

**Approval of the Application
by German Accreditation Council (GAC)
for Inclusion on the Register**

Register Committee
24/25 October 2022

Ref. RC37/A109
Ver. 1.0
Date 2022-11-02
Page 1 / 5

Application of:	2021-02-02
External review report of:	2022-06-22
Type of review:	Full
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)
Review panel members:	Beatriz Atienza Carbonell, Luut Kroes, Oliver Vettori, Đurđica Dragojević
Decision of:	2022-10-25
Registration until:	2027-06-30
Absented themselves from decision-making:	Michael Lehmann (observer)
Attachments:	<ol style="list-style-type: none"> 1. External Review Report, 2022-06-22 2. Applicant's statement on the report, 2022-09-01 3. Clarification by the Review Panel, 2022-10-05

1. The application of 2021-02-02 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 2021-02-17.
3. The Register Committee considered the external review report of 2022-06-22 on the compliance of GAC with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee further considered GAC's statement on the review report. The Register Committee further sought and received clarification from the chair and secretary of the review panel.

Analysis:

5. In considering GAC's compliance with the ESG, the Register Committee took into account:
 - *programme accreditation;*

- *system accreditation;*
- *alternative procedures accreditation;*
- *equivalency assessment (specifically for the German Jordanian University).*

Register Committee

24/25 October 2022

Ref. RC37/A109

Ver. 1.0

Date 2022-11-02

Page 2 / 5

6. GAC's international cooperation activities (e.g. projects) are not within the scope of the ESG and, thus, not pertinent to the application inclusion on the Register.

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

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

ESG 2.2 – Designing methodologies fit for purpose

9. The panel noted that no actor had ownership or full responsibility for the entire accreditation system and process, since the specimen decree appoints specific responsibilities to both GAC and the agencies.

10. The Register Committee sought further clarification from the panel as to how that impacted continuous improvement and development. The panel noted that opportunities for improvements were discussed actively; the ongoing review of the Specimen Decree was an example of that. The panel, however, saw a lack of GAC itself assuming a more proactive, coordinating role and taking responsibility for the system as a whole; this would be reasonable given its unique and pivotal position.

11. **The Register Committee concluded that continuous improvement seems to be ensured despite the distributed responsibilities and thus concurred with the panel's conclusion that GAC complies with standard 2.2;** the issues related to GAC's role and strategy are considered under standard 3.1 below.

ESG 2.5 – Criteria for outcomes

12. The panel considered critically the lack of formal mechanisms to ensure a consistent understanding and application of the criteria (e.g. guidelines, interpretations or a precedent database made available by GAC).

13. The panel was unable to draw a conclusion whether the post-2018 system – with decisions made by GAC, including the practice to change conditions deviating from the proposal by the expert panels – actually delivered a higher degree of consistency or not.

14. The panel further noted that the current organisation of the Council's work included the risk that analysis of cases might often be "monopolised" in the hands of a single (academic) Council member, while some other Council members are currently not participating in the preparatory work as rapporteurs.

15. **The Register Committee concurred with the panel that GAC only partially complies with ESG 2.5.**

ESG 3.1 – Activities, policy and processes for quality assurance

16. The panel considered that the lack of involvement of stakeholders beyond those individuals who are members of the agency bodies themselves might lead to a lack of critical distance. The panel thus saw a need for more and broader stakeholder feedback, and recommended more regular dialogues with stakeholder organisations on strategic and policy matters.

17. The panel further considered that GAC's strategic planning did not sufficiently reflect its central, pivotal role in the accreditation system (see also the comments under ESG 2.2 above). The panel saw a strong need for a broader discussion with agencies and all stakeholders on GAC's role in the system and its strategy. In particular in view of the upcoming revision of the Specimen Decree, the panel found such a discussion was urgent to define a strategy that describes clearly the role GAC plans to assume in the system and its mid-term priorities.

18. While the Register Committee appreciates that GAC has begun to plan a strategy process (see statement on the report), it considered that the panel's analysis under this standard points to important issues in GAC's governance and engagement with stakeholders; these are particularly important in light of GAC's pivotal role in the German system.

19. **The Register Committee was therefore unable to concur with the conclusion that GAC substantially complies with the standard, but considered that GAC only partially complies.**

ESG 3.4 – Thematic analysis

20. The panel discussed the analyses produced by GAC on various topics, with the most recent ones focusing on conditions imposed on higher education institutions/programmes in decisions by the agencies and by GAC, published in 2018 and 2020 respectively. While the panel questioned whether this was "a crucial topic in the development of the HE system", the Register Committee considered that such an analysis is certainly based on the general findings of GAC's external quality assurance activities and thus meets the expectation of the standard. Moreover, while the panel did not specifically indicate whether stakeholders found the topic relevant, an analysis of conditions might show how the accreditation criteria resonate with the sector and indicate topics that are typically challenging for institutions and programmes, and hence be relevant beyond GAC.

21. Given the role of GAC as the central body of the German accreditation system, the panel considered that the current publishing rate (one paper per year) was "insufficient". As the standard remains completely open as to the frequency of analysis, the Register Committee found it an overly strict interpretation of the standard to influence the compliance level on that basis; the remark should rather be seen as a recommendation to publish more analyses.

Register Committee

24/25 October 2022

Ref. RC37/A109

Ver. 1.0

Date 2022-11-02

Page 3 / 5

22. Given that GAC does regularly publish analyses that meet the standard's expectations, the Register Committee was unable to concur with the panel's conclusion, but concluded that GAC complies with the standard.

23. The Register Committee nevertheless shared the panel's recommendation that GAC should discuss possibilities to enhance the work on thematic analyses within its strategy process. Given the central role of GAC and the fact that many of the agencies face challenges in this area, GAC and the agencies might also consider collaborative solutions.

ESG 3.5 – Resources

24. The review panel noted a lack of human resources at GAC's disposal, leading to staff having to prioritise initial accreditation in their work, with re-accreditation procedures taking longer than they should in turn.

25. In its comments on the review report, GAC informed EQAR that a staff increase by 9.25 FTE was now confirmed.

26. The Register Committee sought clarification from the panel on the resources in light of this increase. The Committee understood that this staff increase would address the resourcing in quantitative terms, but that the positive impact of this would remain limited as long as the reservations about the organisation of the Council's work remain, as noted under ESG 2.5.

27. In light of the staff increase, the Register Committee considered that GAC now complies with standard 3.5, while noting that the serious concerns stated under standard 2.5 relate to the question whether GAC effectively deploys its resources, especially in terms of organising the Council's work.

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

Conclusion:

29. Based on the external review report and the considerations above, the Register Committee concluded that GAC 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	Substantial compliance	Compliance
2.3	Substantial compliance	Compliance
2.4	Substantial compliance	Compliance
2.5	Partial compliance	Partial compliance
2.6	Full compliance	Compliance
2.7	Substantial compliance	Compliance
3.1	Substantial compliance	Partial compliance

3.2	Full compliance	Compliance
3.3	Substantial compliance	Compliance
3.4	Partial compliance	Compliance
3.5	Partial compliance	Compliance
3.6	Full compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

Register Committee

24/25 October 2022

Ref. RC37/A109

Ver. 1.0

Date 2022-11-02

Page 5 / 5

30. The Register Committee considered that GAC only achieved partial compliance with two standards. In its holistic judgement, the Register Committee considered that especially standard 2.5 weighs heavily, as it relates to the core of the small share of the overall accreditation process that GAC actually carries out itself. At the same time, the Committee noted that there is full awareness on the side of GAC of the challenges it faces as a result of its role and the large amount of cases to process. The Committee therefore concluded that these are eventually limited issues and that GAC complies substantially with the ESG as a whole.

31. The Register Committee therefore approved the application for inclusion on the Register. GAC's inclusion shall be valid until 30/06/2027¹.

32. The Register Committee further underlined that GAC 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.

Chair of the Accreditation Council

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Bonn, 01.09.2022

Application of the German Accreditation Council (GAC) for listing in eqar: Statement on the external review report by ENQA of 22 June 2022

Dear Colin,

We would like to take this opportunity to name developments since the site visit and to comment on the report.

Developments since the site visit

Regarding recommendation to ESG 3.1/ESG 2.2: At its 113th meeting, the Accreditation Council (AC) has appointed a working group consisting of members of the AC and the Head Office, which will prepare the strategy process structurally and methodically. All recommendations of the ENQA experts, also those on the other ESG, will be taken as starting points for the reflection process.

Regarding recommendation to ESG 3.3: Currently, regular meetings of programme managers of the agencies and of GAC are being tested as a new exchange format. A first meeting took place at the end of June. Another meeting is planned for the autumn. Its aim is to exchange views on issues relating to the processing of applications.

Regarding recommendation to ESG 3.5: The Budget Commission of the Finance Officers of the Länder will recommend to the Conference of Finance Ministers (FMK) to approve the requested increase in posts of plus 9.25 full-time equivalents. All new posts would be permanent. From 2026 onwards, they would be provided with so-called "kw-notices" (kw = to cease to exist in the future), however. That means that when the post holder leaves the position will not be

filled. The FMK is expected to make its decision on 1 September 2022. We will submit it as soon as possible.

Corrections to the report

In the attached table we have clarified where we believe the report contains incorrect information or evaluations.

Best regards



Prof. Dr.-Ing. Hans-Joachim Bargstädt

Attachment

Annex to GAC's statement on the external review report

Page of the error in the report, and the error itself	Comment by the agency
<p>Page 12: "If HEIs are system-accredited, and have thus demonstrated that they ensure that their programmes meet the programme quality standards, they receive the right to self-accredit new programmes with the GAC seal, and are obliged to submit the related quality reports to GAC for publication."</p>	<p>If the HEIs are system-accredited they receive the right to self-accredit all their Bachelor and Master programmes, not only new ones.</p>
<p>Page 16: "Procedures are prioritised so that initial accreditations are usually done within 12 weeks (depending on the timing of the submission and the AC meeting),"</p>	<p>Initial accreditation submissions are usually <i>dealt</i> with in the next meeting of the AC if they are handed in up to 12 weeks before this meeting. If the Accreditation Council intends to deviate from the experts' proposal, the higher education institution is given the opportunity to comment on the planned AC decision. If the higher education institution waives this possibility, the decision becomes effective; this is usually the case a few weeks after the AC meeting. If a statement is submitted, the final decision is usually made at the next AC meeting.</p>
<p>Page 24: "This is even more so when considering that half of the recent publications have dealt with the conditions imposed by the agencies and GAC – a topic obviously useful for GAC self-evaluation and informative for the stakeholders inasmuch as it provides guidelines for interpreting some criteria, but not necessarily a crucial topic in the development of the HE system. This is not to say that GAC should not focus on evaluating itself and the wider QA system, but rather that such activities are covered by other ESG standards (e.g. 2.2, 2.5 and 3.6)."</p>	<p>Conditions are connected with major issues of quality development at the HEI's. The main aim and output of the current analysis of conditions is to find out which problems HEIs have in implementing the formal and academic criteria and thus to identify the main enhancement needs at HEIs. Therefore, in our opinion, conditions are definitely a crucial topic in the development of the HE system. For example, recent analysis of conditions has shown that recognition (Lisbon-Convention) and recognition of prior learning is still a relevant issue.</p>
<p>Page 25: "45% as agreed upon by the Lands HRK"</p>	<p>What is meant here is: "45% as agreed upon by the Lands and HRK"</p>

<p>Page 25: “They are employed as civil servants, and there is a 1000-euro budget earmarked for staff training connected to a workshop plan”</p>	<p>We can invest more than these 1.000 Euros if needed and if the money is saved in other areas. This is going to happen in 2022.</p>
<p>Page 28: “At the site visit, the panel heard a number of positive comments by the newly employed staff members on the 4-week on-boarding process which includes appointment of a mentor, scheduled discussions with specific colleagues, the availability of all colleagues for additional comments and explanations, and a feedback session at the end.”</p>	<p>The on-boarding process takes six weeks.</p>
<p>Page 31: “During the site visit, the agencies’ representatives commented that the ‘check each keyword’ approach behind the templates was burdensome and not always necessary.”</p>	<p>Stringing together "keywords" is not what GAC requires of reports. Already in the guidance notes for the preparation of accreditation reports of March 2019, cited in the SAR on page 75, GAC explained:</p> <p>“One of the central strengths of accreditation is the examination of the accreditation object in relation to the individual case, which (especially in the programme accreditation) also takes into account the specifics of the subject culture. When reading the accreditation report, the reader must get a picture of the study programme or the QM system including possible strengths and weaknesses.</p> <p>Platitudes and generalities should be avoided as far as possible [...].”</p>
<p>Page 33: “Any ‘substantial changes’ in the programmes need to be reported to GAC –previously they were reported to the agencies - and first such reports have only started coming in. According to the GAC staff, the procedure is being implemented in ELIAS. On the basis of current experience, for 90% of reports they establish that the change is within the existing regulations, and only 10% are forwarded to the Board, which is just building its decision-making practice.”</p>	<p>The procedure regarding substantial changes is as follows: Staff checks whether a change is substantial. If this is the case, the Board decides whether it is covered by the existing accreditation. According to our experience to date, the substantial changes are covered by the existing accreditation in about 90 percent of the cases.</p>
<p>Page 34: “While the accreditation is defined as expiring after the 8-year period, it is possible to prolong it in specific cases, e.g., when applying for a system accreditation for the first time. It also follows from the general principles of the administrative law that it is possible to terminate an accreditation procedure for specific reasons – which</p>	<p>It is right that it follows from general principles of administrative law that a HEI can terminate an accreditation procedure at any time before the accreditation decision has been taken. In this case, however, the accreditation period will not be prolonged.</p>

<p>in effect can mean pausing it for up to a year to implement changes in order to avoid losing an accreditation.”</p>	
<p>Page 34: “While the reports contain a rubric for listing any developments since the last accreditation, it is the impression of the panel, supported by the agencies and HEIs met at the site visit, that it should be more elaborated and more prominent.”</p>	<p>There are not one but three rubrics in the report templates where it is explicitly mentioned that developments since the last accreditation should be evaluated:</p> <ul style="list-style-type: none"> -In the rubric “Summary assessment of the expert panel”, -in the rubric “2.1 Focus of the evaluation / focus of quality development”, -in the evaluation of each academic criterion, as evidenced by the "Strengths and Development Needs" heading included for the evaluation of each criterion. <p>Practice shows that agencies amply use these rubrics to evaluate developments of study programmes/QA systems.</p>
<p>Page 38: “The panel was worried that participation in monitoring will make AC biased in future decision-making but was reassured at the site visit that monitoring only starts once the accreditation is complete. Additionally, most future accreditations would be done by bodies other than GAC.”</p>	<p>In the new accreditation system, all accreditation decisions are made by GAC. This is also true for the accreditation of alternative procedures. The accreditation of alternative procedures has up to now been a special case concerning the conducting of the evaluation process prior to the accreditation decision: In the first accreditations of alternative procedures GAC itself carries out the evaluation processes. The purpose with this is to gain experiences with regard to the accreditation of the alternative procedures and the application of the Rules of Procedure, thus enabling GAC to give guidance to other bodies conducting other evaluation processes in the future. As stated before, though, GAC will still be able to carry out evaluation processes in the accreditation of coming alternative procedures if this seems advisable.</p> <p>The monitoring of an alternative procedure happens after the alternative procedure has been successfully accredited. This has two purposes: The observing of whether the alternative procedure is implemented as intended aims to build trust among the decision-makers into the accreditation of alternative procedures in general (since this third line of accreditation procedures is relatively new). Additionally, the monitoring also aims to give insights that may benefit the wider accreditation system through closely following the conducting of the alternative procedure in practice. This is in line with § 34 (3) of the specimen decree, that requires alternative procedures to be able to contribute to</p>

	<p>the advancement of the accreditation system as a whole. The monitoring itself is therefore case-dependent and will not lead to a bias in future decision-making.</p> <p>Therefore, as also mentioned at page 13, the last part of the sentence (“and all future accreditations would be done by bodies other than GAC”) is misleading. We would suggest deleting or rewording this half sentence.</p>
<p>Page 39: “As noted, the conditions often seem to relate to formalities, or very detailed aspects of the programme and/or system design, and rarely seem to be connected with major issues of quality development. If no conditions are imposed, no follow-up is performed. The panel is satisfied that GAC meets the EQAR interpretation of this criterion, as it conducts follow-up – albeit quite formal - when conditions are imposed. However, the panel agrees with other ENQA panels working in the German system that this is insufficient, especially concerning the long accreditation cycle of 8 years with possibilities of extension. It is an additional worry that GAC considers follow-up – apart from checking the fulfilment of conditions - not to be part of its mandate and does not really see it as an important aspect of the accreditation procedure.”</p>	<p>It is not correct that the conditions often relate to formalities, or very detailed aspects of the programme and/or system design, and rarely seem to be connected with major issues of quality development. The process of issuing and fulfilling conditions is an important instrument in the German accreditation system with which quality deficiencies at HEIs can be remedied and quality development can be promoted. They are connected with major issues of quality development, e.g. conditions concerning staff, implementation of qualification goals, deficits in internal QA. Even conditions that at first glance seem to relate to formalities, such as those concerning the LRC and the Diploma Supplement, point to aspects of quality that are extremely relevant for students.</p> <p>It follows from the above that follow-up by checking the fulfilment of conditions is a very important aspect of GAC’s work. Besides, the evaluation of substantial changes for GAC is indeed a second important follow-up procedure which guarantees that changes that affect the quality are evaluated, while at the same time the, indeed desirable, quality development at the HEIs is not hindered.</p>
<p>Page 39: “GAC does have a form of monitoring HEIs after accreditation, through obligatory notification of substantial changes and, for system accredited HEIs, submission of programme accreditation reports. However, the procedure of reporting substantial changes is so far only in the beginning stages and not very transparent to HEIs”</p>	<p>GAC has published a series of FAQs on substantial changes in April 2021 that describe the change notification process and provide guidance on what changes are substantial; see https://www.akkreditierungsrat.de/de/faq/thema/18-wesentliche-aenderungen</p>
<p>Page 44: “AC discussed an option to include students as rapporteurs and also implement the four-eye principle but decided against it”</p>	<p>This statement is only partly correct and can lead down the wrong track. It was one professor who wanted students as – compulsory – rapporteurs, and the student members were against it.</p>

	<p>All members are free to be rapporteurs! In fact, just recently a student member – as a first – volunteered as a rapporteur in an application for system accreditation.</p> <p>See § 3 Abs. 9 of the Rules of Procedure of the AC:</p> <p>“Für die Akkreditierung von Studiengängen und hochschulinternen Qualitätssicherungssystemen können aus den Reihen der Mitglieder und stellvertretenden Mitglieder des Akkreditierungsrates jeweils Berichterstatte(r)innen und Berichterstatte(r) benannt werden. Die Benennung erfolgt durch den Vorstand. Die Berichterstatte(r)in bzw. der Berichterstatte(r) steht den übrigen Mitgliedern, dem Vorstand sowie der Geschäftsstelle für Fragen zu den jeweiligen Akkreditierungsverfahren bzw. zu den eingereichten Unterlagen zur Verfügung.”</p>
<p>Page 44: “GAC interprets the Specimen Decree §22 provision that allows it to change the panel recommendation, as the basis for ensuring consistency of decisions by deviating from panel recommendations, and changing the conditions imposed – removing some, or adding new ones. It was reported at the site visit that this was common practice in Germany regarding administrative acts. According to a GAC estimate, this is done with about half of the decisions, but mostly regarding details, while substantial deviations happen in about 10% of cases.”</p>	<p>§ 22 specimen decree explicitly provides that the Accreditation Council may deviate from the agencies' assessment proposals. See also the explanatory memorandum to § 22: „Since these are recommendations by the agency in each case, the accreditation council is not bound by these assessments.“</p>
<p>Page 47: “focus on quality development: strengths and development needs should be listed in a separate chapter, which should become increasingly important in reaccreditation procedures.”</p> <p>Page 48: “Recommendations and suggestions for enhancement – apart from those related to the accreditation conditions – could be given a more prominent position in the report template. It would be good to develop the rubric on past developments in the report so it clearly describes the steps taken on the basis of the</p>	<p>There are three rubrics in the report templates where it is explicitly mentioned that developments since the last accreditation should be evaluated; see above.</p>

<p>previous review, in addition to the general changes in the programme or institution.”</p>	
<p>Page 47: “GAC staff check all reports from the perspective of the above functions and, when considered necessary, return them to the agencies for amendments. As all other formal communication with the agencies regarding accreditation procedures, this is done via the applying HEI as an intermediary and this lack of a feedback loop is apparently a source of some confusion on the side of the agencies, as reported by them during the site visit. The agencies expressed a view that the need to elaborately comment on each and every criterion to prove its fulfilment affected the overall report quality and left little room for a panel’s developmental considerations. The agencies also find that in line with the spirit of the reform of EQA in Germany, a decision to return a report for revision should be an academic one, rather than done solely by GAC staff.”</p>	<ul style="list-style-type: none"> - The decision to return a report is always a decision of the Board or the AC and not a decision of the staff. - The agencies in every case are informed immediately and get the emails with the reasons of rejection of reports at the same time as the HEIs.
<p>Page 47: “It is necessary to click on ‘Further Information’ to reach the link to the report and, where applicable, the AC decision. Additionally, only reports on the programmes and institutions (re)accredited after the 2018 system change are available in the database – older reports are meant to be found on agency websites, but GAC staff has plans of also including those in the database.”</p>	<p>Currently, both current accreditation reports published as of 2018 and older agency accreditation reports can be accessed in the database of ELIAS. The changes were released in the database on 08.12.2021.</p> <p>When opening the accreditation history of a study programme or a system-accredited HEI, the most recent accreditation is always displayed directly in the interface; only the older accreditation records require an additional click to view the respective information.</p>
<p>Page 47: “Feeding accreditation reports into DEQAR appears to lie in the responsibility of the “assessing agencies”, which can also be concluded from the review reports on German accreditation agencies in the last five years.”</p>	<p>All programme and system accreditations according to both the current legal situation and the old law have been/are exported from the central database to DEQAR. This was agreed with the agencies and DEQAR.</p> <p>In August 2020, a one-time export was carried out including all historical information. Since then, a regular export from the central database has taken place.</p> <p>The agencies only export procedures which they carry out under their own responsibility and in which the seal of the Accreditation Council is not awarded.</p>
<p>Page 48: “(Re)negotiating responsibilities for making the final reports available on DEQAR is one of the aspects that needs to be resolved in a close dialogue between the “assessing agencies” and GAC, in order</p>	<p>See our comment above.</p>

<p>to clarify who is finally responsible (see also the panel's related comments in other parts of the report and the "additional observations" section)."</p>	
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Subject: WG: Bewerbung EQAR Listung

From: Katrin Mayer-Lantermann <lantermann@akkreditierungsrat.de>

Date: 05/09/2022, 18:07

To: Colin Tück <colin.tueck@eqar.eu> (colin.tueck@eqar.eu)
<colin.tueck@eqar.eu>

Dear Colin, please feel free to share with the Register Committee the information that the Conference of Finance Ministers (FMK) now approved the requested increase in posts of plus 9.25 full-time equivalents as explained in our statement on the report.

Kind regards
Katrin

Application by GAC for Inclusion on the Register

Clarification provided by the Panel

Register Committee

Date of the conversation:	2022-10-05
Panel members:	Oliver Vettori (chair), Đurđica Dragojević (secretary)
Representatives of EQAR:	Beate Treml, Blazhe Todorovski, Colin Tück

Ref. A109
Date 2022-10-19
Page 1 / 3

1. GAC has submitted on 2021-02-02 an application for inclusion on the European Quality Assurance Register for Higher Education (EQAR). On 2022-09-01, GAC submitted the external review panel's report of 2022-06-22.
2. In order to prepare the deliberations of the Register Committee on GAC's compliance with the ESG, EQAR contacted the Panel to clarify the matters below.

ESG 2.2 – Designing methodologies fit for purpose

3. EQAR representatives asked the panel to elaborate on the issue of ownership and its impact, especially on continuous improvement.
4. The panel noted that there clearly was significant “buy in” from all stakeholders to the current German system, despite no single actor having full responsibility for the entire external QA process. Even though the system was different from many other countries' systems, the panel found that it was effective in general.
5. While the distributed responsibilities sometimes led to a tendency to “shift the blame” to other actors for things that work less well, there was plenty of exchange and discussion between different stakeholders on how the system was working and to identify room for improvement.
6. These discussions, however, take place in scattered occasions and formats since there is a lack of systemic involvement and dialogue with stakeholder organisations coordinated/managed by GAC as a pivotal actor of the system (see also ESG 3.1).
7. The current revision of the specimen decree, led by the state governments in consultation with different stakeholders, shows that review and continuous improvement are happening, even if it is not primarily driven by GAC itself.
8. The panel saw a certain mismatch between GAC's obviously central role, its desire to take on a more strategic, system-level role and its focus on formal responsibilities and tasks in practice (see ESG 3.1).

9. While GAC and the agencies have together formed the system for many years, their work has become more entangled with GAC taking final accreditation decisions instead of the agencies; this created more potential for friction and tensions than in the previous system.
10. While the panel was confident that GAC complied with most standards of ESG Part 2 – either through its own processes or by virtue of the agencies' processes complying, demonstrated through their EQAR registration –, these tensions became visible at certain interface points between GAC and the agencies, as set out in the report.

ESG 3.1 – Activities, policy and processes for quality assurance

11. EQAR inquired further about the involvement of stakeholders and the issue of strategic planning.
12. The panel underlined that all stakeholders are involved through their representatives on the Council, but that there was too little dialogue with stakeholder organisations and representatives beyond those persons that sit on the Council themselves. Even though the Council membership effectively ensured that stakeholder perspectives are always present in GAC's day-to-day operation, the members' perspectives might become less external once they serve on the Council.
13. Hence, the panel found it would be helpful if GAC had more regular and official exchanges with the relevant stakeholder organisations at a general and strategic level.
14. This actually links to the second issue: the panel considered that GAC had a process of strategic planning, which was based on its mission statement generally. At the same time, the panel found that the mission and strategy did not fully reflect the central role of GAC in the German accreditation system and how GAC aimed to fill this central role, in particular in terms of acting as a coordinator and driver of the system beyond its immediate statutory and operational responsibilities assigned by the law and specimen decree.
15. Despite the distributed responsibilities in the system, it seemed obvious to the panel that only GAC could potentially assume such an overarching, coordinating function in the system.

ESG 3.5 – Resources

16. EQAR asked the panel to comment on its findings in light of GAC staff increased by 9.25 FTE, which was recently confirmed.
17. The panel was pleased that the addition of staff capacity could be secured. This increase was under consideration at the time the review took place and the panel considered it necessary, as reflected in its analysis. The panel found that the staff increase would allow GAC to adequately handle the load of procedures in terms of staff capacity.

18. The panel, however, underlined that one of the main challenges resulting from the huge amount of procedures/reports to be processed by GAC would not be resolved by a staff increase. With a view to criteria and consistency, the panel also had concerns whether the current way of organising the Council members' work – especially with one single rapporteur reviewing a case and not all Council members taking part in that work – was adequate; see under ESG 2.5.
19. Hence, the now-confirmed staff increase would resolve the resources issue in a quantitative sense, but if the issues raised under ESG 2.5 are not addressed the positive impact could remain limited.

Register Committee

Ref. A109
Date 2022-10-19
Page 3 / 3

