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## Report

**on the application by the Swiss Agency of Accreditation and Quality Assurance  
(AAQ) from 22 May 2015 for accreditation and for verification of compliance with  
the Standards and Guidelines for Quality Assurance in the European Higher Educa-  
tion Area (ESG)**

- submitted on 1 July 2016 -

### 10 I. Summary

The expert group received a very positive impression of the agency, which is characterised by its marked awareness for quality, its professionalism and its excellent capacity for self-reflection and for reflecting on others.

The agency can look back on a comprehensive reform process, which is completed for the most part: With the new Federal Act on the Funding and Coordination of the Higher Education Sector (HEdA), which entered into force in the beginning of 2015, the Swiss higher education sector, and in particular the national quality assurance system, has been re-regulated and, in a welcome change, is now open to international agencies. As recognised decision-maker, the Swiss Accreditation Council (SAR) has become one of the key players in the Swiss higher education sector. Also, it belongs – as decision-making body – to AAQ, which is the successor institution to OAQ (Centre of Accreditation and Quality Assurance of Swiss Universities).

AAQ and SAR have made use of the reorganisation together with the other key players in the field of higher education policy in Switzerland: for example, considerable progress with regard to the agency's independence and the involvement of interest groups has been made with the SAR-AAQ structure. In implementing this change, the agency has addressed the results from previous external evaluations. AAQ is a learning organisation that continuously reflects on its own work and, in order to improve its working practices and its procedures, also actively seeks external feedback. Over the years, it has established itself in the Swiss higher education sector as a service-provider in the area of quality assurance that is met with great trust by the relevant players in the sector. It is not without reason that, during the reform process, the agency took on an important expert role. One of the short to medium-term challenges will be to carry this confidence over to the

new structures and procedures and, therefore, to also establish and build trust in SAR as an expert committee in the area of quality assurance. With increasing clarity with regard to its role within its wide and also complex spectrum of activities, the expert group without doubt considers both institutions to be well on track. The report contains suggestions and recommendations as to how both roles could and should be communicated with greater transparency.

The design and implementation of the new structures is driven forward with great dedication by people with a considerable depth of knowledge in the area of quality assurance and quality development in the higher education sector. It is evident that this is the reason why many things work so well. With regard to international collaboration, which AAQ, SAR and the other relevant players in the Swiss higher education sector are committed to, these structures should be designed in a more reliable way in critical areas, and therefore with less dependence on the individuals involved, through a higher degree of commitment. Potential areas of conflict are specified in the report. The expert group also sees a need for development with regard to follow-up processes and collaboration with professional practice. In addition, the agency should use the knowledge it has gained from its steadily increasing international and cross-sectoral experience more effectively. The potential within this has not yet been exhausted.

The application for accreditation was submitted by AAQ alone, not by AAQ and SAR together. However, the expert group believes AAQ can currently only be considered as a quality assurance agency in the European Higher Education Area together with SAR as its decision-making body. This applies in equal measure for certification by the German Accreditation Council. The expert group considers this structure to be sustainable and has therefore included SAR throughout the assessment procedure. The expert group considers this structure to be largely in compliance with the ESG and also with the criteria from the Accreditation Council. The expert group believes the agency meets the requirements for renewed membership in ENQA as well as entry into the Register and certification for system accreditation in Germany.

Whether this structure will result in conflicts relating to SAR's regulatory and supervisory function, which is yet to be organised, remains to be seen in the course of their accreditation activities. This will depend on particular clarity with regard to roles and the greatest possible transparency. This question will not be considered any further, as without certification of additional agencies it can only be answered in hypothetical terms and also extends beyond the scope of the assessment procedure. The Swiss accreditation system overall will not be assessed, rather, AAQ has requested that it be assessed according to the ESG and certified by the German Accreditation Council.

## II. Procedural framework

### II.1 Statutory mandate

In accordance with § 2 Para. 1 No. 1 of the law on establishing a *Foundation for the Accreditation of Study Programmes in Germany*, the foundation's task is to certify accreditation agencies. It grants, for a limited period of time, the right to accredit study programmes or the internal quality assurance systems of higher education institutions by awarding the foundation's seal. The Accreditation Council's accreditation decision, as well as the implementation of the procedure for certifying an accreditation agency, is based on the resolution "*Rules of the Accreditation Council for the Accreditation of Agencies*" from 8 December 2009, as amended on 10 December 2010.

In order to promote international recognition for the decisions made by the Accreditation Council and the accreditation agencies, in approving its criteria for accreditation, the Accreditation Council adopted the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, as they were passed at the Bologna Follow-Up Conference in May 2005 in Bergen by the ministers responsible for higher education. By taking these standards into account, the Accreditation Council underlined the central role played by accreditation in achieving the objectives of the Bologna Process and made clear that quality assurance, and above all accreditation, in the higher education sector can no longer focus exclusively on national standards or distinctions. Further important sources for the Accreditation Council's criteria were the *Code of Good Practice of the European Consortium for Accreditation* from 3 December 2004 and the *Guidelines of Good Practice of the International Network for Quality Assurance Agencies in Higher Education* from April 2005. The Accreditation Council will take the adoption of the new ESG in May 2015 in Yerevan as an opportunity to fundamentally revise its rules and criteria.

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### II.2 Compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)

In order to be recognised as a member of the European Association for Quality Assurance in Higher Education (ENQA) or to be included in the European Quality Assurance Register for Higher Education (EQAR), an agency must demonstrate through an external assessment that it complies with the ESG, although, for EQAR, full membership of an agency in ENQA is considered prima facie evidence of compliance with the ESG.

In order to avoid the need for two external assessments, the Accreditation Council also offers agencies a review of their compliance with Parts 2 and 3 of the ESG as part of the

accreditation procedure, and to present this explicitly in a separate part of the assessment. This assessment is therefore performed in accordance with the *Guidelines for external reviews of quality assurance agencies in the EHEA* from the ENQA (ENQA Guidelines).

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### **II.3 Significant results from the previous accreditation, ENQA review and EQAR registration**

AAQ, and formerly its predecessor institution OAQ, was certified to perform accreditation procedures in Germany in 2009. The last assessment of its compliance with the ESG took place in 2011 and was coordinated by ENQA. On this basis, ENQA renewed the agency's membership in 2011 and OAQ was entered into the European Register (EQAR) in May 2012.

#### **Accreditation by the German Accreditation Council in 2009**

The agency was accredited subject to three conditions. It was requested

- 15 - to revise and publish its procedure guidelines,
- to introduce a binding procedure for preparing experts in accordance with the relevant resolution by the Accreditation Council and
- to introduce a formalised internal complaints procedure.

In January 2010, the German Accreditation Council established that the agency had fulfilled these conditions.

In addition, various recommendations were drafted, which also serve to aid the agency's further development and which relate to both the criteria set by the German Accreditation Council and by the ESG. The agency was recommended

- 25 - to give experts instruction on the results of the consultation and any measures that have been taken and to expand their quality manual with specific aspects of the procedure in Germany,
- to ensure that reports are always published,
- to expand the further training options open to employees and
- 30 - to ensure the requirement for regular external evaluation is taken into account in any potential revision to the legal basis.

**ENQA review in 2011**

In the assessment procedure carried out by the ENQA, the agency was rated as “fully compliant” with six ESG standards and “substantially compliant” with ten ESG standards. The assessment resulted in a range of recommendations relating to the following points:

- 5
  - Involvement of interest groups (ESG [2005] 2.2);
  - Publication of reports (ESG [2005] 2.3, 2.5, 2.6);
  - Selection and preparation of experts (ESG [2005] 2.4);
  - Follow-up (ESG [2005] 2.6);
  - System-wide analyses (ESG [2005] 2.8),
- 10
  - Human resources management (ESG [2005] 3.4),
  - Mission statement (ESG [2005] 3.5),
  - Independence (ESG [2005] 3.6),
  - Complaints procedure (ESG [2005] 3.7)
  - Internal quality assurance and reporting (ESG [2005] 3.8)

**15 EQAR decision in 2012**

With the certification for entry into the European Register, the EQAR committee specified three so-called “flagged issues”, which it believes ought to be addressed in the ongoing assessment procedure. These include:

- 20
  - involvement of interest groups, above all students, in the development of quality assurance procedures (ESG [2005] 2.2);
  - complete publication of reports, even in the case of negative decisions (ESG [2005] 2.6);
  - structuring and formalisation of internal and external feedback processes and of relations with the interest groups (ESG [2005] 3.8).

- 25 In addition, EQAR requested further information on Art. 9 Para. 3 of the Accreditation Guidelines on the basis of which AAQ can take external quality reviews into account for institutional accreditation in Switzerland.

**AAQ’s response to the results**

- 30 During the assessment procedure, AAQ provided detailed reports on the way in which it used the recommendations for the purpose of continuous quality development. It also submitted a so-called “Follow-up Report” to ENQA in November 2013 with a report on the implementation of recommendations, which was explicitly welcomed by the Board of the association. In accordance with Cl. 1.5 of the Rules of the Accreditation Council for the Accreditation of Agencies from 8 December 2009, in a re-accreditation procedure the as-

assessment is also based on a progress report on the activities of the agency during the elapsed accreditation term. Both AAQ and the Board of the Foundation for the Accreditation of Study Programmes in Germany have produced such reports (SA Part 2, p. 32, Annex II.24). Both reports can only be incorporated into the assessment procedure to a limited extent as they are not based on the current structures and processes that have been in place since the HEdA came into force.

This report will refer to AAQ's reaction to the results of the assessment procedure in the respective relevant areas. The same applies to the "flagged issues", which EQAR believes should be addressed.

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#### II.4 Outline of the procedure

AAQ submitted the application for accreditation as an accreditation agency to the Accreditation Council with a letter dated 22 May 2015 after it had been accredited by the Accreditation Council on a provisional basis up to 30 September 2016. On 4 January 2016, it submitted the explanatory statement for the application alongside additional documentation. Additional documents were subsequently requested by email on 23 February 2016 and 15 March 2016, and these documents were received by letters dated 26 February 2016 and 17 March 2016 respectively.

The following experts were nominated by the German Accreditation Council by a resolution on 30 September 2015:

**Prof. Dr. Volker Linneweber**, President of the University of Saarland (Chair)

**Prof. Dr. Ossi Lindqvist**, Professor Emeritus of Applied Zoology, University of Kuopio

**Floris Lammens**, International Coordinator, Royal Conservatoire Antwerp

**Franziska Chuleck**, Ilmenau University of Technology (student representative)

**Dr.-Ing. Martin Molzahn**, formerly of BASF Aktiengesellschaft, Ludwigshafen (professional practice)

The expert group was supported by Friederike Leetz on behalf of the head office of the Foundation for the Accreditation of Study Programmes in Germany.

On 8 January 2016, a preparatory meeting was held for the experts during which the applicable criteria set by the Accreditation Council and the ESG were presented and explained. The preparatory meeting also served to deepen the experts' knowledge of the course of the procedure and their understanding of their roles in accreditation procedures.

## Explanatory statement for the application

As the explanatory statement for the application AAQ has submitted two self-evaluation reports: one self-evaluation on its compliance with the ESG (2015) and one self-evaluation on its compliance with the German “Criteria for the Accreditation of Agencies”.

5 Each part is provided with its own set of annexes.

Both reports are in themselves very informative. At certain points it is useful to combine the information from both parts. The self-evaluation report regarding the ESG is oriented towards the ENQA guidelines and therefore contains a strength/weakness analysis for each standard and for the agency as a whole. With this, AAQ has a good foundation for  
10 an assessment geared towards development.

The explanatory statement for the application was submitted by AAQ alone, not by AAQ and SAR together. In terms of its focus, it is therefore written from AAQ’s perspective. As a result, some information regarding SAR and the internal relationship between both institutions is lacking. These gaps could be filled in through the documents filed subsequently  
15 and the discussions during the on-site visit.

## On-site visit

An on-site visit took place at the agency’s head office in Bern from 9 to 11 March 2016. The expert group conducted discussions with the management and the employees of AAQ as well as with the members of the Swiss Accreditation Council, experts and repre-  
20 sentatives from universities at which the agency has implemented procedures, and finally with the sponsors, clients and external partners of the agency. The schedule is included as an annex.

The discussion atmosphere was open and friendly throughout, which also facilitated the discussion of critical issues. The expert group would like to thank the agency for this.

## 25 Report

The expert group submitted the enclosed report with a unanimous vote on 1 June 2016, taking the statement by AAQ from 30/31 May 2016 into account.

The report is based on the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) from May 2015 and the resolution of the Accreditation  
30 Council “Rules of the Accreditation Council for the Accreditation of Agencies“ from 8 December 2009 as amended on 10 December 2010. The resolution of EQAR’s “Policy on the Use and the Interpretation of the ESG” from 12 June 2015 was included in the assessment.

The report is more detailed because the agency, as OAQ's successor institution, had recently undergone a reform process and because two different accreditation systems form the framework for the assessment procedure.

## 5 II.5 The accreditation systems in Switzerland and in Germany

### Switzerland

In Switzerland, the Federal Constitution requires that the Confederation and the cantons work together to provide a high-quality and competitive higher education area. In order to perform this constitutional obligation, the higher education sector and the national quality assurance system in Switzerland was, as of 1 January 2015, newly regulated with the following three issuances:

- Higher Education Act (HEdA)
- Intercantonal Agreement on the Swiss Higher Education Sector (Higher Education Concordat)
- 15 - Federal-Cantonal Collaboration Agreement (FCA)

The HEdA regulates the entire Swiss higher education area including the responsible higher education policy bodies of the Confederation and the cantons. Cooperation between the cantons subject to the agreement with one another and with the Confederation is governed in the Higher Education Concordat for coordination in the Swiss higher education area. The joint bodies responsible for higher education are ultimately appointed by means of the collaboration agreement.

The joint bodies created by the Confederation and the cantons are

- the Swiss Conference of Higher Education Institutions (SHK),
- 25 - the Swiss Conference of Rectors of Higher Education Institutions (swissuniversities) and
- the Swiss Accreditation Council (SAR), including the Agency of Accreditation and Quality Assurance (AAQ) which is subordinated to it.

As the highest-level body in education policy in Switzerland, the SHK ensures the nationwide coordination of activities by the Confederation and the cantons in the higher education sector across Switzerland. swissuniversities represents the interests of universities, universities of applied science and universities of teacher education both in Switzerland and on an international level. SAR and AAQ are the two institutions for accreditation and quality assurance in the Swiss higher education sector (for more detailed information on the organisation and the responsibilities of these institutions, see III 2 below).

Through the new accreditation system, access to the Swiss higher education sector, amongst other things, will be controlled and harmonised in line with quality assurance considerations: All public or private higher education institutions with the intention to operate under the title “university”, “university of applied science” or “university of teacher education”, or any other title derived from these, must undergo institutional accreditation. Public higher education institutions may receive federal contributions following successful accreditation. Alongside this, the HEdA allows higher education institutions the opportunity to subject their study programmes to programme accreditation.

In addition, the accreditation system in Switzerland has been liberalised through the HEdA: alongside AAQ, SAR can certify additional national and international agencies for accreditation operations. Certification of agencies is based on the guidelines set by the Swiss Accreditation Council concerning the qualification of agencies for accreditation pursuant to HEdA (recognition guidelines).

## 15 **Germany**

Germany has a decentralised accreditation system which is distinguished by the fact the accreditation agencies are certified for practise in Germany by the Accreditation Council. Accreditation was introduced in 1998 and has always been based on the involvement of academics, students and professional practice.

The role of accreditation is to ensure the standards of the specialised content covered which, alongside a review of the study programme concept and the academic feasibility of the programme offered, also takes into account the quality of teaching as well as a review of a programme’s professional relevance and the promotion of gender equality. As a general rule, accreditation is a prerequisite for introducing and running Bachelor's and Master's study programmes. In addition to programme accreditation, system accreditation was introduced in 2007. Positive system accreditation entitles a higher education institution to award the quality seal of the Accreditation Council for study programmes in accordance with their own internal quality assurance system.

The activities of the German Accreditation Council are based on the law on establishing a Foundation for the Accreditation of Study Programmes in Germany, which was passed on 15 February 2005. Alongside certifying agencies temporally for their activities in Germany, it stipulates the basic requirements for accreditation procedures, which must be conducted according to reliable and transparent standards. At the same time, it ensures that issues relating to the overall system for which individual states are responsible are given consideration in the scope of accreditation. The Foundation for the Accreditation of Study Pro-

grammes in Germany also functions as a centralised documentation office for accreditation and manages the database of accredited study programmes in Germany.

### III. Swiss Agency of Accreditation and Quality Assurance (AAQ)

#### 5 III.1 Foundation and statutory mandate

AAQ was founded with the entry into force of the HEdA on 1 January 2015. Together with SAR, it is the successor institution for OAQ, which started operating in October 2001. The same staff work in the agency as before in OAQ and the procedures are being continued, with the exception of the new accreditation pursuant to HEdA.

10 The HEdA entrusts AAQ with the implementation of procedures for institutional accreditation and programme accreditation in the Swiss higher education sector (Art. 32 HEdA). Alongside this, it may carry out so-called third-party mandates as part of its function (Art. 7 FCA-CHE). Currently, this includes certifications of higher education institutions' internal quality assurance systems in Germany and in Austria, programme accreditation in medical and psychology professions, and finally evaluations. With the exception of the new accreditation pursuant to HEdA, all of these formats were already conducted by OAQ.

#### III.2 Organisation of the agency

As a legally dependent institution under public law, AAQ reports to SAR. In addition, the Swiss Conference of Higher Education Institutions (SHK) also influences the agency's organisation and working methods constituting the highest-level body in education policy in Switzerland. AAQ and SAR are self-organised institutions. SAR manages its own budget and the budget of AAQ and administers separate accounts for each.

#### Organisation and responsibilities of AAQ

25 AAQ is a secretariat pursuant to HEdA and is also a secretariat of SAR (Art. 4 et seq. OReg-AAQ).

- As a **secretariat pursuant to HEdA**, it conducts accreditation procedures, further develops accreditation and quality assurance methodology and fosters discussion with interest groups and with the general public.
- 30 - As a **secretariat of SAR**, it supports SAR in its work (preparation and follow-up work for meetings, publications and implementing decisions, etc.). The corresponding human resources are included in SAR's budget and regarded as a reduction in expenses in AAQ budget.

The **Director** of AAQ is responsible for governing AAQ and for managing its business activities. He/she is responsible for strategic planning, financial planning, financial reporting, procedural planning and personnel management within AAQ. The Director is supported by the **Deputy Director**.

- 5 Currently AAQ does not have its own committee structure as SAR is extensively involved in all of its activities. AAQ has the option of establishing an AAQ accreditation commission, which would decide on procedures commissioned by third parties (Art. 15 Para. 1 Let. D OReg-SAR).

### Organisation and responsibilities of SAR

- 10 As the expert committee for accreditation and quality assurance in Switzerland, SAR ensures that all Swiss higher education institutions are accredited according to the same procedure. It is both an accreditation authority pursuant to HEdA (Art. 33 HEdA) and supervisory body to AAQ (Art. 22 Para. 2 HEdA). AAQ involves SAR, as its decision-making body, in all procedures and in its internal quality assurance system.
- 15 - As an **accreditation authority**, SAR decides on the accreditation procedure stipulated in the HEdA and, in this context, can certify additional Swiss or foreign accreditation agencies to conduct procedures in accordance with HEdA.
- As the **supervisory body to AAQ**, it appoints the Director of AAQ as well as the Deputy Director upon the Director's request (Art. 2 Para. 2 Let. D Cl. 2 FCA-CHE).
- 20 Upon the Director's request, it approves AAQ's strategic and financial planning as well as the annual accounts (Art. 15 OReg-SAR). In addition, it issues the organisational regulations and the statutes on fees for itself and for AAQ (Art. 21 Para. 5U 8, Art. 35 Para. 2 HEdA).
- As its **decision-making body** AAQ involves SAR in the (further) development of the
- 25 individual procedure formats and in the concrete organisation of procedures: SAR approves the expert groups, reviews AAQ's procedure reports and makes decisions in procedures carried out by AAQ on behalf of third parties. It is also decides on the guidelines, in which AAQ describes the procedures it carries out, as well as other policy documents such as the strategic planning or the quality principles of AAQ.
- 30 SAR consists of 15-20 members who are supposed to represent higher education institutions, the professional world (professional practice), students, mid-level faculty staff and teaching staff (Art. 21 Para. 1 HEdA). It currently has 18 members, including 11 representatives for higher education institutions and 2 representatives each for students, mid-level faculty staff and for international quality assurance as well as one representative for
- 35 professional practice (SA Part 2 p. 8). Members were appointed by the Higher Education

Council of the SHK, which was aided by suggestions from SAR's Presidium and from the relevant interest groups. The Director of AAQ takes part in SAR's meetings in an advisory capacity (Art. 7b OReg-SAR).

In order to prepare for decisions, SAR can form committees, which may be made up of both internal and external members (Art. 12 OReg-SAR). Such committees currently exist for institutional procedures in Germany and Austria as well as for the accreditation of training and further education courses in the field of psychology and medicine (SA Part 1, p. 26). Another commission is responsible for requests for appeals (complaints) (SA Part 1, p. 35 et seq.).

## 10 Organisation and responsibilities of the SHK

The SHK is the highest-level body in education policy in Switzerland and is responsible for ensuring the nationwide coordination of activities by the Confederation and the cantons across Switzerland in the higher education sector. It convenes as the Plenary Assembly and as the Higher Education Council. The Higher Education Council is, amongst other things, responsible for guaranteeing quality assurance and for accreditation upon the request of SAR (Art. 12 Para. 3 Let. A Cl. 2 HEdA). It is responsible for the supervision of SAR (Art. 12 Para. 3 Let. H HEdA).

The Higher Education Council consists of government members from the Confederation and the cantons. A range of other experts take part in the meetings in an advisory capacity, this includes swissuniversities, the National Research Council of the Swiss National Science Foundation (SNF) and other representatives from the professional world, students, mid-level faculty staff and teaching staff from Swiss higher education institutions. (See Art. 12 et seq. HEdA)

The Higher Education Council's duties are summarised in Art. 2 Para. 2 Let. B FCA-HS and are also derived from the Regulations on its Personnel (PReg-HSR<sup>1</sup>). With a view to the organisation and working method of AAQ and SAR, these duties include:

- electing SAR members, including the Presidium,
- approving the establishment, change and termination of the employment relationship with Director of AAQ,
- enacting regulations regarding accreditation and quality assurance upon SAR's request including setting out the requirements for institutional accreditation and for programme accreditation in accordance with the HEdA in accreditation guidelines,

<sup>1</sup> The Personnel Regulations are available online at: <http://www.shk.ch/pdf/reglemente/...>, last accessed 2 February 2016.

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- approving the organisational regulations and the regulations on fees for SAR AAQ, and
  - adopting the budget and approving the annual accounts of SAR and AAQ.

5 As the Higher Education Council, the SHK is also employer to the staff working for SAR and AAQ, although this responsibility has been passed over via SAR to AAQ with the exception of the Director of AAQ. SAR is responsible for employer decisions regarding the staff employed by SAR.

### III.3 Setup

10 According to information provided by AAQ itself, it has an annual budget of around CHF 2 million. For SAR, an additional CHF 416,000 is recorded in the budget for the current year. Both institutions are legally required to finance their quality assurance procedures through cost-covering fees. The Confederation and the cantons each pay half of the costs provided these costs arise out of the fulfilment of duties pursuant to HEdA and are not already covered by the fees.

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There are 15 employees working at AAQ including SAR's head office (11.2 full time equivalents/FTE: as of March 2016). In some cases people may be employed in relation to individual projects or with temporary employment contracts. With the exception of three people, the current staff were already employed by OAQ.

20 The head office of AAQ is located in Bern where it operates fully equipped office spaces covering around 180 square metres.

### III.4 Spectrum of activities

AAQ's spectrum of activities currently includes the following procedure formats, which, with the exception of the new accreditation procedure pursuant to HEdA, were already carried out by OAQ:

<b>Institutional accreditation in Switzerland</b>	
<p><u>Subject of the procedure:</u> The procedure will review whether the Swiss higher education institutions have a quality assurance system with which they can guarantee and further develop the quality of their teaching, research and services in the long term.</p> <p>Subsequent to the procedure, the higher education institutions will be granted the right to operate under the title “university”, “university of applied science” or “university of teacher education” or another title derived from these. Private institutions must undergo the same accreditation if they aspire to operate under these titles. For public higher education institutions, accreditation is also a prerequisite for receiving federal financial contributions. Finally, institutional accreditation grants institutions to conduct optional programme accreditations in accordance with HEdA (see below).</p>	<p><u>Procedural framework:</u> Art. 27 et seq. HEdA, set down in the HEdA accreditation guidelines.</p> <p>Institutional accreditation procedures can be conducted by all agencies that have been certified for this by SAR. Up to now this only applies to AAQ.</p>
<p><u>Quantitative significance of AAQ:</u> In total, AAQ assumes it will carry out at least 36 institutional accreditation procedures by 2022. Two procedures are currently in progress, none have so far been completed. AAQ expects to receive applications from public higher education institutions from 2017 at the earliest; in part the legal bases must still be established and higher education institutions may wish to improve their quality assurance systems. The 12 universities in Switzerland will undergo institutional accreditation from 2020 as the third cycle of the previous Quality Audits was only completed in 2013/2014.</p>	
<b>System accreditation in Germany</b>	
<p><u>Subject of the procedure:</u> The procedure assesses the quality assurance system in a higher education institution in the area of teaching and learning. The structures and processes relevant to teaching and learning are reviewed in order to establish whether they reach the qualification objectives and guarantee a high level of quality in their study programmes.</p> <p>Subsequent to the procedure, responsibility for study programme accreditation is transferred to the German higher education institutions. This is otherwise achieved through programme accreditation which is mandatory.</p>	<p><u>Procedural framework:</u> Rules for Accrediting Study Programmes and for System Accreditation. Resolution of the German Accreditation Council from 8 December 2009, as amended 23 February 2013.</p> <p>System accreditation procedures can be conducted by all agencies that have been certified for this by the German Accreditation Council. Alongside AAQ, eight further agencies are currently certified to do this.</p>

Quantitative significance of AAQ: Since its certification by the German Accreditation Council in 2009, AAQ has completed a total of four system accreditation procedures. Three additional procedures are currently in progress and a fourth is being prepared. In total, AAQ anticipates that it will be able to complete four to six system accreditation procedures by 2022, or roughly one procedure per year.

### Quality Audits in Austria

Subject of the procedure: The procedure assesses the organisation and performance of quality management systems in Austrian universities and higher education institutions in core and cross-sectional tasks.

AAQ has recourse to the Swiss quality audit, which was carried out in Swiss universities up to 2014.

Procedural framework: Austrian Federal Act on Quality Assurance in Higher Education (HS-QSG).

Quality Audits in Austria may be performed by the AQ Austria and by other agencies, provided these have been qualified by the Austrian Federal Ministry of Science and Research (BMWV). Alongside AAQ, 14 other agencies are currently certified to do this.

Quantitative significance of AAQ: Since its certification in 2012, AAQ has completed a total of four Quality Audits, a final procedure is in progress. No further audits are currently planned.

### Programme accreditation

Subject of the procedure: Programme accreditation in Switzerland covers the certification of study programmes at higher education institutions that have undergone institutional accreditation as well as the certification of state-regulated training and further education courses in medical and psychology professions.

In the field of medical and psychology professions, programme accreditation is a legal requirement and is related to the regulations regarding professional titles and access to the profession.

Programme accreditation in accordance with HEdA is optional. In this context, AAQ offers institutions accreditation for engineering study programmes in accordance with the EUR-ACE criteria.

Procedural framework:

HEdA: Art. 27 et seq. HEdA, set down in the HEdA accreditation guidelines

MedPA: Art. 22 et seq. MedPA set down in the provisions of the Swiss Federal Department of Home Affairs (EDI)\*

PsyPA: Art. 11 et seq. PsyPA set down in the provisions of the EDI

Programme accreditation procedures pursuant to HEdA can be conducted by all agencies that have been certified for this by SAR. Up to now this only applies to AAQ. Training and further education courses in the field of medicine and psychology are accredited by AAQ exclusively.

*\*The accreditation of medical training courses is currently undergoing comprehensive revision. In future, this should be conducted as programme accreditation in accordance with HEdA and supplemented with specific standards drawn from the Swiss Medical Professions Act.*

Quantitative significance of AAQ:

*HEdA:* For the time being, AAQ is not active in this area as higher education institutions will not receive access to programme accreditation procedures in accordance with HEdA until they have undergone institutional accreditation.

*MedPA:* In the field of medical training, the first accreditation cycle was carried out in

2010-2012. The next accreditation cycle will commence in 2020 (roughly 20 procedures). Further education courses were first accredited in 2003-2005 and then again in 2009-2011. The next accreditation cycle will commence in 2016. AAQ expects around 55 procedures.

*PsyPA*: In the field of psychology, the first accreditation cycle for the roughly 40 - 60 programmes is currently in progress. The procedures should be completed in 2018. 23 procedures have already been initiated.

### Programme and institutional evaluation

Subject of the procedure: AAQ offers evaluations, both in Switzerland and internationally, which are composed according to the needs of the institution or the study programme. The evaluations are conducted on an optional basis and do not result in any formal accreditation decision.

Procedural framework: Evaluations are designed specifically in accordance with the needs of the applicant before they are started.\*

#### Quantitative significance of AAQ:

The field is currently undergoing extensive revision.

In the past, evaluations were primarily important when there was no statutory option for (programme) accreditation. The subject of evaluations were, for example, “non-degree programmes”, such as the Executive Master of Business Administration (EMBA) or Master of Advanced Studies (MAS) from universities of applied science. Between 2008 and 2015, AAQ carried out 30 of these procedures. Under the new requirements of the HEdA, AAQ anticipates less activity in this field overall than in previous years.

AAQ itself attaches great value to the application of the ESG to all procedure formats, irrespective of whether the formats are geared towards programmes offered by higher education institutions or other institutions in the tertiary education sector. The latter, for example, applies to further education courses pursuant to MedPA, which are the responsibility of scientific speciality societies, hospitals and medical practices and therefore do not necessarily fall within the ESG’s area of application<sup>2</sup>. As this relates to quality standards set by AAQ itself, all procedure formats will be assessed in accordance with the ESG in future.

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<sup>2</sup> In the ESG, the area of application is associated with the term “higher education institution” amongst other things.

#### IV. Assessment of the European Standards and Guidelines (ESG)

##### 2.1 Consideration of internal quality assurance

**STANDARD:**

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

**GUIDELINES:**

Quality assurance in higher education is based on the institutions' responsibility for the quality of their programmes and other provision; therefore, it is important that external quality assurance recognises and supports institutional responsibility for quality assurance. To ensure the link between internal and external quality assurance, external quality assurance includes consideration of the standards of Part 1. These may be addressed differently, depending on the type of external quality assurance.

**Documentation**

5 With the exception of evaluations, assessment standards for individual procedure formats are specified with binding effect in the respective procedural frameworks (see overview above). AAQ and SAR were involved in their development in different ways, for example, as part of working groups or hearings.

10 AAQ provides summaries for all of these formats, in which the quality criteria used are compared with the standards in Part 1 of the ESG (SA Part 1 p. 17 and 19 as well as A I.4.1.A-C and DFS 14).

For system accreditation in Germany and quality audits in Austria, AAQ also points out that their compliance with Part 1 of the ESG has been confirmed in external evaluations by OAQ and by the German Accreditation Council.

15 AAQ sees room for improvement with regard to the implementation of Standard 1.2 from the ESG (Design and approval of programmes) in their institutional procedures and, in general, with regard to the new Standard 1.3 (Student-centred learning, teaching and assessment), which could be given a clearer emphasis in all procedures. AAQ would like to work towards this in upcoming revisions to the formats. In addition, AAQ would like to increase overall recognition for the ESG in the Swiss higher education area; until now there  
20 has been no discussion of the ESG from 2015 with higher education institutions in Switzerland.

**Assessment**

25 The efficacy of higher education institutions' internal quality assurance systems plays a key role in all procedure types. The higher education institutions maintain primary responsibility for quality assurance and development. As would be expected, they have limited influence in the area of state regulated study programmes and professions. The presentations in the summaries are plausible, they also demonstrate that the individual standards

from Part 1 have been incorporated and show how they have been incorporated – prudently, with different focuses either on the institution or the individual study programme. This also applies to evaluation procedures, which AAQ, or OAQ, have carried out in the past. The evaluations offered by AAQ and the accreditation procedures in basic medical training can currently only be evaluated to a limited extent as these areas are currently being revised. However, in light of the proven and long-standing expertise in quality assurance, there is no doubt that Standard 2.1 and the other standards from Part 2 of the ESG have likewise been observed in these areas. This is not addressed specifically in the following assessments.

- 5
- 10 Although AAQ is not primarily responsible for the quality standards and criteria, it plays an important advisory role in their (further) development (see the assessment concerning Standard 3.1). The expert group considers discussion with higher education institutions concerning the new ESG with, amongst other things regard to the further consolidation of the European Higher Education Area, to be very worthwhile and would like to encourage
- 15 AAQ in this undertaking. AAQ can also use this discussion to gain some practical knowledge of the efficacy and applicability of the criteria.

### Recommendations

None

### Result

- 20 **Standard 2.1 is fulfilled.**

## 2.2 Designing methodologies fit for purpose

### STANDARD:

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

### GUIDELINES:

In order to ensure effectiveness and objectivity it is vital for external quality assurance to have clear aims agreed by stakeholders.

The aims, objectives and implementation of the processes will

- bear in mind the level of workload and cost that they will place on institutions;
- take into account the need to support institutions to improve quality;
- allow institutions to demonstrate this improvement;
- result in clear information on the outcomes and the follow-up.

The system for external quality assurance might operate in a more flexible way if institutions are able to demonstrate the effectiveness of their own internal quality assurance.

## Documentation

With the exception of evaluations, the purposes and goals of all formats conducted by the agency are specified with binding effect in the respective procedural frameworks (see above). In part, specifications for the organisation of assessment procedures are provided. In this way, AAQ and SAR are bound, for example, in Germany to the procedure rules set by the German Accreditation Council (A I.3.H) and apply the specifications of the Swiss Federal Office of Public Health (FOPH) in the area of medical and healthcare professions in Switzerland. AAQ is involved in the development of the procedures in different ways, for example, as part of working groups or hearings.

5 The fact that and the way in which the relevant interest groups from the respective responsible bodies are involved in the development of these procedures and the way in which they are involved is described in detail in the application (SA Part 1, p. 21-23). For example, the HEdA accreditation guidelines were developed in a broad consultation process involving representatives from public and private higher education institutions, students, various employer and employee as well as professional associations and other interest groups. Upon SHK's instruction, AAQ led the consultation process, whose results were published in a report by the Swiss State Secretariat for Education, Research and Innovation (SERI) (A I.4.2B).

10 Within this framework, AAQ is responsible for the organisation, implementation and further development of the procedures (Art. 4 OReg-AAQ, A I.3E). In this context, AAQ is supposed to ensure that the formats comply with international standards and, to this end, to foster discussion between international interest groups and network with international accreditation and quality assurance organisations. The individual formats from AAQ are each specified in guidelines, which are available for all procedures except for the accreditation of training courses in the field of medicine (A I.4.5A-G, DFS 13). Before the procedures are started, evaluations are designed specifically in accordance with the needs of the applicant (SA Part 1, p.10).

20 AAQ regularly involves SAR in the development and continuous improvement of the individual formats: All projects and concepts are discussed in SAR before implementation. (SA Part 1, p. 20 et seq.) Furthermore, SAR approves all of AAQ's guidelines (SA Part 1, p. 24).

30 AAQ believes that the involvement of the relevant interest groups in the development of procedures is guaranteed through SAR: by law, higher education institutions, the professional world, students, mid-level faculty staff and teaching staff including international experts are associated with SAR (§ 21 Para. 1 HEdA, A I.3.C). AAQ subsequently filed in-

formation on the current composition of SAR and appointment of the members (DFS 1 letter from AAQ dated 17 March 2016).

5 AAQ itself is also linked with the various interest groups in Switzerland and abroad (SA Part 1, p. 23). It is in regular contact with the rectors of Swiss higher education institutions and with the political committees of the cantons, is an active member of the Swiss Q network as well as the European and international networks for quality assurance (ENQA, EQAE, INQAAHE, ENAEE Réseau francophone des agences qualité) and works closely with other European agencies.

10 Overall, AAQ judges the involvement of interest groups to be effective and transparent. For the future, it sees potential for development in the involvement of private higher education institutions, which are generally being more strongly involved in the Swiss accreditation and quality assurance system through the new HEdA. (SA Part 1, p. 23)

## Assessment

### Comprehensive evaluation

15 In the (further) development of their procedure formats, AAQ and SAR take into account the purposes and goals of each format with due regard to the relevant statutory framework conditions. This is demonstrated in the descriptions in the self-assessment as well as in the other documents submitted. The purposes and goals of all formats are, to the extent possible at this point, described and published in the agency's guidelines on its website  
20 amongst other places<sup>3</sup>. The efficacy of the procedures was confirmed by the higher education institutions in the discussions held during the on-site visit. The agency's sponsors, its clients and its partners likewise gave a positive response.

For the area of evaluation which is subject to revision, the expert group suggests that AAQ discusses possible, perhaps individually-tailored, areas for evaluation with the higher  
25 education institutions. It can also receive suggestions regarding this from other agencies, as the area has relevant potential for development. With the evaluations AAQ could also even out any unforeseeable fluctuations in the work load (see the explanation to Standard 3.5 below).

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<sup>3</sup> See <http://aaq.ch/akkreditierung/leitfaeden-qualitaetsstandards/>

### Involvement of interest groups

The relevant stakeholders – namely representatives from higher education institutions, students and professional practice as well as international experts – are involved in the organisation and further development of the individual procedure formats by the respective relevant political bodies and by SAR. The expert group was impressed by the broad consultation process, during which the new accreditation guidelines in Switzerland were developed. It welcomed the fact that the key players in the Swiss accreditation and quality assurance system – including AAQ and SAR – continually discuss the practicability of the monitoring procedure. The sponsors, clients and partners highlighted the expert role played by AAQ and subsequently by SAR as well as their good links in the Swiss and European Higher Education Area as particularly positive.

Within AAQ, the expert group considers the systematic involvement of the relevant interests groups, which Standard 3.1 of the ESG requires, as guaranteed through the link with and the involvement of SAR as its decision-making body. This structural decision, which at the same time enabled AAQ to improve the involvement of interest groups in comparison to previous evaluations conducted by the German Accreditation Council and by the ENQA, is currently regarded as sustainable by the expert group. This should be communicated with greater force both within the system and to the public. For example, it should be clear from AAQ's guidelines that they are approved and also backed by SAR. The same applies to the strategy, the quality paper and AAQ's other policy documents and reports.

The expert group has looked into SAR's composition more intensively, as specification in the statutes is comparatively vague for the benefit of greater flexibility. In the discussions on-site and from the documents filed subsequently, the expert group was able to assure itself of SAR members' proven expertise and could also understand the appointment procedure. It welcomes the fact that SHK's Higher Education Council drew on the suggestions of SAR's Presidium as well as those from relevant interest groups in its appointment of members. With a view to international collaboration, the selection procedure and criteria should be made more formalised, which would also increase transparency. However, formalisation on a non-legal level would be sufficient.

In addition, in composing subsequent accreditation councils, professional practice must be given greater consideration, as was originally intended. The expert group also acknowledges that SAR members generally represent more than one interest group in terms of "stakeholder involvement" and that suggestions made by the employer and employee as-

sociations were taken into account in the selection decision. AAQ and SAR should also involve themselves more strongly with professional practice in general.

Whether the involvement of the relevant interest groups can be realised in the long term through SAR remains to be seen in the course of their accreditation activities. This depends on further development in terms of access to the Swiss accreditation system and on the concrete organisation of SAR's regulatory and supervisory function. During the on-site visit, this question was not further examined because it extends beyond the scope of the current assessment procedure and could also only be answered in hypothetical terms<sup>4</sup>.

## 10 Recommendations

**Recommendation:** It should be communicated with greater force both within the system and to the public that SAR is AAQ's decision-making body. For this, it should be clear from AAQ's guidelines that they are approved and backed by SAR. The same applies to the strategy, the quality paper and other policy documents and reports from AAQ.

15 **Recommendation:** With a view to international collaboration, the selection procedure and criteria used to appoint SAR members should be more formalised. The aim should be to structurally, and therefore in a way that is not dependent on individual persons, guarantee the necessary skills of those involved in the procedure as well as the involvement of the relevant interest groups over the long term. The professional world/professional practice should be more strongly involved in the composition of subsequent accreditation councils. In order to achieve this, AAQ and SAR should, in general, strengthen their links with the professional world/professional practice.

## Result

**Standard 2.2 is substantially fulfilled.**

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<sup>4</sup> The Recognition Guidelines of the Swiss Accreditation Council came into force on 1 January 2016. According to current information, no other agency is currently certified for accreditation procedures in Switzerland apart from AAQ.

## 2.3 Implementing processes

### STANDARD:

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

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

### GUIDELINES:

External quality assurance carried out professionally, consistently and transparently ensures its acceptance and impact.

Depending on the design of the external quality assurance system, the institution provides the basis for the external quality assurance through a self-assessment or by collecting other material including supporting evidence. The written documentation is normally complemented by interviews with stakeholders during a site visit. The findings of the assessment are summarised in a report (cf. Standard 2.5) written by a group of external experts (cf. Standard 2.4).

External quality assurance does not end with the report by the experts. The report provides clear guidance for institutional action. Agencies have a consistent follow-up process for considering the action taken by the institution. The nature of the follow-up will depend on the design of the external quality assurance.

### Documentation

5 With the exception of evaluations and the accreditation of training courses in the field of medicine, AAQ has documented the procedure process for the individual formats in the process schedules (A I.4.3A). The process schedules are published with additional explanations in the guidelines on AAQ's website, for example (A I.4.5 A-G, DFS 13). The implementation of assessment procedures is in part stipulated as a binding requirement in the respective procedural frameworks.

#### General outline of the procedures

10 All formats are essentially composed of five phases: preparation or beginning of the procedure (1), self-assessment by the institution (2), assessment by external experts including an on-site visit (3), multi-stage decision-making procedure based on the experts' report and the corresponding statement by the higher education institution (4) and – excluding evaluations – follow-up processes for implementing conditions and recommendations

15 (5).

In order to reduce costs and resource usage, the results from other external quality reviews may be taken into account for HEdA accreditation procedures, provided they are not more than three years old (Art. 9 Para. 3 HEdA Accreditation Guidelines, A I.3.C). The precise details are contractually agreed upon with the higher education institutions on a

20 case-by-case basis and with due regard for the quality standards and rules of procedure set down in the Accreditation Guidelines (letter from AAQ dated 26 February 2016 regarding documents subsequently filed, p. 3).

AAQ believes a consistent implementation of procedures is guaranteed through its internal quality assurance system. The organisation handbook, the synthesis reports and the formal study by SAR are considered key elements of this. (SA I, p. 26)

Decision-making procedure

5 In all procedure formats, decisions are not made by AAQ. Instead, either SAR decides (for accreditation according to HEdA including basic medical training, system accreditation in Germany, quality audits in Austria). Otherwise the EDI, as the authority responsible for the procedure, has the decision-making power – following a decision in SAR (for programme accreditation for further education courses pursuant to MedPA and PsyPA). Within SAR,  
 10 commissions are intended to guarantee adequate competence in all fields of activity. Such commissions currently exist for institutional procedures in Germany and Austria as well as for the accreditation of training and further education courses in the field of psychology and medicine (SA Part 1, p. 26). The duties and composition of these commissions, which ultimately decide upon the selection of experts and the reports and serve to prepare  
 15 SAR’s certification and follow-up decisions, are derived from the council’s internal meeting documents and from the documents filed subsequently (A I.4.3B, II.14, DFS 3, letter from AAQ dated 17 March 2016).

According to the presentation in the guidelines, AAQ is involved in several procedure formats with an independent role in decision-making; here it requests the decision-making  
 20 power from SAR on the basis of the report. At least concerning system accreditation procedures in Germany, AAQ can deviate (with good reason) from the recommendation of the expert group, whereby SAR in turn can deviate from the application made by the agency (SA Part 2 p. 27).

Follow-up

25 All decisions can be linked to conditions, which the higher education institutions must meet by a set deadline. In addition, recommendations can be made to higher education institutions, which should be addressed in follow-up procedures. In principle, SAR decides on the fulfilment of conditions or the decision-making power lies with the EDI as the authority responsible for the procedures. In evaluations, earlier recommendations are ad-  
 30 dressed during the assessment procedure. The development of follow-up approaches forms part of the current strategic planning (A I.5.1B, p. 5).

AAQ regards Standard 2.3 as fulfilled, though there could be a greater focus on the implementation of recommendations. In addition, AAQ is currently reviewing ways in which the follow-up with the experts could be further developed.

## Assessment

### Comprehensive evaluation

5 In implementing its procedures, AAQ meets the requirements of Standard 2.3. All procedure formats – excepting any gaps in the public presentation e.g. through the council’s internal commission – comply with the international standards for quality assurance. The procedure elements required according to the ESG are complied with and are well integrated into the individual procedures and applied with a high degree of professionalism.

10 In the discussions on site, the benefit of the procedure for the higher education institutions was confirmed. The guidelines were evaluated as helpful in providing information about the procedure process and helping to prepare for the procedures by both the higher education institutions and AAQ’s experts. Through this and with the firmly established preliminary meetings with the higher education institutions in all procedure formats, AAQ has a targeted impact on the efficacy of external quality assurance. The agency can guarantee the consistent implementation of the individual procedure steps and uses its synthesis reports, amongst other things, to aid targeted further development of the procedure formats (for detailed information on this see the evaluations concerning Standard 3.4 and 3.6).

The fact that the results of other external quality reviews can be taken into consideration in HEdA accreditation procedures can be regarded as an example of good practice in terms of efficiency.

### 20 Decision-making procedure

In the discussions on site, the expert group received the impression that AAQ and SAR currently work well together as a unit in decision-making procedures. It also noted that AAQ does not have an independent role in the decision-making process – contrary to the description in the guidelines. AAQ simply forwards the report, including the experts’ recommended decision, to SAR as its decision-making body without having the opportunity to deviate from the experts’ recommended decision in this intermediary role. This description of the decision-making process is in accordance with the representation of the procedure in the published reports, which does not discuss any independent role played by AAQ in the decision-making procedure. The allocation of duties should be presented with greater transparency in the relevant guidelines. A conflict between the regulatory and supervisory functions of SAR could theoretically arise in future out of this allocation of duties. At present, however, this is, merely speculation and, therefore, it is not further discussed in the assessment procedure.

The organisation of the commissions is reasonable both in terms of efficacy and efficiency and, also, in terms of guaranteeing sufficient technical and professional perspectives in SAR. In future, SAR ultimately intends to judge programme accreditation according to HEdA and, therefore, also the quality of study programmes in terms of their content. The expert group was convinced by the documents filed subsequently that the commissions, and likewise SAR, have a competent team of staff overall. Nonetheless, it considered it expedient that representatives from the field of medicine are included in SAR. Equally, it suggests that, in terms of involvement, the commissions responsible for accreditation in the area of psychology and medicine should be supplemented by members who are actively involved in these fields. This perspective, which was shown to be very well proven in the Bologna process and in quality assurance in the higher education area, should not be excluded, even if the procedures do not necessarily fall within the ESG's area of application. In the commission, more attention should be paid to professional practice for institutional procedures in Germany and Austria. The expert group nonetheless acknowledges that, in the current composition, one of the commission members was recommended by the employer associations. Overall, it is regarded as absolutely necessary that the procedure and criteria for selecting commission members are made more formalised so as to simultaneously increase transparency. With regard to the requirement for transparency from Standard 2.3, it is also necessary to incorporate the role of the expert commission in the public presentation of the procedure process.

Otherwise, according to the expert group, the fact that the EDI ultimately decides on the certification of further education programmes in the field of medical and psychology professions has no impact on the fulfilment of Standard 2.3. In the European Higher Education Area, stronger state control in relation to regulated professions is current standard. In this case, too, it should be communicated more clearly through the guidelines etc., that SAR and its commissions, as AAQ's decision-making committees, are involved in the decision-making process and in what way they are involved.

#### Follow-up

In the current guidelines, in the self-assessment and in the discussions on site, the follow-up processes for the individual formats were only discussed briefly and, in part, with some contradiction<sup>5</sup>. The expert group sees a need for action here. It would therefore like to ex-

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<sup>5</sup> According to the self-evaluation report the fulfilment of conditions is always decided on by SAR, except for in the case of accreditation procedures pursuant to MedPA and PsyPA (SA Part 1, table 3.6B p.13). In accordance with the guidelines for institutional accreditation, this step may be delegated to AAQ. (A I.4.5A, p.13). The guidelines for system accreditation and quality audits also do not describe SAR's role in follow-up processes (A I.4.5B, p. 4 and 8, I.4.C, p. 12).

pressly support AAQ and SAR in working on the follow-up processes for its procedures as soon as possible, particularly due to the different level of importance the new HEdA accreditation attaches to this procedure step. In this context, both organisations should also clarify whether experts are to be involved in the follow-up processes and, if so, at which point they should be involved. Finally, the follow-up processes should be described in greater detail in the guidelines in order to better inform higher education institutions about the overall outline of the procedures. Other than that, the guidelines could also contain a reference to the new Standard 1.10 in the ESG, which consistently highlights the responsibility of higher education institutions for successful external quality assurance procedures: Higher education institutions should ensure that follow-up activities as well as progress are taken into account in subsequent procedures.

### Recommendations

**Recommendation:** With a view to international collaboration, the selection procedure and criteria used to appoint SAR's commission members should be made more formalised. The aim should be to structurally, and therefore in a way that is not dependent on individual persons, guarantee the necessary expertise of those involved in the procedure as well as the involvement of the relevant interest groups over the long term. In addition, it should be made clear in the public presentation of the procedure which role the subject specific commissions play in the individual procedure formats. Professional practice should be better represented in the Commission for Institutional Procedures.

**Recommendation:** The different roles that AAQ and SAR actually occupy during the individual decision-making process must be presented with greater transparency in the corresponding guidelines.

**Recommendation:** The expert group explicitly encourages AAQ and SAR to work on the follow-up processes for all their procedures overall. As part of this, both organisations should also clarify whether experts are to be involved in the follow-up processes and, if so, at which point they should be involved. Finally, the follow-up processes should be described in greater detail in the guidelines in order to better inform higher education institutions about the overall outline of the procedures.

**Result:**

**Standard 2.3 is substantially fulfilled.**

## 2.4 Peer-review experts

### STANDARD:

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

### GUIDELINES:

At the core of external quality assurance is the wide range of expertise provided by peer experts, who contribute to the work of the agency through input from various perspectives, including those of institutions, academics, students and employers/professional practitioners.

In order to ensure the value and consistency of the work of the experts, they

- are carefully selected;
- have appropriate skills and are competent to perform their task;
- are supported by appropriate training and/or briefing.

The agency ensures the independence of the experts by implementing a mechanism of no-conflict-of-interest.

The involvement of international experts in external quality assurance, for example as members of peer panels, is desirable as it adds a further dimension to the development and implementation of processes.

### Documentation

- All of AAQ's procedure formats are organised in the form of peer reviews during which the evaluations from external experts are the primary focus. According to the strategy, AAQ
- 5 considers the experts a key factor for the quality of the procedures (A I.5.1.B, C). For this reason, this standard is addressed in more detail here.

#### Composition and selection criteria for expert groups

- With the exception of evaluations, the composition and selection criteria for experts are derived from the corresponding principles under (procedural) law (I.3C, F, G, H). These
- 10 are specified in the available guidelines (A I.5 A-G, NRU 13) and are commented on in the self-assessment (SA Part 1, p. 27 et seq.).

- **Institutional accreditation in Switzerland:** Expert groups are usually composed of five people. Of primary importance is experience in the area of managing higher education institutions' internal quality assurance and quality development, in teaching and
- 15 in research and also, if applicable, non-academic viewpoints. AAQ also attaches greater importance to sufficient knowledge of the Swiss higher education sector as well as an active knowledge of the procedure language. One member must come from the student body. The composition of the expert group should be well-balanced, have an international orientation it required and should take into account the gender,
- 20 background and age of the experts. (A I.4.5A, p. 9; Basis Art. 13 HEdA)
- **System accreditation in Germany:** At least five people are appointed, the majority of whom have experience in the area of higher education institution management and in the internal quality assurance practices of higher education institutions. One mem-

ber must come from the student body and another from professional practice. One member should have extensive experience in the areas higher education institution administration, curriculum design and quality assurance in teaching and learning respectively. At least one international member is appointed. (A I.4.5B, p. 6; Basis Cl. 5.5 of the rules)

- **Quality audits in Austria:** Expert groups are composed of five people. One member should be an active member of the higher education institution's administration. The other members - including one member from the student body - should have experience in the area of higher education institution management and in the internal quality assurance practices of higher education institutions. One member should contribute a non-academic perspective. AAQ also attaches great importance to sufficient knowledge of the Austrian higher education sector and on active skills in the procedure language. (A I.4.5C, p. 8)

- **Programme accreditation in Switzerland:**

Expert groups for *programme accreditation procedures pursuant to HEdA* should adequately represent both teaching and professional practice, whereby for state-regulated professions, additional special legislative requirements must be taken into account. One member must come from the student body. The actual size of the expert group and its composition depends on the faculty and on the demand of the higher education institution in terms of quality development (SA Part 1 p. 28, Basis Art. 13 HEdA). The same principles apply to the *accreditation of medical training courses* (SA Part 1 p. 28). For EUR-ACE assessments, AAQ appoints an expert group made up of three people who represent the specialist discipline, the employment market and the student body. In selecting experts, expertise in accreditation and/or evaluation procedures in the higher education sector as well as experience in curriculum design are key factors alongside proven specialist subject and educational expertise (A I.4.5F, Basis EUR-ACE Framework: Standards and Guidelines).<sup>6</sup>

For the *accreditation of medical further education courses* AAQ appoints two to five people who have specialist subject and educational expertise (Master of Medical Education or equivalent), experience in university and non-university medical further education as well as knowledge of Swiss public healthcare policy. Alongside recognised Swiss specialists, foreign specialists must also be represented (A I.4.5D, Basis Art. 27 MedPA). Similar principles apply for the accreditation of further education courses in the field of psychology. Here the expert group is also composed of three experi-

<sup>6</sup> <http://www.enaee.eu/wp-assets-enaee/uploads/2015/04/EUR-ACE-Framework-Standards-and-Guidelines-Mar-2015.pdf>

- 5 enced specialists from the field of psychology professions who come from Switzerland and abroad (A I.4.5E, Basis Art 15 PsyPA). AAQ notes that no Bachelor's or Master's students are involved in the expert group for further education courses as these focus on professional specialist training. AAQ considers it is reasonable to involve alumni instead of students as external experts (SA Part 1, p. 28).
- **Programme and institutional evaluations:** The field of evaluations is currently undergoing extensive revision.

#### Selection procedure and independence

- 10 In its self-assessment, AAQ describes the selection procedure in detail as well as the "longlist procedure" it has developed, which it uses in all quality assurance procedures. In this procedure, AAQ first determines the general profile of the expert group together with the higher education institution on the basis of the selection criteria mentioned above and then, on the basis of this, creates the so-called "longlist" with a list of names of potential experts. The higher education institution has the opportunity to express their opinion on
- 15 any possible impartiality amongst the experts before the longlist is confirmed by SAR. AAQ then selects the experts from this longlist. Through this standardised selection procedure, AAQ aims, firstly, to pay specific attention to the individual characteristics of the higher education institutions as well as their development goals and, secondly, to guarantee the independence of the evaluation.
- 20 Aside from this, AAQ contractually ensures the independence of experts and has specified criteria for independence and impartiality as part of this (A I.4.4, II.21). Alongside this, it has developed a code of conduct directed towards experts, amongst others, which contains basic information regarding integrity, independence and confidentiality (A 5.6D).

#### Preparation, supervision

- 25 Basic information for the preparatory briefings for experts is contained in the self-evaluation report (Self-evaluation report, p. 29) and in the guidelines (A I.5 A-G, DFS 13). In its current strategic planning, AAQ has set itself the goal of investing in the preparatory briefing of experts through concrete measures. (A I.5.1B, p. 7)

- 30 According to the information in the self-assessment and in the guidelines, the preparation for all formats generally takes place in two phases:

- (1) The experts first receive relevant documents and, as part of this, also receive the relevant guidelines which contain a summary of information regarding the outline and contents of the procedure.
- (2) This is followed by personal preparation, which is conducted either alongside the

assessment procedure (institutional accreditation in Switzerland, quality audit in Austria) or prior to the procedure by telephone (system accreditation in Germany, programme accreditation). In accordance with the self-evaluation report, student members of the expert groups are given additional preparation by the national student associations, whereby AAQ contributes to both the content and funding of the National Student Union of Switzerland's (VSS) activities (see the contract between AAQ and the VSS regarding this, I.4.4 C).

In terms of content, the preparation for all procedures aims to explain the role as well as both the general and concrete activities of experts. AAQ also addresses the context of the respective higher education system. At the same time, questions regarding the specific procedure are discussed (Self-evaluation report, p. 29). As evidence of this, two sample presentations for preparation for institutional accreditation in Switzerland and for a quality audits in Austria are provided with the self-evaluation report (A I.4.4.B).

### **Assessment**

#### 15 Comprehensive evaluation

In the discussions on site, the expert group was able to confirm that the agency has a very strong awareness of the particular importance of Standard 2.4. In recent years, AAQ has, through its targeted activities, been able to reach a degree of professionalism in its peer-review system that has a noticeable impact on the quality of the procedures it carries out. The expert group received the same feedback from the representatives of the higher education institutions, the experts as well as the clients and partners of AAQ.

The expert group explicitly welcomes AAQ's investment in collaboration with the VSS. This investment is particularly worthwhile and should be continued.

The expert group sees potential for development through stronger synthesis across different procedures in terms of the agency's internal standards for selecting and preparing experts, as far as this is compatible with the principles under (procedural) law. AAQ, as a learning organisation, should address this. In addition, transparency should be increased in certain other areas (see the following evaluation).

#### Composition and selection

30 AAQ can guarantee the competence and independence of experts and therefore also the overall quality of assessment procedures through the selection criteria developed on the basis of the relevant procedural provisions.

The criteria are derived, in a transparent and largely comprehensible way, from the aims of the individual procedures: For example, it has proven beneficial to include professional

practice in all programme accreditation procedures and in system accreditation in Germany as standard, whereas in certain cases, for institutional accreditation in Switzerland and for quality audits in Austria, greater value is attached to the inclusion of an external, non-academic perspective in the expert group. At the same time, the expert group suggests  
 5 once again that AAQ looks into the contribution made by professional practice in the assessment procedures and, with this in mind, invests in its collaboration with professional associations. Quality management experts should be appointed to the expert groups with caution, in order to avoid potential mutual self-assessment between the internal quality assurance systems of higher education institutions.

10 In the discussions on site, the expert group noted that AAQ promotes the inclusion of international experts in all procedure formats and, with this aim, also works together with foreign agencies (surprisingly, a statement to this effect is not included in the guidelines for quality audits in Austria). The expert group welcomes this strategic decision, which is aligned with AAQ's new, albeit not yet adopted, mission statement, emphasises independence in the assessment procedures and is also indispensable for the convergence of  
 15 the European Higher Education Area. In this context, it is positive that, according to its guidelines, AAQ pays attention to knowledge about the relevant higher education sector as well as active skills in the procedure language for almost all formats (surprisingly, a statement to this effect is not included in the guidelines for system accreditation).

20 The fact that AAQ cannot appoint any Bachelor's or Master's students for the accreditation and evaluation of further education programmes is understandable. If possible, external perspectives from the circle of active participants, which were proven to be extremely reliable during the Bologna process and in quality assurance in the higher education sector, should not be dispensed with. Even though the procedures do not necessarily fall within  
 25 the ESG's area of application, AAQ and SAR together with their partners should try to find ways and means by which these perspectives could be included in the procedures.

Selection procedure and independence

AAQ involves the higher education institutions in the selection of experts as part of the so-called "longlist procedure" without compromising the integrity of the selection. This practice, which was evidently experienced positively by AAQ and by the higher education institutions, clients and other partners of the agency, has a markedly positive effect on the development-centred elements of external quality assurance<sup>7</sup>. Nonetheless, the selection  
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<sup>7</sup> See also the progress report from the Foundation Board, p. 4.

procedure is described with varying degrees of detail in the various guidelines; here, emphasis should be placed on the greatest degree of transparency.

5 AAQ prevents possible conflicts of interest by, for example, taking great care of confirming the independence of experts itself, by allowing higher education institutions the opportunity to comment on the partiality of experts as well as through the experts' contractual declarations of their independence and impartiality on the basis of suitable criteria. The importance of independent assessments is also highlighted through the code of conduct. Nonetheless, the criteria for impartiality and independence have not yet been published and the code of conduct has only so far been published in one part of the guidelines (not  
 10 in the guidelines for system accreditation or for accreditation pursuant to MedPA or PsyPA). The expert group sees a need for action here. In addition, it might be useful if experts and higher education institutions were contractually bound to AAQ's code of conduct.

Preparation, supervision

15 Following the discussions held during the on-site visit, the expert group is satisfied with AAQ's now excellent support for experts.

The preparatory briefing of experts, which was raised as an issue during the last ENQA assessment and in the assessment conducted by the German Accreditation Council, has improved. Through its collaboration with the VSS, AAQ has made targeted investments in  
 20 the overall preparation of students. However, in practice, there are still differences between the preparatory briefings of experts from different interest groups and different procedure formats. With regard to the consistency of reports and decisions, the expert group would like to encourage AAQ to invest further in the basic preparatory briefing of experts. One possibility are workshops that cover different types of procedures, which would also  
 25 help the agency to make better use of the potential for synergy between the different procedure formats. The preparation measures for the specific individual procedures were satisfactory.

Otherwise, the expert group expressly welcomes the fact that AAQ now gives the experts detailed information regarding the context of the relevant national quality assurance systems prior to each procedure. The fact that AAQ sometimes also gives higher education  
 30 institutions the opportunity to discuss with the expert groups the particular requirements of the system from their perspective, can be seen as an example of good practice.

**Recommendations**

**Recommendation:** The agency's internal standards for selecting and preparing experts should be made consistent across the various different procedure formats. There is potential for development in, for example, the involvement of non-academic perspectives in institutional procedures and of active participants in accreditation procedures in the field of medicine and psychology. AAQ should further invest in the basic preparatory briefing of experts. Editorial discrepancies regarding the selection criteria in the guidelines should be rectified at the next available opportunity.

**Recommendation:** In order to increase transparency, both the impartiality and independence criteria for experts and the code of conduct should be published consistently. In addition, the "longlist procedure" should be described with the greatest degree of detail in all guidelines so there can be no doubts as to the – established – integrity of the selection of experts.

**Result**

15 **Standard 2.4 is substantially fulfilled.**

**2.5 Criteria for outcomes****STANDARD:**

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

**GUIDELINES:**

External quality assurance and in particular its outcomes have a significant impact on institutions and programmes that are evaluated and judged.

In the interests of equity and reliability, outcomes of external quality assurance are based on pre-defined and published criteria, which are interpreted consistently and are evidence-based. Depending on the external quality assurance system, outcomes may take different forms, for example, recommendations, judgements or formal decisions.

**Documentation**

The standards/criteria for AAQ's activities in Switzerland (accreditation pursuant to HEdA, MedPA, PsyPA) are specified with binding force in the relevant legal stipulations for the individual procedures (A I.3C, I.3G, I.3F). These form the basis for the external assessment and for the accreditation decision and are published by the competent authorities. This is similar for system accreditation in Germany, for which the German Accreditation Council defines and publishes the criteria (A I.4.1E). For quality audits in Austria the HS-  
20 QSG specifies testing areas which AAQ has set down in quality standards (A I.4.5C). The  
25 EUR-ACE standards used by AAQ are specified by the European Network for Engineering

Accreditation (ENAAEE).

With the exception of system accreditation in Germany and in basic medical training, AAQ has also published the criteria/standards for the individual formats in its guidelines (A I. 4.1D, 4.5Aff., NRU 13). For institutional accreditation pursuant to HEdA, the guidelines also contain a commentary on the standards, which are intended to assist the experts and the higher education institutions in interpreting the standards.

With regard to the consistent application of the standards/criteria, in its application AAQ refers, firstly, to the role of its employees during the on-site visit and, secondly, to the role of SAR. The employees should pay attention to the fact that the experts base their quality judgement exclusively on the relevant standards/criteria. Before making its decision, SAR reviews the integrity and consistency of the report by comparison, and may, if necessary, refer it back to the agency. (SA, S. 31)

For the future, AAQ is considering making explicit reference to the ESG in its guidelines, in order to ensure those involved in the procedure have a better understanding of the relevant assessment procedure in the overall context of quality assurance and to give the agreed principles for quality assurance greater emphasis.

### **Assessment**

The responsible institutions in Switzerland and Germany have each defined criteria for certification procedures which are publicly available. AAQ made these procedures transparent through its guidelines, amongst other means. For quality audits in Austria it draws on its own auditing standards and shows in its guidelines, in a comprehensible way, that the standards are based on the testing areas specified by the HS-QSG and in what way.

The fact that AAQ refers to the relevant reference documents in its guidelines can be regarded as an example of good practice; the reference to the ESG also is to be welcomed, too. This form of organisation could make it easier for those involved in the process to develop a shared understanding of the standards and criteria and, on this basis, to make consistent decisions across different formats. The same applies to the commentary on the standards for institutional accreditation in Switzerland, which AAQ developed.

Through the self-assessment and following the discussions held during the on-site visit, the expert group was satisfied that AAQ and SAR attach great value to consistency in quality judgements and decision-making, including in the follow-up stage. This claim is also implicitly reflected in AAQ's quality principles, in which the reliability of the procedures is specified as a quality criterion (A I.5.6A). Nonetheless, AAQ and SAR should devote more in-depth attention to the question of consistency as part of their internal quality as-

5 surance systems and should more explicitly represent the consistency requirements from Standard 2.3 in their internal quality assurance systems. Otherwise, the expert group assumes that SAR only deviates from the expert-recommended decisions with caution and with good reason. As it learned during the discussions on site, there are already guidelines for deviating decisions. These guidelines should be made transparent.

### Recommendations

10 **Recommendation:** As part of their internal quality assurance systems, AAQ and SAR should devote more detailed attention to the question of consistency and should more explicitly represent the consistency requirements from Standard 2.3 in their internal quality assurance systems.

**Recommendation:** Guidelines forming the basis for SAR's option to deviate from the expert-recommended decisions should be published.

### Result:

15 **Standard 2.5 is substantially fulfilled.**

## 2.6 Reporting

### STANDARD:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

### GUIDELINES:

The report by the experts is the basis for the institution's follow-up action of the external evaluation and it provides information to society regarding the activities of an institution. In order for the report to be used as the basis for action to be taken, it needs to be clear and concise in its structure and language and to cover

- context description (to help locate the higher education institution in its specific context);
- description of the individual procedure, including experts involved;
- evidence, analysis and findings;
- conclusions;
- features of good practice, demonstrated by the institution;
- recommendations for follow-up action.

The preparation of a summary report may be useful.

The factual accuracy of a report is improved if the institution is given the opportunity to point out errors of fact before the report is finalised.

### Documentation

20 The standards regarding the publishing of expert reports are derived from the principles under (procedural) law for the individual formats (A I.3C, F-J), are described in the guidelines (A I.5 A-G, DFS 13) and provided with a commentary in the self-assessment (SA Part 1, S. 32-35). It is also stipulated in the guidelines that higher education institutions

may always comment on the factual accuracy of the report. Examples for the reports are available on AAQ's website<sup>8</sup>.

#### Content requirements from Standard 2.6

5 On the basis of its experiences from the EQArep project, AAQ has developed a template in order to guarantee the comprehensibility and informative value of the expert reports. For this reason, more recent reports also include statements regarding the basis and the process of a procedure alongside the assessment and the recommended decision. In addition, strengths, challenges and recommendation for improving quality are summarised in a separate section. In some cases, the decisions are also printed in the published reports.

10 AAQ, which supports the experts in composing the reports, is responsible for their coherence and consistency; the reports are then reviewed by SAR.

AAQ sees potential for development in improving the accessibility of the relevant documents and information for the interested public, since the self-assessments, expert reports, decisions and follow-up measures are currently published by various committees and organisations in different places. In this area, AAQ plans on working together with others involved in the procedures to improve transparency.

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#### Formal requirements from Standard 2.6

In its self-assessment, AAQ has reached the conclusion that it cannot fully apply the formal requirements from Standard 2.6 on the basis of the provisions under (procedural) law in Switzerland for two reasons: Firstly, negative decisions are generally not published in Switzerland as this is contrary to both the political traditions and the law. Secondly, complete publication of the report, even with a positive result, would require the consent of the higher education institution concerned. As the backdrop to this, AAQ explains that Swiss law attaches particular importance to the protection of privacy rights. Expert reports could therefore only be published with a legal basis or with the consent of the higher education institutions. The HEdA contains no statutory provisions of this kind that could form the legal basis for the publication of expert reports.

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Within these framework conditions, AAQ endeavours to honour the transparency requirements from Standard 2.6. Up to now, it has successfully agreed upon the publication of reports with the higher education institutions on an individual case basis through a corresponding passage in the contracts and has the express support of the Board of swiss-universities in doing this (DFS 20). AAQ currently has no option to effect the publication of

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<sup>8</sup> See <http://aaq.ch/verfahrensberichte/>

negative decisions. It points out that, in the past, only one procedure has been judged negatively, as the higher education institutions may withdraw their application up to the point at which the decision is made (cf. Art. 16 Accreditation Guidelines (A I.3.C)).

On this basis, the current publication practice is as follows:

- 5       - For accreditation **pursuant to HEdA**, the application for accreditation by AAQ as well as the report by the expert group, given the consent of the higher education institution, are published (A I.4.5A, S.13, DFS 13). SAR, which has to publish a list of accredited higher education institutions and/or study programmes, is responsible for the publication of the accreditation decision (Art. 20 HEdA AL, A I.3.A).
- 10       - According to the guidelines, for the **accreditation of medical further education pursuant to MedPA** the report and the decision are published by the EDI and AAQ (A I.4.5D, p. 10).
- According to the guidelines, for the **accreditation of further education courses pursuant to PsyPA** the accreditation decision is published on the EDI's website and the expert reports are published on AAQ's website (A I.4.5E, p. 12).
- 15       - For **system accreditation in Germany** and **quality audits in Austria**, AAQ publishes the complete results of the procedures in the form of so-called procedure reports, which contain the reports together with the decision of SAR.

No information is available concerning the publication of the results of **evaluations**.

## 20 **Assessment**

### Content requirements from Standard 2.6

In terms of content-related considerations, the quality of the reports must be highlighted. AAQ acted on the recommendations from the previous ENQA evaluations and has, for example, worked intensively on its own publication practice as part of the EQArep project.

- 25 It is possible to see the improvement in quality in the published procedure reports. The templates are helpful in ensuring the consistent and high quality of the reports. This impression was confirmed during the discussions on site. The reports are a good decision-making basis for the decision-making committees and entities and can be used by the higher education institutions for the purposes of quality development. AAQ's experts feel
- 30 that the support they receive in composing the reports is improving.

Nonetheless, both the expert group and AAQ consider it necessary that the agency, in collaboration with its clients and partners, should work towards the cross-procedure systematisation of documents and information to be published and therefore, ultimately, towards greater transparency. During the assessment procedure, the expert group was only

able to access some of the reports and corresponding accreditation and follow-up decisions with considerable effort. In this context, it is notable that even for the procedures that are solely the responsibility of AAQ and SAR, no information regarding possible follow-up decisions (fulfilment of conditions) has so far been published.

#### 5 Formal requirements from Standard 2.6

During the design and implementation of the new accreditation system in Switzerland, AAQ and SAR were committed to the complete implementation of the international publication standards. In accordance with the expert group's evaluation, AAQ is able to meet the formal requirements from Standard 2.6 for both international procedures and procedures within Switzerland: Art. 32 HEdA specifies that the accreditation procedures must comply with international standards. From the perspective of the expert group, this regulation, which takes priority over the HEdA accreditation guidelines, also includes the implementation of international standards for publication. While the standards included in the law are to be specified in an upcoming legislative procedure, nothing stands in the way of publishing all reports in full, to which swissuniversities is also committed. As a consequence, negative decision should therefore also be published, particularly since extensive withdrawal options for accreditations applications are available. A comprehensive publication requirement also better accommodates the objectives of the new accreditation system in Switzerland. For accreditation procedures pursuant to MedPA and PysPA, no other publication standards should apply, although the procedures do not necessarily fall within the ESG's area of application. The expert group therefore considers Standard 2.6. to be fulfilled.

#### **Recommendations**

**Recommendation:** AAQ and SAR should work together with their clients and partners towards cross-procedure systematisation of their publication practice and therefore towards greater transparency. Above all in procedures that are solely AAQ's and SAR's responsibility, the relevant documents and information, including the decisions concerning the follow-up, should be published in a suitable way, e.g. as updates to the existing accreditation reports, through hyperlinks or similar.

**Recommendation:** The expert group recommends that the agency publishes all reports and negative decisions.

#### **Result**

**Standard 2.6 is substantially fulfilled.**

## 2.7 Complaints and appeals

### STANDARD:

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

### GUIDELINES:

In order to safeguard the rights of the institutions and ensure fair decision-making, external quality assurance is operated in an open and accountable way. Nevertheless, there may be misapprehensions or instances of dissatisfaction about the process or formal outcomes.

Institutions need to have access to processes that allow them to raise issues of concern with the agency; the agencies, need to handle such issues in a professional way by means of a clearly defined process that is consistently applied.

A complaints procedure allows an institution to state its dissatisfaction about the conduct of the process or those carrying it out.

In an appeals procedure, the institution questions the formal outcomes of the process, where it can demonstrate that the outcome is not based on sound evidence, that criteria have not been correctly applied or that the processes have not been consistently implemented.

### Documentation

The complaints procedure, which SAR defined as one of its first administrative acts, is set out with binding force in the regulation concerning the organisation of the Appeals Commission (OReg-AC, A 4.7 A) and is described in greater detail in the application (SA Part 1  
5 35 et seq. and Part 2 p. 31). Biographical information on the current composition of the Appeals Commission is provided (DFS 03).

Accordingly, the higher education institutions can make a complaint about the decisions made by SAR (Art. 1 OReg-AC). SAR forwards objections to the Appeals Commission,  
10 which discusses the complaints and should then provide SAR with a recommendation for the final decision.

The Appeals Commission is made up of three external members selected by SAR and two substitute members (Art. 2 OReg-AC). SAR ensured that all of the necessary skills are represented in the current composition: legal expertise, knowledge of the German,  
15 Austrian and Swiss higher education sectors as well as knowledge of accreditation methodology (SA Part 2 p. 24). Under Art. 5 of OReg-AC, the commission members are committed by the rules of abstention of the Swiss Administrative Procedure Act, i.e. in the case of personal or other partiality, they do not have voting rights (see Art. 10 APA).

The complaints procedure is published on AAQ's website and, in more detail, on SAR's  
20 website. It is referred to in the guidelines for the individual procedure types (A I.4.5A-G, DFS 13).

In addition to the complaints procedure, higher education institutions have the option, in every procedure, to comment on the partiality of the experts and to express their opinion of the report before the decision is reached.

For programme accreditation and further education courses in the field of medical and psychology professions, the complaints process is set out by the EDI (administrative proceedings) (SA Part 1, p35 et seq.).

5 There have so far been no experiences with the new appeals procedure as AAQ and SAR have not yet recorded any complains. AAQ does, however, see potential for development with regard to Standard 2.7, as the current version of the HEdA excludes the possibility of legal proceedings against decisions made by SAR (Art. 65 Para. 2 HEdA, A I.3A).

### Assessment

10 With the appeals procedure, AAQ/SAR provides a formalised complaints process for higher education institutions alongside the standard options for raising objections relating to the expert group and the report. This substantially fulfills the requirements from Standard 2.7.

15 The process of the appeals procedure is clearly described in OReg-AC and published, for example, on SAR's website<sup>9</sup>. Based on its merits, the expert group considers the procedure and the current composition of the Appeals Commission to be suitable overall for ensuring the necessary fairness towards the higher education institutions. In the long term, however, the criteria for the composition of the Appeals Commission should be described with greater binding authority, in order to make the complaints procedure more reliable. In addition, a student member could be appointed to the Appeals Commission at the next  
20 available opportunity, as the inclusion of student perspectives is one of the key European standards for quality assurance. As this perspective is currently ensured through the student members of SAR, which ultimately decides on complaints by higher education institutions, there is no urgent need for action.

25 The expert group is more critical of the limited subject scope of the complaints procedure because, on the basis of Art.1 Para. 1 OReg-AC, higher education institutions can currently only complain about SAR's decisions and not about possible errors in the implementation of the procedure. Admittedly, some points of dispute may also be resolved through the contractual relationship between AAQ and the higher education institution. In accordance with Standard 2.7 of the ESG, the expert group nonetheless considers a formalised,  
30 out-of-court procedure for conflict resolution to be clearly preferable. Action is required here. Otherwise, the agency should also bear in mind that, for accreditation procedures pursuant to PsyPA and MedPA, Standard 2.7. cannot be met through simply initiating the legal proceedings. The expert group has not made any recommendation on this point as

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<sup>9</sup> See <http://aaq.ch/die-aaq/reglemente/> and <http://akkreditierungsrat.ch/de/akkreditierungsrat/>

this procedure does not necessarily fall within the area of application of the ESG (see the notes on the area of activity above).

Overall, higher education institutions should be given clearer information on their options for raising complaints. Currently, information regarding the complaints procedure is primarily available on SAR's website, which could lead to confusion, above all amongst non-Swiss higher education institutions. In the current AAQ guidelines, information on this is very brief, in the guidelines for quality audits it is not mentioned at all. Action is also required here even though, against the backdrop of AAQ and SAR's professional working practices, the actual number of complaints is likely to remain low in future.

With regard to the new breadth of implications associated with institutional accreditation, it is unfortunate that there is no right of appeal for accreditation procedures pursuant to HEdA. Fulfilment of Standard 2.7 is, however, not dependant on this. In light of the conventional options for legal protection for accreditation procedures pursuant to MedPA and PsyPA, the expert group is surprised that clearly different standards apply for accreditation procedures in Switzerland.

### Recommendations

**Recommendation:** AAQ and SAR should further develop their complaints procedure. In terms of content, formalised complaints procedures should be established for possible errors in the implementation of procedures and the student perspective should be included in the Appeals Commission. In addition, higher education institutions should receive more transparent information about the options for raising complaints and the criteria for the composition of the Appeals Commission should be made more formalised, in order to guarantee in the long term through structural measures and therefore independently of individual persons, that those involved in the procedure possess the necessary competencies and that the relevant interest groups are involved.

### Result

**Standard 2.7 is substantially fulfilled.**

### 3.1 Use of external quality assurance procedures for higher education

#### STANDARD:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

#### GUIDELINES:

To ensure the meaningfulness of external quality assurance, it is important that institutions and the public trust agencies.

Therefore, the goals and objectives of the quality assurance activities are described and published along with the nature of interaction between the agencies and relevant stakeholders in higher education, especially the higher education institutions, and the scope of the agencies' work. The expertise in the agency may be increased by including international members in agency committees.

A variety of external quality assurance activities are carried out by agencies to achieve different objectives. Among them are evaluation, review, audit, assessment, accreditation or other similar activities at programme or institutional level that may be carried out differently. When the agencies also carry out other activities, a clear distinction between external quality assurance and their other fields of work is needed.

#### Documentation

The agency, which describes itself as a cross-sectoral accreditation agency in its self-assessment, has summarised its mission, vision, values and goals in its current strategy paper 2013-2016 (A I.5.1B) and published this on its website<sup>10</sup>. This was developed by  
5 OAQ and adopted by AAQ in a form adjusted to the conditions of the HEdA (SA Part II, p. 12). The strategy was approved by SAR pursuant to Art. 15 1b OReg-SAR. AAQ's quality principles, which are a key component of its internal quality assurance system, also serve as a form of mission statement. (A I5.6A).

10 The self-image of the agency and the development it is pursuing up to 2016 is described in the strategy paper: it aims to support Swiss higher education institutions in the development of their quality assurance systems as an external partner and, in this way, contribute to the development of a culture of quality in the Swiss academic community. Its  
15 commitment on both a national and international level is intended to guarantee the quality of the services provided and also safeguard confidence in the Swiss system of higher educational institutions internationally.

In terms of its vision, it aims to be a leading partner for quality assurance in the Swiss higher education sector, to contribute to quality development in higher education on both a national and international level and to be recognised for its high standard of quality. In its  
20 activities, the agency is guided by the following values:

- Respect for the autonomy of higher education institutions and the diverse range of

<sup>10</sup> see <http://aaq.ch/die-aaq/auftrag/>.

- disciplines;
- The priority of quality development above quality control;
  - Transparency;
  - Institutional, linguistic and cultural diversity;
- 5 - Continuous self-reflection and development as an organisation.

AAQ and SAR have started to update their strategic planning for 2016-2019. The process should be finished in December 2016. A first draft is available (A I.5.1C). In the draft, the mission, vision and the essential values were carried over and supplemented by a greater emphasis on the European Higher Education Area.

- 10 The agency's spectrum of activities is summarised in Para. III.4 both in terms of content and with a view to quantity. For the consideration of Part 2 of the ESG, the agency likewise refers to the statements above.

### Assessment

- 15 During the discussions on-site, the expert group was convinced by the agency's marked quality awareness, which it has described in its strategy papers and in the quality principles. Both papers demonstrate the agency's clear self-image with regard to its accreditation activities, which focus on quality development in the higher education sector and on the autonomy of higher education institutions. They are publicly accessible on the agency's website.

- 20 The individual procedure formats regularly conducted by the agency are derived in a clearly comprehensible way from this self-image. Overall, they largely comply with Part 2 of the ESG, meaning that Standard 3.1 is substantially fulfilled (regarding this, see the evaluations of the Standards 2.1 - 2.7 including the evaluation of the involvement of interest groups in Standard 2.2.).

- 25 As part of its strategic planning, the agency has, to a certain extent, applied time limitations to its visions, values and goals. Through this, the agency ensures that it stays able to change and to develop, which is appropriate given the particular dynamics in the higher education sector and in quality assurance. The new version of the ESG and the transition to the new Swiss Higher Education Act are perfect examples of this.

- 30 In the current draft of its strategy for 2016-2019, the agency placed stronger emphasis on its role in the European Higher Education Area. This strategic focus is plausible, since AAQ has already started to establish itself beyond the borders of its own country as a European quality assurance agency. These international activities may have a positive impact of the quality of the agency's work and/or on confidence in the Swiss system of high-

er education institutions. Moreover, with their transnational perspectives, AAQ and SAR can also make an important contribution to quality development in the European Higher Education Area as a whole. The same applies with regard to the cross-sectoral experience and knowledge the agency is gradually building up. For the sponsors and external partners of the agency, both of these things are an additional benefit that extends beyond the consideration of international standards for quality assurance. The expert group would therefore like to encourage the agency to further focus on developing and using its international expertise and its cross-sectoral insight in the coming years.

### Recommendation

10 See recommendations regarding Standards 2.1 - 2.7

### Result:

**Standard 3.1 is substantially fulfilled because Standards 2.1 to 2.7 are substantially fulfilled. The agency's mission statement meets the requirements of the standard.**

15 **3.2 Official status**

#### STANDARD:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

#### GUIDELINES:

In particular when external quality assurance is carried out for regulatory purposes, institutions need to have the security that the outcomes of this process are accepted within their higher education system, by the state, the stakeholders and the public.

### Documentation

AAQ and SAR have the HEdA as their legal basis (A I.3.A) and were established with the Federal-Cantonal Agreement on Cooperation in Higher Education (FCA-CHE, A I.3.A). As a legally dependent institution under public law, AAQ reports to SAR (Art. 22 HEdA).

20 The HEdA entrusts AAQ with the implementation of institutional and programme accreditation in Switzerland (Art. 32 HEdA). Alongside this, it may accept third-party mandates (Art. 7 Para. 2 FCA-CHE). On this basis, it conducts, amongst other things, procedures in Germany (system accreditation) and in Austria (quality audits), whereby AAQ is recognised by the relevant responsible authority<sup>11</sup>. In addition, on the basis of the Swiss Medi-

<sup>11</sup> The German Accreditation Council accredited AAQ on the basis of § 2 Para. 1 No. 1 of the German Law on the Establishment of a Foundation "Foundation for the Accreditation of Study Programmes in Germany" (Accreditation Foundation Law) and has thus granted AAQ the authority to accredit study programmes and the internal quality assurance systems of higher education institutions in Germany. Refer to the entry in the list of certified accreditation agencies in Germany at <http://www.akkreditierungsrat.de/index.php?id=aaq>, last accessed: 14 January 2016.

cal Professions Act (Art. 48 MedPA) and the Swiss Psychology Professions Act (Art. 35 PsyPA), AAQ is delegated the role of accreditation body for the accreditation of corresponding study programmes in education and further training. For accreditation and quality assurance procedures on behalf of third parties, AAQ is granted signatory authority (Art. 15 Para. 2 OReg-SAR, A I.3.D).

SAR is the joint federal and cantonal body responsible for accreditation and quality assurance within the Swiss higher education sector. According to the legal foundations, it is both an accreditation authority pursuant to HEdA (Art. 33 HEdA) and supervisory body to AAQ (Art. 22 Para. 2 HEdA). AAQ involves SAR, as its decision-making body, in all procedure formats.

### Assessment

AAQ and SAR were established on a legal basis by the responsible government bodies in Switzerland with the concrete task of conducting quality assurance procedures. It is therefore “formally recognised” by the responsible public institution. This equally applies to the implementation of quality assurance procedures for third parties.

### Recommendations

None

### Result

**Standard 3.2 is fulfilled.**

### 3.3 Independence

#### STANDARD:

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

#### GUIDELINES:

Autonomous institutions need independent agencies as counterparts.

In considering the independence of an agency the following are important:

- Organisational independence, demonstrated by official documentation (e.g. instruments of government, legislative acts or statutes of the organisation) that stipulates the independence of the agency’s work from third parties, such as higher education institutions, governments and other stakeholder organisations;
- Operational independence: the definition and operation of the agency’s procedures and methods as well as the nomination and appointment of external experts are undertaken inde-

In Austria, the Federal Minister of Science, Research and Economy authorised AAQ on the basis of § 19 Para. 2 HS-QSG, as EQAR-listed agency, to conduct audits on universities and universities of applied science pursuant to § 22 Para. 2 HS-QSG. Refer to the corresponding decree at [https://www.ris.bka.gv.at/...](https://www.ris.bka.gv.at/), last accessed 14 January 2006.

pendently from third parties such as higher education institutions, governments and other stakeholders;

- Independence of formal outcomes: while experts from relevant stakeholder backgrounds, particularly students, take part in quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Anyone contributing to external quality assurance activities of an agency (e.g. as expert) is informed that while they may be nominated by a third party, they are acting in a personal capacity and not representing their constituent organisations when working for the agency. Independence is important to ensure that any procedures and decisions are solely based on expertise.

### Documentation

AAQ is a legally dependent institution under public law with the HEdA as its legal basis (Art. 22 HEdA). It reports to SAR, which the Confederation and the cantons established as the decision-making body for accreditation and quality assurance in the Swiss higher education sector (Art. 2 Para. 2 Let. D FCA-CHE). It is involved in all of AAQ's procedure formats. For the evaluation of Standard 3.3, the (potential) influence of SHK's Higher Education Council on both institutions is also an important factor, which, as the highest-level body in education policy in Switzerland, is responsible for ensuring the nationwide coordination of activities by the Confederation and the cantons across Switzerland in the higher education sector. (Art. 10 HEdA).

The constitution and the responsibilities of the three institutions are derived from an overall picture of AAQ and SAR's organisational foundation. Of decisive importance are, above all, the HEdA, the FCA-CHE, the PReg-HSR, the organisational rules of AAQ and SAR and the representation of the procedures in the agency's guidelines.

- **Organisational independence:** In the organisational provisions of SAR and AAQ, it is laid down expressis verbis that both institutions act independently and without instructions: Art. 21 HEdA stipulates that SAR is not dependent on instructions and that its members are independent. In accordance with Art. 2 of its statutes, AAQ is professionally independent from the Federal Administration, from the cantons and from higher education institutions and other institutions within the higher education sector and, as a legally dependent institution, is only accountable to SAR. In accordance with Art. 21 HEdA, AAQ and SAR are responsible for their own organisation, SAR has at its disposal a budget for itself and for AAQ and administers separate accounts for each. (Art. 21 HEdA). SHK's Higher Education Council has reserved the right to approve all of SAR and AAQ's regulations. Staff management for SAR and AAQ is also the responsibility of SHK's Higher Education Council (Art. 3 FCA-CHE), whereby this responsibility has been assigned to AAQ via SAR with the exception of the position of Director (Art. 18 OReg-SAR). The members and the Presidium of SAR are selected by SHK's Higher Education Council (Art. 21. Para. 2 HEdA). AAQ described this pro-

cedure in detail in a letter to EQAR (letter from AAQ dated 17 March 2016, subsequently filed).

- 5 - **Operational independence including independence of the results:** With the exception of evaluations, the individual procedure formats conducted by AAQ and SAR are specified with binding effect by the respective procedural frameworks (see overview above). AAQ and SAR are involved in the (further) development of the formats in different ways, for example, as part of working groups or hearings. Within this framework, AAQ is responsible for the organisation, implementation and further development of the procedures (Art. 4 OReg-AAQ, A I.3E). As part of this, it involves SAR as  
10 its decision-making body. For example, it decides on all of the agency's guidelines and is also decision-maker in relation to the individual procedure: SAR approves the expert groups and makes the decisions in procedures conducted by AAQ. For further-education courses in the field of medical and psychology professions, the EDI has reserved the right to make the final decision regarding the accreditation and the follow-  
15 up.

SAR's decision-making modalities are stipulated in its Organisational Regulations (A I.3D). These include exclusion rules in case of personal partiality on the part of its members (Art. 5 Para. 6 OReg-SAR).

In relation to itself, AAQ considers Standard 3.3. fulfilled, although the principles for independence could be communicated more effectively and made more visible externally.  
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## Assessment

### Comprehensive evaluation

During the assessment procedure, the expert group looked into the agency's independence very intensively, as this standard was evaluated critically in the previous assessments by the ENQA and by the German Accreditation Council<sup>12</sup>.  
25

It acknowledges with appreciation how attentively all those involved in reconfiguring the Swiss accreditation system took the autonomy of action of SAR and AAQ into account in line with the international standards for quality assurance. As far as the expert group could discern, the agency, which was until recently still much more directly accountable to the  
30 Federal and Cantonal education departments, has gained independence with the new structures.

Nonetheless, the remaining (potential) influence of the agency's sponsors and clients still poses a risk to the agency's independence that should not be underestimated. In practice,

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<sup>12</sup> See ENQA Report, p. 45 et seq; AC Report, p. 25 et seq.

however, the independence of the SAR-AAQ structure is guaranteed. Ideas and recommendations for future development are included in the following evaluations concerning the organisational and operational independence of the agency.

#### Organisational independence

- 5 The expert group was able to confirm the organisational independence of SAR and AAQ in practice.

Nonetheless, the members and the Presidium of SAR are ultimately selected by SHK's Higher Education Council and therefore by the Confederation and the Cantons. SAR and AAQ's provisions under organisational law and the concrete organisation of the selection  
10 procedure nonetheless guard against any possibility that one side may exert a particular influence. Firstly, the legal basis assumes involvement by a wide range of different interest groups with a relatively large share of international experts. Secondly, SHK's Higher Education Council was advised on their selection of members by SAR's Presidium and also drew on suggestions by the various interest groups listed in the law. This prevented  
15 one-sided majority structures, which would have a negative impact on the independence of SAR and AAQ. The balanced composition of the current SAR is confirmation of this. With regard to international collaboration, the expert group recommends that the selection procedure and the criteria for the composition of SAR and its commissions are set down with greater binding force in order to further reinforce SAR and AAQ's independence.

20 SAR and AAQ's actions are to a large degree autonomous, although SAR's and AAQ's Organisational Regulations, both their Fees Regulations as well as the budget and annual accounts must be approved by SHK's Higher Education Council. With these approval conditions, which are stipulated by law and thus structurally required, SHK's Higher Education Council has far-reaching possibilities to exert influence on the organisation and  
25 working practices of SAR and therefore also AAQ. However, both institutions operate autonomously de facto, as the approval conditions are of a more formal nature. The same applies for the management of AAQ's and SAR's staff: responsibility for this is reserved by SHK's Higher Education Council for purely legal reasons (AAQ itself cannot be an employer). The expert group is surprised that SHK's Higher Education Council has reserved  
30 the right to establish, change and terminate the employment contract of the Director of AAQ. It would consider it more appropriate if these responsibilities were transferred to SAR. In the long term, it believes it would be worthwhile for the agency to further critically reflect on the (potential) possibilities for influence that are still present in discussion with SHK's Higher Education Council. This could involve a review of which approval conditions

are necessary, so as to reduce the framework set by the state to a minimum in favour of greater autonomy of action for the agency.

#### Operational independence including independence of the results

5 The independence standard establishes a link between the operational autonomy of action of an agency and the objective organisation of procedures. The expert group considers the latter guaranteed for all procedure formats conducted by AAQ, even though the sponsors and clients specify the procedures and assessment criteria. As the positive evaluation with regard to Part 2 of the ESG demonstrates, the international standards for quality assurance and, above all, the autonomy of higher education institutions have been  
10 observed. A higher degree of independence in future would of course be desirable and the agency should aim towards this. In this context, the sponsors' and the clients' regulatory competences and approval conditions, for example for accreditation guidelines pursuant to HEdA, must also be reviewed.

15 The requirements for operational independence are safeguarded because the agency – in the SAR-AAQ structure – is responsible for processes and decision-making in the individual procedure formats. With certain limitations in the accreditation of further education courses pursuant to MedPA and PysPA, it is fully responsible for the procedures it conducts (regarding the evaluation concerning the decision-making responsibility of the EDI, see Standard 2.3).

20 The exclusion rules stipulated in SAR's statutes, which also apply to SAR's commissions, ensure that decisions are made in an independent and impartial way. The statutes also emphasise that members must perform their duties themselves and not, for example, as representatives of an organisation.

25 The fact that AAQ is able to guarantee the independence of the experts in its procedures and the way in which this is guaranteed has already been evaluated in detail in relation to Standard 2.4. In this context, the expert group expressly welcomes the code of conduct developed by AAQ, which is not only directed at the expert group but also the higher education institutions and AAQ's employees. With this code of conduct, AAQ is able to make its standards with regard to independence particularly transparent. During the discussions  
30 on site, the expert group was satisfied that no other principles of conduct apply to SAR than to AAQ. It advises SAR to set down these principles in its own code of conduct or, for example, to adopt AAQ's existing code of conduct and ultimately publish this.

**Recommendations**

**Recommendation:** Selection procedures and criteria for the composition of SAR and its commissions should be specified in a binding document in order to further reinforce the organisational independence of SAR and AAQ.

- 5 **Recommendation:** The expert group advises SAR to set down the principles of conduct applicable to it in its own code of conduct or, for example, to adopt AAQ's existing code of conduct and ultimately publish this.

**Result**

**Standard 3.3 is substantially fulfilled.**

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**3.4 Thematic analysis****STANDARD:**

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

**GUIDELINES:**

In the course of their work, agencies gain information on programmes and institutions that can be useful beyond the scope of a single process, providing material for structured analyses across the higher education system. These findings can contribute to the reflection on and the improvement of quality assurance policies and processes in institutional, national and international contexts.

A thorough and careful analysis of this information will show developments, trends and areas of good practice or persistent difficulty.

**Documentation**

- 15 In the past, AAQ, or OAQ, regularly published so-called synthesis reports, which contain summaries of the key findings from the procedures it has conducted. These reports are part of the agency's internal quality assurance and are available for the previous Swiss quality audits and for programme accreditation in the field of medical training and further education (see A I.5.4 B and I.5.4 C as well as the publications at <http://aaq.ch/analysen-projekte/>).

- 20 The expansion of research-based or thematic cross-sectional analyses is the subject of AAQ's strategic planning (see A I.5.1.B, C). According to the action plan 2013-2016, AAQ's focuses here on collaboration with third parties, amongst other things. It is also actively involved in various projects accordingly. These include a research project with the Zurich University of Applied Sciences (ZHAW), in which the site visits are considered in terms of discourse analysis. Other examples include the ENQA-coordinated EQArep project on the quality of reports as well as additional thematic working groups and networks,
- 25 in which AAQ actively participates (e.g. ENQA working group on impact of quality assur-

ance, Quality Audit Network). Thematic cross-sectional analyses should be conducted in future (see A I.5.1.C).

### Assessment

5 With the synthesis reports, AAQ has developed an effective instrument for analysing the strengths and weaknesses of the procedures it conducts and to detect areas for potential development. In the reports, not only the procedure components are considered methodologically, AAQ also looks into discernible trends and developments in the Swiss higher education landscape. It incorporates feedback from the higher education institutions, the experts and other relevant interest groups and thus increases the acceptance for the results as well as their relevance.

10 AAQ refers to the findings from the thematic analyses in collaboration with its sponsors and external clients in a satisfactory way when reviewing the individual procedure formats. Nonetheless, it is apparent that the synthesis reports only partially correspond to the follow-up processes so far. In this area, AAQ should consistently further develop its analyses, especially because conditions and recommendations are now integral components of accreditation procedures in Switzerland.

15 The fact that, in the past, AAQ consciously decided to collaborate with external (research) instructions speaks for the quality of analyses and their thematic breadth. Thematic analyses are resource-intensive. The experts therefore suggest that, in future, AAQ also makes use of external expertise through targeted cooperation here.

20 The experts note that AAQ does not undertake specific systematic analyses of the procedures in Austria and Germany in its self-assessment, although this was recommended in previous assessments conducted by the ENQA and the German Accreditation Council.<sup>13</sup> They can understand that, in terms of focus, AAQ concentrates on its procedures in Switzerland. In future, these procedures will be AAQ primary field of activities, and independent analyses of procedures conducted in other countries would not be very representative due to the low number of such procedures. However, AAQ should not disregard its international activities. According to the expert group's estimation, the impressions from the various procedures, for example in the planned cross-sectional analyses, can be combined well with one another as the formats are similar in terms of methods, and to a certain degree, content. In this way, the agency's international activities could be used in a more targeted fashion.

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<sup>13</sup> See ENQA Report, p. 35; AC Report, p. 22.

**Recommendations**

**Recommendation:** The agency should further develop its thematic analyses and should, in future, deal with the follow-up processes for the individual procedure formats more intensively as part of this. International activities should be incorporated into the thematic analyses in a visible way, for example, through planned cross-sectional analyses.

**Result**

**Standard 3.4 is substantially fulfilled.**

**3.5 Resources****STANDARD:**

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

**GUIDELINES:**

It is in the public interest that agencies are adequately and appropriately funded, given higher education's important impact on the development of societies and individuals. The resources of the agencies enable them to organise and run their external quality assurance activities in an effective and efficient manner. Furthermore, the resources enable the agencies to improve, to reflect on their practice and to inform the public about their activities.

**10 Documentation**

Pursuant to Art. 21 section 6 HEdA, SAR has at its disposal a budget each for itself and for AAQ as well as separate accounts, which are approved by SHK's (Swiss Rectors' conference) Higher Education Council (Art. 2 section 2 Let. BFCA-CHE). The equipment of AAQ and SAR is described in detail in the self-assessment along with references to the relevant legal bases and additional annexes (esp. SA Part 1, p. 43 et seq., Part 2, p. 28 et seq.). AAQ's strategic planning, which summarises the planned activities for the coming years, must also be consulted (A I.5.1.B, C). During the on-site visit, the expert group was also able to gain a direct impression of the equipment and to clarify the few remaining unanswered questions.

**20 Financial resources**

AAQ has an annual budget of CHF 2 million at its disposal (SA Part 1, p. 44). For SAR, an additional CHF 416,000 is accounted for in the budget for the current year (A I.5.5.B). Since HEdA came into force, the agency has been legally required to issue invoices for cost-covering fees for the quality assurance procedures conducted (Art. 35 HEdA, A I.3.C). The fee tariffs are regulated in SAR's fees regulations for procedures pursuant to HEdA as well as for services performed for third parties (A I.5.5C). In the fee tariffs direct costs (expenses, fees) and indirect costs (amount of work including infrastructure contri-

bution and operating costs) are taken into account. Separate costs for SAR are not accounted for there. Information on this can be found from the guidelines on the recognition of agencies for accreditation pursuant to HEdA (recognition guidelines) which meantime has been adopted by SAR.<sup>14</sup>

- 5 The Confederation and the Cantons each pay half of AAQ and SAR's costs provided these costs arise out of the fulfilment of their duties pursuant to HEdA and are not covered by fees (Art. 8 Para. 1 Let. B FCA-CHE, A I.3.B). The revenue from procedures carried out on behalf of third parties is therefore repaid to the owners (the Confederation and the Cantons) as a reduction in expenses (SA Part II, p. 26). This is because AAQ is subject to
- 10 the Swiss Subsidies Act: it may have neither equity nor record profits (SA Part II, p. 26).

This basis for AAQ and SAR's current budget is a multi-year plan with a forecast of the accreditation and evaluation procedures expected up to 2022 (A I.5.5B).

#### Human resources and internal organisation

- AAQ employs 15 people in three staff categories (directors, project managers and administrative staff: 10.4 full-time equivalents in total: as of March 2016: see DFS 05). All employees have permanent employment contracts. Additional staff is occasionally employed in connection with individual projects or with fixed-term employment contracts, in order to be able to respond to increased workloads. The tasks and responsibilities of the employees are documented in the job descriptions and are described in the application (SA Part
- 15
- 20 1, p. 11).

- AAQ currently also employs the manager of SAR's head office (0.8 FTE). She has no further tasks within the agency and reports directly to SAR's President. Where required, she is supported by AAQ's administrative staff. (SA Part 1, s. 12) For this, SAR's budget has funds amounting to CHF 240,000, in AAQ budget this is accounted for as a reduction in
- 25 personnel expenses (A I.5.5.B).

AAQ has recently revised its internal organisational structures (SA Part 1, p. 9). Employees responsible for each format have been nominated for the individual procedure formats and new responsibility structures have been established for cross-departmental functions such as internal quality assurance or other internal services.

- 30 AAQ's staff recruitment and development measures are described in detail in the application (SA Part 1, p. 43). For the latter, management discussions with the Director, weekly

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<sup>14</sup> The recognition guidelines are not included with the self-documentation. They are available online at: <http://akkreditierungsrat.ch/download/Rechtliche%20Grundlagen/Anerkennungsrichtlinien-Agenturen.pdf>, last accessed 22 March 2016.

team meetings and training courses are held. In addition, employees took part in (inter-) national conferences, organised workshops and events. There is an annual budget for employee further training: in 2015/16, CHF 20,000 is reserved for each year (A I.5.5.B).

#### Material setup

- 5 The offices in Bern (total office space of around 180 sq.m. alongside conference rooms for meetings and workshops) are equipped with modern and suitable office infrastructure. The agency has its own protected data network with the corresponding servers. In addition to desktop PCs, employees are also provided with laptops. Furthermore, AAQ also maintains a reference library and an archive.

### 10 **Assessment**

#### Financial resources

- With a budget of 2 million francs, the agency has been able to perform its duties in recent years. According to AAQ's financial planning, expenses are offset by revenues for the years 2015/2016, although staff, operational and material expenses will largely be carried  
15 forward. This demonstrates that the agency is adequately equipped, even with regard to the new fee financing model.

- Only a limited evaluation of the adequacy of SAR's own budget is currently possible, as there are no available data from previous experience so far. The expert group currently considers it assured, that SAR can perform its supervisory function towards AAQ as well  
20 as its duties as its decision-making body as intended. In the calculation of future budgets, the costs for the currently developing internal quality assurance, in addition to the expenses for communication, should be taken into account. This is because the current budget only records the costs for the fees and expenses for SAR members and for SAR's head office. Otherwise, the foreseen budget may be proved too tight as soon as other agencies  
25 are certified for accreditation procedures in Switzerland. The agency should therefore keep in mind the adequate financing of SAR's regulatory duties, as this has a direct impact on the quality of AAQ's work. In this context, AAQ and SAR should put greater effort into establishing clear separate costing in order to avoid the impression that cross-subsidisation are taking place. In the newly liberalised Swiss accreditation system, this  
30 could have unwanted effects that would distort competition. In this context it was apparently noticed, that in contrast to SAR Recognition Guidelines, the costs for SAR's role are currently not reported separately in the fees regulations.<sup>15</sup>

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<sup>15</sup> As shown in the Recognition Guidelines, for accreditation procedures pursuant to HEdA, SAR charges a fee, at least from agencies other than

In combination with the strategic planning, the multi-year plan, which forms the basis for AAQ and SAR's budget, is a good starting point for comparably reliable financial and human resources planning. Both should be continued accordingly in future. The size of the agency and its internal structure is appropriate for the workload AAQ is expecting in the coming years. However, based on the current framework conditions, it is difficult to estimate when exactly the higher education and teaching institutions will actually request accreditation procedures and whether AAQ and SAR are at risk of being overloaded. The expert group recognises that both institutions are limited in the extent to which they can intervene on this point. With the cooperative relationship with other agencies such as AHPGS and the fixed-term employment contracts, AAQ and SAR have seemingly exhausted their options here. It therefore suggests that AAQ and SAR discuss additional methods to manage this with its sponsors, clients and partners in Switzerland. It might be possible, for example, to agree on times for accreditation procedures with the higher education institutions in advance or to lay down transition rules for expired accreditation terms or similar. At the same time, it remains to be seen, at what extent the opening up of the Swiss accreditation system is progressing.

#### Human resources and internal organisation

The well-developed human resources management within AAQ impressed the expert group. Throughout the discussions on-site, it has been convinced that AAQ had made worthwhile investments in this area in recent years. The employees are exceptionally committed and very well qualified in terms of both professional and general skills. This is demonstrated by the available CVs as well as the feedback from the higher education institutions, AAQ's experts and AAQ's sponsors, clients and other partners. In the current composition, the team is distinguished by the employees' broad diversity of academic education as well as their backgrounds from a range of different regions. The three official languages of Switzerland are represented in the team.

Through attractive and flexible employment conditions, AAQ is able to achieve comparatively low staff turnover. These efforts are ultimately reflected in the high-quality design and implementation of the procedures, including the underlying support and cross-departmental functions.

In establishing the new organisational structures within AAQ and in the structured further development of its human resources management, the agency has been able to strike the right balance for itself at this time between formalisation on the one hand and a culture of

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AAQ, equalling 10 percent of the overall procedure price pursuant to the fees regulations for each accreditation decision. See Art. 10 Para. 2 of the Recognition Guidelines.

dialogue on the other. The expert group would like to encourage AAQ to consistently further pursue this organisational change. As part of this, the support and cross-departmental functions currently being developed, including the various database solutions, should be better integrated into the working processes and, if necessary, further developed. In addition, the options for further education could be more structured, as was already recommended to the agency in 2009. Currently, this largely depends on the employees' own initiative.

#### Material setup

Overall, AAQ and SAR's material setup can be evaluated as appropriate. The open-plan office creates an atmosphere for open dialogue, which corresponds to AAQ's way of working. Flexible working (time) models ensure that working process is not disrupted. However, there should be more private space within the offices. In addition, efforts to increase the flexibility of working conditions should be pushed forward by, for example, introducing "shared desk" models and home office plans to the existing systems.

#### 15 Organisation of SAR's head office

The expert group currently considers it constructive that SAR's head office is situated within AAQ. This integrated solution, which is not uncommon for newly established institutions in the higher education sector, guarantees SAR's capacity to act as well as the flow of information between AAQ and SAR. This structural decision was made with adequate awareness of the potential problems. Both institutions endeavour to represent the different roles in the allocation of duties and in the organisation of work. The process descriptions, which are currently being developed by SAR, will further clarify the different roles. This will be even more decisive when, in future, other agencies are recognised for accreditation procedures in Switzerland. It may then be necessary to review the structural organisation of SAR's head office in AAQ.

Otherwise, the expert group assumes that not only personnel expenses but also material and operational expenses are taken into account in the expenses reserved in the budget for SAR's head office. This should be demonstrated more clearly in future financial planning, to avoid giving the impression that cross-subsidisation is taking place.

#### **30 Recommendations**

**Recommendation:** Attention should be paid to ensuring that SAR's regulatory duties are fully financed. For this purpose, AAQ and SAR should endeavour to establish clearer separate costing and in future budget plans should report, for example, the material and operational costs for SAR head office separately, taking overhead costs into account (e.g.

Internal quality assurance, communication etc.).

**Recommendation:** In order to ensure the greatest possible degree of planning security for AAQ and SAR, the multi-year plan, which forms the basis for the budget for both institutions, and the strategic planning should be continued. The agency should try to establish additional control options that allow AAQ's activities to be planned on a reliable basis.

**Recommendation:** The path of organisational development taken by the agency should be continued consistently. The support and cross-departmental functions, including the various database solutions, should be better integrated into the working processes and, if necessary, further developed. In the human resources management plan, options for further education and for more flexible working conditions should be better structured.

## Result

**Standard 3.5 is substantially fulfilled.**

### 3.6 Internal quality assurance and professional conduct

#### STANDARD:

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

#### GUIDELINES:

Agencies need to be accountable to their stakeholders. Therefore, high professional standards and integrity in the agency's work are indispensable. The review and improvement of their activities are ongoing so as to ensure that their services to institutions and society are optimal.

Agencies apply an internal quality assurance policy, which is available on its website. This policy

- ensures that all persons involved in its activities are competent and act professionally and ethically;
- includes internal and external feedback mechanisms that lead to a continuous improvement within the agency;
- guards against intolerance of any kind or discrimination;
- outlines the appropriate communication with the relevant authorities of those jurisdictions where they operate;
- ensures that any activities carried out and material produced by subcontractors are in line with the ESG, if some or all of the elements in its quality assurance activities are subcontracted to other parties;
- allows the agency to establish the status and recognition of the institutions with which it conducts external quality assurance.

## 15 Documentation

### Internal quality assurance in AAQ

As evidence, AAQ has submitted so-called "quality assurance paper" (A I5.6A). This contains a description of the key quality principles as well as the seven components of the internal quality assurance and enhancement system. In addition, the paper lists the processes for implementing and assuring the quality principles and specifies responsibilities

for internal quality assurance. The quality paper is published on AAQ's website as a draft version.<sup>16</sup> It was adopted in December 2014 during AAQ's team meeting and was acknowledged by SAR in its supervisory function in December 2015.

- 5 - **Understanding the quality and its principles:** AAQ sees itself as a learning organisation, which places the same quality requirements on its own work results and processes, as it would place to the higher education institutions. AAQ's work should be efficient, reliable and of high quality and should also comply with the goals set in AAQ's strategy and with the legal bases. The results of AAQ's work should be informative and transparent, in order to secure the trust of external stakeholders. External and internal feedback loops are intended to support quality development in all  
10 working areas of AAQ, whereby all processes are subject of a continuous improvement process.
- **Responsibilities:** Quality assurance, as one of the four cross-departmental functions, is a key management duty (A I5.6A). As an administrative department, the employee responsible for this cross-departmental function (SA Part 1, Fig. 3.5A, p.11)  
15 coordinates it. All employees should be involved and bound to the internal quality development and assurance (A I5.6A). In some cases, a working group is appointed to develop concrete suggestions for quality development in AAQ. SAR is also involved whilst it reviews the composition of expert groups as well as the applications for accreditation and the award of the quality seal of AAQ.
- 20 - **Implementation:** To implement the quality principles, AAQ refers, amongst other things, to its organisation handbook, which describes the quality assurance processes for for procedure formats and for all cross-departmental functions. In addition to this, AAQ has several additional formal and informal tools at its disposal. These include  
25 weekly team meetings, four in-depth topic meetings annually, employee meetings, feedback processes for experts and higher education institutions as well as a database, which lists all planned, ongoing and completed procedures. Regular external evaluation is also an integral part of the agency's quality assurance. Feedback forms for higher education institutions and for experts are provided in an annex (A I.5.4A).

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AAQ reports about the results in expert committees, in its annual report, the newsletter and synthesis reports, which are also published on its website.<sup>17</sup>

AAQ sees potential for development in the improved performance of its internal data net-

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<sup>16</sup> see <http://aaq.ch/die-aaq/auftrag/>

<sup>17</sup> see <http://aaq.ch/publikationen/>

work, in order to accelerate processes and reduce the risk of errors. The further development of the internal quality assurance system forms part of the current strategic planning (A I.5.1B, p. 6).

Internal quality assurance in SAR

- 5 According to Art. 16 OReg-SAR, the Swiss Accreditation Council also has procedures in place for quality assurance of its own activities (A I.3.D). These procedures are currently being developed. As an initial element, process description for institutional accreditation has been developed (DFS 6).

Integrity

- 10 Alongside the principles in its internal quality management system, AAQ has also developed a code of conduct for its assessment procedures (A 5.6D). The principles of conduct described there, which are directed at higher education institutions, expert groups and employees of AAQ; address the aspects of trust, integrity, confidentiality and discretion. The experts also declare their independence through a mandate agreement: a template of  
 15 this has been provided (A I.4.4A).

Involvement of third parties

- In the area of accreditation pursuant to PsyPA, AAQ has for a long time collaborated with the Accreditation Agency for Study Programmes in Health and Social Science (AHPGS), which has been certified by the German Accreditation Council as well as by the European  
 20 Register and is a full member of ENQA. This collaboration is based on a cooperation agreement (DFS 12).

**Assessment**

Internal quality assurance in AAQ

- In recent years, AAQ has been able to improve its system for internal quality assurance.  
 25 The system has been formalised through the quality paper and the structures have been described therein. Responsibilities have been set out and the values, upon which the internal quality assurance is based, such as respect, loyalty and transparency, have been specified. At the same time, the fact that formalised processes and informal elements are combined, corresponds to AAQ's profile and to its culture of quality. All areas of activity  
 30 are involved in the quality assurance system in a suitable way. Publication of the current version is still pending.

Through the “tool box” which contains different internal and external feedback processes, he AAQ is able to judge the quality of its work and introduce measures for improvement

based on this. During the discussions on site, the expert group was satisfied with the system's efficacy: for example, internal organisational structures and human resources management have been specifically further developed and processes for selecting experts and for composing the reports have been improved. It is evident that AAQ has also used  
5 the results of regular external evaluations as part of its internal quality for its own development. This is clearly reflected in the professionalism shown by AAQ. All loops are closed and AAQ is able to guarantee a consistently high level of quality in its procedures.

AAQ has kept its internal quality assurance system streamlined and concentrated on a few, but nonetheless essential, components. The dynamic cross-references to the strategic  
10 planning and the organisation handbook are of key importance. With these references, AAQ has achieved a high degree of flexibility, which is necessary, for example, in the transition phase to the new HEfA framework conditions or with regard to the different procedure types. At the same time, this flexibility entails a certain degree of risk if the individual tools do not work well together. It is therefore essential that AAQ and SAR regularly  
15 ensure the currentness and implementation of the activities and goals described in the strategic planning. The strategic planning should also be developed through a possibly structured and transparent way, as it shapes the work carried out by the agency. Both should be integral parts of the internal quality assurance system. The organisation handbook, which AAQ's team refers to upon need, should also be kept up-to-date.

During the on-site visit, it became clear that the internal working group for quality assurance is composed of members of AAQ's team. They meet whenever a need for development is identified in the team meetings. The expert group would prefer AAQ to involve interest groups in this process as it is currently the case in SAR. In terms of content, the working group could discuss the consistency of assessments and decisions in relation to  
25 the follow-up processes, in their next meeting. Further potential for development lies in the creation of a more integrated, cross-format quality assurance system. This could be feedback rounds in workshop sessions with higher education institutions and expert groups from different procedures formats.

It appears positive that AAQ not only makes its internal quality assurance system transparent for a wider public, but also, where possible, its results. Correspondingly, the agency should also report on the implementation of strategic planning.  
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#### Internal quality assurance in SAR

It is understandable that SAR, as a newly founded organisation, does not yet have its own developed quality assurance system. The expert group has observed SAR, incorporated  
35 into AAQ's quality assurance system where it acts as the decision-making body and the

driving force behind the agency. However, SAR's regulatory duties may in future require a stronger distinction between the two institutions in this respect. Due to its long experience in this field, AAQ should support SAR, at least during the initial phases, in developing and implementing suitable quality assurance tools. It would, for example, be conceivable for  
 5 AAQ and SAR to form a joint working group for quality assurance, which would also improve involvement of interest groups in internal quality assurance of AAQ. Additional resources may be required for this.

Integrity

10 The criteria developed by AAQ in its Expert Contracts and in its code of conduct are suitable, in order to assure, that the representatives from the higher education institutions, the expert groups and AAQ's employees behave with integrity. Both of these have already been evaluated positively in connection with the Standards 2.4 and 3.3.

15 During the discussions on site, the expert group was convinced that no other principles of conduct apply to SAR than to AAQ. It advises SAR to set down these principles in its own code of conduct or, for example, to adopt AAQ's existing code of conduct and ultimately publish this.

Involvement of third parties

20 The quality and integrity of AAQ's work are guaranteed in the cooperation with AHPGS. Through the cooperation agreement regarding the implementation of outside evaluations of further education courses pursuant to PsyPA, AAQ binds AHPGS to its own guidelines and therefore to its own quality standards. The detailed responsibilities, services and remuneration are specified in the contract, whereby AAQ reserves overall responsibility. For the future, it is suggested that conflict resolution processes supplement the contracts. So far, only the place of jurisdiction has been agreed upon in the existing contract.

25 **Recommendations**

**Recommendation:** With the involvement of all relevant interest groups, the internal quality assurance system should be further developed into a cross-format quality assurance system. The strategic planning and its implementation should form an integral part of the internal quality assurance system. The responsibility for the quality of decisions, including  
 30 for follow-up processes, should be described in a more explicit way. Processes should be developed and serve to maintain the consistency of the decisions.

**Recommendation:** The expert group advises SAR to set down the applicable principles in its own code of conduct or, for example, to adopt AAQ's existing code of conduct and ultimately publish it.

**Result**

**Standard 3.6 is substantially fulfilled.**

**3.7 Cyclical external review of agencies**

**STANDARD:**

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

**GUIDELINES:**

A periodic external review will help the agency to reflect on its policies and activities. It provides a means for assuring the agency and its stakeholders that it continues to adhere to the principles enshrined in the ESG. .

**5 Documentation**

Since its foundation in 2001, the agency has undergone three external assessments, during which compliance with the ESG and with the Accreditation Council’s criteria were evaluated (2006, 2009 and 2011, see SA Part 1, Tab. I.5.7A). External assessment forms part of the agency’s internal quality management system (A I.5.6A).

**10 Assessment**

AAQ has demonstrated that it has undergone external assessment in relation to its compliance with the ESG at least every five years. Such assessments are not simply an end in itself for AAQ, but they use it for the purposes of quality development in line with the internal quality assurance system (see above regarding Standard 3.6 in addition to the additional notes in the appraisal regarding parts II and III of the ESG). The binding inclusion of such evaluations in the agency’s quality assurance system also testifies to this: with this, AAQ has also addressed one of the recommendations from the last assessment by the German Accreditation Council (AC Assessment, p. 29).

15

**Recommendations**

20 None

**Result**

**Standard 3.7 is fulfilled.**

**V. Assessment concerning the criteria from the Accreditation Council****Criterion 2.1: Self-image and understanding of the accreditation task**

**2.1.1 The agency has an openly documented understanding of quality, from which it derives the basis of its accreditation activities. It focusses its activities on the objective of enhancing quality and takes as its basis the higher education institutions' primary responsibility for the profile and quality of teaching and learning.**

**Documentation**

*See Standard 3.1 above regarding the mission statement.*

**5 Assessment**

The agency's self-image meets the requirements of Criterion 2.1.1 and is evaluated in detail under Standard 3.1 of the ESG.

**Recommendations**

None

**10 Result**

**Criterion 2.1.1 is fulfilled.**

**2.1.2 The agency's accreditation activities span different types of higher education institutions and, in certification for programme accreditation, also cover different disciplines.**

**Documentation**

AAQ is responsible for all educational institutions in the Swiss higher education sector (federal institutes of technology, public and private universities, universities of applied science, and universities of teacher education). Up to the end of 2014, it conducted programme accreditation procedures as OAQ in Swiss universities of applied science in all disciplines, from engineering and natural, social and economic sciences to music and art. In line with the requirements of the new HEdA, AAQ will also conduct programme accreditation procedures. Subject to MedPA and PysPA, AAQ is active in the areas medicine, dentistry, pharmacy, veterinary medicine, chiropractic and psychotherapy. AAQ has specified one of its values as respecting and taking into account the diversity of these disciplines (A I.5.1.B, C).

**Recommendations**

None

**25 Result**

**Criterion 2.1.2 is fulfilled**

**Criterion 2.2: Structures and procedures**

**2.2.1 For certification for programme accreditation and/or system accreditation, the agency demonstrates binding internal structures and procedures, which guarantee the correct and consistent application of the “Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation” in its current version. The competences and responsibilities of the institutions, as well as their staffing, are governed appropriately and by law.**

**Documentation**

AAQ would like to conduct only system accreditation procedures in Germany (SA Part 2, p. 15). It has, however, also requested certification for programme accreditation.

- 5 Alongside AAQ and its employees, SAR, its commissions for institutional procedures in Germany and Austria, the Appeals Commission (complaints commission), the experts and SAR’s head office are also involved in system accreditation procedures. The Commission for Institutional Procedures replaces the former Accreditation Commission of OAQ.

10 The procedures are based on the guidelines for system accreditation (A II.12) in addition to further resolutions by SAR on the organisation of procedures (e.g. by the commission, A I.4.3B). All processes, connected to the system accreditation procedure, are presented in AAQ’s organisation handbook, which is reproduced in the application with selected screenshots (SA Part 2, p. 16 et seq.). In its application, AAQ also presents an outline of the procedures for system and programme accreditation in line with the procedure rules  
15 set out by the German Accreditation Council (SA Part 2, p. 18-22). For programme accreditation in Germany, the agency has its own guidelines (A II.13).

AAQ has submitted the model contracts with higher education institutions and with the expert groups as well as information on the current composition of its bodies, committees and head office, which are required for certification for system accreditation (A II.16, DFS  
20 1-3, 5, 15 and letter from AAQ dated 17 March 2016).

**Assessment**

OAQ, as AAQ’s predecessor institution, has demonstrated in the past accreditation period that it has a thorough understanding of the German accreditation system and of the guidelines to be applied in system accreditation. The current application and the progress report  
25 by the Board underline this impression.

Through the comprehensive reform process for quality assurance and accreditation in Switzerland, the structures of AAQ have changed considerably in comparison to OAQ. The agency no longer has its own committee structure, but instead involves SAR including its internal Commission for Institutional Procedures and its Appeals Commission. SAR  
30 and/or its commissions approve the expert groups, review the procedure reports and de-

cide on accreditation and, where applicable, on the fulfilment of conditions. In addition, SAR stipulates the principles for organising the procedure by, for example, approving AAQ's guidelines and other fundamental decisions (e.g. via the internal commissions).

5 This structure, which is, in a sense, stipulated by the new framework conditions under organisational law for accreditation in Switzerland, is understandable and sustainable (see above Standard 2.2 ESG). In principle, this structure allows the agency to demonstrate the correct and consistent application of the rules by the German Accreditation Council. The responsibilities of the different bodies and their staffing are evaluated appropriately and in connection with Part 2 of the ESG (see in particular the ESG Standards 2.2 - 2.5).  
10 The following evaluations regarding this and other criteria are therefore limited to key statements for the certification of system accreditation and, above all, to points that were identified as requiring clarification during the assessment procedure. Overall, the expert group assumes that the agency uses the ideas and suggestions from its assessment regarding the ESG for quality development in relation to accreditation procedures in Germany.  
15 ny.

#### Certification for system accreditation

- **Binding organisation of procedures:** In the discussions on site, the expert group received the impression that AAQ and SAR currently work well together as a unit in conducting system accreditation procedures.

20 In addition to the statutory principles and AAQ and SAR's Organisational Regulations, the agency has set binding regulations concerning the organisation of its system accreditation procedures. However, it is not yet clear from the guidelines that SAR has adopted them and will apply them. The expert group considers this necessary due to the legal independence of SAR, or rather the legal dependence of AAQ (see Criterion  
25 2.3.1 regarding the evaluation concerning legal entity status).

Through the documents filed subsequently, the expert group could be convinced that SAR and its commissions are staffed with competent employees (see the evaluations concerning the Standards 2.2 et seq. and the ESG regarding this). The foundation of the System Accreditation Commission is appropriate in terms of both effectiveness  
30 and efficiency. Additional subject-specific commissions are not necessary, as the agency ensures the technical and professional expertise for system accreditation and, above all, for the corresponding sampling components, very well with the expert groups. In the interests of ensuring the greatest possible reliability during the accreditation period, the selection procedure and criteria for SAR and its commissions have  
35 to be more formalised (see also the evaluation concerning the two subsequent partial criteria regarding this). Formalisation on a non-legal level is sufficient in order to

achieve the level of commitment required in Criterion 2.2.1. In addition, the role of the subject-specific commissions must be included in the public presentation of the procedures. Its activities have so far been governed solely by the council's internal meeting documents (A I.4.3B, II.14).

- 5 - **Composition of contracts with the higher education institutions:** AAQ has signatory authority for procedures carried out on behalf of third parties and therefore also for system accreditation (Art. 7 Para. 2 FCA-CHE, A II.2). On this basis, it concludes contracts with the higher education institutions, which are of decisive importance in the German accreditation system. As shown by the submitted model contract, SAR is
- 10 not currently involved in composing the contracts with the higher education institutions and the accreditation decision is not the part of the specification of services. As a result, the higher education institutions have no guarantee regarding the decision and no options for legal protection. The agency must act here, although the legal independence of SAR must be taken into account in an appropriate way.
- 15 Otherwise, the expert group was surprised to note from the self-evaluation report and the information in the guidelines that AAQ does not conclude contracts with the higher education institutions after the final certification for system accreditation and therefore not during the preliminary assessment (SA Part 2, p. 18 and A II.12). However, the provided model contract does verify that AAQ incorporates the preliminary assessment into the contractual negotiations in compliance with Cl. 5.1 of the rules. Accordingly, the higher education institutions should be informed about this through the
- 20 guidelines.
- **Selection of expert groups:** The expert group cannot conclusively judge the extent to which AAQ's so-called "longlist procedure" conflicts with the German Accreditation
- 25 Council's rules of procedure. However, they have dealt with the procedure extensively and explicitly evaluated it in a positive way in relation to Standard 2.4 ESG (see above). The independence of experts is guaranteed. As far as the expert group is aware, the Accreditation Council wishes to discuss, and potentially ease the guidelines regarding the higher education institutions' right to make suggestions in course
- 30 of the upcoming revision of the rules. There will be therefore no recommendations for conditions in this regard. As an alternative, the expert group recommends the agency to describe the "longlist procedure" as transparent as possible within the guidelines in order to avoid any doubt about the - established - integrity of the selection of experts.
- **Statement by the higher education institution regarding the report:** Contrary to
- 35 Cl. 5.11, AAQ provides higher education institutions with the report together with the expert-recommended decisions and gives them a possibility to write a statement on it (SA Part 2, p.22). The expert group, just like AAQ, believes this practice takes into

account the principles of legal hearing and the transparency requirements from the Standards 2.6 and 2.7. As far as the expert group is aware, the Accreditation Council would like to discuss relaxation of the relevant guidelines in the course of the upcoming revision of the rules. Therefore, no recommendations for conditions have been made in that regard.

- **Decision-making procedure including follow-up:** According to the guidelines for system accreditation, AAQ is involved in decision-making with an independent role: it requests the adoption of a decision from SAR on the basis of the report and the statement by the higher education institution (A II.B, S. 8) and, in doing this, is entitled to deviate from the recommendation made by the expert group for a good reason just like SAR (SA Part 2 p. 27). On this point, the expert group noted during the assessment procedure that AAQ only forwards the report together with the expert-recommended decision to SAR for the decision-making procedure (for more detailed information on this see ESG Standard 2.3). The guidelines are misleading here. The same applies for decisions regarding the fulfilment of conditions, which contrary to the presentation in the guidelines, is also a responsibility of SAR (A II.12, S.4 u. 8, for more detailed information on the evaluation see ESG Standard 2.3). In addition, the justification and decision rules are not reproduced fully in the guidelines. There is no information that says that accreditation procedures can be suspended and must always be justified - i.e. not only in the case of negative decisions (cf. Cl. 5.12 et seq. of the rules).

For further recommendations on decision-making procedures and on the follow-up, refer to the evaluations concerning Standards 2.3 (Implementing processes) and 2.5 (Criteria for outcomes).

#### 25 Certification for programme accreditation

It is understandable that AAQ does not wish to carry out any programme accreditation procedures in Germany for strategic reasons. Firstly, above all institutional procedures such as system accreditation facilitate a transfer of knowledge and experience between higher education systems, where programme accreditation conducted in Germany is not likely to make any substantial contribution to the agency's achievement of its goals. Secondly, according to the agency's own information, it does not have the sufficient human resources. (SA Part 2, p. 15)

Based on the German Accreditation Council's current regulations, the expert group does note that AAQ has requested certification for programme accreditation and therefore must comply with all of the relevant existing guidelines if it would like to conduct system accreditation procedures at higher education institutions with state regulated study pro-

grammes without the involvement of additional agencies.<sup>18</sup> With regard to international collaboration, however, it suggests that the Accreditation Council should revise these strict guidelines. From the expert group's perspective, it would be perfectly conceivable to certify the agency to conduct system accreditation procedures including the corresponding random sampling of state regulated study programmes without deciding on approval for the programme accreditation at the same time. The following two reasons support this: firstly, during the assessment procedure, the agency demonstrated that it can reach decisions regarding the quality of study programmes in accordance with its legal mandate in Switzerland. The agency possesses the necessary professional expertise (see the evaluation concerning Standard 2.3 of the ESG regarding this). Secondly, it has been established that AAQ and SAR observe the relevant legal framework conditions in the (further) development of their procedure formats and this includes the guidelines for state regulated study programmes (see also ESG Standard 2.3). The expert group therefore suggests to the German Accreditation Council that it arranges the certification decisions and the composition of the contract with the agency accordingly.

### Recommendations

**Condition:** For certification for system accreditation, it must be communicated more clearly both internally and externally that SAR is AAQ's decision-making body. For this, it should be clear from AAQ's guidelines that they are approved and backed by SAR. The same applies for the other policy papers such as the strategy or the quality paper, which are of decisive importance for the way the agency works in Germany.

**Condition:** The selection procedure and criteria for the composition of SAR as well as its internal Commission for Institutional Procedures and for applications for appeals must be more formalised. The aim should be structurally, and therefore in a way that is not dependent on individual persons, to guarantee the necessary skills of those involved in the procedure, taking into consideration the involvement of the relevant interest groups, over the long term.

**Condition:** The guidelines for system accreditation must be revised. Different roles by AAQ, SAR and its Commission for Institutional Procedures during a system accreditation procedure must be presented with greater transparency. Furthermore, the information

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<sup>18</sup> If higher education institutions offer state-regulated Bachelor's and Master's study programmes (e.g. teaching), at least one study programme must be assessed through random sampling, taking into consideration the criteria for the accreditation of study programmes, in accordance with the German Accreditation Council's rules of procedure for system accreditation. The random samples may only be conducted by an agency certified for programme accreditation, because the professional and technical contents of the study programmes are of key importance. Cf. Cl. 5.6 and 5.9 of the rules.

must be corrected regarding the point at which the contract was signed and regarding the decision and justification rules for system accreditation. .

**Condition:** The decision procedure including the decision(s) regarding the fulfilment of any conditions must be incorporated in the contract drafting with the higher education institutions. Due to the legal independence of SAR, it must be included in the contract design in a suitable way.

**Recommendation:** The “longlist procedure” should be described in the guidelines in a way that eliminates any possible doubt about the integrity of the expert selection.

**Recommendation:** The guidelines, based on which SAR may deviate from the expert-recommended decisions, should be published.

**Recommendation:** The expert group explicitly encourages AAQ and SAR to work on the follow-up processes for system accreditation. As part of this, both organisations should also clarify whether experts are to be involved in the follow-up processes and, if so, at what stage. Finally, the follow-up processes should be described in detail within the guidelines in order to better inform higher education institutions about the overall outline of the procedures.

## Result

**Criterion 2.2.1 is partially fulfilled.**

**2.2.2 The agency involves the interest groups that are relevant with regard to the fulfilment of conditions (academics, students and professional practice).**

### 20 Documentation

*Regarding the involvement of the relevant interest groups in SAR and in its commissions, see the Standards 2.2. (Design) and 2.3 (Implementation), regarding their involvement in the expert groups, see Standard 2.4 (Peers) and regarding their involvement during the agency’s internal complaints procedure, see Standard 2.7 (Complaints) above.*

### 25 Assessment

The involvement of the relevant interest groups is currently guaranteed and has been comprehensively evaluated in connection with the relevant ESG standards.

Within AAQ, this works systematically through the connection with/inclusion of SAR, in which the higher education institutions, the professional world, students, mid-level faculty staff and teaching staff are represented.

The Commission for Institutional Procedures in Germany and Austria is currently composed of members from higher education institutions and students, whereby one of the members of the commissions was suggested by the employer associations.

5 There is no student member in the Appeals Commission. This does not require immediate action as the student perspective is ensured through SAR, which ultimately decides on complaints made by the higher education institutions. The same applies for the perspective from professional practice.

Academics, students and professional practice are regularly represented in the expert groups for system accreditation.

## 10 Recommendations

**Recommendation:** In upcoming reappointments to the agency's bodies and committees, the matter of involvement should be ascribed even greater importance with regard to the representation of students and professional practice. In this way, professional practice should be better represented in the composition of subsequent accreditation councils. The same applies to the Commission for Institutional Procedures. Student perspectives should be involved in the Appeals Commission.

### Result

**Criterion 2.2.2 is substantially fulfilled.**

**2.2.3 The competence of those involved in the procedures with regard to all of the areas relevant to programme accreditation or system accreditation testing procedures is guaranteed by suitable selection procedures and preparation.**

## 20 Documentation

*For basic information regarding the competence of SAR and its Commissions see the standards 2.2 (Design), 2.3 (Implementation) and Standard 2.7 (Complaints), regarding the competence of the expert groups see Standard 2.4 (Peers) and regarding the employees see Standard 3.5 (Resources) above.*

25 For certification for system accreditation, AAQ has also provided an extract from the manual for members of SAR, which describes in detail SAR's duties, the context in terms of education policy and the system accreditation procedure. (A II.14)

Within AAQ, a core team of the agency's German-speaking employees are entrusted with accreditation procedures in Germany.

30

## Assessment

The competence of those involved in the procedure is currently guaranteed and is evaluated in more detail in connection with the relevant standards. The following evaluations are therefore limited to key statements for certification for system accreditation.

### 5 Selection and preparation of members of SAR and its commissions

Through the documents filed subsequently and during the discussions on site, the expert group was convinced by the proved expertise of the members of SAR and its commissions. In order to meet the criterion, however, the expert group considers it necessary that SAR further formalises the selection procedure and criteria for SAR and its commissions, 10 whereby formalisation on a non-legal level would be sufficient. The agency must take action here, as has already been addressed in connection with Criterion 2.2.1. A condition at this point is therefore not necessary.

The manual is a suitable basis for preparing members of SAR and its commissions. Nonetheless, the justification and decision rules are not fully reproduced. Firstly, there is no in- 15 formation to say that accreditation decisions must always be justified - i.e. not only in the case of negative decisions (cf. Cl. 5.13 of the rules). Secondly, there is no information to say that accreditation procedures may be suspended. Action is required here.

### Selection and preparation of expert groups

With the selection criteria for the expert groups, AAQ adequately represents the relevant 20 rules of the German Accreditation Council. Only the fact is missing, that experts for supplementary determinations in terms of professional law must sometimes be included in the expert group (cf. Cl. 5.5 of the rules). As the expert group discovered whilst on site, the agency also takes into account experts' knowledge of the higher education sector and active specific language competences for the accreditation procedure during the selection 25 process. It is clearly an editorial error in the guidelines that these criteria are not cited in contrast to the guidelines for Switzerland and for Austria.

According to the application, AAQ gives experts fundamental preparation for assessment activities by telephone. The expert group initially suspected that this might fall short of the expectations for certification of an agency for system accreditation. However, in the dis- 30 cussions and from the self-assessment by AAQ regarding the ESG, the expert group was convinced that this telephone preparation is well structured and focussed on the respective relevant required information. In addition, on the day before the first on-site visit it was clear that the preparation was very detailed and, therefore, that the agency meets the standards of the Accreditation Council for the preparatory briefing of experts overall.

Nonetheless, the expert group would like to encourage the agency to further invest in the basic preparatory briefing of experts. One possibility would be workshops that cover different procedures, which would also help the agency to make better use of the potential for synergy between the different procedure formats.

#### 5 Selection and preparation of employees

The expert group is impressed with AAQ's detailed human resources management concept and welcomes the new organisational structure. It would like to encourage AAQ to consistently further pursue this organisational change and, on this point, refers to the corresponding recommendation regarding Criterion 2.4 (Setup).

#### 10 **Recommendations**

**Condition:** The justification and decision rules for system accreditation must be reproduced fully in the manual for the members of SAR.

**Recommendation:** Editorial discrepancies regarding the selection criteria for the expert group in the guidelines should be corrected at the next available opportunity. In addition, the agency should further invest in the basic preparatory briefing of experts.

#### **Result**

**Criterion 2.2.3 is partially fulfilled**

**2.2.4 If the agency commissions other organisations to implement parts of the procedures, it guarantees that these parts are implemented correctly using reliable rules and procedures.**

#### **Documentation**

20 This criterion relates to procedures in which AAQ grants the seal of the Accreditation Council. AAQ performs system accreditation procedures itself (SA Part II p. 25).

#### **Assessment**

**Criterion 2.2.4 is not applicable.**

#### 25 **Criterion 2.3: Independence**

**2.3.1 The agency has its own legal entity.**

#### **Documentation**

*For more information on the legal entity, see Standard 3.2 (official status) above.*

## Assessment

This is to say that AAQ – as OAQ once did – as a legally dependent establishment, has the properties in the German legal system connected to such a status of legal identifiability and capacity, e.g. independence in matters of contracts, such that the requirement of this criterion could be seen as having been materially fulfilled.<sup>19</sup> However, the decision-taking power in system accreditation has been as of now transferred to SAR, which as a recognised body in Switzerland is legally independent.

The renewed certification for system accreditation is therefore only possible if SAR also signs the agreement with the German Accreditation Council as AAQ's decision-making body (cosignatory). Otherwise, e.g. the requirements for §§ 7, 13 of the model agreement would not be fulfilled (revision of accreditation decisions following a reasoned request of the German Accreditation Council, the agency's obligations of cooperation and disclosure).

Alternatively, AAQ would have to have its own decision-making body, which satisfies the requirements of the other criteria (e.g. involvement of the interest groups, competence etc.). SAR's statutes allow for this possibility (Art. 15 Para. 1 Let. D OReg-SAR, A II.5).

## Recommendations

None

## Result

**Criterion 2.3.1 is fulfilled for the construction of AAQ-SAR. AAQ alone cannot meet the criterion. SAR, as AAQ's decision-making body, should therefore be included in the agreement with the German Accreditation Council, e.g. as a cosignatory or in another suitable manner.**

**2.3.2 It is a non-profit organisation and carries out the accreditation procedures on a full-costs basis.**

## 25 Documentation

*For basic information, see Standard 3.5 (Resources) above.*

For accreditation procedures in Germany the agency, based on SAR's regulations on fees, shall levy fees to cover the costs that arise from the fees and expenses for experts and from the agency's internal costs. The latter includes a contribution to the infrastructure

<sup>19</sup> This is the decision of the German Accreditation Council on certifying OAQ for programme and system accreditation procedures in 2009. Cf. the report, p. 8.

as well as the ordinary operating costs and are recorded in the regulations on fees as hourly rates that differ between AAQ staff categories. Extraordinary material and operating costs are also invoiced. (A II.18)

5 To prove that the criterion is fulfilled, AAQ has moreover subsequently filed the complete calculation of a system accreditation procedure as well as three up-to-date financial statements of system accreditation procedures (DFS 16-19). The calculation references a higher education institution that offers state-regulated study programmes and reveals AAQ's direct and indirect costs including the role of SAR.

10 The cost for system accreditation in a procedure lasting three and a half days and with a five-person expert group are in the region of approx. 58,000 EUR excl. VAT. Deviations may occur through special configuration of the procedure. (SA Part 2, p. 26 et seq.) As shown in the financial statements, AAQ estimated personnel expenditure for each procedure of on average about 25.5 to 28.5 working days (WD) for the research associates, as the staff category with the highest quantitative expense. Included in this was on average  
 15 approx. 9 WD for work of the secretariat, management and SAR.

**Assessment**

The financial conduct of the agency is regulated by Swiss federal law and its regulations on fees. The guidelines do not permit acting for profit.

20 With the regulations on fees, AAQ has a transparent calculation basis for the costs of its procedures. The current financial statements and the calculation are indicative of the procedures being carried out on a full-costs basis, although the costs for the personnel expense seem to have been partially calculated at the lower limit.

25 The expert group was not made aware of a prohibited cross-subsidisation of the regulation and monitoring function of SAR through AAQ procedures, which could have the result of too high costs for system accreditation (for more detailed information on this see the evaluation of Standard 3.5 of the ESG).

**Recommendations**

30 **Recommendation:** Attention should be paid to ensuring that SAR's regulatory duties are fully financed. For this purpose, AAQ and SAR should endeavour to establish clearer separate costing and in future budget plans should report, for example, the material and operational costs for SAR's head office separately, taking overhead costs into account (e.g. Internal quality assurance, communication etc.).

**Result****Criterion 2.3.2 is fulfilled.**

**2.3.3 The agency guarantees the freedom from instruction of the organs based on the individual cases and the independence and impartiality of the people acting on behalf of them.**

**Documentation**

- 5 *For basic information, see the Standard 3.3 (independence).*

**Assessment**

The freedom from instruction of the organs based on the individual cases and the independence and impartiality of the people acting on behalf of them is currently guaranteed and evaluated comprehensively under Standard 3.3 of the ESG. For the certification for  
10 system accreditation, the selection procedures and criteria must be drafted for SAR and for its commissions so as to be binding, in order to structurally ensure the independence and freedom from instruction for a long period of time and therefore irrespective of any persons. The agency must take action here, as it already has been addressed in connection with Criterion 2.2.1. A condition at this point is therefore not necessary.

- 15 With regard to the requirement for transparency in accreditation in Germany, it additionally depends on publishing of the criteria for the impartiality and independence of the expert groups. The same should apply to the existing code of conduct, which has been developed by AAQ. Furthermore, the expert group advises the agency to set down the principles of conduct applicable to SAR in its own code of conduct or, for example, to adopt  
20 AAQ's existing code of conduct and, ultimately, publish this.

**Recommendations**

**Condition:** In order to increase transparency, both the impartiality and independence criteria for experts and the code of conduct should be published.

- Recommendation:** The expert group advises SAR to set down the principles of conduct applicable to it in its own code of conduct or, for example, to adopt AAQ's existing code of  
25 conduct and ultimately publish this.

**Result****Criterion 2.3.3 is partially fulfilled.**

**Criterion 2.4: Setup**

**The agency is sufficiently equipped with staff and resources to sustainably carry out its function in all the required areas.**

**Documentation**

*For more information on equipment, see Standard 3.5 (Resources) above.*

**Assessment**

- 5 The agency's equipment is sufficient for its function and is comprehensively evaluated under Standard 3.5 of the ESG.

**Recommendations**

- 10 **Recommendation:** The path of organisational development taken by the agency should be continued consistently. The support and cross-departmental functions, including the various database solutions, should be better integrated into the working processes and, if necessary, further developed. In the human resources management plan, options for further education and for more flexible working conditions should be more structured.

**Result**

- 15 **Criterion 2.4 is substantially fulfilled.**

**Criterion 2.5: Internal quality management**

**The agency continuously uses a formalised internal quality management system, which is suitable for judging the effectiveness of the internal controlling processes and which guarantees the assurance and continuous improvement of the quality of the activity. It is publicly accessible and includes systematic internal and external feedback processes.**

**Documentation**

- 20 *For information on internal quality management see Standard 3.6 (internal quality assurance and professional conduct) above.*

**Assessment**

- 25 The agency's internal quality management is comprehensively evaluated under Standard 3.6 of the ESG. In terms of content, it in large part honours the requirements from Criterion 2.5. The publication of the current version is still pending, meaning that as a result the criterion is partially fulfilled.

**Recommendations**

**Condition:** The current version of the quality paper acknowledged by SAR must be published.

**Recommendation:** With the involvement of all relevant interest groups, the internal quality assurance system should be further developed into a cross-format quality assurance system. The strategic planning and its implementation should form an integral part of the internal quality assurance system. The responsibility for the quality of decisions, including for follow-up processes, should be presented in a more explicit way. Processes should be developed and serve to maintain the consistency of the decisions.

## Result

### Criterion 2.5 is partially fulfilled

## 10 **Criterion 2.6: Internal complaints procedure**

**The agency has a publicly accessible, formalised internal procedure for assessing accreditation decisions upon request from the higher education institution.**

### Documentation

*For basic information, see Standard 2.7 (Complaints) above.*

According to the application, no complaints have been filed with regard to system accreditation procedures (SA Part 2, p. 34).

## 15 **Assessment**

The agency's complaints procedure is comprehensively evaluated under Standard 2.7 of the ESG.

### Recommendations

**Condition:** The agency's complaints procedure must be expanded with formalised complaints procedures for possible errors in the implementation of procedures.

**Recommendation:** Higher education institutions should be given clearer information on their options for raising complaints.

## Result

### Criterion 2.6 is partially fulfilled

25

## **Criterion 2.7: Reporting**

**The agency describes its procedures and assessment criteria in sufficient detail and publishes them. It publishes the names of the experts, the reports and the decisions of the accreditation procedures which it has carried out.**

## Documentation

The procedures carried out by AAQ and SAR in Germany and the assessment criteria applied are described in the guidelines for the programme and system accreditation.

5 The guidelines for system accreditation are published on AAQ's website. In addition, AAQ has created a flyer for system accreditation which is an initial source of information for interested higher education institutions. The flyer can also be retrieved on AAQ's website.<sup>20</sup>

AAQ publishes SAR's decision, the report and the names of the experts on its website<sup>21</sup> for programme accreditations and system accreditations and makes the entries into the Accreditation Council's database through the "Higher Education Compass". Information  
10 about the other obligations to report and to publish arises from the progress report, which the board of the Accreditation Council submitted in preparation of the procedure (A II.24).

## Assessment

### Transparency concerning the procedures

15 The published guidelines for system accreditation and the flyer form a good basis of information for higher education institutions and interested third parties (see the positive evaluation for Standard 2.3 of the ESG). However, the guidelines lack information on the role of the internal commission for institutional procedures and on the decision-making procedure including the fulfilment of conditions. In addition, the guidelines are missing the  
20 point that experts for supplementary determinations in terms of professional law must occasionally be included in the expert group, and the longlist procedure is only briefly described. Finally, it is not so far apparent that SAR has adopted the guidelines and therefore adheres to them. The agency must take action here, as it has already been addressed in connection with the previous criterion. A condition at this point is therefore not necessary.

25 The guidelines for programme accreditation, with which AAQ only provides information about taking random samples of state regulated study programmes as part of the system accreditation, are understandably not published on the website. The expert group considers the guidelines to be overall unnecessary, as AAQ does not want to offer any programme accreditation procedures at all in Germany. The relevant information about the  
30 random samples is also shown in the guidelines for system accreditation. The rules of procedure and assessment criteria furthermore arise from the original resolutions of the German Accreditation Council, which are published in the guidelines.

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<sup>20</sup> see <http://aaq.ch/akkreditierung/systemakkreditierung/>

<sup>21</sup> see <http://aaq.ch/de/verfahrensberichte/>

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### Obligations to report and publish / Database

Based on the board's progress report, the expert group acknowledges that AAQ and its predecessor institution OAQ have so far done well in meeting the obligations to report and publish in the German Accreditation Council. The accreditation decisions have been published promptly in the database and in accordance with the guidelines of the German Accreditation Council. From the perspective of the expert group, the newly established cross-departmental function is worthwhile here for communication.

AAQ also makes the results of their procedures transparent via their own website. However, it became apparent here that the reports yet do not contain any information about the follow-up (fulfilment of conditions). As the publication of decisions regarding the fulfilment of conditions, which has long been standard in the German accreditation system, does not immediately follow from the rules of procedure for system accreditation, the expert group is only expressing a recommendation.

### **Recommendations**

Decisions regarding the follow-up should be published in a suitable manner, e.g. as an update to the pre-existing accreditation reports, hyperlinks or similar.

### **Result**

**Criterion 2.7 is partially fulfilled**

## VI. Recommendations from the expert group

### VI.1 Regarding compliance with the ESG

The expert group recommends that the Accreditation Council finds AAQ to have met the “Standards and Guidelines for Quality Assurance in the European Higher Education Area” (ESG) in large part.

According to the assessment by the expert group, the following three standards are fulfilled: 2.1; 3.2; 3.7

According to the assessment by the expert group, the following eleven standards are substantially fulfilled: 2.2; 2.3; 2.4; 2.5; 2.6; 2.7; 3.1; 3.3; 3.4; 3.5; 3.6

The expert group issues the following recommendations:

**Recommendation:** It should be communicated with greater force both within the system and to the public that SAR is AAQ’s decision-making body. For this, it should be clear from AAQ’s guidelines that they are approved and backed by SAR. The same applies to the strategy, the quality paper and AAQ’s other policy documents and reports. [2.2]

**Recommendation:** With a view to international collaboration, the selection procedure and criteria used to appoint SAR members should be more formalised. The aim should be to structurally, and therefore in a way that is not dependent on individual persons, guarantee the necessary skills of those involved in the procedure as well as the involvement of the relevant interest groups over the long term. The professional world/professional practice should be more strongly involved in the composition of subsequent accreditation councils. In order to achieve this, AAQ and SAR should, in general, strengthen their links with the professional world/professional practice. [2.2]

**Recommendation:** With a view to international collaboration, the selection procedure and criteria used to appoint SAR commission members should be more formalised. The aim should be to structurally, and therefore in a way that is not dependent on individual persons, guarantee the necessary expertise of those involved in the procedure as well as the involvement of the relevant interest groups over the long term. In addition, it should be made clear in the public presentation of the procedure which role the subject specific expert commissions play in the individual procedure formats. Professional practice should be better represented in the Commission for Institutional Procedures. [2.3]

**Recommendation:** The different roles that AAQ and SAR actually occupy during the individual decision-making process must be presented with greater transparency in the corresponding guidelines. [2.3]

**Recommendation:** The expert group explicitly encourages AAQ and SAR to work on the follow-up processes for all their procedures. As part of this, both organisations should also clarify whether experts are to be involved in the follow-up processes and, if so, at which point they should be involved. Finally, the follow-up processes should be described in greater detail in the guidelines in order to better inform higher education institutions about the overall outline of the procedures. [2.3]

**Recommendation:** The agency's internal standards for selecting and preparing experts should be made consistent across the various different procedure formats. There is potential for development in, for example, the involvement of non-academic perspectives in institutional procedures and of active participants in accreditation procedures in the field of medicine and psychology. AAQ should further invest in the basic preparatory briefing of experts. Editorial discrepancies regarding the selection criteria in the guidelines should be rectified at the next available opportunity. [2.4]

**Recommendation:** In order to increase transparency, both the impartiality and independence criteria for experts and the code of conduct should be published consistently. In addition, the "longlist procedure" should be described with the greatest degree of detail in all guidelines so there can be no doubts as to the – established – integrity of the selection of experts. [2.4]

**Recommendation:** As part of their internal quality assurance systems, AAQ and SAR should devote more detailed attention to the question of consistency and should more explicitly represent the consistency requirements from Standard 2.3 in their internal quality assurance systems. [2.5]

**Recommendation:** Guidelines forming the basis for SAR's option to deviate from the expert-recommended decisions should be published. [2.5]

**Recommendation:** AAQ and SAR should work together with their clients and partners towards cross-procedure systematisation of their publication practice and therefore towards greater transparency. Above all, in procedures that are solely the responsibility of AAQ and SAR, the relevant documents and information, including the decisions concerning the follow-up, should be published in a suitable way, e.g. as updates to the existing accreditation reports, through hyperlinks or similar. [2.6]

**Recommendation:** The expert group recommends that the agency publishes all reports and negative decisions. [2.6]

**Recommendation:** AAQ and SAR should further develop their complaints procedure. In terms of content, formalised complaints' procedures should be established for possible er-

rors in the implementation of procedures and the student perspective should be included in the Appeals Commission. In addition, higher education institutions should receive more transparent information about the options for raising complaints and the criteria for the composition of the Appeals Commission should be made more formalised, in order to

5 guarantee in the long term through structural measures and therefore independently of individual persons, that those involved in the procedure possess the necessary competencies and that the relevant interest groups are involved. [2.7]

**Recommendation:** Selection procedures and criteria for the composition of SAR and its commissions should be specified in a binding document in order to further reinforce the

10 organisational independence of SAR and AAQ. [3.3]

**Recommendation:** The expert group advises SAR to set down the principles of conduct applicable to it in its own code of conduct or, for example, to adopt AAQ's existing code of conduct and ultimately publish this. [3.3]

**Recommendation:** The agency should further develop its thematic analyses and should,

15 in future, deal with the follow-up processes for the individual procedure formats more intensively as part of this. International activities should be incorporated into the thematic analyses in a visible way, for example, through the planned cross-sectional analyses. [3.4]

**Recommendation:** Attention should be paid to ensuring that SAR's regulatory duties are fully financed. For this purpose, AAQ and SAR should endeavour to establish clearer separate costing and in future budget plans should report, for example, the material and operational costs for SAR's head office separately, taking overhead costs into account (e.g. Internal quality assurance, communication etc.). [3.5]

20

**Recommendation:** In order to ensure the greatest possible degree of planning security for AAQ and SAR, the multi-year plan, which forms the basis for the budget for both institutions, and the strategic planning should be continued. The agency should try to establish additional control options that allow AAQ's activities to be planned on a reliable basis. [3.5]

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**Recommendation:** The path of organisational development taken by the agency should be continued consistently. The support and cross-departmental functions, including the various database solutions, should be better integrated into the working processes and, if necessary, further developed. In the human resources management plan, options for further education and for more flexible working conditions should be better structured. [3.5]

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**Recommendation:** With the involvement of all relevant interest groups, the internal quality assurance system should be further developed into a cross-format quality assurance

system. The strategic planning and its implementation should form an integral part of the internal quality assurance system. The responsibility for the quality of decisions, including for follow-up processes, should be described in a more explicit way. Processes should be developed and serve to maintain the consistency of the decisions. [3.6]

- 5 **Recommendation:** The expert group advises SAR to set down the applicable principles in its own code of conduct or, for example, to adopt AAQ's existing code of conduct and ultimately publish it. [3.6]

## VI.2 Regarding compliance with the German Accreditation Council's criteria

- 10 The expert group recommends that the German Accreditation Council certifies the agency for system accreditation including the corresponding random sampling of state regulated study programmes. For this, the expert group does not consider it necessary that the agency is also certified for programme accreditation. The expert group therefore suggests to the German Accreditation Council that it forms the certification decisions and the composition of the contract with the agency accordingly (for justifications see the evaluation regarding Criterion 2.2.1).
- 15

For certification for system accreditation, the expert group considers it necessary that SAR, as AAQ's decision-making body, also signs the agreement with the German Accreditation Council, e.g. as co-signatory (for justification see the evaluation regarding Criterion 2.3.1).

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The expert group recommends that the Accreditation Council issues the following conditions and recommendations:

- Condition:** For certification for system accreditation, it must be communicated more clearly both internally and externally that SAR is AAQ's decision-making body. For this, it should be clear from AAQ's guidelines that they are approved and backed by SAR. The same applies for the other policy papers such as the strategy or the quality paper, which are of decisive importance for the way the agency works in Germany. [2.2.1]
- 25

- Condition:** The selection procedure and criteria for the composition of SAR as well as its internal Commission for Institutional Procedures and for applications for appeals must be more formalised. The aim should be to structurally, and therefore in a way that is not dependent on individual persons, to guarantee the necessary skills of those involved in the procedure, taking into consideration the involvement of the relevant interest groups, over the long term. [2.2.1]
- 30

- 5 **Condition:** The guidelines for system accreditation must be revised. Different roles of AAQ, SAR and its Commission for Institutional Procedures during a system accreditation procedure must be presented with greater transparency. Furthermore, the information must be corrected regarding the point at which the contract was signed and regarding the decision and justification rules for system accreditation. [2.2.1]
- Condition:** The decision procedure including the decision(s) regarding the fulfilment of any conditions must be incorporated in the contract draftings with the higher education institutions. Due to SAR's legal independence, it must be included in the contract design in a suitable way. [2.2.1]
- 10 **Condition:** The justification and decision rules for system accreditation must be reproduced in full in the manual for SAR's members. [2.2.3]
- Condition:** In order to increase transparency, both the impartiality and independence criteria for experts and the code of conduct should be published. [2.3.3]
- 15 **Condition:** The current version of the quality paper acknowledged by SAR must be published. [2.5]
- Condition:** The agency's complaints procedure must be expanded with formalised complaints procedures for possible errors in the implementation of procedures. [2.6]
- Recommendation:** The "longlist procedure" should be described in the guidelines in a way that eliminates any possible doubt about the integrity of the expert selection. [2.2.1]
- 20 **Recommendation:** The guidelines, based on which SAR may deviate from the expert-recommended decisions, should be published. [2.2.1]
- Recommendation:** The expert group explicitly encourages AAQ and SAR to work on the follow-up processes for system accreditation. As part of this, both organisations should also clarify whether experts are to be involved in the follow-up processes and, if so, at what stage. Finally, the follow-up processes should be described in detail within the guidelines in order to better inform higher education institutions about the overall outline of the procedures. [2.2.1]
- 25
- 30 **Recommendation:** In upcoming reappointments to the agency's bodies and committees, the matter of involvement should be ascribed even greater importance with regard to the representation of students and professional practice. In this way, professional practice should be better represented in the composition of subsequent accreditation councils. The same applies to the Commission for Institutional Procedures. Student perspectives should be involved in the Appeals Commission. [2.2.2]

**Recommendation:** Editorial discrepancies regarding the selection criteria for the expert group in the guidelines should be corrected at the next available opportunity. In addition, the agency should further invest in the basic preparatory briefing of experts. [2.2.3]

5 **Recommendation:** The expert group advises SAR to set down the principles of conduct applicable to it in its own code of conduct or, for example, to adopt AAQ's existing code of conduct and ultimately publish this. [2.3.3]

10 **Recommendation:** The path of organisational development taken by the agency should be continued consistently. The support and cross-departmental functions, including the various database solutions, should be better integrated into the working processes and, if necessary, further developed. In the human resources management plan, options for further education and for more flexible working conditions should be more structured. [2.4]

15 **Recommendation:** With the involvement of all relevant interest groups, the internal quality assurance system should be further developed into a cross-format quality assurance system. The strategic planning and its implementation should form an integral part of the internal quality assurance system. The responsibility for the quality of decisions, including for follow-up processes, should be described in a more explicit way. Processes should be developed and serve to maintain the consistency of the decisions. [2.5]

**Recommendation:** Higher education institutions should be given clearer information on their options for raising complaints. [2.6]

20 **Recommendation:** Decisions regarding the follow-up should be published in a suitable manner, e.g. as an update to the pre-existing accreditation reports, hyperlinks or similar [2.7]

**Annex 1: Schedule for the on-site visit**

<b>9 March 2016</b>		
6:00 p.m.	Internal preparatory meeting in the hotel	

<b>10 March 2016</b>		
9:00 - 9:15 a.m.	Welcome by AAQ'S project group	Dr. Christoph Grolimund; Laura Beccari; Katrin Meyer; Berchtold von Steiger
09:15 - 10:30 a.m.	Meeting with AAQ's directorate	Dr. Christoph Grolimund, Director; Dr. Geneviève Le Fort, Deputy Director
10:30 - 10:45 a.m.	Break, internal discussion	
10:45 a.m. - 12:00 p.m.	Meeting with the members of the Swiss Accreditation Council	Ewa Popowska, Head Office Manager, Prof. Dr. William Pralong, MedPA Committee President, Prof. Dr. Jean-Marc Rapp, President; Prof. Dr. Giambattista Ravano, Vice President, Anja Schuler, VSS, Prof. Dr. Tatjana Volkova
12:00 - 13:30 p.m.	Break, internal discussion	
13:30 - 14:00 p.m.	Meeting with AAQ's employees (AAQ internal services)	Barbara Gissler (Secretariat and Logistics), Malgorzata Lanz (Accounts), Petra Lauk (Communication), Cornelia Leibundgut (IT), Berchtold von Steiger (Internal Quality Assurance)
14:00 - 14:15 p.m.	Break, internal discussion	
14:15 - 15:30 p.m.	Meeting with experts from the agency's procedures	Prof. Franco Cavallo, Faculty of Medicine, University of Turin, Clau Dermont, Student, University of Bern, Dr. Tina Klug, TU Darmstadt, Dr. Heike Schorcht, TU Ilmenau, Julia Wysling, Student, ETH Zurich
15:30 - 15:45 p.m.	Break, internal discussion	
15:45 - 17:00 p.m.	Meeting with the representatives from the higher education institutions (institutional procedures)	Dr. Christine Abele, Uni Konstanz, Dr. Peter Lindström, Uni Sankt Gallen, Prof. Paul Richli, Uni Luzern, Prof. René Roux, FTL Lugano, Dr. Wolfgang

		Schatz, University of Lucerne, Magister, Gabriele Scherer, University of Leoben
17:00 - 19:00 p.m.	Internal concluding discussion	

<b>11 March 2016</b>		
09:00 - 10:00 a.m.	Group meeting with AAQ's employees (employees responsible for the formats)	Bastien Brodard (PsyPA), Katrin Meyer (D), Laura Beccari (International Relations), Dr. Stephanie Hering (MedPA), Christa Ramseyer (Austria), Monika Risse (Evaluation), Nina Wyss (MedPA)
10:00 - 10:15 p.m.	Break, internal discussion	
10:15 - 11:15 a.m.	Meeting with the representatives from the higher education institutions (study programme procedure)	Dr. med. Werner Bauer, SIWF <sup>22</sup> , Ahidoba de Franchi, University of Geneva, Prof. Dr. Thomas Kopp, HS Rapperswil, Dr. med. Christian Schirlo, University of Zurich, n.n., person responsible for study programmes (PsyPA).
11:15 - 11:30 a.m.	Break, internal discussion	
11:30 - 12:30 a.m.	Meeting with the agency's sponsors, clients and external partners	Valérie Clerc, Secretary General of the SHK,; Marianne Gertsch, FOPH (Division Manager, Psychology Professions); Dr. med. Olivier Glardon, FOPH (Division Manager, Quality Assurance Accreditation); Melanie Gut, Executive Committee (Executive Committee); Silvia Studinger, Division Manager, State Secretariat for Education, SERI Dr. Martina Weiss, Secretary General of swissuniversities
12:30 - 13:30 a.m.	Lunchtime snack, internal discussion	
13:30 - 15:45 a.m.	Internal concluding discussion	Experts, tour

<sup>22</sup> Swiss Institute for Continuing Medical Education [Schweizerisches Institut für ärztliche Weiter- und Fortbildung], independent body of the Swiss Medical Association [Verbindung der Schweizer Ärztinnen und Ärzte: FMH].

15:45 - 16:00 a.m.	Brief concluding discussion with AAQ	AAQ directorate and project group
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**Annex 2: Abbreviations**

A	Annex
AAQ	Swiss Agency of Accreditation and Quality Assurance [Schweizerische Agentur für Akkreditierung und Qualitätssicherung]
DFS [NRU]	Documents Filed Subsequently [ <i>Nachgereichte Unterlagen</i> ]
EDI	Swiss Federal Department of Home Affairs [ <i>Eidgenössisches Department des Innern</i> ]
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
FTE [VZÄ]	Full Time Equivalents [ <i>Vollzeitäquivalente</i> ]
FCE-CHE [ZSAV-HS]	Swiss Federal-Cantonal Agreement on Cooperation in Higher Education [ <i>Vereinbarung zwischen Bund und Kantonen über die Zusammenarbeit im Hochschulbereich</i> ]
HEdA [HFKG]	Swiss Federal Act on the Funding and Coordination of the Higher Education Sector [ <i>Bundesgesetz über die Förderung der Hochschulen und die Koordination im schweizerischen Hochschulbereich</i> ]
HS-QSG	Austrian Federal Act on the External Quality Assurance in Higher Education and the Agency for Quality Assurance and Accreditation Austria [ <i>Bundesgesetz über die externe Qualitätssicherung im Hochschulwesen und die Agentur für Qualitätssicherung und Akkreditierung Austria</i> ]
KMK	Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany [ <i>Ständige Konferenz der Kultusminister der Länder in der Bundesrepublik Deutschland</i> ]
KMK Structural Guidelines	Common Structural Guidelines of the Länder for the Accreditation of Bachelor's and Master's study programmes. Resolution by the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder from 10 October 2003, as amended 4 February 2010 (Germany)
MedPA [MedBG]	Swiss Medical Professions Act [ <i>Medizinalberufegesetz</i> ]
OAQ	Swiss Centre of Accreditation and Quality Assurance [ <i>Organ für Akkreditierung und Qualitätssicherung</i> ]
OReg-AAQ	Organisational Regulations of the Swiss Agency of Accreditation and Quality Assurance [ <i>Reglement über die Organisation der Schweizerischen Agentur für Akkreditierung und Qualitätssicherung</i> ]
OReg-SAR	Organisational Regulations of the Swiss Accreditation Council [ <i>Reglement über die Organisation des Schweizerischen Akkredi-</i>

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	<i>tierungsrats]</i>
PReg-HSR	Swiss Regulation on the Staff of the Higher Education Council [ <i>Reglement über das Personal des Hochschulrats</i> ]
PsyPA [PsyG]	Swiss Psychology Professions Act [ <i>Psychologieberufegesetz</i> ]
Rules	German Rules for the Accreditation of Study Programmes and for System Accreditation from 8 December 2009, as amended 20 February 2013 [ <i>Regeln für die Akkreditierung von Studiengängen und für die Systemakkreditierung</i> ]
SAR	Swiss Accreditation Council [ <i>Schweizerischer Akkreditierungsrat</i> ]
SA [SB]	Self-Assessment [ <i>Selbstbewertung</i> ]
SHK	Swiss Conference of Higher Education Institutions [ <i>Schweizerische Hochschulkonferenz</i> ]
VSS	National Student Union of Switzerland [ <i>Verband der Schweizerischen StudentInnenenschaften</i> ]

**Annex 3: Equivalence between Part 1 of the ESG 2015 and the criteria for programme and system accreditation**

As of September 2015

<b>ESG 2015</b>	<b>Programme accreditation</b>	<b>System accreditation</b>
1.1 Policy for quality assurance	Implicit in 2.9 Quality assurance and further development	6.3 Internal quality assurance systems of higher education institutions
1.2 Design and approval of programmes	Implicit in 2.3 Study programme concept	Implicit in 6.2 Internal management of higher education institutions
1.3 Student-centered learning, teaching and assessment	Animated learning - examinations: 2.5	Animated learning - organisation of examinations: 6.2
1.4 Student admission, progression and certification	Certification: 2.3 Curriculum design: 2.4 Recognition: 2.3 Certificates: 2.2	Implicit in 6.2
1.5 Teaching staff	2.7 Setup	Teaching staff: 6.2
1.6 Learning resources and student support	2.7 Setup	Setup: 6.2
1.7 Information management	2.9 Quality assurance	6.3 Internal quality assurance systems of higher education institutions
1.8 Public information	2.8 Transparency and documentation	6.4 Report system and data collection
1.9 On-going monitoring and periodic review of programme	2.9 Quality assurance	6.3 Internal quality assurance systems of higher education institutions

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1.10 Cyclical external quality assurance	3.2.1 Time limitation	7.2.1 Time limitation
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