



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

Register Committee

Ref. RC19/A45

Ver. 1.0 Date 2017-06-23 Page 1/4

Application of:	19/05/2016
Agency registered since:	25/05/2010
External review report of:	23/01/2017
Review coordinated by:	ENQA
Review panel members:	Andreas Musil (chair), Lutz-Helmut Schön, Blaženka Divjak (academics), Timo Gayer, Florian Pranghe (student), Stefan Bartels (GAC member, observer), Ketevan Becker, Olaf Bartz (GAC staff, secretaries)
Decision of:	20 June 2017
Registration until:	31 January 2022
Absented themselves from decision-making:	Izabela Kwiatkowska Suika (guest, incoming RC)
Attachments:	 <u>Confirmation of eligibility, 30/06/2016</u> <u>External Review Report, 23/01/2017</u> <u>Applicant's statement on the report, w/o date</u> <u>Request to the Review Panel, 25/04/2017</u> <u>Clarification by the Review Panel, 08/05/2017</u>

- 1. The application of 19/05/2016 adhered to the requirements of the EQAR Procedures for Applications.
- The Register Committee confirmed eligibility of the application on 30/06/2016, taking into account the Register Committee's decision of 6/06/2016 on the Substantive Change Report by AQAS.
- The Register Committee considered the external review report of 23/01/2017 on the compliance of AQAS with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
- 4. The Register Committee sought and received clarification from the chair of the review panel.

Analysis:

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







6. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

ESG 2.5 – Criteria for outcomes

The review panel noted that AQAS's criteria for international institutional accreditation were not published at the time of the review.

The Register Committee took note of AQAS' statement on the review report and that AQAS now published the criteria for international institutional accreditation on its website.

The Register Committee further noted that AQAS published the criteria without the additional "indicators", which illustrates what is covered by a criterion. The Committee sought and received clarification by the review panel as to whether it considered publication without the "indicators" as sufficient.

The Register Committee took note of the explanation that due to plagiarism and copyright infringements experienced in the past, AQAS published the criteria without additional, detailed material, while the "indicators" were made available to institutions applying for accreditation.

Given that the substantial criteria for international institutional accreditation are now published, the Register Committee concluded that AQAS complies with the standard.

ESG 3.1 – Activities, policy and processes for quality assurance

When confirming eligibility of the application, the Register Committee requested AQAS to clarify the relation between AQAS e.V. and AQAS ARCH, as well as the separation of external quality assurance procedures from consultancy services.

The Register Committee took note of the clarification that AQAS ARCH did not engage in any activities within the scope of the ESG, but was engaging only in consultancy and project work, and welcomed the clarity provided.

The Register Committee further welcomed AQAS' clear statement that it agreed "that the work of an accreditation agency in a particular procedure, be it programme or institutional accreditation, is incompatible with a preceding (or current) consultancy at the same university" and that "this incompatibility naturally includes organisations which are connected operationally with the agency" (statement on the review report); consequently, "AQAS e.V. cannot accredit the same organisation that received consultancy services through AQAS ARCH GmbH" (idem).

The review panel, however, noted that these principles do not seem to be clearly documented in a published official policy document of AQAS and thus recommended that "AQAS should, in form of the formal resolution,

Register Committee

Ref.	RC19/A45
Ver.	1.0
Date	2017-06-23
Page	2/4





define the distinction between accreditation and consultation, between ESG and non-ESG activities and between AQAS and AQAS ARCH" (review report, p. 12).

The Register Committee concluded that AQAS was able to explain that it appropriately separates its different areas of activity, while the details and consequences of this separation are not yet fully publicly documented. The Committee was therefore unable to concur with the review panel's conclusion and concluded that AQAS only partially complies with the standard.

ESG 3.4 – Thematic analysis

When AQAS last had its registration renewed, the publication of thematic analyses was flagged.

Considering the review report, the Register Committee concluded that AQAS carried out a number of relevant internal analyses and produced relevant reports, e.g. the overarching report produced based on its accreditations in Moldova. These were, however, carried out on an adhoc basis, internal and not published as required by the standard.

In its statement on the review report, AQAS explained that it had published a first set of thematic analyses on its website. While the Register Committee welcomed the efforts taken to date, it was not yet possible to conclude whether thematic analyses are produced regularly.

The Register Committee therefore concluded that the flag was partially addressed and concurred with the panel's conclusion that AQAS partially complies with the standard.

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

Conclusion:

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

Standard	Review panel conclusion	Register Committee conclusion
2.1	Fulfilled	Compliance
2.2	Fulfilled	Compliance
2.3	Fulfilled	Compliance
2.4	Fulfilled	Compliance
2.5	Partially fulfilled	Compliance
2.6	Substantially fulfilled	Compliance
2.7	Substantially fulfilled	Compliance
3.1	Substantially fulfilled	Partial compliance

Register Committee

Ref.	RC19/A45
Ver.	
Date	2017-06-23
Page	3/4





Standard	Review panel conclusion	Register Committee conclusion	
			Regi
3.2	Fulfilled	Compliance	
3.3	Fulfilled	Compliance	Ref
3.4	Partially fulfilled	Partial compliance	Kei
3.5	Fulfilled	Compliance	Ver
3.6	Substantially fulfilled	Compliance	Date Page
3.7	(not expected)	Compliance (by virtue of applying)	5

- 9. The Register Committee considered that AQAS only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that AQAS complies substantially with the ESG as a whole.
- 10. The Register Committee therefore approved the application for inclusion on the Register. AQAS's inclusion shall be valid until 31/01/2022¹.
- 11. The Register Committee further underlined that AQAS is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.

Register Committee

Ref.	RC19/A45
Ver.	
Date	2017-06-23
Page	4/4



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





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Agency for Quality Assurance through Accreditation of Study Programmes (AQAS) Doris Herrmann Hohenstaufenring 30-32

506740 Köln Germany

Brussels, 30 June 2016

Confirmation of Eligibility: Application for Renewal of Registration Application no. A45 of 19/05/2016

Dear Doris,

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

Based on the information and draft terms of reference provided, the external review coordinated by the German Accreditation Council (GAC) fulfils the requirements of the EQAR Procedures for Applications.

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

- Programme Accreditation in Germany
- System Accreditation in Germany
- Programme Accreditation international
- Institutional Accreditation international
- Accreditation of Joint Programmes

Following the Register Committee's decision of 6 June 2016 on Substantive Change Report by AQAS, the Register Committee expects that AQAS would further decide on one of the following two possibilities in its next external review:

(1) to include the subsidiary's activities (within the scope of the ESG) in the scope of their registration and thus in AQAS' application for renewal on EQAR.

In this case, the *evaluation and certification procedures* carried out by AQAS ARCH (and any other external quality assurance activities that fall within the scope of the ESG, see Use and Interpretation of the ESG) should be considered.

(2) to ensure and demonstrate that the work of AQAS ARCH can effectively be distinguished from AQAS e.V..

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In this case the review should consider how the agency ensures and is able to demonstrate that there is no risk of confusion in the evaluation or certification procedures carried out by AQAS or by the subsidiary. The division of tasks between AQAS e.V. and AQAS ARCH and the clear separation between the activities carried out by the two entities should be addressed.

In both situations the review should consider the separation of external quality assurance procedures from the consultancy services carried out by AQAS or by its subsidiary.

In the application form, AQAS stated that it did not consider the following activity to be within the scope of the ESG:

- Institutional and Programme Accreditation in Oman

We considered the information provided and came to the conclusion that this activity might be within the scope of the ESG. It is the understanding of the Register Committee (see Use and Interpretation of the ESG¹) that the ESG are applicable to all external quality assurance activities of higher education provision carried out by EQAR listed agencies within and outside the European Higher Education Area (EHEA). Thus the ESG are also applicable to the institutional and programme accreditation procedures carried out by AQAS in Oman.

Please ensure that the self-evaluation and external review of AQAS covers all the aforementioned activities, including the external quality assurance carried out in by AQAS in Oman.

We further remind you that the following issues were flagged when AQAS' registration was last renewed, and should be addressed in the self-evaluation report and external review report:

ESG 3.4 – Thematic analysis [ESG 2005: standard 2.8]

Attention should be given to whether AQAS regularly and systematically publishes overarching findings from its accreditation activities.

ESG 3.3 - Independence & ESG 3.6 – Internal Quality Assurance and Professional Conduct [ESG 2005 standard 3.6]

It should receive attention whether AQAS has implemented structural measures to safeguard more systematically and sustainably the independence of judgements and accreditation decisions, as well as to exclude potential conflicts of interest and undue influence.



¹ See Scope and Applicability of the ESG, page 2

https://www.eqar.eu/fileadmin/documents/eqar/official/RC_12_1_UseAndInterpr etationOfTheESG_v1_0.pdf





We will forward this letter to GAC in its capacity as the coordinator of the external review. At the same time we underline that it is AQAS's responsibility to ensure that the coordinator and review panel take account of the present confirmation, so as to ensure that all activities mentioned are analysed by the panel.

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

Yours sincerely,

l- rick

Colin Tück (Director)

Cc: GAC





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To the Managing Director of the German Accreditation Council (GAC) Dr. Olaf Bartz Geschäftsstelle der Stiftung zur Akkreditierung von Studiengängen in Deutschland Adenauerallee 73

53113 Bonn

Response by AQAS: GAC report for the re-accreditation of AQAS e.V.

Dear Dr. Bartz,

we hereby give thanks to the expert panel and the GAC for their report and the manner in which the procedure was carried out so far which we felt was extremely fair. We were very pleased by the panel's positive appreciation of our work which was communicated to us verbally after the visit. During the meetings we received initial advice on how to develop our work further; we immediately picked up these suggestions and have, in parts, already implemented them. Unfortunately, the tone of the GAC report is rather matter-of-fact and does not reflect the good atmosphere of the procedure and the appreciation expressed by the expert panel.

The report follows the logic of the GAC rules for the accreditation of agencies of 23.09.2016. The report clarifies that the decision by GAC is based on the set of rules of 08.12.2009 in the version of 10.12.2010. In its letter of 13.07.2016 initialising the reaccreditation procedure the GAC assured AQAS that the procedure would be based on this set of rules. Nothing to the contrary was agreed between the GAC and AQAS.

AQAS' international business activity is still at the development stage despite first orders from international universities and our participation in EU projects. In 2015 we reviewed and systematised - on the basis of the new ESG (2015) - our documents that we use in programme and institutional accreditations. Due to the "Substantive Change Report" by EQAR of 06.06.2016 and the "Confirmation of Eligibility: Application for Renewal of Registration Application" we suspect that issues raised by the Register were given a higher profile during the accreditation procedure than it seemed justified, given the size of our international business operation in comparison to the volume of national accreditation procedures.

We would like to expressly thank the GAC expert panel for their willingness to openly discuss the critical points raised by EQAR with the AQAS representatives and to engage with our arguments. At the same time we are keen to stress that we can't comprehend the allegation made by EQAR that our agency mixes the business areas of consultancy and 2accreditation. There was never any proof for this allegation, nor a complaint made against



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18.01.2017

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us; nor were we ever guilty of any misconduct. These allegations, however, run through the whole accreditation procedure and are also reflected in the report. On the other hand, the outstandingly positive feedback that we have received to date from

international universities and experts regarding the professionalism and efficiency of our accreditation procedures were not taken into consideration in the evaluation by the GAC panel.

Please find below our detailed response regarding the separation between AQAS e.V. and AQAS ARCH GmbH.

In the following response to the GAC report we separated factual corrections from contentrelated comments. Editorial comments have been included as an Appendix.

I. Factual corrections

III.2 Organisation

Paragraph 7:

"From the second half of 2016 the AQAS **Head Office** has been divided into three main business areas: system accreditation, programme accreditation and an international operation. Each of these three areas is headed up by a member of staff (f/m). The two Managing Directors have responsibility for all business areas and manage, in addition, system accreditation and international activities in which they also act in an operational capacity."

The newly created business area "quality assurance" was added in the second half of 2016, functioning as a cross-sectional area beyond the three business fields described above.

IV Assessment of the European Standards and Guidelines (ESG)

ESG 3.1, Assessment, Paragraph 3

"So far, AQAS has not submitted a written policy on the separation between quality assurance and consultancy".

This statement is not correct. In the subsequent delivery of 11.11.2016 AQAS submitted a detailed paper explaining the relationship between AQAS e.V. and AQAS ARCH GmbH.

The Board as well as the General Assembly discussed the separation of consultancy and accreditation at its decision to set up the daughter company (GmbH) in 2014. In its founding decision the Board states as follows:

"Through the separation of the areas of classical accreditation (with the award of the seal by GAC) in the e.V. and additional projects in the daughter company (GmbH) a stronger internal and external transparency should be achieved.

The aim is to set up a separate company not involved in the German accreditation system and which therefore has a greater potential to attract new business, offering universities and other education providers additional services. The non-profit company (AQAS e.V.) would therefore only serve the company's main aim (accreditation of QA systems in universities and study programmes)."

As explained in our SER we are perfectly clear that AQAS e.V. cannot accredit the same organisation that received consultancy services through AQAS ARCH GmbH. We always interpreted the GAC decision "Standards for the design of the relationship between system accreditation and consultancy services" of 31.10.2008 as a fundamental requirement that we fully subscribe to in our programme accreditation procedures and in our international activities. AQAS shares the GAC position that an unbiased assessment and decision are key requirements for accreditation procedures to be

trustworthy and impartial, along with agencies' professionalism and the highest levels of transparency. The ESG and the "Code of Good Practice for the Members of the European Consortium for Accreditation in Higher Education" provide us with direction and guidance in our work. We agree with GAC that the work of an accreditation agency in a particular procedure, be it programme or institutional accreditation, is incompatible with a preceding (or current) consultancy at the same university. This incompatibility naturally includes organisations which are connected operationally with the agency.

In our consultancy project with the [...] we clearly showed that we understood and implemented the guidelines and code of practice outlined above. AQAS ARCH carried out an assessment of the university's evaluation statutes, however, when AQAS e.V. was invited to bid for tender for a system accreditation at [...], we declined to participate (compare SER, p. 16.). We also made our reasoning transparent to GAC.

ESG 3.4, Documentation, Paragraph 1

"The agency states that it undertakes thematic analyses with the instrument "reporting back". AQAS thereby collects the results and experiences accumulated throughout the course of different projects and accreditation procedures. These results and experiences are presented at events, conferences, trainings, workshops as well as discussions and also published in bespoke newsletters and publications. This allowed AQAS to feed key findings back into the accreditation system (see Appendix V.4)."

The activities of AQAS in the framework of the "reporting back" process go beyond merely "collecting" data. The aim is to present or publish theme-based summaries of our results and experiences that we made over the course of various accreditation procedures and projects. Our aim it to relay key findings into the system. Thus, AQAS wishes to actively contribute to the discourse of stakeholders engaged in the accreditation system (see SER, p. 22).

The relevant summary of our extensive activities to date has been included as an Appendix with our response.

ESG 3.4, Documentation, Paragraph 2

"Within the framework of the previous re-accreditation procedure of AQAS it was stated that AQAS would put together an end-of-year report, summarising the results and experiences the agency had made during the year. This report would be presented to the Board and to members of staff. In the current SER no reference is made to a report."

Due to capacity issues, AQAS decided to no longer publish these internal reports.

ESG 2.2, Documentation, Paragraph 4

"Research and governance are not explicitly assessed during the institutional on-site visit, however, these areas find their way into the different interfaces between studying and teaching."

We were surprised by the explicit reference to research and governance as the ESG does not pick up on these areas. Nevertheless, experts intensively discussed research aspects in [...] procedure. These discussions were also reflected in the expert report which was also made available to the GAC review group.

ESG 2.2, Assessment, Paragraph 3

"As far as the institutional accreditation in [...] was concerned common issues in Europe such as gender equality or the Lisbon convention were met with difficulties".

This statement is not correct. AQAS has never, at any stage of the re-accreditation procedure, made such a statement.

Even if the ESG don't include the theme of Gender Mainstreaming the international expert panel explicitly discussed the theme of gender equality with the representatives (f/m) of the [...] University: Female and male students are taught at the university in the same courses and the percentage of women is very high. There are numerous female professors who made it clear that they were neither restricted in teaching nor in research. Since the experts could not identify any problems, the [...] report did not perceive gender equality as a problem. On the contrary, the experts reached the following assessment:

"The QA system [...] supports scientific integrity; forms of discrimination were not detected. The college shows a highly developed level of awareness of discrimination." (p. 18).

It is correct, however, that international projects always require a culturally specific interpretation of the ESG. Against this background there was also a discussion around "recognition" as shown in the report:

"Recognition procedures are regulated. The regulations regarding re-sits, disability compensation, illness and other circumstances are written down in the Postgraduate/Undergraduate Academic Regulations Handbook and transparent to all stakeholders." (p. 31)

In this respect, the statement made above in the report for the re-accreditation of AQAS is wholly without foundation.

More correct would be the following description:

"During the [...] accreditation procedure [...] a number of common topics in Europe such as gender equality and the Lisbon Convention were also discussed. No fundamental problems came to light".

In addition we would like to point out that we consider it inappropriate to include contentrelated statements in the AQAS re-accreditation report which refer to a concrete project.

We also consider such statements highly questionable in terms of safeguarding the university in question.

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ESG 2.3, Assessment, Paragraph 3

"The expert group shares this assessment, encouraging AQAS to explain in detail how the agency understands its function and role in international projects. This self-definition should be clearly defined for all stakeholders if this hasn't already happened."

In the context of a TEMPUS project AQAS informed university and ministry representatives on aspects of external quality assurance, among them the ESG and the criteria development as well as the process for external evaluation. The TEMPUS project resulted, amongst others, in setting up a national accreditation agency in [...]. AQAS did not, subsequently, carry out consultancy services for universities but undertook accreditation procedures for different study programmes in [...]. AQAS fully understands that consultancy services have to be separated from accreditation procedures in international projects. It goes without saying that this understanding also informs AQAS' practice in Germany. There are neither consultancy elements nor is there an "international bonus" for applicants involved in international accreditation procedures co-ordinated by AQAS. There was, however, a specific problem in [...] that we described in our report submitted to the Ministry of Education and which we have made available to the GAC expert panel (see Appendix of the additional delivery).

Many study programmes in [...] were good in terms of their quality but failed to reflect the level of subject-specific and academic discussions in western European countries. The experts (m/f) found the programmes to be sound but old-fashioned. The AQAS expert group attempted to provide, in a sense, "developmental support", offering recommendations on how to further develop the university's study programmes. This "support" was offered in two areas, namely for the subject-specific content of study programmes and their competence orientation. From our point of view (and that of our experts!) our "support" complies with the Quality Enhancement approach which has long been demanded (by QA stakeholders) in Europe.

II. Explanatory notes to the assessment

III. Assessment of the European Standards and Guidelines

Standard 3.1. Use of external quality assurance procedures for higher education

• Assessment, Paragraph 3:

"The experts, however, hold the view that a fundamental decision has to be taken regarding the relationship between the parent company and its subsidiary once the business volume of AQAS ARCH increases significantly."

"Recommendation 1: AQAS should formulate guidelines in the form of a basic decision defining the separation between accreditation and consultancy, between ESG and non-ESG activities as well as between AQAS and AQAS ARCH."

We understand very well the experts' assessment that a basic decision governing the relationship between parent company and subsidiary is recommended if the business volume increases. However, we don't understand why the long-term perspective of the experts' recommendation ("once the business volume of AQAS ARCH increases") was not included in the wording of recommendation 1. This omission suggests that there are



difficulties separating the two business areas for which action should be taken. From our point of view this omission picks up the allegation made by EQAR which is reflected in recommendation 1.

We've already been able to prove in the procedure that there is no problem; this was also stated by the expert panel in their report: "In conversations with the Managing Directors and staff members it became apparent to the expert panel that the separation between quality assurance and consultancy is ensured."

Standard 3.4. Thematic Analysis

Recommendation 2: AQAS should develop a concept for future thematic analyses and should soon publish a first contribution on its homepage.

Even if we've long followed the "reporting back" principle (as described above) it is correct that we had no central location where we published relevant contributions. In the meantime, we have set up a section on our homepage where we put our first contributions online. Next to older publications one can find new articles that we wrote - as suggested by the expert panel - on the basis of our reflective texts from the SER. In addition there are references to publications which we published elsewhere (for legal reasons).

AQAS seeks to publish, at least annually, a "thematic analysis" on a current topic.

We therefore consider this recommendation to have been implemented.

http://www.aqas.de/ueber-aqas/thematische-analysen/

Standard 3.6 Internal quality assurance and professional conduct

Assessment, Paragraph 5:

"The Quality Management concept of the agency admittedly remains incomplete because quality control loops have not been closed. In order to ensure the representation and improvement of each single process and to comply with the PDCAprinciple (plan-to-check-act), the Share Point Server should be supplemented by incorporating quality assurance mechanisms such as the ZEM analyses and by defining robust feedback loops."

Recommendation 3: "AQAS should expand its existing Share Point Server so that processes of the quality management system are mapped onto the requirements of the PDCA cycle."

In the preceding accreditation procedure we presented in detail the different instruments and measures that AQAS draws upon for its international quality assurance. From our point of view the quality control loop has hereby been closed. The Share Point Server fulfills the function of a Quality Management Handbook and supports AQAS in terms of a document management system through illustrating processes and providing a steer through them. We are prepared to submit another summary (for instance as an image) to show that we have implemented a closed control loop system and to incorporate the relevant documentation on our Share Point Server.

7

Standard 2.1 Consideration of internal quality assurance

Assessment, Paragraph 1:

"With regards to programme and institutional accreditation with the seal of the GAC it is not necessary to assess the added synopses as these procedures comply with the "Rules for the Accreditation of Study Programmes and for Institutional Accreditation " of GAC which are aligned with the 2005 ESG version."

This statement in the report by GAC took us by surprise: we prepared these synopses specifically for this procedure in order to show that we had, to a large extent, already implemented the ESG 2015 in our guidance notes and checking criteria (and the accompanying criteria), whilst applying the current criteria of the GAC for programme and institutional accreditation.

• Assessment, Paragraph 2:

"In addition, AQAS developed bespoke guidelines for programme and institutional accreditation procedures outside Germany. Even if the agency did not submit synopses for these guidelines the listed criteria clearly show – with reference to the relevant ESG standards – that the standards comply with the ESG.

From our point of view it is not necessary to have a synopsis in place matching up international programme accreditation criteria with the ESG as these are nearly, worded identically with the ESG.

Standard 2.5 Criteria for outcomes

"Recommendation 4: The criteria for international institutional accreditation should be published."

We would like to express our thanks for suggesting that the criteria for international institutional accreditation should be published on the AQAS homepage.

In the meantime we immediately corrected this oversight and assume that we have hereby implemented this recommendation.

http://www.aqas.eu/services/institutional-accreditation-audit/

Standard 2.6 Reporting

"Recommendation 5: AQAS should improve the search facilities on its website for reports from international procedures."

All reports from international accreditation procedures have been inputted into the database by AQAS. However, it was fed back to us that it was difficult to find the international reports in the database. Based on the feedback by the expert group we put together a summary of our international accreditation procedures and have already uploaded it on our international homepage.

We assume that this recommendation has now been implemented.

http://www.aqas.eu/services/accredited-study-programmes/

• Assessment, Paragraph 2:

"The publication and processing of all database records for AQAS, which have a relatively high market share compared to other agencies' records, is a very time consuming and onerous activity. AQAS should consider whether existing personnel capacity is sufficient".

Existing personnel capacity is sufficient! The ongoing technical database problems have nothing to do with human resource issues at AQAS.

"Recommendation 6: AQAS should look for solutions, jointly with GAC and those responsible for the database, on how these data record entry problems in the main database could be solved. The disputed issues around functionality and loss of data should be put down in writing."

Together with the other agencies AQAS has been, for years, in contact with GAC about these database problems: the minutes of the GAC Round Table with the other agencies of 03.05.2013 (Appendix) show that we had, at the time, flagged up that the database was "not state-of-the-art". The email correspondence with the Head Office of GAC from 2015 (also included as an Appendix) proves that we have repeatedly pointed out the recurring problems with the database (esp. the "loss" of data). Other agencies corroborated these problems.

Since late 2016 we've been again in an extensive email contact with the GAC and those responsible for the database (this can be viewed from the enclosed email correspondence which has also been included as an Appendix). We are happy to work constructively towards improving the database, however, do not consider the proposed conditions to be appropriate:

- The timescale allotted to agencies in which they have to meet a condition and provide evidence to GAC is normally six months. However, the scale of the problem is thus that it will certainly take considerably longer (for all parties concerned) to come up with the required solution.
- AQAS cannot take sole responsibility for the problem referred to in the condition, nor can AQAS fulfil the condition on its own. It is only by working together with the GAC and those responsible for the database that a solution can be found.
- With the introduction of a traffic light system, presented during our re-accreditation procedure, we have already established a quality assurance process. The traffic light system ensures that any problems faced by us when entering data on the database will be documented and monitored.

V. Assessment on the basis of the GAC criteria

- The rendition of the recommendation 2 (self-reflexive reports) does not correspond to the wording in the text for standard 3.4. The resulting condition 2 does not comply with the criteria of GAC for the accreditation of agencies in the version of 10.12.2010 upon which the procedure is based (see above).
- The proposed condition 4 does not comply with the criteria of GAC for the accreditation of agencies in the version of 10.12.2010 upon which the procedure is based (see above).

AQAS Agentur für Qualitätssicherung durch Akkreditierung vor



V.1 In reference to the fulfilment of the GAC criteria

- The description refers to the GAC criteria in the version of 23.09.2016 (see above). According to the statements made above full reference should have been made to the criteria in the version of 10.12.2010.
- The assessment of the **criterion 3.1**. seems inappropriately short.
- Assessments for criteria **3.4**, **3.10** and **3.11**. are altogether missing.
- The assessment for criterion 3.7 comes as a surprise as the adequate composition of the AQAS expert panels was nowhere called into question during the procedure. The resulting condition 2 furthermore does not comply with the criteria of GAC for the accreditation of agencies in the version of 10.12.2010 upon which the procedure is based (see above).

AQAS sought to be as transparent as possible in the procedure towards GAC and its expert panel; we openly disclosed business figures and data. We expect that all relevant information in the application documents and the assessment report will be blackened prior to publication.

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

Yours sincerely

Prof. Dr. Eberhard Menzel Chair of the Board

Doris Herrmann Managing Director for Strategy, Process and International

Dr. Verena Kloeters Managing Director

Appendices

- Summary of activities "reporting back"
- Excerpt protocol of GAC for the Round Table of 03.05.2013
- Excerpts of email correspondence AQAS/GAC/HRK relating to the database
- Editorial comments



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– via email –

Brussels, 25 April 2017

Application by AQAS for renewal of registration on EQAR

Dear Mr Musil,

AQAS has made an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of January 2017 on which AQAS' application is based.

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

The review panel noted that only the criteria for international programme accreditation were published at the time of the review, whereas those for international institutional accreditation were not (see standard 2.5).

Whereas AQAS stated in its response to the panel's report that it had now also published the criteria for institutional accreditation, we noted that the criteria published on the websiteⁱ are substantially shortened versions of the documents contained in the annex to AQAS' self-evaluation reportⁱⁱ, both for programme accreditation and institutional accreditation.

Could you please clarify whether the panel was aware that only shortened versions of these documents are published?

If the panel considered that appropriate, could you please also elaborate on the panel's reasons?

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We be would grateful if it was possible for you to **respond by 9 May 2017,** and we would appreciate if you get in contact with us should that not be feasible.

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

We appreciate your assistance and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,

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Colin Tück (Director)

Cc: German Accreditation Council (coordinator & secretary) AQAS

ⁱ See at <u>http://www.aqas.eu/downloads/Criteria%20for%20Programme%20Accre</u> <u>ditation.pdf</u> and <u>http://www.aqas.eu/downloads/Criteria</u> Instit Accreditation AQ <u>AS.pdf</u>



[&]quot; See annexes VI.02 and VI.07



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Colin Tück Director EQAR Oudergemselaan/Av. d'Auderghem 36 BE-1040 Brussels

Dear Mr Tück,

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Thank you for your enquiry and for the opportunity to clarify the issues addressed in your letter.

The review panel has discussed the publication issue extensively with the agency. AQAS and the panel fully agreed that the criteria should be published immediately which has happened until now as you noticed.

In addition to the criteria in the sense of ESG 2.5, AQAS provides additional material, called "indicators", to help HEIs to prepare the accreditation processes. AQAS does not publish these indicators but gives it to HEIs when an agreement with the agency is imminent or has been signed. The reason is that AQAS has experienced severe copyright infringements in the past. Material provided by AQAS has been used in various cases by other organizations or has even been published without any essential adjustments and permission. In order to secure the copyrights, to maintain a fair competition and to avoid plagiarism and theft, AQAS publishes only the criteria on its website.

The review panel is strongly convinced that ESG 2.5 is about the criteria, not about all other related documents.

Furthermore, the review panel discussed this issue in the course of different sessions with the representatives of various international institutions where AQAS has conducted accreditation processes. The panel was convinced that AQAS works transparent on the international level and provides the HEIs with the full range of documentation, as it is contained in the annexes of the agency's self-evaluation report.

As described, the review panel evaluated this aspect but it unfortunately has not been explicitly incorporated in the report. I apologize for the inconvenience and hope that my response gives a plausible explanation to the addressed questions.

Kind regards,

Andreas Musil

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