a complaint or appeal and the explanation for the procedure are as clear as possible (ESG 2.7).

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

## **SUGGESTIONS FOR FURTHER IMPROVEMENT**

1. The review panel suggests expanding the portfolio of activities of AKAST by developing other quality assurance procedures relevant to its aims. (ESG 3.1)
2. The review panel suggests strengthening the international perspective by introducing additional international representatives in AKAST governing bodies and pursuing more opportunities related to various dimensions of internationalisation, in particular with similar agencies and bodies abroad. (ESG 3.1)
3. The review panel suggests balancing the representation of different stakeholders in the AKAST Accreditation Committee, by ensuring additional expertise in quality assurance and accreditation matters as well as by introducing substitute members for the experts in quality assurance and accreditation and representatives of professional practice. (ESG 3.1)
4. Appointment of a panel chair prior to the site visit and broadening his current responsibilities could improve stability of the work and reduce possible unforeseen instances. This could also reduce the burden of the AKAST Administrator.(ESG 2.2)
5. AKAST could improve the follow-up to its procedures by monitoring the long-term improvements that are not necessarily related to compliance with the standards. This could be done both for the assessments covered by the Interstate Treaty and those not covered. (ESG 2.3)
6. In order to facilitate easier navigation, include the year of review or a search function, when publishing the review reports on the AKAST website. (ESG 2.6)
7. The review panel suggests consolidating the Complaints and Appeals Regulation and the Rules of Procedure of the Complaints and Appeals Committee in one document. (ESG 2.7)

# ANNEXES

## ANNEX I: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
<b>02.06.2023 - Online meeting with the agency's resource person</b>				
1	13:00 - 15:00 (120 min)	Review panel's kick-off meeting and preparations for site visit		
2	15:00 - 16:00 (60 min)	An online clarifications meeting with the agency's resource person regarding the specific national/legal context in which an agency operates, specific quality assurance system to which it belongs and key characteristics of the agency's external QA activities	<ul style="list-style-type: none"> <li>- Administrator of AKAST</li> <li>- Chairperson of AKAST, Katholische Universität Eichstätt- Ingolstadt</li> </ul>	Mark Frederiks
<b>18.06.2023 – Day 0 (pre-visit)</b>				
3	20:00 - 22:00	Review panel's private dinner		

**19.06.2023 – Day I**

	09:00 - 10:15 (75 min)	Review panel's private meeting		
	10:15 - 10:30 (15 min)	Comfort break		
1	10:30 - 11:30 (60 min)	Meeting with the <b>AKAST Executive Board</b>	<ul style="list-style-type: none"> <li>- <i>Chairperson of AKAST, Katholische Universität Eichstätt-Ingolstadt</i></li> <li>- <i>First Vice Chairperson of AKAST, Universität Passau</i></li> <li>- <i>Second Vice Chairperson of AKAST, Universität Bonn (online)</i></li> </ul>	Mark Frederiks
	11:30 - 11:45 (15 min)	Review panel's private discussion		
2	11:45 - 12:45 (60 min)	Meeting with the <b>AKAST staff</b>	<ul style="list-style-type: none"> <li>- <i>Administrator of AKAST</i></li> <li>- <i>Secretary of AKAST</i></li> <li>- <i>Student Assistant of AKAST</i></li> </ul>	Tomaž Deželan
	12:45 - 13:00 (15 min)	Review panel's private discussion		

3	13:00 - 14:00 (60 min)	Meeting with members of the <b>General Meeting</b>	<ul style="list-style-type: none"> <li>- <i>Auxiliary Bishop, German Bishops' Conference (online)</i></li> <li>- <i>representative of the German Bishops' Conference</i></li> <li>- <i>Lecturer of musicology subjects and professional director of the library, University of Catholic Church Music &amp; Music Pedagogy Regensburg, Representative of the General Meeting</i></li> <li>- <i>Chair of Medieval and Modern Church History, University Bonn, Representative of KThF at the General Meeting (online)</i></li> <li>- <i>Rector, Faculty of Theology Fulda, Representative of KThF at the General Assembly (online)</i></li> <li>- <i>Rector, Graduate School of Philosophy and Theology Sankt Georgen, Representative of KThF at the General Meeting (online)</i></li> </ul>	Mark Frederiks
	14:00 - 15:00 (60 min)	Lunch (panel only) & Review panel's private discussion		
4	15:00 - 16:00 (60 min)	Meeting with the <b>Accreditation Committee</b>	<ul style="list-style-type: none"> <li>- <i>Chair of Dogmatics and Theology of Ecumenism, CH-Fribourg (online)</i></li> <li>- <i>Chair of Church History Middle Ages and Modern Times, Ludwigs-Maximilians-University Munich (online)</i></li> <li>- <i>Representative of Fundamental Theology and Religious Studies, University Erfurt (online)</i></li> <li>- <i>Chair of Pastoral Theology &amp; Homiletics, Faculty of Theology Fulda (online)</i></li> <li>- <i>Pastoral Counsellor, Twistringen (online)</i></li> </ul>	Mark Frederiks

	16:00 - 16:15 (15 min)	Review panel's private discussion		
5	16:15 - 17:00 (45 min)	Meeting with <b>Catholic University of Eichstätt-Ingolstadt (KUE) foundation</b>	<ul style="list-style-type: none"> <li>- <i>Representative of the Unit I/2 – Personnel Services: Science Support Staff, Catholic University Eichstätt-Ingolstadt</i></li> <li>- <i>Representative of the Unit II – Finances: Finance Department Manager, Catholic University Eichstätt-Ingolstadt</i></li> <li>- <i>Representative of the Unit III/3 – Third Party Funding, Catholic University Eichstätt- Ingolstadt</i></li> </ul>	Bogdan-Marius Negrea
	17:00 – 17:15 (15 min)	Review panel's private discussion		
6	17:15 - 18:00 (45 min)	Meeting with the <b>ACQUIN</b>	<ul style="list-style-type: none"> <li>- <i>Managing Director of ACQUIN</i></li> </ul>	Tomaž Deželan
	18:00 - 18:45 (45 min)	Wrap-up meeting among panel members and preparations for day 2		
		Dinner (panel only)		
<b>20.06.2023 – Day 2</b>				
	09:00 - 09:30 (30 min)	Review panel's private meeting		

7	09:30 - 10:15 (45 min)	Meeting with the <b>AVEPRO</b>	- <i>Member of the AKAST Advisory Board, Member of the AVEPRO Scientific Council, University of Tilburg</i>	Tomaž Deželan
	10:15 - 10:30 (15 min)	Review panel's private discussion		
8	10:30 - 11:15 (45 min)	Meeting with <b>German Accreditation Council</b>	- <i>Managing Director of German Accreditation Council (online)</i>	Mark Frederiks
	11:15 - 11:30 (15 min)	Review panel's private discussion		
9	11:30 - 12:30 (60 min)	Meeting with the <b>representatives of reviewed study programmes</b>	<ul style="list-style-type: none"> <li>- <i>Chair of Moral Theology, University of Regensburg</i></li> <li>- <i>Representative of Quality Management and Coordination in study and teaching, University of Regensburg</i></li> <li>- <i>Rector, University of Catholic Church Musik &amp; Music Pedagogy Regensburg)</i></li> <li>- <i>Chair of Exegesis of New Testament, Faculty of Theology Trier (online)</i></li> <li>- <i>Lecturer Graduate School of Philosophy and Theology Sankt Georgen (online)</i></li> </ul>	Tomaž Deželan
	12:30 - 12:45 (15 min)	Review panel's private discussion		
10	12:45 - 13:45 (60 min)	Meeting with <b>representatives from the reviewers' pool (excluding student reviewers)</b>	<ul style="list-style-type: none"> <li>- <i>Chair of Fundamental Theology, Catholic University Eichstätt-Ingolstadt, Reviewer in the procedure at Faculty of Theology Trier 2022</i></li> <li>- <i>Biblical Introduction and Dean of Studies, Ludwigs-Maximilians- University Munich, Reviewer in the procedure at Faculty of Theology Paderborn</i></li> </ul>	Mark Frederiks

			<p>2021/22</p> <ul style="list-style-type: none"> <li>- Chair of Canon Law, Julius-Maximilians-University Würzburg, Reviewer in the procedure at University Münster 2021/22</li> <li>- Management Diocesan Library Rottenburg, Reviewer in the procedure at University Bonn 2021/22 (online)</li> <li>- Rector of the Priest Seminary St. Lambert, Reviewer in the procedure at University Münster 2021/22</li> </ul>	
	13:45 - 14:45 (60 min)	Lunch (panel only)		
11	14:45 - 15:25 (40 min)	Meeting with the <b>students included in the AKAST governing structures</b>	<ul style="list-style-type: none"> <li>- substitute student member of the Accreditation Committee, Studies Teaching Post German and Catholic Religion at University Würzburg</li> <li>- student member of the Accreditation Committee, Studies Catholic Theology (Mag. theol.) at University Mainz</li> <li>- formerly student member of the Complaints Committee</li> <li>- former student member of the Accreditation Committee (online)</li> </ul>	Bogdan-Marius Negrea
	15:25 - 15:40 (15 min)	Review panel's private discussion		
12	15:40 - 16:30 (50 min)	Meeting with the <b>student reviewers</b>	<ul style="list-style-type: none"> <li>- Studies Teaching Post Mathematics and catholic Religion at Westfälische Wilhelms-University Münster (Reviewer in the procedure at Faculty of Theology Trier 2022/2023)</li> <li>- Studies Teaching Post for Catholic Theology and Social</li> </ul>	Bogdan-Marius Negrea

			<p>Science at University Siegen (Reviewer in the procedure at University Münster 2021/22 and Reviewer in the procedure at Graduate School of Philosophy and Theology Sankt Georgen 2022/2023)</p> <ul style="list-style-type: none"> <li>- <i>Studies Philosophy (B.A.) and Catholic Theology (Mag. theol.) Graduate School of Philosophy and Theology Sankt Georgen</i> (Reviewer in the procedure at Vinzenz Pallotti University Vallendar 2022)</li> <li>- <i>Studies Teaching Post for English and Catholic Religion at University Köln</i> (Reviewer in the procedure at Ludwigs- Maximilians-University Munich 2020)</li> </ul>	
	16:30 - 18:00	Review panel's private discussion to agree on the issues to be clarified & prepare preliminary findings		
<b>21.06.2023 – Day 3</b>				
13	9:00 - 10:00 (60 min)	Meeting with the <b>Advisory Board</b>	<ul style="list-style-type: none"> <li>- <i>Philosophy, emerged, University Salzburg</i></li> <li>- <i>Representative of the Center for Internal Leadership of the German armed Forces Koblenz)</i></li> </ul>	Mark Frederiks
	10:00 - 10:15 (15 min)	Review panel's private discussion		
14	10:15 - 11:00 (45 min)	Meeting with the <b>Complaints Committee</b>	<ul style="list-style-type: none"> <li>-</li> <li>- <i>member of the editorial board ZDF department Church and Life (online)</i></li> </ul>	Tomaž Deželan



	11:00 - 12:00 (60 min)	Review panel's private discussion to agree on the issues to be clarified & prepare preliminary findings		
15	12:00 - 13:00 (60 min)	Meeting with the <b>Chairperson and Administrator to clarify any pending issues</b>	<ul style="list-style-type: none"> <li>- <i>Chairperson of AKAST, Katholische Universität Eichstätt-Ingolstadt</i></li> <li>- <i>Administrator of AKAST</i></li> </ul>	Mark Frederiks
	13:00 - 14:30 (90 min)	Lunch (panel only) & Review panel's private discussion		
	14:30 - 15:00 (30 min)	Final de-briefing meeting with <b>AKAST management and staff to inform about preliminary findings</b>	<ul style="list-style-type: none"> <li>- <i>Chairperson of AKAST, Katholische Universität Eichstätt-Ingolstadt</i></li> <li>- <i>Administrator of AKAST</i></li> <li>- <i>Secretary of AKAST</i></li> <li>- <i>Student Assistant of AKAST</i></li> </ul>	

## ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

### External review of the Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany (AKAST) by ENQA

#### Annex I: TRIPARTITE TERMS OF REFERENCE BETWEEN AKAST, ENQA AND EQAR

February 2023

#### 1. Background and context

AKAST was first accredited as an accreditation agency in 2008 and entitled to accredit canonical study programmes and to award them the quality seal of the Accreditation Council. AKAST was successfully reaccredited in December 2013 and December 2018. Registered under the number VR 8946. Pursuant to Section 24 (1), sentence 2, of the Specimen Decree, the Accreditation Council authorises the Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany (AKAST) in Germany until 31 December 2023.

AKAST has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2021 and is applying for the renewal of EQAR registration.

#### 2. Purpose and scope of the review

This review will evaluate the extent to which AKAST (the agency) complies with each of the standards of Parts 2 and 3 of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) and support the agency in its efforts to continually review and enhance its work. Such an external review is a requirement for agencies wishing to apply for EQAR registration.

##### 2.1 Activities of the agency within the scope of the ESG

To apply for EQAR registration, this review will analyse all of the agency's activities that fall within the scope of the ESG, e.g., reviews, audits, evaluations or accreditations of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). All activities are reviewed irrespective of geographic scope (within or outside the EHEA) or whether they are obligatory or voluntary in nature.

The following activities of the agency must be addressed in the external review:

1. Programme Accreditation<sup>1</sup>: Execution of peer review process of study programmes of involving catholic theology and of canonical study programmes in accordance with the Interstate Treaty.
2. Evaluation Procedure<sup>2</sup>: Execution of evaluation procedures of canonical study programmes which are not recorded by the Interstate Treaty.

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<sup>1</sup>Programme accreditation in Germany (as named on the profile of AKAST on EQAR's website).

<sup>2</sup>Programme accreditation (AKAST quality seal) – as named on the profile of AKAST on EQAR's website.

### 3. The review process

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

The review procedure consists of the following steps:

- Formulation of, and agreement on the Terms of Reference for the review between AKAST, ENQA and EQAR (including publishing of the Terms of Reference on ENQA's website<sup>3</sup>);
- Nomination and appointment of the review panel by ENQA;
- Notification of EQAR about the appointed panel;
- Self-assessment by the agency, including the preparation and publication of a self-assessment report;
- A site visit of the agency by the review panel;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Publication of the final review report;
- A decision from the EQAR Register Committee on the agency's registration on EQAR;
- Follow-up on the panel's recommendations to the agency, including a voluntary progress visit.

#### 3.1 Nomination and appointment of the review panel

The review panel consists of four members: one or two quality assurance experts (at least one of which is currently employed by an ENQA member agency), an academic employed by a higher education institution, a student member, and potentially a labour market representative (if requested). One of the members serves as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

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

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

ENQA will provide the agency with the proposed panel composition and the curricula vitarum of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

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

The agency is responsible for the execution and organisation of its own self-assessment process and must adhere to the following guidance:

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<sup>3</sup> The agency is encouraged to publish the ToR on its website as well.

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is expected to contain:
  - a brief description of the HE and QA system;
  - the history, profile, and activities of the agency;
  - a presentation of how the agency addresses each individual standard of Parts 2 and 3 of the ESG for each of the agency's external QA activities, with a brief, critical reflection on the presented facts;
  - opinions of stakeholders;
  - the instances of partial compliance noted in the most recent EQAR Register Committee decision of inclusion/renewal and any other aspects that may have been raised by the EQAR Register Committee in subsequent change report decisions (if relevant);
  - reference to the recommendations provided in the previous review and actions taken to meet those recommendations;
  - a SWOT analysis;
  - reflections on the agency's key challenges and areas for future development.
- All the agency's external QA activities (as defined under section 2.1) are described and their compliance with the ESG is analysed in the SAR.
- The report is well-structured, concise, and comprehensive. It clearly demonstrates the extent to which the agency performs its tasks of external quality assurance and meets the ESG.

The self-assessment report is submitted to the ENQA Secretariat, which has two weeks to carry out a screening. The purpose of a screening is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Agency Reviews*, is present. If the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

### **3.3 A site visit by the review panel**

The review panel will draft a proposal of the site visit schedule which must be submitted to the agency at least six weeks before the planned dates of the visit. The schedule is to include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is usually 2,5 days. The approved schedule must be given to the agency at least one month before the site visit to properly organise the requested interviews.

In advance of the site visit (ideally at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

The review panel will be assisted by the ENQA Review Coordinator during the site visit. The review coordinator will act as the panel's chief liaison with the agency, monitor the integrity of the review process and its consistency, and ensure that ENQA's overall expectations of the review are considered and met.

The site visit will close with a final debriefing meeting in which the panel outlines its general impressions and provides an overview of the judgement on the agency's ESG compliance. The panel will not comment on whether or not the agency would be granted/reconfirmed registration on EQAR.

### **3.4 Preparation and completion of the final review report**

Based on the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will follow the purpose and scope of the review as defined under sections 2 and 2.1. It will also provide a clear rationale for the panel's findings concerning each standard of Parts 2 and 3 of the ESG. When preparing the report, the review panel should also bear in mind EQAR's *Policy on Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies*<sup>4</sup> to ensure that the report contains sufficient information for the Register Committee to consider the agency's application for registration on EQAR.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language, and it will then be submitted to the agency – usually within 10 weeks of the site visit – for comment on factual accuracy and grave misunderstandings only. The agency will be given two weeks to do this and should not submit any additional material or documentation at this stage. Thereafter, the review panel will take into account the agency's feedback on possible factual errors and finalise and submit the review report to ENQA.

The report should be finalised within three months of the site visit and will normally not exceed 40-50 pages in length.

### **3.5. Publication of the report and a follow-up process**

The agency will receive the review panel's report and publish it on its website once the Agency Review Committee has validated the report. The report will also be published on the ENQA website together with the statement of the Agency Review Committee validating external review reports by assessing the integrity of the review process and checking the quality and consistency of the reports. Importantly, during this process, and prior to final validation of the report, the Agency Review Committee has the option to request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome.

As part of the review's follow-up activities, the agency commits to react on the review recommendations and submit a follow-up report to ENQA within two years of the validation of the final external review report. The follow-up report will be published on the ENQA website.

The follow-up report may be complemented by an optional progress visit to the agency performed by two members of the original panel (whenever possible). The visit, which normally takes place 2-3 years after the verification of the final external review report (and after submission of the follow-up report), aims to offer an enhancement-oriented and strategically driven dialogue that ordinarily might be difficult to truly integrate in the compliance-focused site visit. The progress visit thus does not have the objective of checking the agency's ESG compliance or how the agency has followed up on the recommendations, but rather provides an arena for strategic conversations that allow the agency to reflect on its key challenges, opportunities, and priorities. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

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<sup>4</sup> Available at: <https://www.eqar.eu/about/official-documents/#use-and-interpretation-of-the-esg>

#### 4. Use of the report

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

The report is used as a basis for the Register Committee's decision on the agency's registration on EQAR. The review report should only be considered final after validation by the Agency Review Committee. After submission to ENQA but before validation by the ARC, the report may not be used or relied upon by the agency, the panel, or any third party and may not be disclosed without ENQA's prior written consent. The approval of the report is independent of the decision on EQAR registration.

For the purposes of EQAR registration, the agency will submit the review report (once validated by the Agency Review Committee) to EQAR via email before expiry of the agency's registration on EQAR. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, and any other documents that may be relevant for the application (i.e., annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency's application at its Register Committee meeting as stipulated in the indicative review schedule below.

#### 5. Indicative schedule of the review

Agreement on Terms of Reference	January 2023
Appointment of review panel members	February 2023
Self-assessment completed	31 March 2023
Screening of SAR by ENQA Review Coordinator	Early April 2023
Preparation of the site visit schedule and indicative timetable	April 2023
Briefing of review panel members	May 2023
Review panel site visit	Early June 2023
Draft of review report and its submission to ENQA Review Coordinator for verification of its compliance with the Guidelines	July/August 2023
Draft of review report to be sent for a factual check to the agency	August 2023
Agency statement on the draft report to the review panel (if necessary)	August 2023
Submission of the final report to ENQA	September 2023
Validation of the review report by the Agency Review Committee	Late September/October 2023
Publication of report	October 2023
EQAR Register Committee meeting and initial consideration	October/November 2023 (the agency's registration is valid until 30 November 2023)
Decision on ENQA membership by the ENQA Board	N.A.

### ANNEX 3: GLOSSARY

ACQUIN	Accreditation, Certification and Quality Assurance Institute
AGT	Association of Theology Students
AKAST	Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany
AVEPRO	Agency for the Evaluation and Promotion of Quality in Ecclesiastical Universities and Faculties
DBK	German Bishops' Conference
ENQA	European Association for Quality Assurance in Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
GAC	German Accreditation Council
HE	higher education
HEI	higher education institution
HRK	German Rectors' Conference
KMK	Standing Conference of the Ministers of Education and Cultural Affairs of the Länder
KThF	Association of Faculties of Catholic Theology
KUE	Catholic University of Eichstätt-Ingolstadt
QA	quality assurance
SAR	self-assessment report
VDD	Association of German Dioceses, the legal entity for the German Bishops' Conference

## ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

### DOCUMENTS PROVIDED BY AKAST

#### Self-assessment report

*Annexes to the self-assessment report:*

1. AKAST Statutes as amended on 27 January 2022
2. Entry in register of associations
3. Key Points for the Structure of Studies in Study Courses Involving Catholic and Protestant Theology/Religion (“Key Points for the Structure of Studies in Study Courses Involving Catholic and Protestant Theology/Religion”), resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Countries (KMK) of 13 December 2007; amended on 8 September 2022.
4. Letter from the Congregation for Catholic Education of 9 August 2013 – recognition as articolazione territoriale
5. AKAST’s budget for the financial year 2024 and financial plan
6. Proof-of non-profit status
7. Conference “Report of the Study Reform”, invitation letter dated 7 January 2021
8. Findings of the third evaluation of the KMK ‘Key Points’ resolution: KMK resolution of 8 September 2022
9. Comparison between ESG 2015 and rules and criteria of German Accreditation System; <https://www.akkreditierungsrat.de/sites/default/files/downloads/2022/Annex%2006%20Mapping%20grid%20ESG%20part%2001.pdf>
10. AKAST-KUE cooperation agreement (2018)
11. AKAST-ACQUIN cooperation agreement (2018)
12. AKAST Instructions for reviewers (2019)
13. AKAST Rules of Procedure of the Complaints Committee (2021)
14. AKAST Procedure and criteria of the appointment of reviewers (2019)
15. AKAST Internal quality assurance system (2014)

*Links to the regulatory framework:*

Interstate Treaty on the organisation of a joint accreditation system to ensure the quality of teaching and learning at German higher education institutions (Interstate study accreditation treaty) (Decision of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany of 08/12/2016). Enacted on January 1, 2018; [https://www.kmk.org/fileadmin/Dateien/veroeffentlichungen\\_beschluesse/2016/2016\\_12\\_08-Studienakkreditierungsstaatsvertrag-englisch.pdf](https://www.kmk.org/fileadmin/Dateien/veroeffentlichungen_beschluesse/2016/2016_12_08-Studienakkreditierungsstaatsvertrag-englisch.pdf)

Specimen Decree pursuant to Article 4, paragraphs 1 – 4 of the interstate study accreditation treaty; [https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207\\_Musterrechtsverordnung\\_Englisch.pdf](https://www.akkreditierungsrat.de/sites/default/files/downloads/2021/171207_Musterrechtsverordnung_Englisch.pdf)



*Additional information provided to the review panel:*

Meeting minutes of the working group that produced SWOT analysis

SWOT analysis as presented to the AKAST Executive Board

SWOT analysis as confirmed by the AKAST Executive Board

Meeting minutes of the Accreditation Committee, Advisory Board, Executive Board (including the minutes from 19 January 2023) and General Meeting (including the minutes of the meeting where the current AKAST Chairperson was elected)

Declaration of impartiality and confidentiality (Executive Board)

Declaration of impartiality and confidentiality (Accreditation committee)

Declaration of impartiality and confidentiality (Advisory Board)

Declaration of impartiality and confidentiality (Complaints Committee)

Declaration of impartiality and confidentiality (Review panel)

AKAST's statement on the upcoming thematic analysis

AKAST's statement on complaints and appeals received

English translation for the Flowchart on Programme Accreditation

Folders of information provided to the expert panel and Accreditation Committee on particular review procedures

Self-assessment reports by higher education institutions (available for inspection at the AKAST premises)

Template of the AKAST evaluation contract with higher education institutions

#### OTHER SOURCES USED BY THE REVIEW PANEL

AKAST's profile on the EQAR website <https://www.eqar.eu/register/agencies/agency/?id=65>

Accreditation system in Germany. <https://www.akkreditierungsrat.de/en/accreditation-system/accreditation-system>

ELIAS database. <https://antrag.akkreditierungsrat.de/>

GAC 2022 external review report <https://www.enqa.eu/wp-content/uploads/GAC-external-review-report.pdf>

## ENQA AGENCY REVIEW 2023

THIS REPORT presents findings of the ENQA Agency Review of the Agency for Quality Assurance and Accreditation of Canonical Programmes of Studies in Germany (AKAST), undertaken in 2023.

**enqa.**

European Association for  
Quality Assurance in Higher Education