

Approval of the Application
by Accreditation Agency for Study Programmes of
Engineering, Information Science, Natural Sciences and
Mathematics (ASIIN)
for Renewal of Inclusion on the Register

Register Committee
 15 October 2021

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 Ver. 1.0
 Date 2022-04-07
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Application of:	17/11/2020
Agency registered since:	08/04/2009
External review report of:	06/08/2021
Review coordinated by:	The Agency for Science and Higher Education (ASHE)
Review panel members:	Fiona Crozier, Aleksandar Šušnjar, Volker Linneweber, Maria João Machado Pires da Rosa
Decision of:	15/10/2021
Registration until:	31/08/2026
Absented themselves from decision-making:	Aleksandar Šušnjar
Attachments:	<ul style="list-style-type: none"> 1. External Review Report and Terms of Reference, 06/08/2021 2. Applicant's statement on the report, of 19/07/2021 3. ASIIN Appeal, 20/01/2022

1. The application of 17/11/2020 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 03/03/2021.
3. The Register Committee considered the external review report of 06/08/2021 on the compliance of ASIIN with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered ASIIN's statement (of 19/07/2021) to the review report.

Analysis:

5. In considering ASIIN's compliance with the ESG, the Register Committee took into account the following activities within the scope of the ESG:

- Institutional accreditation/evaluation
 - *System accreditation in Germany*
 - *ASIIN seal institutional accreditation*
 - *Institutional/System evaluation*
- Programme accreditation/evaluation
 - *Programme accreditation in Germany*
 - *ASIIN seal programme accreditation*
 - *EQAS-Food Label joint programme review*
 - *EQAS-Food Label review*
 - *AMSE Label joint programme review*
 - *AMSE Label review*
 - *EUR-ACE joint programme review*
 - *EUR-ACE review*
 - *Eurobachelor joint programme review*
 - *Eurobachelor review*
 - *Euro-Inf joint programme review*
 - *Euro-Inf review*
 - *Euromaster joint programme review*
 - *Euromaster review*
 - *Joint programme accreditation*
- *Certification*
- *Evaluations for quality assurance and quality enhancement ("type 1")*

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

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

ESG 2.1 – Consideration of internal quality assurance

8. In its Change Report Decision of 02/11/2020, the Register Committee requested that the next external review of ASIIN considers how the agency ensures sufficient coverage of ESG Part 1 in its combined ("piggybacking") procedures (ESG 2.1).

9. The agency explained that ESG Part 1 is embedded as a standard procedure in every external QA activity carried out (Self Evaluation Report p. 35). Having considered how ESG Part 1 is mapped against ASIIN's seals while also including the standards of the German Accreditation Council, the panel was convinced of the coverage and link to ESG Part 1 in all its

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activities. The documents confirmed that all subject-specific label requirements are assessed in addition to ASIIN's generic standards for degree programmes, which incorporate ESG Part 1. The panel also underlined that SAR templates for each review method were structured to follow ESG Part 1.

10. The Register Committee was therefore satisfied that ESG Part 1 is sufficiently addressed in ASIIN's combined ("piggybacking") procedures.

ESG 2.3 – Implementing processes

11. In its last review the Register Committee noted that ASIIN's policies were not always followed in practice, i.e. use of on-site visits in evaluations and use of evaluation results in programme accreditations. In its current review, the panel stated that it did not find any evidence of deviations from the prescribed procedures and that policies are implemented consistently.

12. The panel, however, remarked that ASIIN could provide better guidance about the site visit schedule and ensure more transparency in the processing of requests deemed potentially problematic from countries of higher education institutions outside of the European Higher Education Area (see also under ESG 3.1).

13. Notwithstanding the above remarks, the Register Committee concurred with the panel's conclusion that ASIIN complies with the standard.

ESG 2.7 – Complaints and appeals

14. The Register Committee considered the panel's findings that show that ASIIN's appeals and complaints processes are not well differentiated and as a result not consistently used, i.e. the institutional accreditation handbook discuss complaints procedure although what is described is the means to appeal a decision, whereas the handbooks for the programme accreditation and certification processes mention appeals procedure, the name of the Appeals/Complaints Committee appear to have four different permutation. The panel further comments on the agency's lack of understanding of the two different concepts.

15. In its response to the review report (19/07/2021) ASIIN's stated that it has revised its documents and website, employing the right terminology. While the Register Committee welcomed ASIIN's corrections, the Committee found the panel's concerns have not been fully address, as the lack of understanding of the two concepts may affect the agency's ability to effectively handle both appeals and complains for all its activities.

16. The Register Committee therefore concurred with the review panel's view and concluded that ASIIN complies only partially with ESG 2.7.

ESG 3.1 – Activities, policy and processes for quality assurance

17. In its last decision, the Register Committee noted that ASIIN continued to use the term evaluation for type 2 evaluations against the panel's

recommendation, and thus the separation between activities within the scope of the ESG and those that are carried out as type-2 evaluations remained unclear.

18. In its review report the panel considered that the difference made by ASIIN in various documents between type 1 evaluation and type 2 evaluation sufficiently differentiated between accreditation and consultancy.

19. The panel further noted that ASIIN had a policy not to conduct accreditation for those institutions/ programmes at which consultancy activities were carried out, and that this was adhered to in practice (p.31). The Committee therefore concluded that this shortcoming has been addressed.

20. The Register Committee noted that ASIIN's Board of Directors consists exclusively of representatives of member organisations/institutions of ASIIN. The involvement of a diverse set of stakeholders (including students) in the governance of the agency is, however, ensured within the technical committees, Accreditation Commission and Certification Commission.

21. Considering ASIIN's expansion of its external QA activities to other areas the panel underlined that ASIIN should rethink its current structure and broaden its competences (p.16). The panel recommended a stronger involvement of the Board of Directors in the strategic direction of the agency and the monitoring of its strategic goals, while at the same time expanding its membership to also include external stakeholders (including a student member). The Committee underlined that recommendation of the panel.

ESG 3.3 – Independence

22. The Register Committee noted that the members of ASIIN's technical committees can simultaneously hold the position of an external reviewer for ASIIN's review panels, which would put them in a conflict of interest when discussing the reports prepared by the same panel they were members of.

23. Considering the panel's concern of a potential conflict of interest resulting from this arrangement, the Committee concluded in its initial decision that ASIIN complied only partially with ESG 3.3.

24. In its Appeal of 20/01/2022, ASIIN challenged the Committee's conclusion and judgment arguing that the independent decision making of its Technical Committee was not compromised. The agency made the case that the involvement of active experts as members within ASIIN's 14 Technical Committees ensured a consistent application of procedures and criteria in the preparation of accreditation reports. ASIIN further explained that ASIIN's Technical Committees did not have any decision-making power as regards the accreditation decision. Moreover, the experts involved in the procedure would regularly abstain.

25. The Committee welcomed the abstention of the Technical Committee members, but could not determine if the practice of abstention was institutionalised in ASIIN's procedure.

26. The Register Committee further underlined that the integrity of the review process could be better safeguarded by ensuring that members of the Technical Committees would not partake at all (i.e. by leaving the room) when their report is considered by the Technical Committee.

27. Having weighed the limited role of the Technical Committee in ASIIN's decision making process and the fact that its members abstain from decision-making in such cases where they were involved as reviewers, the Register Committee concluded that ASIIN's independent decision-making is not compromised and thus found that the requirement of the standard is met. The Committee therefore concurred that the agency complies with ESG 3.3.

28. In its next renewal of registration the agency is nevertheless asked to further document the integrity of the review process in view of the Register Committee's observations, as mentioned above.

ESG 3.4 – Thematic analysis

29. In its last renewal of registration on EQAR, the Register Committee noted that ASIIN only partially fulfilled the requirement of the standard, since ASIIN did not conduct such analysis on a regular basis and the prepared analysis and studies contained only elements of what is understood as thematic analysis.

30. In its current review report, the panel commends ASIIN for its efforts in regularly developing thematic analysis through its impact studies which provide significant insights on the agency's external QA activities. While the panel finds that ASIIN could improve the dissemination of its impact studies among stakeholders, the panel is satisfied that the requirement of the standard is met.

31. Having addressed the earlier concerns in its compliance with ESG 3.4, the Register Committee concurred with the panel's conclusion that ASIIN now complies with the standard.

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

Conclusion:

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

Standard	Review panel conclusion	Register Committee conclusion
2.1	Full compliance	Compliance

2.2	Full compliance	Compliance
2.3	Substantial compliance	Compliance
2.4	Substantial compliance	Compliance
2.5	Full compliance	Compliance
2.6	Full compliance	Compliance
2.7	Partial compliance	Partial compliance
3.1	Substantial compliance	Compliance
3.2	Full compliance	Compliance
3.3	Substantial compliance	Compliance
3.4	Substantial compliance	Compliance
3.5	Full compliance	Compliance
3.6	Substantial compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

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34. The Register Committee considered that ASIIN only achieved partial compliance with some standards. In its holistic judgement, the Register Committee concluded that these are specific and limited issues, but that ASIIN continues to comply substantially with the ESG as a whole.

35. The Register Committee therefore approved the application for renewed ASIIN's inclusion on the Register. ASIIN's renewed inclusion shall be valid until 31/08/2026¹.

36. The Register Committee further underlined that ASIIN 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.



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Your sign

Our sign
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Name
Dr. Iring Wasser

Datum
19.07.2021

Dear Mina Dordevic,

many thanks for the detailed report of the peers in the procedure for our continuous registration by EQAR. We also like to thank the peers for the good atmosphere they created in all discussion rounds and for providing their remarks, which are very helpful. We will take up the recommendations and suggestions of the peers for the further development of our internal quality management.

In the following, please find only a few comments on our part, especially regarding ESG 2.7 where meanwhile we have already implemented the necessary changes.

Regarding ESG 2.7

Recommendation of the panel:

The panel recommends that ASIIN uses the guidelines of ESG 2.7 to ensure that its processes differentiate between a complaint and an appeal and revises its procedure accordingly.

The panel recommends that the agency ensures that the body that is responsible for considering complaints and appeals is referred to consistently by one title across all internal and external documentation, including the website and handbooks.

Comment

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We are sorry for the irritation caused by using an inconsistent terminology. We have meanwhile corrected this on the website as well as in the criteria for institutional accreditation and certification following the terminology in the criteria for programme accreditation. Additionally, the panel is now consistently referred to as “Appeals Committee”.

[Appeals Committee - ASIIN](#)

[0.3 Criteria for the Accrediation of Degree Programmes 2015-12-10.pdf \(asiin.de\)](#)

[0.4 Institutional Accreditation Evaluation Criteria for the ASIIN System Seal 2021-06-18.pdf](#)

[Standards for the Certification of Further Education and Training 2021-06-18.pdf \(asiin.de\)](#)

Regarding ESG 2.3

Recommendation of the panel:

The panel recommends that ASIIN redesigns the template for site visits to make sure that they are accurate in mentioning the involvement of external stakeholders

Comment

The schedule for the onsite visit published on our website has been amended and contains the “Meeting with partners from the industry/private sector” at the first day of the audit which is a standard of our accreditation procedures..

[ASIIN schedule onsite visit HS Studiengang Datum](#)

Best Regards



Dr. Iring Wasser

Managing Director



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European Quality Assurance Register for Higher Education (EQAR) aisbl

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Unser Zeichen
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Durchwahl, Name
-10, Dr. Iring Wasser

Datum
2022-01-20

Dear Colin, dear Melinda,

Dear Members of the EQAR register committee,

the decision of the EQAR on the “Approval of the Application by Accreditation Agency for Study Programmes of Engineering, Information Science, Natural Sciences and Mathematics (ASIIN) for Renewal of Inclusion on the Register” has been formally delivered to ASIIN on the 25th of October 2021. We have in the meantime thoroughly discussed the important findings internally and thank the experts and the EQAR for its guidance and suggestions. We also would like to update you/react particularly with regard to the two partial compliances, which have been identified.

As regards the EQAR decision regarding ESG 2.7, we fully concur with and appreciate the findings. We have in the interim taken the necessary steps to distinguish and make transparent to ASIIN's stakeholders and clients the distinction between our appeals and complaints processes. You will find evidence to that regard also on our Websites (in German/English:

<https://www.asiin.de/de/beschwerdeausschuss.html> ; <https://www.asiin.de/en/appeals-and-complaints-committee.html>).

As regards the finding of the register regarding ESG 3.3 – Independence, and after a very extensive internal discussion, we ask the Register Committee to reconsider its findings, which I copy subsequently verbatim:

“ The Register Committee noted that the members of ASIIN's technical committees can simultaneously hold the position of an external reviewer for ASIIN's review panels, which would put them in a conflict of interest when discussing or assisting to the discussion of the reports prepared by the same panel they have been members of. 23. The Register Committee concurs with the review panel, that ASIIN should avoid concurrent committee and expert panel membership – regardless of the specified abstention from decisions of the technical committee – and instead permit committee members

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to reactivate their role as an expert reviewer only once their term on the committee had ended. Considering that the current arrangements does not fully safeguard an independent decision making, the Register Committee cannot follow the review panel's conclusion of compliance but considers that ASIIN complies only partially with ESG 3.3."

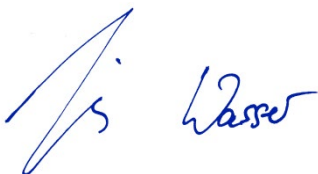
ASIIN appeals the decision to find only partial compliance with ESG 3.3.on the following grounds: The ENQA register committee argues that the participation of individual members of ASIIN's Technical Committees as part of ASIIN experts groups does compromise the independence of the decision-making process within our organization. We suggest that this finding is based on incorrect assumptions and therefore should be reconsidered:

First and foremost, the Independence of decision-making will not be compromised due to the fact that the Technical Committees in ASIIN simply does not have any decision-making power what so ever as regards the accreditation decisions. This power is exclusively vested in and reserved for the ASIIN Accreditation Commission. Members of the Technical Committees, which on a case to case basis might participate in an expert groups consisting regularly of at least four or more members serve as a most important link between the peer groups and the Technical Committees. They regularly abstain when it comes to submitting a non-binding vote of the Technical Committees to the Accreditation Commission. This Accreditation Commission then independently renders its final decision. In the new German Accreditation System in particular, the finding of the EQAR simply also does not apply, as the final accreditation decision remains exclusively with the German Accreditation Council. The GAC however as frequently voiced its great satisfaction with ASIIN's reports, cherishing the stabilizing role of ASIIN's Technical Committees and the consistent application of procedures and criteria, which is related to the topic at hand.

ASIIN since its founding in 1999 has been most sensitive to any attempts to jeopardize the quality and independence of its decision-making, establishing a thorough system of checks and balances on all levels. We can't see an argument to suggest that in any way the independence of the decision-making of our independent accreditation commission is compromised. All of our bodies (the board of directors, the accreditation commission as well as the community of ASIIN members) are strongly in favour of using the expertise of the most experienced members of ASIIN's 14 Technical Committees to be at times part of expert groups.

We trust that the EQAR Committee can follow this line of reasoning and reconsiders its finding on ASIIN's compliance of this particular ESG.

Best regards



Iring Wasser