

Approval of the Application
by Swiss Agency of Accreditation and Quality Assurance
(AAQ)
for Renewal of Inclusion on the Register

Register Committee
1-2 July 2021

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Ver. 1.0
Date 2021-09-02
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Application of:	06/02/2020
Agency registered since:	08/05/2012
External review report of:	21/04/2021
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)
Review panel members:	Bernard Coulie (chair), Vanessa Duclos (secretary), Michèle Wera, Philipp Schulz (student)
Decision of:	02/07/2021
Registration until:	30/04/2026
Absented themselves from decision-making:	1. Jacques Lanares 2. Andrea Blättler
Attachments:	1. Confirmation of eligibility, 10/03/2020 2. External Review Report, 21/04/2021

1. The application of 06/02/2020 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 10/03/2020 having considered clarification received from the agency on the types of activities it offers.
3. The Register Committee considered the external review report of 21/04/2021 on the compliance of AAQ with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).

Analysis:

4. In considering AAQ's compliance with the ESG, the Register Committee took into account the following activities:
 - *Institutional accreditation in Switzerland (according to HEdA),*

- *Programme accreditation in Switzerland (according to HedA, Medical Professions Act and to the Health Professions Act – HEdA and MedPA),*
- *System accreditation in Germany,*
- *Certification procedures in Austria (institutional Q-audit),*
- *Evaluation procedures.*

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5. *Accreditation of advanced professional training in medicine and Accreditation of advanced professional training in the psychology professions* are not within the scope of the ESG and, thus, not pertinent to the application inclusion on the Register.

6. In line with its previous decisions, the Register Committee has considered AAQ's renewal of registration including the Swiss Accreditation Council (SAR), in its capacity of decision making body of AAQ. The Register Committee underlined that the role, tasks and activities of SAC in relation to SAC's other area of work and AAQ in general should be covered sufficiently in future evaluations.

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

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

ESG 2.1 – Consideration of internal quality assurance

9. The panel noted that AAQ does not cover ESG 1.3 (Student-centred learning, teaching and assessment) and covers ESG 1.2 (Design and approval of programme) only partially in the criteria for institutional accreditation.

10. These standards are only fully covered in programme accreditation, which is voluntary except for health professions. As institutional accreditation is the core activity of the agency and the only mandatory external quality assurance for all Swiss institutions, it should assure full coverage of ESG Part 1 by itself.

11. Considering the above mentioned, the Register Committee was not able to concur with panel's conclusion and found AAQ only partially compliant with standard 2.1.

ESG 2.2 – Designing methodologies fit for purpose

12. The Register Committee learned that the agency gathers feedback using several tools. The panel noted that the reflections on the methodologies take place for the institutional accreditation, but not in the other types of activities that the agency is implementing (p.31). The findings indicate that the feedback is only sporadically used in the improvement of the agency's external QA activities (see also ESG 3.6).

13. The report further noted that the “accreditation is to some extent perceived as control instrument, and not always as a developmental tool” (p.31). Additionally, the current mechanisms rarely involved representatives from the professional world.

14. The Register Committee welcomed the diverse methods that the agency is using in order to gather feedback from different stakeholders, but could not confirm that the reflections are efficiently and systematically used in the improvement of the activities. Following this, **the Committee found the agency to be only partially compliant with standard 2.2.**

ESG 2.3 – Implementing processes

15. The Register Committee noted the need for better defined roles of AAQ and SAC and improved clarity of the procedures related to the follow up, as identified by the panel. The Committee, however, welcomed the overall improvement in the distinction of roles and activities undertaken by both bodies since the last review, and therefore concurred with the panel's conclusion.

ESG 2.4 – Peer-review experts

16. AAQ involves academics in panels in all activities. Students are included in all panels except in the procedure for programme accreditation of continuing education (i.e. other programmes than regular Bachelor and Master programmes).

17. The Register Committee understood that programmes for continuous education do not target traditional group of students and that the student body differs in its profile compared to Bachelor and Master studies. While finding suitable student panelists could indeed be a challenging task in such cases, the Register Committee could not see that the agency is using a specific alternative solution or measure for such programmes, but simply does not involve students in the panels in these procedures. Following this, **the Register Committee considered that AAQ currently lacks the student perspective on panels in some activities, and therefore, found the agency to be only partially compliant with the standard.**

ESG 2.6 – Reporting

18. The panel pointed out that publication of AAQ's reports is subjected to contract between the agency and the university. Such arrangements primarily derive from the legal framework in Switzerland, which does not prescribe obligatory publication of reports. In practice, the agency has so far published all reports that led to a positive decision.

19. The Register Committee learned that the agency has not published any negative decisions on its website. In addition, the panel noted that on systemic level, there was no intention for discussing this matter further, and publishing of the reports with a negative outcome was not on the political agenda of the stakeholders.

20. The Register Committee concluded that the status quo in regards to standard 2.6 remains unchanged since the last renewal of registration in 2016. That is, there remains a theoretical possibility that some of the agency's reports could not be published.

21. Consequently, the Register Committee found that the agency remains partially compliant with the standard.

ESG 2.7 – Complaints and appeals

22. AAQ now distinguishes two processes which enable institutions to question the process and outcomes of the evaluation activities, i.e. appeals and complaints.

23. The panel found that complaints procedure involved addressing the Commission of AAQ by third parties, informal direct contact with institutions and dissemination of questionnaire after accreditation procedure. The complaints procedure, however, had “no prescribed form nor is subject to formal deadlines”.

24. The Register Committee concurred with the panel's conclusion that AAQ complies with the standard and underlined the panel's recommendation that complaints procedure could be better structured and more detailed to enhance transparency and certainty.

ESG 3.6 – Internal quality assurance and professional conduct

25. While the Register Committee was able to concur with panel's conclusion, it nevertheless recognised the need for refining the internal quality assurance system in AAQ, in particular to improve the stakeholders' involvement and incorporate the feedback in the strategical planning and further development of external QA activities of the agency (see also ESG 2.2).

26. Additionally, the Committee underlined that the agency should address more systematically the recommendations raised in earlier external reviews and registration decisions.

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

Conclusion:

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

Standard	Review panel conclusion	Register Committee conclusion
2.1	Substantial compliance	Partial compliance
2.2	Substantial compliance	Partial compliance
2.3	Substantial compliance	Compliance
2.4	Substantial compliance	Partial compliance
2.5	Full compliance	Compliance
2.6	Substantial compliance	Partial compliance
2.7	Full compliance	Compliance
3.1	Substantial compliance	Compliance
3.2	Full compliance	Compliance
3.3	Full compliance	Compliance
3.4	Full compliance	Compliance
3.5	Substantial compliance	Compliance
3.6	Substantial compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

29. The Register Committee considered that AAQ only achieved partial compliance with some standards. The Register Committee considered that one issue relates to one occasional and – so far – hypothetical activity (ESG 2.4) and recognised the agency’s practice of having so far ensured the publication of all reports with a positive outcome in practice (ESG 2.6); these issues thus weigh less heavily. In its holistic judgement, the Register Committee therefore concluded that AAQ continues to comply substantially with the ESG as a whole.

30. The Register Committee therefore renewed AAQ’s inclusion on the Register. AAQ’s renewed inclusion shall be valid until 30/04/2026¹.

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

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

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

Swiss Agency of Accreditation and Quality Assurance (AAQ)

Christoph Grolimund

Effingerstrasse 15

Postfach

3001 Bern

Switzerland

Brussels, 10 March 2020

Confirmation of Eligibility: Application for Renewal of Registration

Application no. A93 of 06/02/2020

Dear Christoph,

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

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

In order to prepare deliberations of the Register Committee, EQAR contacted AAQ via telephone on 26/02/2020 to clarify AAQ's activities reported as outside of the scope of the ESG.

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

- *Institutional accreditation in Switzerland (according to HEdA)*
- *Programme accreditation in Switzerland (according to HedA, Medical Professions Act and to the Health Professions Act - HEdA and MedPA)*
- *System accreditation in Germany*
- *Certification procedures in Austria (institutional Q-audit)*
- *Evaluation procedures*

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

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

- *Accreditation of advanced professional training in medicine*

European Quality Assurance
Register for Higher Education
(EQAR) aisbl

Aarlenstraat 22 Rue d'Arlon
1050 Brussels – Belgium

Phone: +32 2 234 39 12

Fax: +32 2 230 33 47

info@eqar.eu

www.eqar.eu

VAT BE 0897.690.557

EQAR Founding Members:



- *Accreditation of advanced professional training in the psychology professions*

While these activities are not relevant to your application, it is AAQ's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

Nevertheless, the self-evaluation report and the external review report should address how AAQ ensures a clear separation between the activities that are within the scope of the ESG and those that are outside of the scope of the ESG.

We further remind you that the following standards were considered as partially compliant when AAQ's registration was last renewed ([decision of 3/12/2016](#)). We kindly ask you to ensure that these matters receive particular attention in your self-evaluation report and the external review report:

- ESG 2.3 – Implementing processes
- ESG 2.6 – Reporting
- ESG 2.7 – Complaints and appeals

In addition, we kindly ask you to ensure that the issues noted in the Register Committee's Substantive Change Report decisions [of 4/2/2019](#) and [of 19/6/2019](#) receive attention in the external review.

We will forward this letter to ENQA in its capacity of the coordinator of the external review. At the same time we underline that it is AAQ'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. AAQ 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,

A handwritten signature in black ink, appearing to read 'Colin Tück'.

Colin Tück
(Director)

Cc: ENQA (coordinator)

Application by Swiss Agency of Accreditation and Quality Assurance (AAQ) for Renewal of Registration

Minutes of Telephone Conversation

Register Committee

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Date of the conversation:	26 February 2020
Representative of AAQ:	Laura Beccari
Representative of EQAR:	Jelena Šantić Stefanoska

1. AAQ has submitted on 06/02/2020 an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).
2. In order to prepare the deliberations of the Register Committee on the eligibility of the application and AAQ's activities within the scope of the ESG, EQAR contacted AAQ via telephone to clarify the matter(s) below.
3. AAQ agreed to clarify the matter(s) by means of a telephone conversation.
4. The agency was asked to clarify whether activities *Accreditation of advanced professional training in medicine* and *Accreditation of advanced professional training in the psychology professions* are considered to be outside of the scope of the ESG since in the previous application for renewal of EQAR registration they were included in the review.
5. The agency clarified that in the previous application for renewal the panel considered that further education courses pursuant to MedPa and PsyG are not part of the higher education system in Switzerland.
6. AAQ agreed with the consideration of the panel and made clear that advanced professional training in medicine and psychology are not higher education activities as understood by the ESG.
7. The activities *Accreditation of advanced professional training in medicine* and *Accreditation of advanced professional training in the psychology professions* are obligatory practices for obtaining a professional (federal) title and a pre-condition to conduct the profession or independent practice and thus they are considered to be outside the scope of the ESG for the purpose of AAQ's application to renew the registration on EQAR.
8. AAQ emphasises that it uses the ESG as guidelines for all its practices inside or outside higher education as understood by the ESG.