

ENQA AGENCY REVIEW

**FOUNDATION FOR
INTERNATIONAL
BUSINESS
ADMINISTRATION
ACCREDITATION
(FIBAA)**

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EXECUTIVE SUMMARY

This report analyses the compliance of the Foundation for International Business Administration Accreditation (FIBAA) with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It is based on an external review conducted from March - October 2021.

The online site visit took place on 11, 14 and 16 of June 2021. The analysis of the self-assessment report (SAR), the additional documents provided by FIBAA and the agency website, together with interviews held during the site visit, provided evidence of the extent to which FIBAA meets the ESG 2015 standards.

The following national and cross border activities of FIBAA are addressed in the external review:

- (1) Programme Accreditation,
- (2) Institutional Accreditation,
- (3) Certification of Continuing Education Courses, and
- (4) Evaluation Procedures According to Individual Objectives (offered by FIBAA Consult).

FIBAA has a long tradition of quality assurance activities since the early 1990s and has maintained its position as a broadly recognised and respected quality assurance agency by institutions and stakeholders in Germany and internationally. Stakeholders feel strongly involved in the different activities of FIBAA, especially in the development of the new FIBAA seals through pilots, workshops but also in the continuous development of FIBAA's criteria and methodologies. FIBAA staff are appreciated for their knowledge and the level of commitment and reliability in the way they carry out their work. FIBAA has set up tools to support its operation, such as a database for experts, as well as an ambitious quality management manual that sets out all steps in FIBAA processes at all levels, to ensure consistency in the accreditation methods. This quality management manual is especially helpful in the induction of new staff. FIBAA's support of new staff, especially during the pandemic is also notable.

FIBAA's long tradition as a respected and recognised quality assurance agency nationally and internationally has great potential, but it currently lacks formal strategic vision and planning. This is a potential risk as a private quality assurance provider in a competitive market. It is also recommended that FIBAA, as another strategic step, develops a policy for thematic analysis that includes the outcomes of the processes it has conducted. The agency's interpretation of the standard for thematic analysis is also an area to reconsider.

In line with FIBAA seeing itself as a partner in supporting the further development of the HEIs, the agency is recommended to consider including a consistent follow-up of given recommendations as part of the current process, rather than as a starting point for the next accreditation.

The panel found FIBAA's level of alignment with the ESG standards to be the following:

- Fully compliant with the following ESG standards – 3.2, 3.3, 3.6, 3.7, 2.1, 2.2, 2.5, 2.6
- Substantially compliant with the following ESG standards – 3.1, 3.5, 2.3, 2.4, 2.7
- Partially compliant with the following ESG standard – 3.4

INTRODUCTION

This report analyses the compliance of the Foundation for International Business Administration (FIBAA) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in March – October 2021.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

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

FIBAA has been a member of ENQA since 2001 and is applying for renewal of ENQA membership. As this is FIBAA's third review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

FIBAA has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2009 and is applying for renewal of EQAR registration.

MAIN FINDINGS OF THE 2017 REVIEW

FIBAA's second review against the ESG was conducted in 2017. In the report from that review, the panel found FIBAA to be *"a reliable partner who handles evaluation procedures professionally and efficiently. The committees are high ranking and have impressed the review panel with their professional expertise. The agency has been established for years in the area of accreditation of business and study programmes. In the opinion of the review panel, it is also well positioned for implementing system accreditation procedures and other institutional procedures. However, such procedures have only been carried out to a relatively low extent, especially since FIBAA has been mainly recognised as a specialist agency up until now.¹ As the other new procedures offered by the agency have also been in rather moderate demand up until now, the agency should deepen its strategy debate. The agency substantially observes the ESG and the national additional criteria of the Accreditation Council with all types of procedures it offers. The agency should, however, increase its efforts to ensure a transparent separation of consultation and assessment procedures as well as provide a more transparent representation of the requirements for the awarding of the premium seal. It should ensure regular implementation of internal and external feedback in all areas of business and increase the evaluation of results from the procedures it carries out. Finally, there is a need to make improvements with regard to the correct and prompt publication of accredited study programmes in the Accreditation Council's database."*

The following is a summary on FIBAA's level of compliance with the ESG in the 2017 review. The recommendations from the panel can be found in chapter Findings, in this report.

FIBAA complies fully with ESG:

3.2 Official status

¹ According to FIBAA's statement from 18.01.2017, the agency has been responsible for more than 20 percent (as of 10.01.2017) of the system accreditation procedures implemented throughout Germany. In addition, the agency has also been assigned additional system accreditation procedures. On an international level, the FIBAA has carried out 10 institutional procedures over the last five years; three of which are still in progress.

- 3.7 Cyclical external review of agencies
- 2.1 Consideration of internal quality assurance
- 2.3 Implementing processes
- 2.4 Peer-review experts

FIBAA complies substantially with ESG:

- 3.1 Activities, policy and processes for quality assurance
- 3.3 Independence
- 3.4 Thematic analysis
- 3.5 Resources
- 3.6 Internal quality assurance and professional conduct
- 2.2 Designing methodologies fit for purpose
- 2.5 Criteria for outcomes
- 2.7 Complaints and appeals

FIBAA complies partially with ESG:

- 2.6 Reporting

This report follows up on the main recommendations of the 2017 review under the relevant standards.

REVIEW PROCESS

The 2021 external review of FIBAA 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 (ToR). Beside setting the timetable for the review, the ToR identified the purpose of the review, the activities of the agency and other relevant background information concerning the review. The ToR was finalised in December 2020 and can be found in Annex 2 of this report. The following activities of FIBAA are within the scope of the ESG, and therefore part of this review:

- (1) Programme Accreditation,
- (2) Institutional Accreditation,
- (3) Certification of Continuing Education Courses, and
- (4) Evaluation Procedures According to Individual Objectives (offered by FIBAA Consult).

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

- Fiona Crozier (Chair), former Head of International, QAA, UK, (QA professional, ENQA nominee);
- Karin Järplid (Secretary), Head of Department of QA, UKÄ, Sweden, (QA professional, ENQA nominee);
- Mar Campins Eritja, Professor in Public International Law, Universitat de Barcelona, Spain, (academic, EUA nominee);
- Joshua Weygant, M.Sc. student in Microsystems Engineering, University Freiburg, Germany, (ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool)

On 30 March 2021, the self-assessment report (SAR) from FIBAA was made available to the panel. A month later, on 30 April 2021, a briefing call with the panel was organised by ENQA Secretariat. Prior to that the review secretary had separate meetings with the review coordinator and the chair. Following the briefing call, the chair, secretary, panel members and ENQA review coordinator had regular e-mail exchanges in preparing for the site visit.

Prior to the site visit, additional documents were requested from FIBAA. Those mainly consisted of translations of annexed documents to the SAR, since they all were in German. Some other supplementary information was also provided, such as summaries in English of on-line tools for FIBAA staff and experts. For clarifications on how to proceed with the translation demands from the panel, a clarifying on line meeting was held on 26 April 2021 between the review secretary and FIBAA Managing Director and agency contact person.

An on-line site visit was held on 11, 14 and 16 June 2021. The panel had preparatory meetings on 2 and 10 June 2021, as well as a pre-meeting with the Managing Director and the Deputy Managing Director on 10 June 2021 to clarify elements related to the overall system and context.

The review panel confirms that it was given access to all documents and people it wished to consult throughout the review. However, the panel found it somewhat surprising that an internationally oriented agency had such limited information available in English.

Finally, the review panel produced this report on the basis of the SAR, annexed documents, site-visit and its findings. After the site visit, the review secretary prepared an initial outline report in cooperation with chair and panel members. A draft evaluation report was submitted to ENQA review coordinator for pre-screening followed by a submission to FIBAA for factual comments on its accuracy.

After receiving comments from FIBAA, further revision of the report was agreed between review chair and review secretary, in consultation with the panel. The final report was submitted by the review secretary to the panel, the ENQA Secretariat and to FIBAA.

Self-assessment report

The panel learned that the process of preparing for the self-assessment report (SAR) started in mid 2020 on the initiative of the managing director of FIBAA. A steering group was set up consisting of the managing director, the division manager of controlling and accounting, the division specialist FIBAA consult and the division manager office. The division specialist of FIBAA consult was appointed to build the framework of the SAR and to draft the report. He also received special support from the division manager's office and a longstanding employee who was involved in previous ENQA reviews in 2012 and 2017.

The steering group met every two weeks to reflect on the development of the SAR and discuss on how to proceed. All employees of FIBAA, division managers, project managers and support employees were involved in the SAR process through workshops. An exchange of information with staff led to the preparation of a SWOT analysis of FIBAA, which was included in the SAR. A draft version of the SAR was sent to selected members of the Accreditation and Certification Commission. The steering group and the division manager then made the final adjustments of the report and submitted the final version to ENQA and EQAR.

The SAR included 65 pages and eight annexes in German language. The panel found the SAR to be clear, however the explanations were sometimes short and the panel had to seek for further information in the annexes. Before the site visit, the panel asked for some supplementary information, such as a clarification of the Quality Management Manual, information on training of experts, as well as a large number of translations of annexed documents since they all were provided in German. Prior to this, the ENQA Secretariat had asked for additional information, for example on the relation to ESG part I for all of FIBAA's activities that are part of this review.

To summarise, FIBAA produced a self-assessment report, which, after completion, provided a substantial portion of the evidence that the panel used to form its conclusions.

Site visit

The panel conducted an online site visit to validate fully the SAR and clarify any points of issue. The site visit took place on 11, 14 and 16 June 2021.

The programme included interview sessions with the President of FIBAA Foundation Council and the Managing Director followed by meetings with the Senior Management Team, members of staff as well as members of FIBAA Accreditation Committee and FIBAA Appeals Committee.

The review panel also met with the German Accreditation Council, heads of reviewed national and international HEIs, quality assurance officers of HEIs, representatives of FIBAA expert's pool as well as employer and student representatives. An overview of all meetings held at site visit can be found in Annex I.

During the site visit, the panel had various internal consensus-forming discussions. At the end of the site visit, the panel held an internal meeting during which it agreed on the preliminary conclusions and FIBAA's level of compliance on each of the standards.

The panel appreciated the open and in-depth discussions it had with FIBAA and the various stakeholders. The panel believes that, despite the online format of the site visit, it provided an opportunity to get to know the work of FIBAA in depth.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM²

Germany is a federal republic with 16 federal states (Länder). Higher education is primarily the responsibility of each state. However, in order to coordinate cooperation in the area of higher education and research, the federal states have established *The Standing Conference of the Ministers of*

² Parts of this chapter origins from:

- EURYDICE https://eacea.ec.europa.eu/national-policies/eurydice/content/types-higher-education-institutions-31_en
- FIBAA SAR page 6

Education and Cultural Affairs, as an instrument for the coordination and development of higher education in Germany. This consortium of ministers formulates joint interest and objectives for all the 16 federal states.

As of 2020, Germany had a total of 390 state-maintained and state-recognised institutions of higher education:

- Universities,
- Colleges of art and music,
- *Fachhochschulen* (universities of applied sciences),
- Equivalent institutions of higher education (technical universities, pedagogical HEIs, theological colleges et al.).

Whilst the focus on teaching and research applies to all institutions of higher education, a distinction may be drawn between the functions of UNIVERSITIES and other types of institutions of higher education in that university education is traditionally closely linked to basic and theoretical research. COLLEGES OF ART AND MUSIC prepare students for artistic professions and teaching of music and art. The characteristic features of the design of the courses of study and the organisation of teaching and studying at FACHHOCHSCHULEN are the particular emphasis on practical application and the closer links with the requirements of the professional world.

In addition to institutions of higher education, Germany's tertiary sector also includes either state-run or state-recognised *Berufsakademien* in some Länder. They offer an alternative to higher education in the form of courses qualifying to practise a profession for those who have completed the upper level of secondary education and gained a higher education entrance qualification. The *Fachschulen* and the *Fachakademien* in Bayern are classified as post-secondary on the national level but are assigned to the tertiary sector internationally.

Additionally, there are a number of special higher education institutions which only admit certain groups, e.g., higher education institutions of the Federal Armed Forces and *Verwaltungsfachhochschulen*.

QUALITY ASSURANCE³

While the final responsibility for decision-making always rests with the public competent authorities, external quality assurance characterizes the German quality system. FIBAA is one of the ten agencies authorised to assess the quality of study programmes and institutional quality management systems in Germany. The others include seven German quality assurance agencies (ACQUIN, AHPGS, AKAST, AQAS, ASIIN, FIBAA and ZEvA), one Austrian (AQ Austria) and one Swiss (AAQ) quality assurance agency.

As already mentioned, the legal framework for higher education in Germany is provided by each federal state. However, an agreement between the federal states came into force in 2018, the Interstate Study Accreditation Treaty (*Studienakkreditierungsstaatsvertrag*), a federal legislation on a Joint Accreditation System for Quality Assurance in Studies and Teaching with a Specimen Decree. According to this legislation a distinction is made between the assessment process and the

³ Parts of this chapter origins from:

- EURYDICE https://eacea.ec.europa.eu/national-policies/eurydice/content/types-higher-education-institutions-31_en
- FIBAA SAR page 6

preparation of an expert opinion, carried out by the agencies, and the accreditation decision, which is now taken by the German Accreditation Council (GAC). This has led to the need for the quality assurance agencies to adjust and adapt to the new GAC procedures.

The German accreditation system provides three types of accreditations: programme accreditations, institutional accreditations, also called system accreditations, and alternative procedures. The accreditations follow a two-step procedure:

1. The HEI in question commissions an EQAR registered quality assurance agency to carry out the assessment procedure according to the standards defined in Specimen Decree. Once the assessment has been completed by the agency, the report is sent to the higher education institution.
2. The institution then submits the report, along with their comments, to the GAC, who will make a decision on the accreditation of the programme or the system in question. The decision is made on the basis of the accreditation report from the agency, and it is possible for the GAC to deviate from the expert recommendations. The GAC is responsible for the follow-up on the accreditation decisions.

The vast majority of Bachelor's and Master's degree programmes are subject to accreditation in accordance with the relevant federal legislation. Programmes whose quality is assured on the basis of the Interstate Study Accreditation Treaty are recognised in all federal states as equivalent in terms of quality assurance under higher education legislation.

Beside FIBAA's involvement in these GAC accreditations, FIBAA also offers other external quality assurance activities, in Germany and worldwide, which are further described in the chapter *FIBAA's functions, activities and procedures*.

The GAC

The German Accreditation Council (GAC) is a foundation of public law that the federal states have set up for accreditation and quality assurance in teaching and learning at German HEIs. According to the Interstate Study Accreditation Treaty ([Studienakkreditierungsstaatsvertrag](#)), the GAC serves the fulfilment of the following tasks:

- To accredit and re-accredit study programmes and internal quality assurance systems of higher education institutions as well as other quality assurance procedures by awarding the seal of the foundation.
- To define the conditions for the recognition of accreditations by foreign institutions, taking into account developments in Europe.
- To promote international cooperation in the field of accreditation and quality assurance.
- To regularly report to the federal states on the development of the consecutive system of study and on quality development within the framework of accreditation.
- To admit the agencies for the assessment and preparation of an expert opinion with decision and evaluation recommendations.
- To support the federal states in the further development of the German quality assurance system.

The Accreditation Council comprises eight professors from institutions of higher education, one representative of the German Rectors' Conference (*Hochschulrektorenkonferenz – HRK*), four representatives of the federal states, five representatives from among professional practitioners, including one representative from the ministries of the federal states responsible for legislation governing service and wages, two students, two foreign representatives with accreditation experience, as well as one representative of the accreditation agencies in an advisory capacity. Additional guest can be invited by the GAC.

The Science Council

The [Science Council](#) (*Wissenschaftsrat*) carries out the institutional accreditation procedures for non-state universities. Within those procedures it is evaluated if a non-state university can offer research and teaching which correspond to scientific standards. Also the resources (materials as well as staff) and financing are evaluated.

FIBAA

FIBAA is a non-profit organisation established as an internationally oriented foundation in 1994 by the leading employer organisations of German, Swiss and Austrian industry. Besides these founding countries, FIBAA is now also recognised in Indonesia, Kazakhstan, the Netherlands, Turkey and Ukraine. The core operations of FIBAA are in Europe, Central Asia, South East Asia and Middle East.

FIBAA's main fields of activity are accreditations of economics, law and social science degree programmes. Since the establishment of FIBAA in 1994, 2 600 programme accreditations have been carried out at HEIs in Germany, Netherlands, Austria, Switzerland, Russian Federation, Kazakhstan, Georgia, Azerbaijan, Slovenia, Ukraine, Jordan, Lebanon, Oman, Qatar, Turkey, Cyprus, Albania, Vietnam, and Indonesia. FIBAA has also carried out 30 system accreditations of higher education institutions in Germany, Austria, Switzerland, Lebanon, Kazakhstan, Russian Federation. Certification of continuing education courses is also a FIBAA activity, and 40 of these have been done since the foundation of FIBAA. Furthermore, the agency also offers a wide range of consulting services, and approximately five of such procedures are carried out per year. The consulting service is not within the scope of ESG and not part of this review. Nevertheless, the panel considered how these consulting activities are separated from the rest of the agency's activities that do fall within the scope of the ESG.

FIBAA'S ORGANISATION/STRUCTURE

[The Executive Committee of FIBAA Foundation Council](#)

The Executive Committee of FIBAA Foundation Council and the Managing Direction are the two main bodies of the foundation. The management is responsible for the operating business and reports directly to the Executive Committee. The Executive Committee consists of six to fifteen members for a term of two years according to the statutes. Five trade associations and consortia from Switzerland, Austria and Germany have one member each in the committee. Currently the Executive Committee consists of two German, three Austrian and two Swiss members. The chair of the Executive Committee rotates between these three countries. The Executive Committee appoints members of the FIBAA Accreditation and Certification Committee (F-ACC), the FIBAA Appeals Committee, the Managing Director and determines the policy of the foundation in accordance with the statutes. The organisation chart of FIBAA's structure is shown in figure 1.

FIBAA Head Office

The head office is located in Bonn with a Managing Director and a total of 18 employees (12 FTE and six PTE), involved in the different working areas according to the organisation chart of FIBAA and its head office. Five employees (three FTE and two PTE) work as support staff, while the majority of the staff are project managers who work directly with the accreditation and certification procedures.

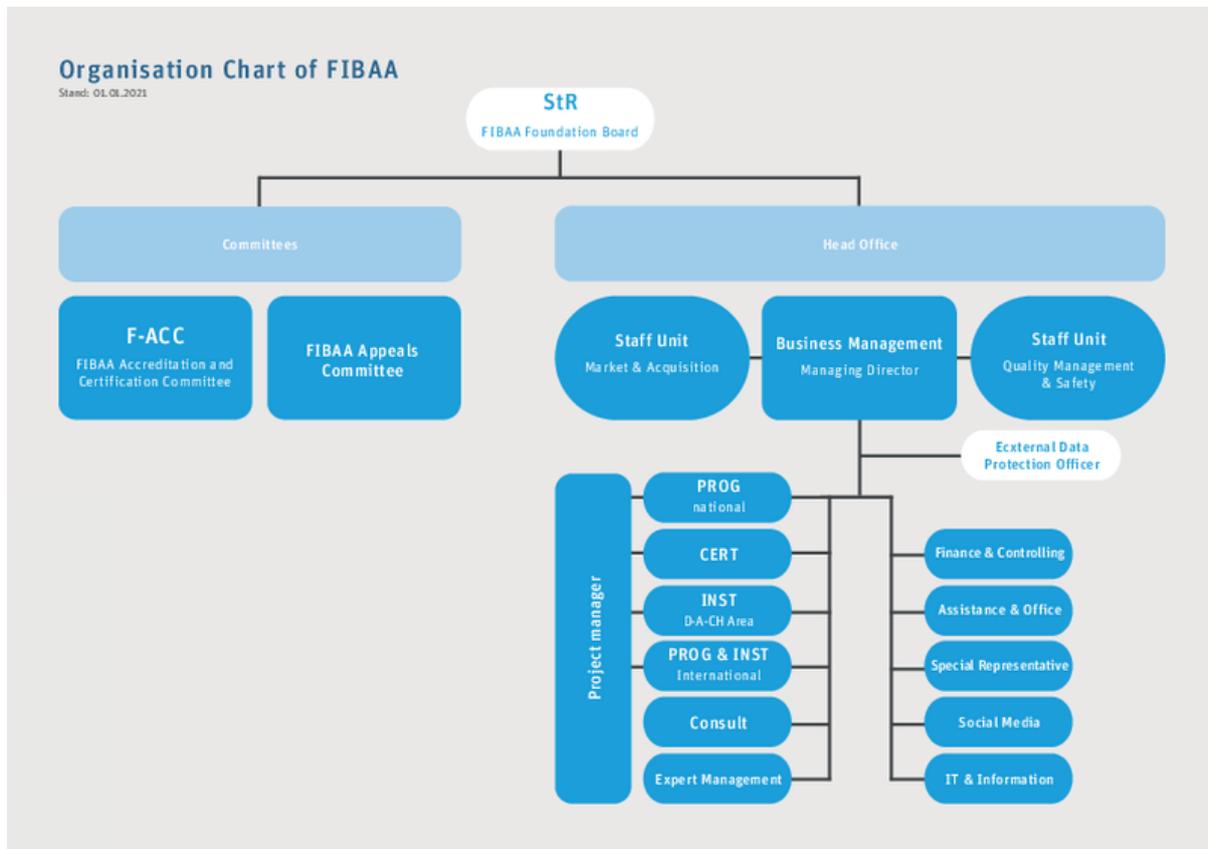


Figure 1: Organisation chart of the structure of FIBAA.

FIBAA Accreditation and Certification Committee

Until 31 December 2020, FIBAA had three accreditation committees:

- FIBAA Accreditation Committee for Programmes (PROG) for national and international programme accreditation.
- FIBAA Accreditation Committee for Institutional Procedures (INST) for institutional accreditation and certification.
- FIBAA Certification Committee for Continuing Education Courses (CERT) for all training courses on minimum EQF level 5.

However, since the agreement in 2018 where GAC is the decision-making body for German accreditations, it was decided in 2020 to join all forces into one common FIBAA Accreditation and Certification Committee (F-ACC). According to the Rules of Procedure of the F-ACC, from 26 February, 2021, the F-ACC is tasked with:

“providing transparency and guidelines for quality assurance and further development, particularly in the fields of higher education and further education with a focus on economics, law and social sciences. The F-ACC evaluates the guidelines and is responsible for their continuing development. At the request of higher

education institutions or further education institutions, it reviews the academic quality of degree programmes and further education courses at programme level and the quality of higher education institutions and their sub-units at institutional level. At the institutional level, it applies its quality guidelines and decides on accreditation or certification. It can also provide its expert evaluation of procedures decided by national institutions. The F-ACC also monitors innovative developments in the higher education sector.”

F-ACC has a total of 25 members appointed by the FIBAA Foundation Council for a term of three years, with 16 HEIs representatives, seven business representatives and two students. Out of these 25 members, two are from Austria, and one member each from the Netherlands, Spain and Switzerland. There are rules and procedures for the mandate of F-ACC, and these include making decisions in the accreditation and certification procedures, deciding on fulfilment/non-fulfilment of standards for FIBAA seals, and appointing and dismissing experts to/from the pool of experts.

FIBAA Appeals Committee

The FIBAA Appeal Committee deals with appeals related to the accreditation and certification procedures for the awarding of the FIBAA seal. For accreditations on a national level, the GAC is the decision-making body and thus responsible for appeals against decisions for the national seal.

The FIBAA Appeal Committee has four members: two representing HEIs, one labour market representative and one from the student body.

Pool of experts

FIBAA has a pool of about 750 experts. They are appointed by FIBAA Project Management (Expert Management). The appointment is reviewed by FIBAA Panel Appointing Committee. More information about the training of experts is provided under section ESG 2.4, Peer-review Experts.

FIBAA’S FUNCTIONS, ACTIVITIES, PROCEDURES

FIBAA is an internationally oriented agency for quality assurance and quality development in higher education. FIBAA carries out the following national and cross-border quality assurance activities that are part of this review:

Programme Accreditation

FIBAA’s programme accreditations mainly concerns programmes oriented towards legal, social and economic sciences as well as management training. The following programme accreditation processes are available:

a) **Programme accreditations in accordance with the rules of the GAC (awarding the GAC seal)**

Upon request from a HEI, FIBAA carries out a review for a single or multiple programmes commissioned by the HEIs. FIBAA prepares an accreditation report after a site visit with peer review experts. Upon request from the HEIs, the GAC makes an accreditation decision for the programme. The aim of the programme accreditation is to ensure the quality of the programme with regard to GAC quality criteria which are in line with ESG. These GAC accreditations are available for bachelors and masters’ programmes in Germany.

b) **Programme accreditations for the awarding of FIBAA seals**

Upon request from a HEI, FIBAA carries out the accreditation process, the accreditation report *and* the F-ACC makes the final decision on the accreditation of a single or multiple programmes. The process includes an on-site visit with peer review experts. FIBAA offers either FIBAA Quality Seal, for programmes, or FIBAA Premium Seal, for established degree programmes which have demonstrated outstanding quality (see also standard 2.5). The assessment criteria are set by FIBAA in line with ESG and defined in the *Assessment Guide for*

the Accreditation of Programmes in Management Studies, Economics, Law and Social Science by FIBAA. These accreditations are available for bachelors, masters' and PhD programmes in Germany and worldwide.

Institutional Accreditation

a) System accreditation for awarding the GAC seal

Similar to the process of programme accreditation for GAC seal, FIBAA carries out institutional review commissioned by the HEIs. FIBAA prepares an accreditation report after two on site visits with peer review experts. Upon request from the HEIs, the GAC makes an accreditation decision for the institution according to the GAC quality criteria in line with ESG. The aim of the system accreditation is to assess the quality management of the institution and its ability to perform re-accreditations of its own study programmes. These institutional accreditations are available for institutions in Germany.

b) Institutional Audit Austria

FIBAA offers this certification process in accordance with the requirements of the Austrian Act on Quality Assurance in Higher Education (HS-QSG). The procedure corresponds to the description of system accreditation for GAC seal. The assessment criteria are defined in the FIBAA Assessment Guide in accordance with the national requirements of Austria and the ESG. The aim is to certify the institution's internal quality management system. The decision about the certification is made by F-ACC who awards the Institutional Audit Austria seal. These institutional audits are accepted as an alternative to the accreditations carried out by the national agency in Austria, in line with the Austrian HS-QSG act, *Implementation of the Quality Assurance Procedure*, § 19⁴.

c) Institutional Accreditation Switzerland

FIBAA offers this accreditation process according to the Federal Act on Funding and Coordination of the Swiss Higher Education Sector (HFKG). The procedure corresponds to the description of system accreditation for GAC seal. The assessment criteria are defined in *FIBAA Assessment Guide* in accordance with the national requirements of Switzerland and the ESG. The process verifies the institution's internal quality management system; the outcome is the acquisition of the Institutional Accreditation Seal of Swiss Accreditation Council, who also makes the final accreditation decision.

d) FIBAA Institutional Accreditation

The process is for the acquisition of the FIBAA Quality Seal or Premium Seal for Institutional Accreditation. The procedure corresponds to the description of the process for the FIBAA seal in programme accreditation except for the difference in criteria and scope of the review. The assessment criteria are set by FIBAA in line with ESG and published in *Assessment Guide for Institutional Accreditation (October 2016)*. These institutional accreditations provide an overall assessment of the institutions' internal quality processes. FIBAA Institutional Accreditations are available for institutions in Germany and worldwide. The final accreditation decision is made by the F-ACC.

FIBAA Institutional Accreditation: Strategic Management

The process offers a FIBAA Quality Seal for Institutional Accreditation in Strategic Management. The procedure corresponds to the description of the programme accreditation for FIBAA seal except for the difference in criteria and scope of the review. The assessment criteria are set by FIBAA in line with ESG and published in *Assessment Guide for Institutional Accreditation – Strategic Management*.

⁴ <https://www.bmbwf.gv.at/en/Topics/Higher-education---universities/Higher-education-system/HS-QSG.html>

These institutional accreditations focus on the strategic management of the institution and are primarily targeted at innovative, entrepreneurial and internationally oriented HEIs. This type of accreditation is available for institutions in Germany and worldwide. The final accreditation decision is made by the F-ACC.

FIBAA Seal on Excellent Digital Teaching or Digitalisation of teaching

As a response to the pandemic situation and the need for HEIs to adapt to online learning instead of on-campus teaching, FIBAA is now in a process of looking at the opportunities of this digital transformation and is, therefore, developing a new seal on digital education. An on-going pilot study is now considering taking aspects such as university-wide strategy for the digitalisation of teaching, number and competencies of staff, technical equipment for the digitalisation of teaching, didactic design of digitised teaching, quality assurance and aspects of "learning analytics". The assessment criteria for the new seal will be set by FIBAA and accreditation decision made by the F-ACC. A concept paper *FIBAA Seal on Excellent digital teaching or digitalization of teaching*, from 12 November 2020, gives further information about the new seal. The pilot study is still on going, and seals in digital teaching has been awarded by the time this report was written.

Certification of Continuing Education Courses:

In accordance with the FIBAA quality standards, FIBAA certifies further education courses which do not lead to an academic degree but are offered at a HEI level. They lead to the award of the FIBAA quality seal for further education courses. As in all of FIBAA procedures the certification process includes a self-evaluation report, an on-site visit with peer review experts, a draft report by FIBAA and a statement by the institution. The assessment criteria are set by FIBAA in line with ESG and published a *FIBAA Assessment Guide for the certification of continuing education courses*, June 2014. The final accreditation decision is made by the F-ACC.

Evaluation Procedures According to Individual Objectives (offered by FIBAA Consult):

These evaluations are planned in close consultation with the client, since it is the client that sets the object and the objective of the evaluation. As far as the objectives of the evaluation are teaching and learning in higher education, the activity is within the scope of the ESG. While FIBAA Consult has not carried out such evaluations yet, the review addresses this activity as far as the activity is defined and designed by FIBAA as published in *Guidelines FIBAA Consult for Evaluation According to Individual Objectives*. The process for these evaluations include: the definition of object and objectives of the evaluation defined in an individual assessment guide, a self-assessment, an external evaluation made by peers, a report with recommendations published on FIBAA Consult's website and a follow-up of these recommendations. No decision is taken by F-ACC.

FIBAA activities outside the scope of ESG

Outside the scope of ESG FIBAA offers, through FIBAA Consult, a wide range of consulting services, such as individual consulting activities, lectures, studies, workshops, conferences and seminars upon request. These consulting services represent a minor part (about 3-5% of total budget) of FIBAA's activities and costs. Furthermore, they are well separated from the accreditation activities since FIBAA staff do not have access to FIBAA Consult documentation, only the Managing Director has been involved so far. Since these FIBAA Consult activities are not within the scope of ESG, they are not part of this review.

FIBAA'S FUNDING

FIBAA is a non-profit organisation registered in Switzerland with headquarters in Bonn, Germany. As an organisation founded in Switzerland, the legal situation of FIBAA does not entitle it to state funding in Germany, which is the primary market for FIBAA. The agency's main source of income is through contracts with German and international HEIs, for whom FIBAA performs accreditation, certification, evaluation or consulting activities. In 2019 the total revenue was 1.534 000 Euros. The fees for FIBAA activities are based on flat rates covering expert fees, travel expenses, accommodation of experts, committee meetings and costs for FIBAA staff and premises.

FINDINGS: COMPLIANCE OF FIBAA 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.

2017 review recommendations

The agency should intensify its internal strategy debates as the comparatively new areas of activity of certification, institutional procedures including system accreditation and evaluation procedures have, up until now, experienced relatively low demand.

It should be transparently regulated which measures respectively head-office-internal processes in which line of activity ensure the separation of consultancy and accreditation. Also should be clarified that an application for a quality assurance procedure to be conducted cannot be made at the same time as or shortly after consultancy services.

Panel conclusion: Substantially compliant

Evidence

FIBAA's mission statement says that the agency is "...a non-profit organisation. Customer-oriented, efficient, fast and flexible work are some of its trademarks. The task of quality assurance lies within the responsibility of the higher education institutions. FIBAA supports them in achieving their self-defined objectives. It offers impulses for further quality development. It promotes quality and transparency in academic education by assessing HEIs, Business Schools, programmes and further study offers nationally and internationally based on international standards and regulations and by means of documenting and publishing the results."

A more detailed version of the mission is published on FIBAA's website and FIBAA believes that all of its processes follow the mission and are in accordance with it.

FIBAA undertakes external quality assurance activities as set out in standard 2.1, on a regular basis. These activities, within the scope of this review, are:

- Programme accreditation (GAC and FIBAA seals (national and international))
- Institutional accreditation (GAC, Institutional Audit Austria, Institutional Accreditation Switzerland and FIBAA seals (national and international))
- Certification of Continuing Education

The activities of FIBAA Consult are not within the scope of this review but the report comments on the agency's response to a recommendation in its previous review in the analysis section below.

The SAR demonstrates the impact of recent changes in the national context on FIBAA's work due to the Interstate Study Accreditation Treaty in 2018 whereby the final decision on national programme and intuitional accreditations that will receive the seal of the German Accreditation Council (GAC) is now taken by the GAC and not by the agency that undertook the accreditation process. This is coupled with a general move away from programme accreditation to system accreditation in Germany which has the potential to decrease the workload of the German QA agencies and to shrink the market. The SAR explains that there is regular dialogue between FIBAA and the GAC about the new system in Germany. FIBAA and the other German QA agencies have a common permanent seat on the GAC's advisory committee and have an advisory vote, thus ensuring that QA agencies are involved in the further development of the German accreditation system. FIBAA is also involved in other meetings and work of the GAC on a regular basis.

The SAR explains that stakeholders are uniformly embedded in the activities of the agency, either as members of FIBAA committees such as F-ACC and the subcommittee for the appointment of expert panels or as experts. Stakeholders (including the experts, the institution and the FIBAA project manager) provide feedback to FIBAA after each accreditation process and this feedback is incorporated into the agency's internal QA system (see standard 3.6 for further information).

In relation to the strategic development of the agency overall and of its activities, the SAR highlighted FIBAA's response to a recommendation made in its previous review by the GAC in 2017 in relation to ESG standard 3.1:

"The agency should intensify its internal strategy debates as the comparatively new areas of activity of certification, institutional procedures including system accreditation and evaluation procedures have, until now, experienced relatively low demand."

The SAR states that FIBAA has sought to intensify its internal strategy debates and has set up a working group for that purpose. The group meets as and when required and is attended by the Managing Director and the Division Managers for the various fields of activity. The working group see its task as a continuous one and it is now supported by the creation of the FIBAA Strategy Circle which consists of current and former FIBAA committee members. The role of the Strategy Circle is to provide supplementary information and advice to the internal strategy debates from the perspective of the market. It can also offer its own suggestions to FIBAA for consideration; any concepts or innovations that are developed by the internal working group and/or the FIBAA Strategy Circle must be approved by the FIBAA Foundation Council and implemented by the FIBAA Head Office. The new seal in Digital Education (see section *FIBAA's functions, activities and procedures*, of this report for further information) is one example of an initiative that was instigated via this strategy route as is the decision to merge the three former accreditation committees into one.

Analysis

The interviewees at the site visit confirmed the on-going dialogue between GAC and FIBAA, along with the other QA agencies in Germany. The rather new legal situation, with the GAC now being the sole decision-making body for the national seal, on one hand makes the agencies freer since the agencies are no longer taking legally binding positions. On the other hand, there are GAC demands to be followed and the review panel learned that meeting the GAC's requirements for the reports is an example of a challenge for FIBAA, as well as the other QA agencies, to meet. The review panel encourages further dialogue between the GAC and German agencies in order to continue discussions on matters that need to be resolved due to the new legal situation.

It was clear to the review panel that stakeholders are involved in the work of the agency; F-ACC members contribute to a very well-established group of peers with some having been on the committee for several years. They confirmed that their meetings are very well-prepared by FIBAA staff and that now, as one committee, there is more synergy as the committee can make links between programme quality and the global governance of an institution.

Employers told the review panel of their interest in FIBAA's focus on Universities of Applied Science where the relevance of the programmes offered is important. Many are F-ACC members and see value in their experience on the debate between skills and qualifications. They are able to provide input into the development of various seals and see these as FIBAA's unique selling point along with its international focus.

Further stakeholder involvement was apparent through the role of experts and students on the various committees and accreditation processes (although the review panel noted that there is no student representative on the Foundation Council) and also through institutional involvement in pilots for new seals and through feedback on review activities, although many of the stakeholders that the review panel spoke to played multiple roles – for example, the employers were also members of F-ACC.

The review panel suggests that FIBAA could consider broadening the externality of its stakeholder involvement to include, for example, members of committees from outside of FIBAA's circle of 'customers.' This would provide the input and challenge of a more 'critical friend' which would benefit the agency.

Although it understood the role and function of the Internal Strategy Group and the FIBAA Strategy Circle, the review panel wished to understand more about the strategic planning cycle, for example in relation to the strategic goals that it had seen and in relation to the discussions that it had had over the course of the review with the Chair of the Council, the Managing Director and other colleagues and stakeholders. It therefore held a clarification meeting with the Managing Director and the Chair of the Foundation Council on the final day of the review and also discussed the role of FIBAA Consult at this meeting.

It was clear to the review panel that strategy and planning processes had evolved quite recently (over the last two years) and that, given the relatively recent appointment of the Managing Director, the new process is still bedding down into the agency's operations. The Chair of the Council explained that FIBAA does not have a periodic and pluriannual Strategic Plan but that the strategic goals are considered at the last meeting in the year of the Council at which it takes a financial and strategic overview. He also confirmed that risk analysis is undertaken but not in a formal way and that this is something that the Council would like to formalise.

The review panel clarified that strategic issues follow a route as follows: strategic matters are brought to the attention of the Managing Director (or are initiated by her); she brings them to the attention of the Internal Strategy Group (and the FIBAA Strategy Circle if appropriate); she then reports the comments of those groups to the Council who may then also comment and initiate a second round of strategic consideration of the issue. Thus, consideration of strategic matters is constant and takes place as and when necessary, but still a highly informal process for setting strategic objectives. It was confirmed that the final responsibility for strategy and its operationalisation remains with the Managing Director, as the Council does not have the power to enforce a particular allocation of resource.

The review panel was told that strategic planning is now much more transparent than it had been in the past and it heard how the agency had responded strategically to, for example, the development

of the seal in Digital Education. It also heard how, strategically, the direction that the agency will take in relation to the changing context in Germany is to focus on the quality of what it offers, particularly in relation to its own seals. It believes that it must be more flexible and offer better quality. This is reflected in its mission statement and was confirmed to the review panel by all stakeholder groups that it met.

It was apparent to the review panel that strategic discussions took place at various levels of the organisation and that the strategies were reflected in the mission and activities of the agency. However, the review panel is of the view that the current strategic planning process, whilst it may be effective in the short term, should be further developed to ensure that it also considers the medium to long term future of the agency. To use FIBAA's strategy for internationalisation as an example, in the short term, FIBAA clearly intends to build on existing relationships in particular countries to further establish its presence there. However, for an agency that states that it is an internationally-facing organisation, the review panel saw a lack of strategic thinking beyond the short term. The review panel believes that a strategic planning process that provides a comprehensive overview of the agency and all its functions and activities, including resourcing, and that ensures that the inter-relationships between activities are recognised will benefit FIBAA and enable it to plan for its medium to longer-term future (see also standard 3.5). The review panel encourages the agency in its development and formalisation of a risk analysis process as part of the development of its strategic planning process.

In relation to FIBAA Consult, the review panel wished to clarify FIBAA's response to a further recommendation under standard 3.1 of its previous review that:

“The agency should try to make a clearer difference between consultancy and accreditation in its processes. Activities should be regulated in a transparent manner that an application for a quality assurance procedure to be conducted cannot be made at the same time as or shortly after consultancy services”.

The review panel can confirm that, shortly after receipt of the above recommendation, FIBAA published an on-line resolution that clarifies the separation of the activities of FIBAA and FIBAA Consult, (*Principles for the separation between consultancy services and assessment in line with ESG*, of January 2017), including the clear separation between consultancy and accreditation services both in terms of whether FIBAA can undertake the work and the independence of the experts that it would use in any accreditation process. The review panel can also confirm that, at the moment, FIBAA Consult activities account for only 3-5% of the agency's work and only involve the Managing Director. Staff who met with the review panel did not have access to FIBAA Consult documentation.

In discussion, the review panel was told that the strategy behind FIBAA Consult was to introduce the agency to those institutions that had no experience of working with the agency. However, this had not been successful and currently the aim is to maintain FIBAA Consult activities at the level of workshops to introduce, for example, trends in Learning and Teaching.

The review panel confirmed, through discussions with FIBAA staff and peer experts, that a strict separation between the two sets of activities is maintained.

Panel recommendations

FIBAA is recommended to further develop its strategic planning process to ensure that it considers the medium to long term future of the agency as well as the shorter term. The development of a formal strategy for managing risk is also encouraged as part of the development of the strategic planning process.

The agency is recommended to include a student member of the Foundation Council.

Panel suggestions for further improvement

The panel suggests FIBAA to consider broadening the externality of its stakeholder involvement to include, for example, members of committees from outside of FIBAA's circle of 'customers.' This would provide the input and challenge of a more 'critical friend' which would benefit the agency.

Panel conclusion: Substantially 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.

2017 review recommendation

None.

Panel conclusion: Fully compliant

Evidence

FIBAA was established as a non-profit foundation under Swiss law founded in 1994 by leading German, Swiss and Austrian employer associations to assure transparency and quality in higher education. As explained in the SAR, FIBAA's main fields of activity are accreditation procedures of economics, law and social science degree programmes and accreditation of higher education institutions. The SAR also tells us that certification of continuing courses is part of FIBAA activities as well as consulting services. The latter are not within the scope of ESG thus not part of this review. FIBAA perform its' quality assurance activities with state and state-recognised private HEIs as well as HEIs that are in the process of being founded. All activities of FIBAA are described in more detail in section *FIBAA's function, activities, procedures*, of this report.

Along with nine other quality assurance agencies, FIBAA is officially authorised by the GAC to carry out accreditation procedures in Germany where the GAC makes the final decision. This authorisation by the GAC requires registration with EQAR, which FIBAA has had since 2009, as well as membership of ENQA since 2002.

Besides conducting quality assurance procedures where the GAC is the decision-making body, FIBAA is also legally recognised to perform international accreditation activities by the following bodies:

Austria

The Federal Ministry of Science, Research and Economy incorporated FIBAA into the "Regulation on quality assurance agencies" which means that FIBAA is entitled to perform institutional audits at public universities and universities of applied science in Austria.

Switzerland

The Swiss Accreditation Council recognised FIBAA to carry out Swiss National Institutional Accreditation in accordance with the Swiss Federal Act on the Funding and Coordination of the Higher Education Sector (HEdA).

Kazakhstan

The Ministry of Education and Science incorporated FIBAA into the National Register of Accreditation Agencies which enables FIBAA to perform officially recognised accreditations of study programmes.

Netherlands and Flemish Community of Belgium

The Accreditation Organisation of the Netherlands and Flanders (NVAO) has recognised FIBAA to carry out nationally recognised accreditation procedures in cooperation with the NVAO.

Turkey

The Higher Education Quality Council of Turkey (HEQC) recognized FIBAA as a foreign accreditation agency in Turkey.

Ukraine

The Cabinet of Ministers of Ukraine added FIBAA to the register of foreign accreditation and quality assurance agencies in Ukraine. This means that FIBAA's decisions on the accreditation of Ukrainian universities and study programs are officially recognized by the Ukrainian government.

Indonesia

The Indonesian Ministry of Education added FIBAA to the register of foreign accreditation and quality assurance agencies in Indonesia. The decisions of FIBAA on the accreditation of Indonesian universities and study programs are officially recognized by the Indonesian Ministry of Education.

Analysis

The review panel finds it well documented that FIBAA has an established legal basis for its operations and is formally recognised as a quality assurance agency by the German Accreditation Council (GAC), as well as by the relevant bodies for FIBAA's international activities. The review panel also found the accreditation processes, and in relevant cases accreditation decisions made by FIBAA, to be recognised by HEIs and other stakeholders.

Panel conclusion: Fully compliant

ESG 3.3 INDEPENDENCE

Standard:

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

2017 review recommendation

The Agency should adopt the rules of procedures currently available in draft form for the F-AC INST and the Appeals Committee.

Panel conclusion: Substantially compliant

Evidence

FIBAA is a non-profit foundation organisation. According to the SAR, its legal status along with regulations in the foundation statutes as well as the rules of procedures, guarantees its organisational independence towards third party influence (Rules of Procedure of the FIBAA Accreditation and Certification Commission (F-ACC) of 26 February 2021 and Rules of Procedure for the FIBAA Appeal Committee of 16 November 2016).

As previously mentioned, the legal framework in Germany changed in 2018, when the Interstate Study Accreditation Treaty and the Specimen Decree was adopted: The main change is that – for accreditation in Germany – FIBAA no longer takes accreditation decisions itself but prepares an assessment report on the basis of which the German Accreditation Council (GAC) takes a decision. Agencies themselves remain responsible for the alignment of their activities with the ESG, therefore, FIBAA applies the criteria as set out in the Specimen Decree, which replace the accreditation criteria previously set by GAC.

With regard to the operational relations between the members of the various committees operating under the FIBAA umbrella, it should be noted that beyond the appointment of the members of these committees, there is no functional dependency relationship with the Executive Committee. In addition, the members of the F-ACC are all bound by a commitment to independence. As for the members of the FIBAA Appeals Committee they act as experts based solely on quality aspects, and they do not take part in the voting as an expert in a procedure in cases of impartialities or job affiliation. Finally, concerning the members of the expert panels, a declaration of impartiality, which all experts must complete and sign evidence their independence. They are also bound by Code of Conduct/Confidentiality and Data Protection Declaration for Experts. According to the documents provided by the agency, FIBAA is also informed by the Guidelines on the Appointment of Experts and Composition of Expert Teams in Accreditation Procedures (Resolution of the 23rd Members' Assembly of the German Rectors' Conference (HRK)) and the Guidelines for Avoiding Conflicts of Interest of the German Research Foundation (DFG).

The SAR also gives information about the recommendation in the review against the ESG from 2017, on ESG 3.1, to have a clear separation on the consultancy and accreditation activities. According to SAR and the ENQA follow up report from May 27, 2019, a decision on the separation of consultancy and accreditation activities was taken by the Executive Committee of FIBAA Foundation Council on January 2017 (see also standard 3.1).

Analysis

The review panel can confirm that the legal status of FIBAA provides a guarantee for organisational independence towards public or private parties, and that all rules of procedure now have been adopted and published on the agency web site, as per the recommendation in 2017. According to the FIBAA follow-up report on recommendations related to the compliance with the ESG, from 27 May 2019, the GAC has also confirmed the procedures being in compliance with the ESG. The official documentation that the review panel had access to shows that FIBAA works independently from third party interests.

FIBAA is accredited by the GAC, the Austrian Federal Ministry for Science and Research, the Swiss Federal Department of Economic Affairs, Education and Research (EAER), the Ministry of Education and Science of Kazakhstan, the Nederlands Vlaamse Accreditatie Organisatie (NVAO), the Higher Education Quality Council of Turkey (HEQC), the Ministry of Education and Culture of Indonesia,

and the Ministry of Education and Science of Ukraine. During interviews at the site visit the review panel learned that the agency maintains a good relationship with governmental and professional bodies in the countries in which it works. Especially in Germany, it now has a fluid and constructive relationship with the GAC, both on a formal level and in the framework of more informal exchanges. However, this in no way calls into question its independence from the GAC. Indeed, according to the meeting with GAC, it can be the case that the final decision of the GAC differs from the report prepared by FIBAA.

Furthermore, the stronger involvement of GAC in the building of a more embedded institutional accreditation environment does not seem to affect the agency's autonomy. In spite of the fact that, in the German system the agency is not making the final decision anymore, the HEIs still consider the role of FIBAA to be relevant and they highly appreciate its independent character and autonomy throughout the accreditation process. You could even argue for a reinforced independence in the German accreditation system since FIBAA can be freer being responsible only for the accreditation process and not the following decision, which is taken by the GAC.

The review panel saw a clear separation in the agency's organisational structure between its governing bodies (Executive Council and Managing Director) and the evaluation bodies (F-ACC, Appeals Committee and panels) with a clear delimitation of the tasks to be carried out by each body.

As for the operational functioning, from both written and oral information provided, the review panel learned that the merger of the three former committees (FAC-PROG, FAC-INST, FAC-CERT) into one (F-ACC) has made the discussion and decision-making process more efficient, coherent and agile, and this was confirmed by the Committee members themselves.

It should also be added that committee members, as well as panel experts perform their duties on the basis of their individual expertise and not as representatives of organisations which also reinforces the level of independence towards any third-party influence.

The operational independence is also ensured by the fact that the F-ACC come to their decisions solely on the basis of expert evaluations in the reports and on the basis of statements made by higher education institutions. The committees can deviate from the recommendations and expert-recommended decisions provided that this seems necessary and justified.

The review panel also learned in interviews at the site visit that in relation to the independence of formal outcomes, there is a strict line between the agency and the experts, in a sense that the whole panel is fully engaged in the quality assurance activity, i.e. the accreditation, its content and the recommendation to F-ACC, while the F-ACC, which is the decision making body of FIBAA, takes full responsibility for the final decision of the quality assurance activity.

Possible conflicts of interest are very strictly controlled: FIBAA's staff, members of the F-ACC, members of the Appeals Committee and members of expert panels sign an impartiality declaration and the code of conduct to avoid potential conflicts of interest. As an example, in the meeting with the employers the review panel was told that if, as members of the F-ACC, they come across an item on the agenda where their interests as a corporation may be at stake and their independence questioned, they are invited to leave the room while this item is being discussed. This seems to happen with some frequency and is standard practice in the F-ACC.

As already mentioned in this report, standard 3.1, the review panel can confirm a strict separation between FIBAA consult and FIBAA accreditation, which ensures that there is no interference as far as the independence of FIBAA's activity in accreditation and certification is concerned.

Panel conclusion: Fully compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

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

2017 review recommendation

The agency should continue to increase the amount of analytical publications in the future and also cover fields of activity beyond programme and system accreditation.

Panel conclusion: Substantially compliant

Evidence

According to the SAR, FIBAA has expanded its publication activities in recent years. On a yearly basis FIBAA summarises its activities in the FIBAA Annual Report, and a link to the 2018 Annual Report was provided in the SAR. This annual report contains a report on the results of FIBAA surveys covering “customer satisfaction” after completed reviews, a thematic analysis on gender balance in expert panels and another thematic analysis on conditions for accreditation of selected study programmes in Kazakhstan and Germany. The annual report gives information about new project managers at FIBAA and a one-page summary that covers performed accreditation activities during the year and a summary of two events.

FIBAA also publishes newsletters on a regular basis, which according to the SAR give “information on general findings and events that FIBAA encountered during its activities in external quality assurance”. The newsletters are available on FIBAA website, and the latest example from April 2021 covers a FIBAA on-line workshop on: *What distinguishes quality in distance learning?*

The SAR also informed the panel that in addition to these regular publications, FIBAA also refers to publications by employees in specialist journals as thematic analyses, such as Digital transformation in QA & impact on communication (2020). FIBAA also includes, as a thematic analysis, presentations in conferences and workshops, and a list of selected presentations is given in the SAR.

Analysis

The review panel was somewhat concerned about FIBAA’s interpretation of this standard. It is said in the SAR that FIBAA has tried to expand the number of thematic analyses in the last years but has not always achieved this because of a high employee turnover and personnel resources. However, the problem is not only a limitation in terms of resources, but also a lack of strategy or policy concerning thematic analysis. FIBAA does not seem to collect in a systematic way information on programmes and institutions that can be used beyond the scope of a single process. Even if some FIBAA activities show new developments, suggestions for improvement or good practices which are shared with stakeholders, it does not produce any overview of the outcomes of specific procedures. The agency does not work in a cross-cutting manner with topics, nor does it cover horizontal issues (graduate employment outcomes, student satisfaction, employability of recent graduates, specific

programmes or disciplines, etc.) that may be of interest for HEIs. The review panel did not see or hear any evidence that suggest that FIBAA is aware of the need to carry out this thematic analysis, nor do they prioritize it over other activities they carry out. Written as well as oral information given to the review panel does not indicate enough attention given to the interpretation of this standard. The review panel received no clear answer to the question of who is responsible for deciding which issues should be analysed. It seems that, depending on the feedback FIBAA receives from stakeholders (who also did not provide clear answers on this issue), it decides on the matters to be addressed, and these are generally discussed in workshops with stakeholders. The panel missed a planned or predefined cycle that includes the whole process of proposing the topics, deciding to address them, carrying out the necessary research and thematic analysis, and finally deciding how to disseminate them.

FIBAA also includes, as a thematic analysis, presentations in conferences and workshops. The review panel does not agree with this interpretation of ESG 3.4.

So far, workshops on topics related to quality assurance and development and any studies that may result from them, are mainly organized by FIBAA Consult and the agency does not expect to see much analytical activity in 2021. The panel believes that FIBAA should reconsider its interpretation of this standard and also consider whether the thematic analysis should continue to be organized by FIBAA Consult. The activities that FIBAA touches upon in SAR within this standard, such as conferences, workshops and analytical work now mainly organized by FIBAA Consult, could very well fit into the work of a quality assurance agency in line with ESG.

Panel recommendations

The panel recommends that FIBAA reconsiders its interpretation of ESG 3.4 and continues, as suggested in the review of 2017, to increase the number of analytical publications, and cover fields of activity beyond programme and system accreditations.

Panel suggestions for further improvement

The panel suggests a more structured approach in identifying, planning and carrying out thematic analysis.

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.

2017 review recommendation

None.

Panel conclusion: Substantially compliant

Evidence

FIBAA is a non-profit organisation with an international profile, oriented towards higher education institutions within business administration. Furthermore, FIBAA is a Swiss charitable foundation documented in the public deed from July 4th, 2000 and the Commercial Register entry of the Canton of Zürich from October 7th, 1987. From a financial point of view, this situation has the advantage that as such a charitable organisation it is exempted from taxation in Switzerland, but at the same time it cannot benefit from aid and subsidies in the territory of other states, especially in Germany. This results in a competitive disadvantage in relation to other agencies in Germany, as the price of its services is usually higher. It is, therefore, difficult for a private body like FIBAA to survive in a market like the German one, where State intervention and interaction with the government is very high. The review panel also learned at the site visit that there have been discussions and investigations on the possibility of changing the legal status of FIBAA, but it has been estimated that, in the end, such a process would be too lengthy and costly.

The SAR informed the panel that, as a consequence of being a non-profit-organisation, members of Foundation Council, the F-ACC and the Appeals Committee are employed “on a voluntary basis”, which means that there is no extra remuneration for these members, but a cover of expenses.

According to the SAR, FIBAA primarily generates income through contracts with national and international HEIs where it is engaged to conduct an accreditation or certification procedure. The fee for each procedure is set on a flat rate basis that covers expert fees, travel expenses and accommodation for experts etc. According to FIBAA’s annual financial statement for 2018/19, the result for 2019 shows a revenue of 1.534 K EUR. The fees are regularly reviewed and for each year FIBAA drafts annual plans for expected revenues and expenses. The income from FIBAA Consult is included in the revenue and at site visit the review panel learned that they represent about 3-5 % of the total revenue. FIBAA also informed the review panel that they expect FIBAA consult to increase its activity (and income) over time, especially in terms of organising workshops, but this has not yet happened.

In relation to FIBAA staff, the SAR states that the Managing Director is responsible for a total of 18 employees (12 FTE and six PTE). She is assisted by 5 Division Managers. There are all in all 10 project managers, and another 3 employees within finance, the secretariat and information systems that can also act as project managers. Four of the project managers are employed on a consultancy basis. At the site visit the panel learned that although the Managing Director is responsible for personnel, the daily support to the project managers is given by the managers of the different divisions. At the site visit the review panel understood that the Managing Director has yearly meetings with all employees.

Analysis

As stated in standard 3.1, the process of designing and implementing a medium/ long-term strategy for the agency’s development is not yet fully developed. A strategy working group discusses the planning for the current year, at most for the next two years, and this is approved by the Foundation Council. Funding and human resource needs are then aligned with these expectations, which are set solely at the operational, not strategic, level by the Managing Director. The review panel learned that the allocation of resources is discussed within the Council, but for informative purposes, as the responsibility lies with the Managing Director. The review panel had difficulty in seeing a clear alignment between the strategic vision of the agency and the planning of actions with the allocation of human and financial resources. It asked for a more detailed breakdown of the budget, but this did

not clarify the resource allocation for the panel. It was difficult to know how much of the budget is allocated to specific activities or concepts, such as training of permanent staff or how much is allocated to recruitment of experts. There was no evidence of pluri-annual financial planning for the medium or long term which does not make the establishment of priorities, with regard to the development of processes and procedures clearly visible.

Furthermore, the review panel could not identify any strategic long-term policy for human resources. The panel understood that a certain number of staff was engaged on a consultancy basis, which potentially could be challenging for an organisation. The number of employees, 18, may also be on the edge of being sufficient for the whole of FIBAA's accreditation activities. Its day-to-day policy is based on hiring ad hoc professionals according to the volume and type of accreditations they have (freelance) and keeping a small core of professionals on a permanent and stable basis. This means that the greatest specialisation is mostly among the senior staff, while younger staff must adapt to the needs of the moment and be willing to assume a great deal of flexibility in the performance of tasks.

Despite this, the review panel learned that FIBAA staff (project managers) feel fully supported in carrying out their tasks. In turn, stakeholders and especially the assessed HEIs value very positively the work and support they receive from FIBAA staff. The panel also understands that the recent changes in the German system make it difficult to plan for definite numbers of accreditations.

From the meetings with the staff and stakeholders, the review panel is convinced that the agency has the resources, both financial and human, to carry out its tasks properly. Nevertheless, the review panel sees a lack of long-term strategic vision which over time could be an obstacle in the context of increasing competition and declining demand for programme accreditation in German HEIs.

Panel recommendations

In line with the recommendation on ESG 3.1, the panel recommends FIBAA to establish a clear alignment between the strategic vision of the agency and the planning of actions with the allocation of human and financial resources.

Panel conclusion: Substantially compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

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

2017 review recommendation

The agency should guarantee for all fields of business that conclusions are regularly drawn from other internal and external feedback (alongside evaluations). The QM concept should also be adopted by the agency's responsible committees.

The different codes of conduct for committee members and expert groups should be adjusted if necessary.

Panel conclusion: Substantially compliant

Evidence

According to the SAR, FIBAA has integrated internal quality assurance processes in all its work processes and its different areas. Also, FIBAA has a quality manager position that reports directly to the Managing Director. FIBAA has an electronic Quality Management (QM) Manual, which is based on the software ViFlow. The manual includes all FIBAA's processes at all levels and describes the steps and responsibilities within the processes. To continuously improve, FIBAA evaluates all its processes by the involved internal and external stakeholders. Additionally, the people involved in the reviews are evaluated: the experts evaluate the project managers, staff at FIBAA's office and the work process itself. In return the experts are evaluated by the project managers and there is a possibility for the project managers to get in touch with the experts if s/he was evaluated poorly.

Results from the evaluations are discussed with the involved stakeholders and are then used to improve the internal QA further. The results of the evaluations are analysed, evaluated and then summarized and published in the annual quality management report, which is published together with the description of the quality concept on FIBAA's homepage, where they are accessible for all interested parties.

During the visit the panel also learned that there is an informal discussion round between the HEIs and FIBAA after each site-visit, where HEIs can give informal feedback to FIBAA. In general, FIBAA collects informal feedback and suggestions during different events, for example workshops or committee meetings, which is then used to change processes within FIBAA. The different stakeholders said they see FIBAA as a learning organisation.

FIBAA states in its SAR that it systematically revises all procedure documents and the QM manual regularly and they follow the plan-do-check-act control cycle. Also, FIBAA generates different internal events, where staff can give feedback, such as the quarterly "jour fixe" or the project manager workshops.

In the last review, it was recommended that FIBAA adjusts the different codes of conduct for committee members and expert groups if necessary.

FIBAA responded with an excerpt from their Codes: *"All persons linked to FIBAA (committee members, experts, employers etc.) are committed to equal opportunities and do not discriminate against anyone, neither explicitly nor implicitly, and in particular not on the basis of ethnicity, religion, conviction, disability, age, sexual identity or sex"*. In addition, experts must follow a code of conduct, provide a confidentiality and data protection declaration and a declaration of impartiality. These documents are based on the guidelines of the German Rectors' Conference and the *Deutsche Forschungsgemeinschaft* (DFG).

Additionally, the panel learned that HEIs can also give feedback about experts and can complain if they believe the experts did not behave professionally. The project managers then engage in a clarifying conversation with the specific expert and there is a possibility that the expert is excluded from future reviews, which has happened.

It was also confirmed during the site visit that, in addition to the resolution of the Council that ensures the strict separation between FIBAA and FIBAA Consult, the agency clearly uses the EQAR and ESG labels only in connections with activities within the scope of the ESG.

Analysis

During the last ENQA review FIBAA was recommended to guarantee for all fields of business that conclusions are regularly drawn from other internal and external feedback (alongside evaluations) mechanisms and that the QM concept should also be adopted in the relevant agency committees.

Through information provided in the SAR along with annexed documents, statements from interviewees at the site visit and the demonstration of the QM Manual, the panel was reassured that FIBAA has implemented sufficient internal quality assurance mechanisms to foster continuous improvement across the agency at all levels and within its different committees. To continuously improve, FIBAA evaluates all its processes by the involved internal and external stakeholders. Feedback and conclusions are regularly drawn from all involved stakeholders for all relevant activities. The formal processes to gather feedback and information are well described and they are applied continuously. Also, the panel learned that the informal feedback is collected, analysed, and used within the agency. Evaluations are performed for the experts, staff and procedures of FIBAA on all levels, they are analysed systematically, and a summary is published online. Thus, the information is available to all relevant stakeholders and interested parties.

The review panel thus evaluates that the combination of the evaluations and informal as well as formal feedback loops, with the code of conduct, the codex of FIBAA etc. is sufficient to ensure professional conduct.

During the site visit the panel learned that the QM Manual is easy to use and helpful for the employees. In particular, the panel was informed by new employees that the manual is particularly helpful for them as newcomers to understand the structure and scope of the processes within and around FIBAA. In general, the panel noticed FIBAA's support to new staff, especially during the pandemic, with close interaction with more experienced project managers as well as with the Heads of Sections in order to make the newly employed part of the team.

Panel commendations

The electronic QM Manual that includes all processes at all levels is an ambitious and commendable tool, especially for the introduction of new employees but also for the internal quality assurance of an agency in general.

Panel conclusion: Fully compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

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

2017 review recommendation

None

Panel conclusion: Fully compliant

Evidence

In order for FIBAA to be a GAC authorised quality assurance agency, it is required to prove its' alignment with the ESG on a regular basis. Therefore, every five years since 2002, FIBAA has undergone a review against the ESG for the renewal of ENQA membership, and since 2009 renewed its inclusion in the EQAR register as well.

Analysis

The panel learned that these five-year cycle reviews are an important tool for further enhancement of the work of the agency (see also standard 3.6). During site visit this was described to the panel as an important supplement to the regular surveys that FIBAA performs after each accreditation. The panel also believes that FIBAA very clearly responded to the recommendations from the previous review against the ESG, as well as took the statements from EQAR into consideration. Furthermore, the panel learned that these external reviews against the ESG have historically served the agency as an important source of information for the FIBAA Foundation Council to get a better insight into the current position and functioning of the agency and therefore an important tool for strategic discussions.

Panel conclusion: Fully compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

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

2017 review recommendation

None

Panel conclusion: Fully compliant

Evidence

The external QA processes in scope for this review are:

- Programme accreditation (GAC and FIBAA seals)
- Institutional accreditation (GAC, Institutional Audit Austria, Institutional Accreditation Switzerland and FIBAA seals)
- Certification of Continuing Education

The Terms of Reference for this review also state that FIBAA's work under its 'Consult' arm, i.e., evaluation according to individual objectives, should be addressed, "as far as this activity is defined." The SAR states that such evaluations would be determined in consultation with the relevant institution, according to the individual objectives that the HEI wishes to achieve. This is also further

explained in chapter *FIBAA's functions, activities, procedures* on page 15. No evaluations of this type have yet been carried out to date and so there was no opportunity to look at any example or evidence in relation to this process. Information on the separation of the work carried out by FIBAA and FIBAA Consult may be found under standard 3.1.

The SAR states that, from their inception, FIBAA assessment guides, which set out the criteria for each process, whether at institutional or programme level, are developed in accordance with the ESG. The Assessment Guides for each method are structured in the same way, with the Assessment Guide for Certification being based on that for Programme Accreditation. FIBAA believes that the solid basis provided by the ESG allows it to ensure that the focus of all its processes is on improvement, thus ensuring that HEIs are in the best position to provide their students with an education that will prepare them for the labour market.

The table in Annex 5 demonstrates how FIBAA has mapped part one of the ESG against its methods that fall within the scope of this review.

Analysis

The review panel was able to view the Assessment Guides for Programme and Institutional Accreditation as well as that for Certification of Continuing Education. The Guides for Programme Accreditation and Certification in particular make explicit links to the ESG in the introductory sections of the document (together with a hyperlink) and the introductory pages to each process on FIBAA's website also introduce the reader to the Bologna Process and its various tools. The Assessment Guides for Institutional Accreditation were also clearly mapped to the ESG part one but did not include the same introductory section in the document. In the case of the Institutional Accreditation processes for Austria and Switzerland, the relevant country-specific information is published via the relevant web-link. In all cases, the mapping of criteria to part one of the ESG was clear to the review panel.

Although it was able to check all Assessment Guides, the review panel sometimes found that the web-links did not function optimally and suggests that FIBAA ensures that consistent information about the Bologna Process and the ESG is accessible through the links on its website and in the introductory section of all its Assessment Guides.

The review panel discussed the impact of the ESG part one on internal quality assurance (IQA) with FIBAA staff and with external stakeholders. The FIBAA project managers and senior managers who met with the panel said that they were specialist in particular accreditation methods rather than generalist and that this allowed them to ensure that part one of the ESG are appropriately applied in each method; for example, their alignment with the GAC criteria obviously has a specifically German focus that would not be appropriate to their interpretation in an international accreditation process.

The review panel spoke to institutional representatives from Germany and Austria as well as those who had undertaken FIBAA's international accreditation processes. The former spoke of FIBAA's reputation for being strict, precise and reliable in their application of their criteria which they agreed were clear and transparent. The latter, particularly those from outside the EHEA, spoke of deciding to work with FIBAA in order specifically to test themselves against the ESG. They also appreciated the very clear articulation of criteria and standards against which they would be judged. Both groups of institutional representatives were able to give examples of conditions of accreditation or recommendations for improvement that were directly related to the ESG part one.

Both groups of institutional representatives told the review panel that the experience of developing a self-assessment report, together with the helpful guidance that they received from the FIBAA

project manager ensured an accreditation experience that was focused on their improvement. In addition, the Austrian and German representatives emphasised the role of the peer experts in their ability to apply the standards in a way that went beyond merely ‘ticking a box’ and that sought to understand fully how the institution or programme is trying to align with the standards and criteria. The review panel was informed that the discussion with peers is key to internal improvement.

Peer experts who spoke to the review panel confirmed that part one of the ESG part is embedded in all FIBAA standards and that accreditation panels are encouraged to ensure that the institution’s own Quality Manual is central to the process. Students who met with the panel said that they were able to see and understand developments in their own HEI’s internal quality assurance system by reference to their work with FIBAA.

Panel suggestions for further improvement

The panel suggests that FIBAA ensures the functionality of web-links with consistent information about the Bologna Process and the ESG on its website and in the introductory section of all its Assessment Guides.

Panel conclusion: Fully compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

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

2017 review recommendation

FIBAA should adopt the rules of appointment.

Panel conclusion: Substantially compliant

Evidence

It should be kept in mind that some of the methodologies which FIBAA uses within the German system are preconceived by the GAC, the Standing Conference of the Ministers of Education and Cultural Affairs of the German federal states, and the respective German federal state itself. FIBAA, as any other agency in Germany, works with the predefined criteria and develops its external quality assurance procedures around them when it comes to procedures where the GAC makes the final decision.

In the SAR, FIBAA describes that, in accordance with its foundation, it achieves its objective “*above all through the development of suitable methods and tools which define the quality guidelines for the respective educational objectives of training courses on offer and institutions*” which serves to facilitate differentiated assessment procedures.

FIBAA has predefined criteria for all its accreditation and certification procedures that are published and regularly updated by the agency to ensure its fitness for purpose. The assessment guides give the expert panel a framework with which they can work. Also, to gain different perspectives, FIBAA

involves different stakeholders, such as academics and employers, via working groups and workshops to ensure the fitness for purpose of their methodologies and to keep them up to date. Also, an external advisory board may be appointed to aid the process of updating the assessment guides. In the SAR FIBAA states that it also incorporates feedback from HEIs, the experts and project managers as well as changes in the legal basis. While doing so, it also reviews if the procedures and methods are still up to date and appropriate. The F-ACC approves about the final version of the assessment guides and adopts them. During the site-visit FIBAA emphasized that, while different processes, for example the development of a new seal, are usually initiated by FIBAA itself, the development involves all stakeholders as is the case with the development of the new seal in Digital Education and the seal in Strategic Management. This was also confirmed by the stakeholders during the site-visit. The final decisions are then made by the F-ACC, which also consists of different stakeholders. The stakeholders also confirmed that they are continuously involved in developing and updating the methodologies, via formal and informal ways (more information on this is available in ESG3.6). For example, when FIBAA introduces a new seal, institutions are involved as pilot partners, which means that FIBAA can incorporate feedback from the pilot institutions before offering the product to all its customers.

While FIBAA manages the accreditation process for program and institutional accreditations within Germany, the final decision is incumbent upon the GAC. For those reviews the assessment criteria and the template for the report (the “Raster”) are predefined by the GAC. However, FIBAA is responsible for the preparation, site-visit and for drafting a review report.

The SAR states that, for accreditation or assessment procedures of joint programmes, the European Approach is applied.

Analysis

During the site visit the review panel had the chance to discuss FIBAA’s methodologies and their purposes with representatives of national and international HEIs, quality assurance officers of different institutions, the relevant stakeholders, such as employers, students, the GAC etc. and with FIBAA’s staff. Following the interviews, the panel is convinced that the methodologies and processes fulfil their purpose. In general, the HEIs and employers expressed a very high satisfaction with the reports and the work done by FIBAA. All stakeholders confirmed that FIBAA is a professional partner, who understands its role in the area of quality assurance and that its applied methodologies and its applied criteria help the HEIs to better understand their own quality assurance system. It also helps them identify their weaknesses and strengths. In particular, the approach of developing FIBAA’s methodologies with the involvement of the different stakeholders is seen by the panel as an example of good practice. The panel perceived the process for developing the new seal in Digital Education and the seal in Strategic Management as a particularly strong and an inspiration to follow in other procedures.

This report refers to activities covered by FIBAA Consult on page 15.

As a follow up on the recommendation from the 2017 review, the panel can confirm that FIBAA has adopted and published its rules of appointment which all can be found on FIBAA website.

Panel commendations

The panel commends FIBAA for the involvement of stakeholders in the development of the agency’s methodologies, in particular in the process of developing the new seal in Digital Education and the seal in Strategic Management.

Panel conclusion: Fully compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

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

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

2017 review recommendation

None

Panel conclusion: Fully compliant

Evidence

External QA procedures consist of the following: a self-evaluation report from the HEI, which is sent to FIBAA by the HEI and then sent to the expert panel by FIBAA. FIBAA provides a template for the HEIs for writing their SAR. Additionally, the responsible staff from the HEI can ask FIBAA for support if they have questions etc. Afterwards a site-visit is conducted (always and for all external QA procedures that fall within the scope of this review). For an institutional accreditation two on-site visits are conducted. The site visit can also be held online. The experts can ask for additional evidence if the evidence they received beforehand is not sufficient. Furthermore, the expert panel can ask for additional interview partners on the site visits and for further proof. After the site-visit, an accreditation report is drafted, and the HEI can add a response to this. For the German system the “Raster” is taken into account, which defines the layout of the final report.

The process described above is the same for all of FIBAA’s procedures.

Depending on whether or not the review is for a GAC seal, the final accreditation decision is made by either the GAC or the F-ACC. After the site visit, there is a group feedback round between the HEI and FIBAA in which the HEI can give feedback on the procedures, experts and FIBAA staff.

Possible outcomes are: accreditation without conditions, accreditations with conditions, negative decisions. Additionally, the HEI has the option to temporarily suspend their procedures to improve quality problems which may lead to a negative decision (when certain aspects are not compliant with the applied criteria and it’s likely they cannot be rectified in the timeframe set).

When the final decision is made by the GAC, the GAC is also responsible for the follow-up. If the accreditation is awarded by FIBAA, then FIBAA is responsible for the follow-up. During the site visit the panel learned that FIBAA conducts follow-ups for accreditations under conditions, but not for accreditations which only have recommendations. In case of conditions and responsibility from FIBAA and not GAC, HEIs usually send documents to FIBAA in which they explain what they did to fulfil the conditions. The F-AAC then decides if the conditions are fulfilled satisfactorily or not. There

is no direct follow-up to recommendations. During the site-visit the panel learned that recommendations are checked again when a program or HEI is to be reaccredited.

Analysis

After analysing the SAR and meeting various employees of FIBAA and the stakeholders, the panel is convinced that FIBAA defines its procedures well and that they are clear and useful for all involved stakeholders. They are applied and implemented in a consistent and transparent way with the support of both, the FIBAA employees as well as expert panel members. All review procedures consist of a self-assessment report from and by the HEI, an external assessment and site visit, an expert's report, and a follow-up for accreditations with conditions, if the accreditation was given by FIBAA. If the decision was done by the GAC, then the GAC is responsible for the follow-up. However, it is the panel's view that it is within the spirits of the ESG that FIBAA considers implementing a consistent follow-up for recommendations as part of their processes. The panel believes that this would further reinforce FIBAA's aim to be a support for its national and international partners. Furthermore, it would underline FIBAA's role in enhancing quality assurance and improvement.

In relation to Evaluation Procedures According to Individual Objectives (offered by FIBAA Consult), given that no such evaluations have yet taken place, the review panel was unable to discuss them with institutions or read any reports. However, in terms of documented procedure, alignment with the spirit of the ESG is clear apart from the final decision, which does not form part of this process due to its developmental nature.

Panel recommendations

FIBAA should implement a consistent follow-up for recommendations as part of the current accreditation process rather than use recommendations as a starting point for the next review cycle.

Panel conclusion: Substantially compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

2017 review recommendation

None

Panel conclusion: Fully compliant

Evidence

There are three categories of experts in all FIBAA quality assurance procedures: representatives of science, professional practice and the student body. The criteria for these categories of experts are published on the FIBAA website. According to the SAR, FIBAA has a pool of about 750 experts from

20 countries. According to FIBAA Annual report 2019, about one third of those 750 experts are women.

Status group	#
Representatives of Universities	154
Representatives of University of Applied Science	308
Representatives of Professional Practice	159
Representatives of the Student Body	76
Additional Expertise (Dual Programmes, Distance Learning Programmes, Country Expertise)	120

SAR, table 6 p. 46

Based on the profiles needed for each assessment procedure, panel experts are pre-selected by FIBAA's technical staff (FIBAA Project Manager in Expert Management) and formally appointed by the FIBAA Panel Appointing Committee. The F-ACC elects three members – a professor, a business representative and a student – to serve in the FIBAA Panel Appointing Committee.

Guidelines on the appointment of experts and the composition of expert panels for accreditation procedures of the GAC as well as its own FIBAA quality criteria for the selection and appointment of experts have been adopted and are published on the website.

The independence of the experts is guaranteed by Rules of Procedure of the FIBAA Accreditation and Certification Commission (F-ACC) of 26 February 2021. All experts have to sign “Appendix to the Expert’s Curriculum Vitae - Data Protection Note” and “Code of Conduct / Confidentiality and Data Protection Declaration” as well as “Declaration of Impartiality” before each specific appointment. Acting as a FIBAA expert in a procedure of accreditation at programme or institutional level is incompatible with a previous or current activity that gives advice or support for the establishment or further development of a programme or the internal quality assurance system at the HEI in question. Before an expert is appointed, the HEI has an opportunity to express any objections against the expert or the entire panel for that matter. Depending on the case, the experts may then have to be replaced.

Possible conflicts of interest are very strictly controlled: in addition of signing all documents, members of expert would be invited to leave the procedure immediately in case of detected conflict of interest.

FIBAA uses several videos and Power Point presentations to provide training for the experts, which can be found in its webpage for on-line training (<https://www.fibaa.org/en/login/loginbereich/gutachter/>). There are two webinars available in German: “*Programme accreditation according to the new German accreditation guidelines*” and “*Q-&A*”, and several ppt presentations, most of them in German too. Personal training sessions, of about 2.5 hours duration, in online webinar format, which are also recorded and later posted on FIBAA’s

website. New experts are provided with individual preparation and support via the website, telephone and e-mail.

There is also a procedure, more or less standardised, through which the quality manager and the project manager assess the work performed by the experts. This is done through an assessment carried out by the assessed HEIs.

Analysis

Given FIBAA's emphasis on its international profile, the review panel found the number of international experts in the pool to be rather low. According to the document "Training of FIBAA experts", only 90 of the 750 experts are English speakers. In fact, it was pointed out to the panel that, as far as Germany is concerned, international (or foreign) experts are only used in international programmes or programmes taught in English. This does not seem to be an optimal situation in an agency whose distinguishing feature is precisely its level of internationalisation. It should be noted that the Agency identifies (at least in that document) "international" experts with those who are "English speakers".

As for gender equality in the appointment of experts, the review panel has not been able to identify a specifically proactive policy. Annual Report 2018 includes an analysis about gender, where it is said that *"the imbalance within FIBAA's pool of experts (scientists and professionals) at programme level (esp. university professors) and even more important in institutional procedures is diachronically grown. It will take time to compensate for this historical development."* But, as already mentioned, the panel cannot see that this has led to any adoption of a gender equality policy for the appointment of experts.

All guidelines and criteria for experts are transparent and published on FIBAA website. During interviews with experts at the site visit the review panel noted that they were all familiar with the guidelines and the criteria they use. The tasks among the experts are not predefined and anyone, including students, can ask questions on any aspect. However, it is most likely that questions are asked according to the origin of the experts, i.e., the student usually leads the sessions with this group, the employer usually asks questions to the employers and the academic to the academics.

The PowerPoint presentations used for the training of experts that the review panel was able to access (those in English) are rather generalist, and it is difficult to say which specific areas they focus on (QA process, national higher education system, practical skills, etc.). Amongst the training materials there is no interactive practical elements (such as case studies, role-plays, etc.). FIBAA might consider whether to use more "tailored-made" and less standardised training. It should be noted that the training of English-speaking experts may not be as comprehensive as that received by German-speaking experts. It is noted that, in the document "Training of FIBAA experts" that the experts receive PowerPoint presentations that summarise the procedural steps of accreditation.

In the SAR as well as in various meetings at the site visit, the review panel learned that the training of experts is done only through an online webinar, not face-to-face, for reasons of time and cost. FIBAA feels very positive about this change, since it certainly allows for greater accessibility and flexibility, and it is more cost effective. However, the review panel believes that face-to-face training is much better at capturing the spirit and the focus of those training processes as well as the group dynamics and personal interactions, which are very important to facilitate and encourage the group work required for these procedures.

The panel noted that there is no clear obligation for experts to undertake training (or supervision on it) prior to an accreditation or certification procedure. It is done on a voluntary basis. Basic training and updates are offered and made available to experts before the start of each procedure

but there is no obligation or supervision of who does or does not undertake this on-line training. As an example, FIBAA's webpage states that: "*experts are advised to refresh their knowledge approx. every two years by attending FIBAA trainings and seminars*" or that participation in online trainings "*is particularly recommended before embarking on the first assignment*" (<https://www.fibaa.org/en/expert-management/training-for-fibaa-experts/>).

The documents suggest that FIBAA distinguishes between newcomers and experienced experts. However, the review panel learned at site visit that there is minimal rotation and little renewal among the experts. On the one hand, a majority of experts have been in the pool for many years; on the other hand, in some interviews the review panel were told about the difficulty of finding academics who are willing to participate in accreditation processes (on a voluntary basis).

The review panel also learned that there is no specific briefing or training of the student representatives that could supplement the core training of the experts. This could also be an opportunity for interaction between student reviewers, both new and more experienced, to facilitate the learning process and stimulate continuous networking among the students engaged in FIBAA's activities.

Although there is a specific procedure for assessing the work of the experts (standardized evaluation sheet and discussion with the project manager, in practice this assessment, and the implementation of possible consequences arising from it, is carried out in a more informal manner: where complaints are made by the HEI, the expert is simply not invited to participate in further proceedings.

Panel recommendations

The agency is recommended to require from all experts to attend at least some core training which is face-to-face if possible, before becoming member of review panel. This is to ensure that they at least understand the ESG on which FIBAA bases its own criteria, FIBAA's decision-making processes and relation to the criteria and FIBAA review methods.

Panel suggestions for further improvement

The panel suggests FIBAA to ask students if there is any specific briefing that it could offer to them in addition to the core training before they start work as an expert.

The panel suggests FIBAA to facilitate a network for its student reviewers to allow them to connect and learn from each other.

The panel suggests FIBAA to encourage its student reviewers to connect to the established student networks, such as The German Student Experts Pool, to stimulate learning and interaction between student reviewers.

Panel conclusion: Substantially compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

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

2017 review recommendation

The agency should publish the weighting of criteria for awarding the premium seal.

Panel conclusion: substantially compliant

Evidence

In the SAR FIBAA states that in all of FIBAA's quality assurance procedures, quality criteria which are derived from the national and international standards are taken as a basis. Basic standards, for example for the FIBAA assessment guides, are specified in advance and published on FIBAA's website and are made available to the HEIs, hence the HEIs do not need to request them.

The SAR explains that, for the purposes of GAC accreditation processes, the criteria are defined by that body (the GAC being also reviewed against the ESG to ensure its compliance with such standards in the EHEA). A link is provided from the FIBAA website to the GAC requirements, regulations and criteria for system accreditation. In addition, the processes of institutional audit (Austria) and institutional accreditation (Switzerland) take into account any local requirements in relation to criteria. Revisions to criteria for these processes are in line with the requirements of the relevant bodies.

In relation to the award of FIBAA seals, separate Assessment Guides are published on the FIBAA website. These guides not only publish the criteria but also provide links to external sources such as the ESG, ECTS and the descriptors for the FHEQ-EHEA. The SAR states that institutions are also provided with the relevant Assessment Guide once the contract for engagement has been signed thus ensuring that they have a full and up-to-date set of the criteria that will be used during the assessment process.

FIBAA believes that this transparent definition and sharing of the criteria is one of the means by which it can ensure that consistency across its decision-making and reporting processes. Peer reviewers use the same Assessment Guides to steer their work. FIBAA is of the view that the guides ensure a homogenous and consistent approach to its processes. The information base provided by the guides is then reinforced by the approach taken to ensure that FIBAA staff are prepared to work consistently with the criteria. As part of their induction, all project managers are provided with briefing and documentary information. They then observe two complete review procedures before being guided by a divisional manager or experienced project manager through the first two processes that they manage. In addition, only staff with several years' experience may lead institutional processes and will, again, observe such a process before managing one, with the same support systems in place as for new staff. All project managers are supported by a designated division manager who is available to provide support during a site visit.

Consistency is further achieved through the project managers' drafting of the report, based on contributions by the peer experts. Each report then follows a moderation process involving the divisional manager to ensure that the application of the criteria is consistent and comparable to other reviews.

The SAR provides information about the updating of the criteria through regular revisions of the Assessment Guides. It explains that, over time, the guides have been reduced in number, not least to reduce confusion amongst institutions, particularly in relation to programme accreditation where previously there were separate guides for distance learning and on-line study programmes. The Assessment Guide for programme accreditation now covers all bachelor and masters' programmes and, FIBAA believes, this is much more transparent.

The SAR states that further transparency and consistency has been achieved through the introduction of two new regulations that will be applied by F-ACC in its decision-making processes in relation to programme accreditation. The first of these regulations is in relation to the number of conditions that will be accepted in order to award an accreditation and is based on the experience that an institution is not able to meet more than a certain number of conditions within the specified timeframe. The second relates to the fulfilment of two specific criteria which if not successfully achieved will lead to a negative decision. As yet, very few accreditations have been held since these regulations were approved and FIBAA is still to evaluate their impact.

FIBAA aims to revise and update its internal documents such as the Assessment Guides very regularly but believes that it is prevented from doing so as often as it would like due to a lack of human resources and the multiple seals that it offers.

Analysis

Through examination of FIBAA's website, the review panel confirmed that all processes are published together with links to the relevant regulations (GAC, Austria and Switzerland) and/or Assessment Guides. The criteria for each method are published; for the FIBAA seals, the Assessment Guides are the key publications in which the methods, including the criteria to be applied are set out. All institutional representatives who spoke to the review panel (German, Austrian and international) confirmed that they were able to access the criteria easily and that, in addition, they were sent the most recent version of the Assessment Guide (or relevant regulations) on completion of the contract.

The approach described in the SAR that is taken to ensure that FIBAA staff work consistently with the criteria was confirmed by the project managers who described the processes in place to support them. They also informed the panel that they in turn support new panel members by going through the assessment guide with them and holding a preliminary meeting with the whole panel to discuss the process and the application of the criteria.

They confirmed that consistency in relation to the application of the criteria is key to the work of the project manager with the review panel and that this is then moderated by the office/divisional manager. Student reviewers corroborated this information and noted that FIBAA staff learn from shadowing each other thus ensuring consistency across programme managers. Students believed FIBAA staff to be well trained in terms of how to apply the criteria and that the work they do with the expert panels is of high quality.

In relation to the clarity of the criteria representatives of German and Austrian HEIs told the review panel that criteria were explicit and clear and that there had been an improvement in this area; it is now much easier to understand the link between the requirements of the criteria and the reasons for giving a condition or a recommendation. It was clear to these institutions that FIBAA has made some effort in this regard. International institutions and students also appreciated the very clear articulation of criteria and standards against which judgements are made and said that the documentation they receive is well-structured in terms of explanations.

The review panel noted that, in relation to the FIBAA seals, it is possible to achieve the FIBAA Quality Seal or the FIBAA Premium Seal. It was explained that exactly the same criteria are used but that there is a threshold of achievement against the criteria above which it is possible to be awarded the Premium Seal. The review panel did not hear or read any evidence to suggest that there was a lack of clarity or confusion around the achievement of the two different levels and the mechanisms for ensuring consistency of application described above apply.

Institutional stakeholders spoke to the review panel about their involvement in the development of two FIBAA seals: the new seal in Digital Education and the system level seal for Strategic Management where they described part of their involvement as providing feedback on the criteria used in the pilots. The panel asked the F-ACC for clarification on this approach in terms of where the final decision lay for determining the criteria. The F-ACC was very clear that the final responsibility was FIBAA's but that the agency always carefully considered the views of the F-ACC. Members of the F-ACC also told the panel that they always have time for discussion of the criteria at their meetings and that this is essential for them to ensure that they work meaningfully with the criteria and are enabled to make consistent decisions.

The SAR states that FIBAA aims to revise and update its internal documents such as the Assessment Guides very regularly but believes that it is prevented from doing so as often as it would like due to a lack of human resources and the multiple seals that it offers. In the view of the panel, the criteria are adequately reviewed and revised as appropriate.

Panel commendations

The approach that FIBAA has taken to the development of methodologies which includes stakeholder involvement in the development and revision of criteria.

Panel conclusion: Fully 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.

2017 review recommendation

The agency should review the process for database entries in such a way that all decisions made in programme and system accreditation procedures, including the publication of the review reports are entered immediately and completely in the database of accredited study programmes.

Panel conclusion: Partially compliant

Evidence

In the SAR FIBAA states that it publishes the following data on their website for FIBAA seal procedures and in EQAR's Database of External Quality Assurance Results (DEQAR) for study programmes and institutional procedures: decision, period of accreditation, the whole report, names and job titles of the responsible project managers, the experts of the panel and any procedural coordinator instructed by the HEI.

FIBAA provides templates for their accreditation and certification procedures, so all accreditation and certification reports are structured in a clear and comprehensible manner.

If FIBAA carries out a review, which leads to a seal from the GAC and not from FIBAA, FIBAA does not publish those reports. Accreditation reports where the GAC made the accreditation decision are published via the “Electronic Information and Application System” (ELIAS; “Elektronisches Informations- und Antragsystem”), which can be accessed via the website of the GAC. FIBAA provides a link on their website which directs the reader to the GAC database.

FIBAA states in its SAR that all reports are published, regardless of whether the outcome is positive or negative. This was also confirmed during the site-visit. The panel also learned that the HEIs get a copy of the reports send by E-Mail and that the HEIs see the reports as very helpful for further enhancement.

During the site visit, the review panel learned that the expert panel determines the conditions and recommendations immediately after the site visit. Based upon the agreed conditions and recommendations, a draft report is written by FIBAA’s staff and then sent to the panel experts. The experts have the possibility to give comments and remarks, add or change things in the document. The whole panel agrees on the final report and FIBAA’s staff does not influence the outcome.

Analysis

The review panel can confirm that all reports where FIBAA had the final decision are fully available on their website. In response to the recommendation from previous ENQA review, FIBAA publishes its reports on accreditation and certification processes, national as well as international, on its website, regardless of a positive or negative evaluation being made. The decision by the F-ACC is added as a prefix to the accreditation or certification report and published together. Also, conditions, recommendations and follow-up measures are summarized at the beginning of the accreditation reports.

The review panel can also confirm that FIBAA provides a link to the database of the GAC where reports are published in which FIBAA did not have the final accreditation decision. However, the panel comes to the conclusion that the link towards the database of the GAC on the website of FIBAA could be made better visible.

In procedures which lead to a formal decision by FIBAA, these formal decisions are made on the basis of the reports. The reports are available to all the stakeholders of the agency, which includes students, academic communities, employers and other relevant and interested parties. During the visit the panel received confirmation that involved stakeholders found the reports to be helpful to foster their improvement. They help the HEIs to understand how they can design their internal quality assurance better and enhance it further, since FIBAA’s reports also make it clear where there is still room for improvement.

Panel suggestions for further improvement

FIBAA could make the link to the GAC reports clearer and more easily accessible.

Panel conclusion: Fully 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.

2017 review recommendation

The agency should make explicit reference on its homepage to the option of issuing complaints about the course of the procedure.

Panel conclusion: Substantially fulfilled

Evidence

The SAR states that it is always possible to make a complaint about the conduct of a FIBAA process. The FIBAA website states that: “*Higher Education Institutions, which have complaints, against the procedure, please write an email to info@fibaa.org.*” FIBAA also states that this possibility is made clear by FIBAA management to all HEIs at the beginning of an accreditation processes. Since FIBAA see themselves as a partner of the HEIs, it is anxious to be available and responsive to any dissatisfaction a HEI might experience.

FIBAA has established procedures for appeal against a decision of a FIBAA accreditation, certification or a FIBAA Consult evaluation. The information is available on FIBAA website. The appeal should be made within one month after a written notification of the decision. The reasons for the appeal must be given in writing. In case FIBAA receives an appeal, it is passed on – after consultation with the review panel – to the F-ACC for a decision. If the decision by the F-ACC does not remedy the appeal, the case is submitted to the FIBAA Appeal Committee for further investigation. The Appeal Committee will clarify the facts of the case and make a recommendation to the F-ACC for a final decision. If the appeal is not remedied, the HEI in question may take legal actions.

Since 2017 a total of 11 complaints or appeals have been processed. Five of those were remedied by the F-ACC and the other six were submitted to the FIBAA Appeal Committee.

FIBAA staff attend the Appeal Committee meeting but have no voting role.

The complaints and appeals procedure described above is only applicable in cases where FIBAA is the decision-making body. In German accreditations decided by GAC, any complaint or appeal is addressed directly to the GAC.

Analysis

The review panel learned that a clear process is in place for dealing with complaints or appeals from the HEIs. The review panel learned, through discussions with members, that FIBAA has a well-functioning Appeals Committee who was knowledgeable about its task and very well supported by FIBAA staff. The Committee members also stressed their work being done independently and that FIBAA staff only have a supportive role at the Appeals Committee meetings.

However the fact that the German word for complaint and appeal is the same has led to the agency to make no difference in its internal processes as to whether the matter is a complaint about a process or an appeal against a decision. This has also led to some unclear use of terminology in describing the different procedures.

Despite this, it was the panel's conclusion that the HEIs (those that the panel has met at the site visit) were well informed about how to put forward any complaint/appeal but had never had any reason to do so. They rather expressed that the agency holds the ambition to solve any dissatisfaction before a complaint or appeal arises.

An example is also given of HEIs having addressed complaints about the behaviour of an expert, who then as a consequence no longer was part of the FIBAA expert pool.

Panel recommendations

The agency is recommended to ensure that the wording of the process for complaints and appeals is accurate and clear in both German and English. At the same, it should ensure that the process as described on the website is up-to-date, for example regarding the merger of the three accreditation committees into one.

Panel suggestions for further improvement

The panel suggests that FIBAA looks at the guidelines to this standard in order to provide clarification to all of its stakeholders over what is a matter of process (complaint) and what is to do with a decision (appeal).

Panel conclusion: Substantially compliant

ADDITIONAL OBSERVATIONS

THE GAC AND GERMAN QUALITY ASSURANCE AGENCIES

The review panel noted the good relationship between FIBAA and the GAC and the possibilities that exist for constructive dialogue between the two (and indeed between the GAC and the community of QA agencies in Germany). Nevertheless, the theme of the impact of the GAC's role runs through the report and appears in almost all standards. The panel encourages FIBAA to continue in this constructive dialogue with the GAC and with the German QA community more broadly to ensure that the division of tasks between FIBAA and the GAC is clear and that opportunities for enhancement of process are not missed. For example, in those processes for which GAC is exclusively responsible for follow-up of accreditation procedures, there is a certain disconnect between a review/accreditation and its follow-up, which impacts the coherence of the entire process. Since this is a feature of the German accreditation system, it will benefit the system and German HE as a whole if such matters are kept under discussion to ensure that processes are as beneficial to HEIs as much as possible.

CONCLUSION

SUMMARY OF COMMENDATIONS

ESG 3.6 The electronic QM Manual that includes all processes at all levels is an ambitious and commendable tool, especially for the introduction of new employees but also for the internal quality assurance of an agency in general.

ESG 2.2 The panel commends FIBAA for the involvement of stakeholders in the development of the agency's methodologies, in particular in the process of developing the new seal in Digital Education and the seal in Strategic Management.

ESG 2.5 The approach that FIBAA has taken to the development of methodologies which includes stakeholder involvement in the development and revision of criteria.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

ESG 3.1 Substantially compliant

FIBAA is recommended to further develop its strategic planning process to ensure that it considers the medium to long term future of the agency as well as the shorter term. The development of a formal strategy for managing risk is also encouraged as part of the development of the strategic planning process.

The agency is recommended to include a student member of the Foundation Council.

ESG 3.2 Fully compliant

ESG 3.3 Fully compliant

ESG 3.4 Partially compliant

The panel recommends that FIBAA reconsider its interpretation of ESG 3.4 and continues, as suggested in the review of 2017, to increase the number of analytical publications, and cover fields of activity beyond programme and system accreditations.

ESG 3.5 Substantially compliant

In line with the recommendation on ESG 3.1, the panel suggest FIBAA to establish a clear alignment between the strategic vision of the agency and the planning of actions with the allocation of human and financial resources.

ESG 3.6 Fully compliant

ESG 3.7 Fully compliant

ESG 2.1 Fully compliant

ESG 2.2 Fully compliant

ESG 2.3 Substantially compliant

FIBAA should implement a consistent follow-up for recommendations as part of the current accreditation process rather than use recommendations as a starting point for the next review cycle.

ESG 2.4 Substantially compliant

The agency is recommended to require from all experts to attend at least some core training which is face-to-face if possible, before becoming member of review panel. This is to ensure that they at least understand the ESG on which FIBAA bases its own criteria, FIBAA's decision-making processes and relation to the criteria and FIBAA review methods.

ESG 2.5 Fully compliant

ESG 2.6 Fully compliant

ESG 2.7 Substantially compliant

The agency is recommended to ensure that the wording of the process for complaints and appeals is accurate and clear in both German and English. At the same, it should ensure that the process as described on the website is up-to-date, for example regarding the merger of the three accreditation committees into one.

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

SUGGESTIONS FOR FURTHER DEVELOPMENT

ESG 3.1 The panel suggests FIBAA to consider broadening the externality of its stakeholder involvement to include, for example, members of committees from outside of FIBAA's circle of 'customers.' This would provide the input and challenge of a more 'critical friend' which would benefit the agency.

ESG 3.4 The panel suggests a more structured approach in identifying, planning and carrying out thematic analysis.

ESG 2.1 The panel suggests that FIBAA ensures the functionality of web-links with consistent information about the Bologna Process and the ESG on its website and in the introductory section of all its Assessment Guides.

ESG 2.4 The panel suggests FIBAA to ask students if there is any specific briefing that it could offer to them in addition to the core training before they start work as an expert.

The panel suggests FIBAA to facilitate a network for its student reviewers to allow them to connect and learn from each other.

The panel suggests FIBAA to encourage its student reviewers to connect to the established student networks, such as The German Student Experts Pool, to stimulate learning and interaction between student reviewers.

ESG 2.6 FIBAA could make the link to the GAC reports clearer and more easily accessible.

ESG 2.7 The panel suggests that FIBAA looks at the guidelines to this standard in order to provide clarification to all of its stakeholders over what is a matter of process (complaint) and what is to do with a decision (appeal).

ANNEXES

ANNEX I: PROGRAMME OF THE FIBAA ONLINE SITE VISIT

Thursday June 10		
TIMING	TOPIC	PERSONS FOR INTERVIEW
9:00-10:30	<p>Checking the stability of internet connection (review coordinator and the agency's contact person)</p> <p>Review panel's kick-off meeting and preparations for pre-visit meeting and site visit</p>	
10:30-12:00	<p>A pre-visit meeting with the agency contact person to clarify elements related to the overall system and context. <i>The meeting should be expanded beyond learning about the agency's context and include the factual check exercise.</i></p>	Mag. ³ Diane Freiberger, MBA, Managing Director Martin Rockenfeller, Deputy Managing Director

Friday June 11		
TIMING	TOPIC	PERSONS FOR INTERVIEW
08:55-09:00	Connection set-up	
09:00-09:30	Review panel's private meeting	
09:30-09:35	Connection set-up	

09:35-10:20	Meeting 1 with the President of FIBAA Foundation Council and the Managing Director	Prof. Dr. oec. HSG Rudolf Minsch, President Mag. ^a Diane Freiberger, MBA, Managing Director
10:20-10:35	Review panel's private discussion (<i>and connection setup for the coordinator</i>)	
10:35-11:20	Meeting 2 with Project Managers	Anna Hadwiger Dr. Birger Hendriks. Adriane Janosch Maya, Köhler Antonia Lütgens Nora Winckel
11:20-11:35	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	
11:35-12:20	Meeting 3 with representatives from the Senior Management Team	Kristina Weng, Division Manager Germany Viktoria Tischanski, Division Manager International Procedures Vera Henkel, Division Manager Certification
12:20-12:30	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	
12:30-13:15	Lunch break	
13:15-13:45	Review panel's private discussion	
13:45-14:30	Meeting 4 with the team responsible for preparation of the self-assessment report	Mag. ^a Diane Freiberger, MBA, Managing Director Sandra Alansigan, B.A. (former FIBAA employee until April 2021)

14:30-14:45	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	
14:45-15:30	Meeting 5 with FIBAA Accreditation Committee	<p>Prof. Dr. jur. Axel Benning, Fachhochschule Bielefeld</p> <p>Prof. Dr. Ottmar Schneck, SRH Fernhochschule Riedlingen - The Mobile University</p> <p>Prof. Dr. Wolfgang Renninger, Ostbayerische Technische Hochschule Amberg-Weiden</p> <p>(Prof. Dr. Jürgen Weigand, WHU Otto Beisheim School of Management, Vallendar)</p>
15:30-15:45	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	
15:45-16:15	Meeting 6 with FIBAA Appeal Committee	<p>Dr. Hans Höller, Siemens AG</p> <p>Prof. Dr. Irina Kohler, Hochschule Fulda</p> <p>Nadja Kolibacz, Student, Technische Universität Berlin</p>
16:15-17:15	Wrap-up meeting among panel members and preparations for day II	

Monday June 14		
TIMING	TOPIC	PERSONS FOR INTERVIEW
08:55-09:00	Connection set-up	
09:00-09:30	Review panel private meeting	
09:30-09:35	Connection set-up	

09:35-10:15	Meeting 7 with the German Accreditation Council	Dr. Olaf Bartz, Managing Director Katrin Mayer-Lantermann, Data Protection Officer, Head of Legal Affairs
10:15-10:20	Connection set-up	
10:20-11:05	Meeting 8 with heads of some reviewed HEIs/HEI representatives	Prof. Dr. Andreas Altmann, Universität Innsbruck and MCI Management Center Innsbruck Prof. Dr. Peter Thuy, IU Internationale Hochschule Dr. Carl-Martin Preuß, Universität Augsburg
11:05-11:20	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	
11:20-12:05	Meeting 9 with heads of some reviewed international HEIs/HEI representatives	Dilbar Gimranova, Dean of the School of Economics and Management at Narxoz University, Kazakhstan Heather McCollum, KIMEP University, Kazakhstan Peter Birdsall (or colleague) Wittenborg Hogeschool, Netherlands Dr. Olga Verkhohlyad UACU, Kyiv, Ukraine Yuliia Romanovska UACU, Kyiv, Ukraine Dr. Maarten Janssen, Erasmus Centre for Management Development in Health Care, Erasmus University Rotterdam, Netherlands
12:05-12:50	Lunch break	
12:50-13:20	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	

13:20-14:05	Meeting 10 with quality assurance officers of HEIs	<p>Prof. Dr. Nina Basedahl, Euro-FH</p> <p>Britta Mindermann, Steinbeis-Hochschule</p> <p>Mag.^a Brigitte Auer, MCI Innsbruck</p> <p>Corinne Rothmann, SRH Fernhochschule</p> <p>Tanja Matic, Hochschule für Technik und Wirtschaft des Saarlandes</p> <p>Dr. Immo Schmidt-Jortzek, Hamburg School of Business Administration</p>
14:05-14:20	<i>Review panel's private discussion (and connection set-up for the coordinator)</i>	
14:20-15:05	Meeting 11 with representatives from the expert's pool	<p>Prof. Dr. Reinhard Hünenberg, Universität Kassel</p> <p>Prof. Mag. Dr. Claudia Mössenlechner, MCI Management Center Innsbruck</p> <p>Prof. Dr. med. Dipl.-Ing. Oliver Rentzsch, Fachhochschule Lübeck</p> <p>Prof. Dr. Susanne Czech-Winkelmann, Hochschule RheinMain</p>
15:05-15:20	<i>Review panel's private discussion (and connection set-up for the coordinator)</i>	

15:20-16:05	Meeting 12 with stakeholders: Employer representatives	Dr. Markus A. Tomaschitz, AVL List GmbH, Graz Karl-Peter Abt, IHK Chief Executive Officer (ret.) Dr. Ivo Matser IEDC Bled School of Management, Slovenia and Academy of Business in Society (abis-global), Belgium Dr. Bernd Baasner, formerly Bayer AG Kerstin Wagner, Deutsche Bahn AG, Head of Human Resources
16:05-16:20	Review panel's private discussion (<i>and connection set-up for the coordinator</i>)	
16:20-17:05	Meeting 13 with stakeholders: Representatives of Students	Julia Ekhardt, Technische Universität München Marie-Luise Meier, Technische Universität Kaiserslautern Jens Weibezahn, Technische Universität Berlin Nadja Kolibacz, Student, Technische Universität Berlin
	Break	
17:10-18:10	Wrap-up meeting among panel members: preparation for day III and provisional conclusions	

Wednesday June 16		
TIMING	TOPIC	PERSONS FOR INTERVIEW
08:55-09:00	Connection set-up	
09:00-09:30	Meeting among panel members to agree on final issues to clarify	

09:30-10.15	Clarifications with the agency staff	-Martin Rockenfeller, Deputy Managing Director -Adriane Janosch, Project Manager (recently started) -Dr. Birger Hendriks, external Project Manager -Christian Bleibaum, Assistant to the Managing Director
10.15-10.20	Short break	
10:20-11:00	Meeting with the President of FIBAA Foundation Council and the Managing Director	Prof. Dr. oec. HSG Rudolf Minsch, President Mag. ^a Diane Freiberger MBA, Managing Director
11:00-12:30	Private meeting among panel members to agree on the main findings	
12:30-13:15	Lunch break (and connection set-up for the coordinator)	
13:15-13:40	Final de-briefing meeting with key staff and Foundation members to inform about preliminary findings	Mag. ^a Diane Freiberger, MBA, Managing Director Martin Rockenfeller, Deputy Managing Director Christian Bleibaum, Assistant to the Managing Director Kristina Weng, Division Manager Germany Viktoria Tischanski, Division Manager International Procedures Vera Henkel, Division Manager Certification

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

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**External review of the Foundation for International Business Administration
Accreditation (FIBAA)
by the European Association for Quality Assurance in Higher Education (ENQA)
Annex I: TRIPARTITE TERMS OF REFERENCE BETWEEN FIBAA, ENQA AND
EQAR
December 2020**

I. Background and context

FIBAA (Foundation for International Business Administration Accreditation) was founded in autumn 1994 by the leading German, Swiss and Austrian employer associations of the business community as an internationally oriented foundation for assuring transparency and quality in higher education. FIBAA's main fields of activity are accreditation procedures of economics, law and social science degree programmes and accreditation of higher education institutions. Certification of continuing education courses, and a wide range of consulting services (the latter are not in the scope of ESG) are also part of FIBAA's business areas. FIBAA collaborates with state and state-recognised private Higher Education Institutions (HEIs) as well as with HEIs that are in the process of being found.

FIBAA regularly performs procedures for quality assurance in higher education in its business areas of programme accreditation (PROG), institutional accreditation (INST) and certification of continuing education courses (CERT).

1.) In the PROG area, these are: Programme accreditation in accordance with FIBAA standards with consideration of the European Standards and Guidelines (ESG) and programme accreditation in accordance with the requirements of the German Accreditation Council (GAC) with consideration of the ESG (only for German HEIs relevant). In the area of Programme Accreditation, FIBAA focuses on study programmes oriented towards legal, social and economic sciences as well as management training.

2.) In the INST area FIBAA performs the following procedures: Institutional Accreditation in accordance with FIBAA quality standards and Institutional Accreditation: Strategic Management in accordance with FIBAA quality standards. Further on, in the German-speaking Area only: System accreditation in accordance with the requirements of the GAC, Institutional Audit Austria in accordance with the requirements of the Austrian Act on Quality Assurance in Higher Education and Institutional Procedures according to the Federal Act on Funding and Coordination of the Swiss Higher Education Sector, mandated by the Swiss Accreditation Council.

3.) In the CERT area, FIBAA certifies continuing education courses that do not lead to an academic degree but are offered at HEI level.

FIBAA has been a member of ENQA since 2001 and is applying for renewal of ENQA membership.

FIBAA has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2009 and is applying for renewal of EQAR registration. Page 2 of 7

2. Purpose and scope of the evaluation

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

2.1 Activities of FIBAA within the scope of the ESG

In order for FIBAA to apply for ENQA membership and for registration in EQAR, this review will analyse all activities of FIBAA that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is independent of whether the activities are carried out within or outside the EHEA and whether they are obligatory or voluntary in nature.

The following national and cross-border QA activities of FIBAA have to be addressed in the external review: (1) Programme Accreditation, (2) Institutional Accreditation, (3) Certification and (4) Evaluation Procedures According to Individual Objectives (offered by FIBAA Consult):

(1) Programme Accreditation:

- Programme accreditation in accordance with the rules of the GAC (awarding the GAC's seal)
- Programme accreditation outside the competence area of the Accreditation Council (to obtain FIBAA's quality seal for programmes).

(The second group not only includes the accreditation of Bachelor's and Master's study programmes, but also doctoral/PhD programmes.)

(2) Institutional Accreditation:

- System accreditation in accordance with the rules of the GAC (to obtain the GAC's seal)
- Institutional Audit Austria ("certification") in accordance with the rules of the Austrian Act on Quality Assurance in Higher Education (HS-QSG) (to obtain the FIBAA quality seal Institutional Audit Austria)
- Institutional Accreditation according to the Federal Act on Funding and Coordination of the Swiss Higher Education Sector (HFKG)
- Institutional Accreditation in accordance with the FIBAA quality standards (to obtain the FIBAA quality seal 'Institutional Accreditation')
- Institutional Accreditation: Strategic Management in accordance with the FIBAA's quality standards (to receive the FIBAA quality seal Institutional Accreditation: Strategic Management).

(3) Certification of Continuing Education Courses:

In accordance to the FIBAA quality standards, FIBAA certifies further education courses which do not lead to an academic degree but are offered at HEI level. They lead to the award of the FIBAA quality seal for further education courses.

(4) Evaluation Procedures According to Individual Objectives (offered by FIBAA Consult):

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As far as the objectives of the evaluation are teaching and learning in higher education, the activity is within the scope of the ESG. While FIBAA Consult has not carried out such evaluations yet; the review should address this activity as far as is defined.

Other matters relevant to FIBAA's application for Registration on EQAR

The other activities of FIBAA's organizational unit, FIBAA Consult (CONS), i.e. SWOT analyses, evaluation of HEIs exams, presentations and workshops are not within the scope of the ESG and do not need to be addressed in the external review (unless requested by FIBAA). The review should however address the way in which FIBAA ensures a clear separation between quality assurance activities and FIBAA's Consult services, taking into account Annex 2 of the [Policy on the Use and Interpretation of the ESG](#)¹.

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

Considering the renewal of FIBAA's application to EQAR, the self-evaluation report and the external review report is expected to also cover issues where the Register Committee concluded in its last decision that the agency complied only partially with the ESG, namely ESG 2.6 and ESG 2.7.

Additionally, the review should also address the changes brought about by the Interstate Treaty between the German federal states, which entered into force in 2018, and the related Specimen Decree as noted in [EQAR's Substantive Change Report](#).

FIBAA's Decision for Renewal of Registration on EQAR and Substantive Change Report can be consulted on FIBAA's Register entry at: <https://data.deqar.eu/agency/26-fibaa> .

3. The review process

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

The evaluation procedure consists of the following steps:

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

3.1 Nomination and appointment of the review team members Page 4 of 7

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

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

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

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

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

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

- 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 broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part 2 and 3) addressed individually, and considerations of how the agency has addressed the recommendations as noted in the ENQA Board's membership decision letter and the instances of partial compliance noted in the previous EQAR Register Committee decision of inclusion/renewal. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which FIBAA fulfils its tasks of external quality assurance and meets the ESG.
- The self-assessment report is submitted to the ENQA Secretariat which has four weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information

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itself but whether the necessary information, as stated in the guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within two weeks. In such cases, an additional fee of 1000 EUR will be charged to the agency.

- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A site visit by the review panel

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

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

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

3.4 Preparation and completion of the final evaluation report

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

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

When preparing the report, the review panel should also bear in mind the *EQAR Policy on the Use and Interpretation of the ESG* to ensure that the report will contain sufficient information for the consideration of the Register Committee of the agency's application to EQAR².

² See here: <https://www.eqar.eu/kb/official-documents/#use-and-interpretation-of-the-esg>

For the purpose of applying for ENQA membership, FIBAA is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which FIBAA expects to contribute to the work and objectives of ENQA Page 6 of 7

during its membership. This letter will be taken into consideration by the Board together with the final evaluation report when deciding on the agency's membership.

4. Follow-up process and publication of the report

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

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

5. Use of the report

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

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

For the purposes of EQAR registration, the agency will submit the review report (once approved by the ENQA Board) via email to EQAR before expiry of the agency's registration on EQAR. The agency should also include its self-assessment report (in a PDF format), a Declaration of Honour, full curriculum vitae (CVs) of all review panel members and any other relevant documents to the application (i.e. annexes, statement to the review report, updates). EQAR is expected to consider the review report and the agency's application at its Register Committee meeting in March 2022.

6. Indicative schedule of the review

Agreement on Terms of Reference	December 2020
Appointment of review panel members	January 2021
Self-assessment completed	1 March 2021
Pre-screening of SAR by ENQA Review Coordinator	March 2021
Preparation of site visit schedule and indicative timetable	April 2021
Briefing of review panel members	May 2021
Review panel site visit	Early June 2021

Draft of evaluation report and submitting it to ENQA Review Coordinator for pre-screening	August 2021
Draft of evaluation report to FIBAA	September 2021
Statement of FIBAA to review panel if necessary	September 2021
Submission of final report to ENQA	October 2021
Consideration of the report by ENQA Board	November 2021
Publication of report	November/December 2021
EQAR Register Committee meeting	February/March 2022

ANNEX 3: GLOSSARY

ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
F-ACC	FIBAA Accreditation and Certification Committee
FIBAA	Foundation for International Business Administration Accreditation
FTE	Full time equivalent
GAC	German Accreditation Council
HE	higher education
HEI	higher education institution
PTE	Part time equivalent
QA	quality assurance
QM Manual	Quality management manual
SAR	self-assessment report

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY FIBAA

- Access to the Quality Management Manual of FIBAA
- Admission of the GAC
- Comparison ESG and activities of FIBAA
- Concept paper of the FIBAA Seal “Excellent digital teaching or digitalisation of teaching”
- Double degree accreditations
- FIBAA landscape of processes
- FIBAA’s annual financial statement for 2018/19
- FIBAA Annual Report 2018
- Follow up report on the recommendations of the ENQA Board, May 27th 2019
- List of employees (as of February 28th 2021)
- Project Handling Programme Accreditation (FIBAA Seal and GAC Seal)
- Rules of procedure of F-ACC
- Statue of the Executive Committee of FIBAA Foundation Council
- Strategy paper for the restructuring of the FIBAA committees
- Training of FIBAA experts

OTHER SOURCES USED BY THE REVIEW PANEL

- FIBAA website
- GAC review of FIBAA, report from January 23rd 2017
- GAC website
- EURYDICE website

ANNEX 5. COMPARISON ESG AND FIBAA ACTIVITIES

Activities FIBAA	FIBAA Programme Acc. Assessment Guide Programme Acc. https://www.fibaa.org/fileadmin/redakteur/pdf/PROG/Handreichungen_und_Vorlagen/200423_AG_PROG_Bachelor_Master_en.pdf	FIBAA Institutional Acc Assessment Guide Inst. Acc Programme Acc. https://www.fibaa.org/fileadmin/redakteur/pdf/INST/Inst_Accreditation/FIBAA_AG_Inst_Accred_Engl_2020.pdf	GAC Programm Acc. https://akkreditierungsrat.de/sites/default/files/downloads/2019/Musterrechtsverordnung.pdf	GAC System ACC https://akkreditierungsrat.de/sites/default/files/downloads/2019/Musterrechtsverordnung.pdf	Certification of continuing education courses https://www.fibaa.org/fileadmin/redakteur/pdf/ZERT/June14-FIBAA_CERT_Assessment-Guide.pdf	Institutional Audit Austria https://www.fibaa.org/fileadmin/redakteur/pdf/INST/Inst_Audit-Oesterreich/25_Handreichung_Institutional_Audit_Austria.pdf	Institutional Accreditation Swiss https://www.fibaa.org/fileadmin/redakteur/pdf/INST/Inst_Acc_CH/FIBAA_FBK_Inst_Schweiz.pdf
I.1 Policy for quality assurance	5.1 Quality assurance and quality development with respect to contents, processes and outcomes 5.2 Instruments of quality assurance (in a broadest sense)	I. Mission Statement, HEI's Profile and Strategic Objectives II. Management Structure and Quality Management	§ 14 Academic success	§ 17 Concept of the quality management system (goals, processes, instruments)	6..1 Quality Assurance and Development of Course Content, Processes and Outcomes Instruments of Quality Assurance	I. 1 Defined goals I. 2 Institutional autonomy I. 3 Strategy I. 4 Quality Management System (QMS) I. 5 Control effect of the QMS I. 6 Responsibilities / Participation I. 7 int. quality standards "	I.1 The higher education institution or the other institution of the higher education sector defines its quality assurance strategy. I.2 The quality assurance system is integrated into the strategy of the higher education institution or the other institution of the higher education sector and effectively supports its development.
I.2 Design and approval of programmes	I Objectives 3.2 Structure 4.3 Cooperation & Partnership 5.1 Quality assurance and development 5.2.3 External evaluation by alumni, employers and third parties	III.2 Outline the following areas for the selected programmes and describe the relevant processes of development. III.4 Which processes are used for the quality assessment of studies and teaching? Please describe the relevant procedures (e.g. course evaluations, graduate surveys) and include information on regularity, responsibility, process and students' involvement. How are the results implemented?	§ 11 Qualification goals and qualification level § 12 Coherent study programme concept and adequate implementation § 13 Subject-content organisation of the study programmes	§ 17 Concept of the quality management system (goals, processes, instruments)	I. Strategien an Objectives 3.1.1 Structure of the Course 3.1.2 Application of the ECTS and modularisation 3.1.3 Study and examination Regulations 3.1.4 Feasibility of study workload	II c). 1 Professional qualification goals II c). 2 Interdisciplinary qualification objectives II c). 3 Positioning II c). 4 Mobility / Internationality II c). 5 Further development II c). 6 Students from abroad	3.3 The quality assurance system allows to ensure that principles and objectives are taken into account in the context of the European Higher Education Area.

<p>I.3 Stu den t- cen tre d lea rni ng, tea chi ng and ass ess me nt</p>	<p>3.1 Content 3.2 Structure 3.3 Didactical Concept 3.4 Internationality 3.5 Multidicplinary Competences 3.6 Skills for employment 5.2.1 Evaluation by Students</p>	<p>III.2 Outline the following areas for the selected programmes and describe the relevant processes of development. (Didactical Concept, Examination Concept)</p>	<p>§ 12 Coherent study programme concept and adequate implementation (paragraph 1) § 15 Gender equality and compensation of disadvantages</p>	<p>§ 17 Concept of the quality management system (goals, processes, instruments)</p>	<p>3.2.1 Logic and conceptual coherence 3.2.2 Integration of theory and practice 3.2.3 International and intercultural contents 3.2.4 Methodological competence 3.2.5 Academic work and science-based teaching 3.2.6 Examinations 3.3 MULTIDISCIPLINARY QUALIFICATIONS AND SKILLS 3.4 DIDACTICS AND METHODOLOGY 3.4.1 Logic and transparency of teaching and learning methodology 3.4.2 Course materials 3.5 SKILLS FOR EMPLOYMENT/ EMPLOYABILITY</p>	<p>II d). 3 Linking research and teaching II c). 1 Professional qualification goals II c). 2 Interdisciplinary Qualification Goals II c). 4 Mobility / Internationality II c). 6 Students from abroad</p>	<p>3.2 The quality assurance system provides for regular evaluation of teaching and research activities, services and results.</p>
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I.4 Student admission, progression, recognition and certification	2. Admission3.2 Structure	III.2 Outline the following areas for the selected programmes and describe the relevant processes of development. (Admission)V.3 Student servicesVII 2 Publications /Public	§ 5 Admission requirements and transitions between different courses§ 6 Qualifications and qualification designations§ 12 Coherent study programme concept and adequate implementation (paragraph 1)§ 14 Academic success§ 17 Concept of the quality management system (goals, processes, instruments)	§ 17 Concept of the quality management system (goals, processes, instruments)	2.1 Focus on the target group2.2 Admission conditions2.3 Legal relationship	III. 1 Program management III. 2 Advising / support for students III. 3 Support for international students III. 4 Equal opportunities / diversity	3.4 The quality assurance system allows to ensure that the criteria for admission and evaluation of student performance and for the delivery of educational degrees are taken into account in accordance with the mission of the university or other institution of higher education
I.5 Teaching staff	4.1 Faculty	VI Resources	§ 12 Coherent study programme concept and adequate implementation (paragraph 2)	§ 17 Concept of the quality management system (goals, processes, instruments)	4.1.1 Course management 4.1.2 Structure and number of teaching staff in relation to curricular requirements 4.1.3 Teaching staff's academic qualifications 4.1.4 Teaching staff's pedagogical/didactical qualifications 4.1.5 Practical business experience of the teaching staff 4.1.6 Internal cooperation 4.1.7 Participant	II b). 1 Recruitment channels II b). 2 Scientific regrowth II b). 3 Qualifications of teaching staff II b). 4 Full-time teaching staff / Appointments II b). 5 Adjunct faculty II b). 6 Personnel development	4.1 With the sponsorship, the higher education institution or the other institution of the higher education sector ensures the human resources, 4.2 The quality assurance system allows to ensure that all personnel are qualified according to the type and specific characteristics of the higher education institution or the other institution of the higher education sector.

					support and coaching		
I.6 Learning resources and student support	4.2 Programm Management 4.4 Facility & Equipment 4.5 Aditional services	V. Student Services VI Resources	§ 12 Coherent study programme concept and adequate implementation (paragraph 3)	§ 17 Concept of the quality management system (goals, processes, instruments)	4.2.1 Administrative course director 4.2.2 Process organisation and administrative support for participants and teaching staff 4.2.3 Service for participants	III. 1 Study program management III. 3 Support for international students	4.1 With the sponsorship, the higher education institution or the other institution of the higher education sector ensures the human resources,
I.7 Information management	General Information: 0.2 Further development of the programme and implementation of recommendations from previous accreditation (if relevant) 5.2 Programme description 5.3 Information an activities during the academc year	II.4 Quality Management System II.5 Quality Management Instruments III.4 Quality assurance	§ 14 Academic success	§ 18 Measures to implement the quality management concept, see paragraph 3	5 Documentation	IV. 1 Informing the public IV. 2 Information of stakeholders IV. 3 Information of interested parties	5.1 The higher education institution or the other institution of the higher education sector makes its quality assurance strategy public and ensures that the provisions on the quality assurance processes and their results are known to the staff, students and, if applicable, external stakeholders
I.8 Public information	5.2 Programme description 5.3 Information an activities during the academc year	VII Publication/ Public	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	1.1 Logic and transparency of course objectives 1.2 International orientation of the course 1.3 Positioning of the course 1.3.1 Positioning of the course in the education and job market, and the professional field ("employability") 1.3.2 Positioning of the course within	V. 5 Foreign language information IV. 2 Stakeholder information	5.2 The higher education institution or the other institution of the higher education sector regularly publishes objective information on its activities and on the study programs and degrees it offers.

					the institution's overall strategy		
1.9 On-going monitoring and periodic review of programmes	1.1 Objectives of the study programme 5.1 Quality assurance and quality development with respect to contents, processes and outcomes	II.4 Quality Management System II.5 Quality Management Instruments III.4 Quality assurance	§ 14 Academic success	§ 18 Measures to implement the quality management concept	1.1 Logic and transparency of course objectives	IV. 6 External Evaluation IV. 7 Participation rights of university members IV. 8 Monitoring of the QMS	1.4 The higher education institution or other institution of higher education periodically reviews the appropriateness of its quality assurance system
1.1 0 Cyclical external quality assurance	General Information, 0.2 Further development of the programme and implementation of recommendations from previous accreditation (if relevant)	II.4 Quality Management System (in a broadest sense) relevant Relevant through reaccreditation	§ 26 Period of validity for the accreditation; extension	§ 26 Period of validity for the accreditation; extension	6.1 Quality assurance and development of course content, processes and outcomes (Asterisk Criterion)	1. 4 Quality Management System (QMS) 1. 5 Control effect of the QMS	1.3 For the development of the quality assurance system and its implementation, all representative groups of the higher education institution or the other institution of the higher education sector are involved at all levels,

ENQA AGENCY REVIEW 2021

THIS REPORT presents findings of the ENQA Agency Review of the Foundation for International Business Administration Accreditation (FIBAA), undertaken in 2021.

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European Association for
Quality Assurance in Higher Education