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Expert Report

on the application of the Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen (AQAS, Agency for Quality Assurance through the Accreditation of Study Programmes, a non-profit organisation), dated 9 May 2011, for accreditation and assessment of the compliance of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)

- issued on 01 February 2012 -

1. Procedural basis

1.1 Statutory mandate

Pursuant to § 2 para. 1 no. 1 of the German Statute on the Establishment of a *Foundation for the Accreditation of Study Programmes in Germany*, the Foundation is assigned with the task of accrediting accreditation agencies. It grants, for a limited period of time, the right to accredit study programmes or internal quality assurance systems of higher education institutions by awarding the seal of the Foundation.

The decision of the Accreditation Council to award accreditation as well as the conduct of the procedure for accreditation of an accreditation agency are based on the resolution *Rules of the Accreditation Council for the Accreditation of Agencies* adopted on 8 December 2009.

In order to promote the international recognition of the decisions taken by the Accreditation Council and by the accreditation agency, the Accreditation Council adopted the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* in the approval of its accreditation criteria, as approved by the ministers responsible for higher education at the Bologna follow-up conference in Bergen in May 2005. By including the *ESG Standards*, the Accreditation Council emphasised the central role of accreditation in implementing the objectives set for the Bologna Process, making it clear that quality assurance in higher education - and particularly accreditation - can no longer be exclusively orientated toward national standards or particular characteristics. Other important sources for the formulation of the criteria set by the Accreditation Council are the

Code of Good Practice laid down by the *European Consortium for Accreditation* on 3 December 2004 and the *Guidelines of Good Practice* elaborated by the *International Network for Quality Assurance Agencies in Higher Education* in April 2005.

1.2 The German accreditation system

In 1998, an accreditation procedure based upon the "peer review principle" was introduced for study programmes in the tiered graduation system. The group of reviewing peers includes scientists but also students, representatives of professional practice and international experts. The German Law on the Establishment of a *Foundation for the Accreditation of Study Programmes in Germany* adopted on 15 February 2005 provided a new legal foundation for accreditation. The objective of accreditation is to ensure content- and subject-related standards by assessing the conceptual outline of study programmes and the academic feasibility of the courses offered, including the assessment of quality in teaching as well as the scrutiny of the professional relevance and the promotion of gender mainstreaming. Generally, accreditation is a prerequisite for introducing and maintaining Bachelor's and Master's study programmes. In addition to programme accreditation, system accreditation was introduced in 2007. The object of system accreditation is the internal quality assurance system of a higher education institution. A positive system accreditation certifies that the quality assurance system of the higher education institution attains the qualification objectives in teaching and learning and ensures the high quality of the study programmes, and in so doing applies the *Standards and Guidelines for Quality Assurance*, the Guidelines of the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder*, and the criteria set by the Accreditation Council.

In Germany, decentralised agencies conduct the accreditation of study programmes (programme accreditation) and of quality assurance systems for teaching and learning (system accreditation). In its role as central accreditation body, the Accreditation Council accredits the accreditation agencies periodically and defines the basic requirements for accreditation procedures, which are to be carried out according to reliable and transparent standards. At the same time, the Accreditation Council takes care that the interests of the entire system, which are the responsibility of each *Land*, are taken into consideration during accreditation. The actual accreditation procedures are conducted independently from the state.

The *Foundation for the Accreditation of Study Programmes in Germany* also acts as a central documentation agency for the accreditation system and manages the database of

study programmes accredited in Germany.

For private higher education institutions, a procedure of institutional accreditation was introduced by the Science Council, which monitors whether or not a higher education institution complies with the specifications for scientific teaching and research. Private higher education institutions must be accredited by the Science Council, preferably prior to starting operation, but at the latest prior to final state approval by the appropriate *Land*.

1.3 Compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area

In order to be admitted as a member of the European Association for Quality Assurance (ENQA) or the European Quality Assurance Register for Higher Education (EQAR), an agency must demonstrate that it abides by the “Standards and Guidelines for Quality Assurance in the European Higher Education Area” (ESG) in an external assessment. The full membership of an agency with the ENQA is valid as prima facie of compliance with the ESG and is thus also valid for the EQAR.

With regard to accreditation, the Accreditation Council also offers the option of assessing whether the agencies are compliant with Part 2 and 3 of the ESG and presenting this explicitly in its own section of the assessment in order to prevent duplicate external assessments. This assessment is, therefore, executed according to the “Guidelines for external reviews of quality assurance agencies in the EHEA”.

2. Course of the procedure

With letter dated 08 May 2011 AQAS submitted its application for re-accreditation for the procedures of programme and system accreditation applying also for assessment of compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (hereinafter referred to as ESG). On 14 October 2011 AQAS submitted an explanatory statement for the application together with additional documents. On the experts' request the agency supplemented its rationale with letter dated 08 November 2011 and 11 November 2011 and also submitted additional documents with letter dated 23 November 2011.

The following experts were nominated by the Accreditation Council in its resolution of 08 June 2011:

Prof. Dr. Peter Pirsch (Chairman), Leibniz University of Hannover, Institute for Microelectronic Systems

Christoph Heumann, University of Hamburg, Section Quality and Legal Affairs

Dr. Kurt Sohm, Managing Director FH Council Austria (Österreichischer Fachhochschulrat)

Rikke Sørup, The Danish Evaluation Institute, Deputy Director of projects

Johannes M. Wagner, Ph.D. student at the University of Bremen

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

On 29 October 2011, the experts participated at a preparatory meeting during which the applicable criteria set by the Accreditation Council and the European Standards and Guidelines (ESG) were presented and explained. This occasion also served to develop the level of knowledge of the experts with regard to the procedural aspects and the understanding of their role.

Between 21 and 22 November 2011 an on-site visit took place at the head office of the Agency in Bonn, prior to which the expert group met for a preliminary meeting on 20 November 2011. The expert group held discussions with the management of the Agency, members of the accreditation commissions for programme and for system accreditation, with personnel of the head office, with experts and also with representatives of the higher education institutions that have already been involved in procedures carried out by the Agency (the schedule is provided in the annex).

The expert group presented the following report with unanimous opinion on 01 February 2012.

3. The Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen (AQAS, Agency for Quality Assurance through the Accreditation of Study Programmes, a non-profit organisation)

3.1 Founding

The Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen (AQAS, Agency for Quality Assurance through the Accreditation of Study Programmes, a non-profit organisation) was founded on 25 January 2002 on the initiative of the universities and universities of applied sciences in North Rhine-Westphalia and Rhineland-Palatinate,

and of the science ministries of both federal states. From the beginning on, the activities of AQAS were not to remain restricted to the federal states North Rhine-Westphalia and Rhineland-Palatinate. Today, they comprise tasks and projects in Germany and abroad.

3.2 Organisation

The Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen (AQAS, Agency for Quality Assurance through the Accreditation of Study Programmes, a non-profit organisation) is a registered association with recognised charitable status. Its members include 74 higher education institutions from all over Germany, as well as two scientific associations (status: October 2011).

AQAS is comprised of the management board, the general assembly, the accreditation commissions for programme- and system accreditation, and a complaints commission. As central decision-making committees, the accreditation commissions decide the accreditation of study programmes and internal quality assurance systems of higher education institutions, as well as the assessment criteria and procedural principles of the agency.

3.3 Resources

Currently, a total of 19 individuals are permanently employed at the head office (status: October 2011). Two managing directors manage the head office. Nine project managers are divided between two teams; one senior project manager heads each team, respectively. Six individuals are permanently employed in the areas of organisational assistance and administration. Four student assistants additionally support the head office's work. A total of 13 employees support the accreditation procedure. The agency plans an extension of human resources with a least one project manager position and one position for organisational assistance. The office space at its disposal currently totals 300 m²; however, due to the planned addition of personnel, this space is to be expanded. The workplaces are equipped with modern office technology and have Internet access. Further plans for renewing the office infrastructure also include the EDP structure. For 2011, the agency calculates income from accreditation (standard- and procedural fees) to the amount of €1,850,000 and membership fees to the amount of €6,800. These stand against external services to the amount of €555,000 and expenses to the amount of €1,297,490; based on the planning, a relatively balanced result.

3.4 Range of activities

The purpose of the association is to carry out accreditation procedures on a national and international level. AQAS' work extends across study subjects and types of higher education institutions and it considers itself an institution funded by higher education institutions and scientific associations for the purpose of quality assurance and development of teaching and learning at higher education institutions. The activities of the association aim to secure high educational quality in the area of higher education with consideration of national and European guidelines, to promote the international recognition of academic degrees and to contribute to the development of reliable and comparable quality assurance systems in the national and international context. AQAS accredits both study programmes and internal quality assurance systems, and has special expertise in the accreditation of study programmes for teacher training. In the future, the agency would like to more strongly position itself in the accreditation of joint degree programmes and international study programmes.

4. Assessment

By resolution of 15.02.2007 of the Accreditation Council, AQAS was reaccredited as an accreditation agency until 14.03.2012 and, by resolution of 31.10.2008, approved for carrying out system accreditation procedures. Since 19.11.2008, AQAS has been a full member of the ENQA and also listed in the European register EQAR.

In the past accreditation period, the agency has continuously and consistently further developed. The procedural routines and internal processes, which were already comprehensively revised as part of the fulfilment of conditions, have been reassessed by AQAS over time as well and readjusted when necessary based on gained experience. Also with a view to the first system accreditation procedure, AQAS demonstrates continuous growth allowing the agency to expand its business office and move its domicile to Cologne in 2012.

AQAS punctually submitted its explanatory statement for the application for reaccreditation through the Accreditation Council, as well as the assessment of compliance with ESG. However, the submitted documents presented were partially difficult to comprehend and incomplete, and contained inconsistent and contradictory statements with regard to both the criteria of the Accreditation Council as well as to the ESG with the result that the experts were only able to make a comprehensive assessment after requesting extensive additional information.

On this basis, and particularly during the on-site visit, the expert group received, overall, an extraordinarily positive impression of the agency. The expert group was especially convinced by AQAS' understanding of quality, which attributes the main responsibility for quality assurance of teaching and learning solely to the higher education institutions and consistently bases the structure of the accreditation procedure derived from this on the objectives of quality development and increasing quality. In all discussions, the expert group received a positive impression of extraordinarily professional implementation of this quality understanding in the accreditation practice in which AQAS is able to honour its self-determined premise through targeted perception of the process responsibility. The excellent training and qualification of the employees contribute to this.

In the view of the expert group, it would be of sufficient advantage for the future for the agency to increase the level of bindingness in some critical points. Particularly in view of the overlapping of personnel in the board and the accreditation commissions, potential conflicts of interest must be excluded, also independently of individuals. This equally applies to the bodies' freedom to issue directives, as well as the independence and impartiality of the commissions and their members, as well as the reviewers. The expert group also views a greater bindingness to the modalities of the decision-making in the accreditation commissions as significant, which would further increase the transparency of decisions both toward higher education institutions and also in the international context.

The expert group recommends that the Accreditation Council accredit the Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen (AQAS, Agency for Quality Assurance through the Accreditation of Study Programmes, a non-profit organisation) both for programme accreditation and system accreditation, and to thereby issue the following conditions and recommendations:

Condition 1: AQAS presents the adaptation of its resolutions and documents to the Accreditation Council's current provisions. In this, care is to be taken that the room for manoeuvre created by the Accreditation Council for higher education institutions is not restricted. (Criterion 2.2.1)

Condition 2: AQAS presents binding exclusion criteria that ensure the independence of experts and that are listed, in a uniform manner, in all significant documents. (Criterion 2.3.3)

Condition 3: AQAS publishes its internal quality management system on its website. (Criterion 2.5)

Condition 4: AQAS presents revised resolutions on the routines of accreditation procedures in which changes in the appeals- and complaints procedure are considered and publishes its internal complaints procedure on its website. (Criterion 2.6)

Recommendation 1: In light of the overlapping of personnel between the board and accreditation commissions, AQAS should be bindingly obliged to document the functions and decision-making powers of the board members in the commissions of the agency. (Criterion 2.2.1)

Recommendation 2: AQAS should be bindingly obliged to document the modalities of the decision-making in the accreditation commissions. (Criterion 2.2.1)

Recommendation 3: AQAS should ensure the participation of all interest groups in appointing experts for programme accreditation and random sample programme assessments. (Criterion 2.2.2)

Recommendation 4: AQAS should take measures for thorough preparation of experts for programme accreditation. (Criterion 2.2.3)

Recommendation 5: AQAS should bindingly document how it ensures instruction-freedom and the independence and impartiality of its committees and their members. (Criterion 2.3.3)

Recommendation 6: In composing the independent complaints commission, an overlapping of personnel with further decision-making bodies of the agency should be excluded. (Criterion 2.6)

4.1 Assessment based on the criteria for the accreditation of accreditation agencies

Criterion 2.1: Self-image and understanding of the accreditation task

2.1.1. The agency has a publicly documented perception of quality, from which it derives the basis of its accreditation activity. Its activity is geared to the objective of enhancing quality and is based on the Higher Education Institutions' key responsibility for the profile and quality of teaching and learning.

Documentation

AQAS formulated the objectives of quality assurance and its understanding of quality in its mission statement adopted by the board on 7 July 2007 (Application, p. 5). It is published in this form in the informational brochures and on the agency's website. The aim of AQAS e.V. is also defined in the preamble of the articles of association and defined there as the purpose of the association (subsequent submission 01, preamble and § 2).

According to this, accreditation procedures are to allow diversity of study programmes, to ensure the quality of these study programmes, and to create transparency so as to contribute to international comparability and recognition, and to guarantee reliable orientation for study programme applicants. Further, it stipulates that AQAS promotes the further development of higher education studies and contributes to quality improvement by assessing quality standards in relation to content and the study subject, and also evaluates the employment-market orientation of academic qualifications as part of the accreditation procedures (subsequent submission 01, preamble). The activity of AQAS is based on an understanding of quality that follows these maxims: (1) The responsibility for teaching and learning, and the quality assurance thereof, is borne by the higher education institutions. (2) The assessment of study programmes by AQAS is oriented on the objectives set by the higher education institutions and on the requirement standards to be fulfilled. (3) In the accreditation procedure (a) the suitability of the objectives and the expertise expressed therein, as well as the (b) suitability of the study programme, the resources, the organisation and the quality assurance procedures of the higher education institutions for achievement of these objectives are evaluated. (4) Basis for the procedure are national and European qualification frameworks. (5) The procedure complies with national or European standards and (6) targets the comparability of study programmes and thereby equivalence not homogeneity (mission statement in the application, p.5).

Assessment

Particularly during the discussions, the expert group received a positive impression of the quality understanding of AQAS and its implementation in the accreditation activity of the agency. AQAS thereby bases the accreditation procedure on the approach of a “fitness for and of purpose” model, following which the objectives of the higher education institution form the decisive evaluation parameters, and national and international frameworks are considered. While AQAS assumes the responsibility for the process of accreditation, the main responsibility for profile and quality in teaching and learning lies solely with the higher education institutions. AQAS thereby places the improvement of quality and its development by the higher education institution in the focus of the accreditation procedure and its structure. The expert group recommends externally documenting this understanding of quality, which forms the basis of the agency’s work, more strongly than to date.

Result

Criterion 2.1.1 is fulfilled.

2.1.2 The agency accredits across types of Higher Education Institutions and also across disciplines in the case of admittance for programme accreditations.

Documentation

According to its own self-image, AQAS works across subjects and types of higher education institutions (Application, p. 4). The composition of the accreditation commission for programme accreditation, pursuant to the articles of association and extending across subjects and types of higher education institutions, serves as evidence of this (subsequent submission 01, § 8 para. 5), as does a statistical overview of the disciplinary distribution of accredited study programmes (VI.2, p. 12). For system accreditation, the agency has concluded contracts both with a university and a university of applied sciences (Application, p. 30, status: October 2011).

Assessment

It has been proven that AQAS works across types of higher education institutions in its system accreditation procedures and also across study subjects in its programme accreditation procedures. Entries of accredited study programmes in the database of the Accreditation Council verify that the agency’s programme accreditation work extends across various types of higher education institutions.

Result

Criterion 2.1.2 is fulfilled.

Criterion 2.2: Structures and procedures

2.2.1 For admittance to programme accreditation and/or for system accreditation, the agency proves binding internal structures and procedures, which ensure the correct and consistent application of the “Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation” in the current version. Responsibilities of the organs and their personnel are functional and legally regulated.

Documentation

The tasks and responsibilities of the bodies of AQAS, as well as their composition, are regulated in the articles of association (subsequent submission 01). The assessment criteria and rules of procedure on which the accreditation procedure is based are bindingly documented in the two informational brochures for programme- and system accreditation and in corresponding resolutions of AQAS (Annexes IV.1 and IV.3).

Pursuant to § 5 of the articles of association, the bodies of the agency comprise the general membership meeting, the management board, the accreditation commission for programme accreditation (hereinafter AC^{Prog}), the accreditation commission for system accreditation (hereinafter AC^{Sys}) and the complaints commission.

Pursuant to § 6 of the articles of association, the general membership meeting elects the management board, passes the statement of accounts, the annual business plans, the articles of association and rules of procedures and decides upon fundamental questions affecting the association as well as other matters presented by the management board. The general membership meeting can make recommendations to the management board for appointment of the accreditation commissions and for procedural principles. The criteria decided by the accreditation commission and the procedural principles are presented to the general membership meeting for acknowledgement.

Members of the association may comprise public and private higher education institutions, associations of higher education institutions, as well as departmental- and faculty associations, scientific societies, and national and international associations that are particularly closely tied to the purpose of AQAS (subsequent submission 01, § 3).

As the executive committee of AQAS e.V., the management board appoints the complaints commission and both accreditation commissions and, pursuant to § 8 para. 5 in the case of the AC^{Prog}, also sets the number of members. In addition, the management board decides about the acceptance and exclusion of members, issues the quality seal on be-

half of the Accreditation Council, concludes agreements for cooperation with other accreditation institutions, prepares the budget and fulfils all other tasks not relegated to another body by the articles of association. Pursuant to § 8 of the articles of association, the management board may give itself rules of procedure; however, to date, use has not been made of this.

The five members of the management board are elected by the general membership meeting for a term of three years. Re-election is possible. A total of four members should be representatives of higher education institutions, whereby a member of the management board does not also need to be a member of the association (subsequent submission 01, § 7).

In procedures for programme- or system accreditation, the individual accreditation commissions are the central decision-making committees of the agency. They decide upon the accreditation and the individual procedural principles and standards for the accreditation procedure. Both commissions ensure that the procedural principles for accreditation comply with laws and guidelines. The chairman of the management board is the chairman of both commissions (subsequent submission 01, § 8).

For the AC^{Prog}, further tasks can be derived from its resolution “General procedural principles of AQAS” of 20.11.2007, its resolution on “Routine of the accreditation procedure” of 23.02.2010 and the identically named resolution of the AC^{Sys} of 10.05.2010 (Annex IV.1, p.13f. and 16f. and Annex IV.3, pp. 21-24). According to this, the AC^{Prog} decides upon the opening of an accreditation procedure, appoints the expert group both for procedures for programme accreditation and for programme random samples for system accreditation, evaluates the reports of the expert groups on the programme random samples, and, if necessary, provides an opinion on as to whether the defects pointed out by the expert group represent quality defects in the sense of the guidelines of the Accreditation Council.

The management board decides the number of members in the AC^{Prog}. Pursuant to § 8 para. 5 of the articles of association, its composition is interdisciplinary and crosses types of higher education institutions, whereby the relevant interest parties (academia, students and vocational practice) are involved and the teachers represent various subject groups and types of higher education institutions. Additional, international members may be taken up in the accreditation commission.

The commission has defined the further tasks of the AC^{Sys} in its resolution on the “Routine of the accreditation procedure” of 10.05.2010. According to this, the AC^{Sys} decides the admittance of a higher education institution for system accreditation and thereby the open-

ing of a procedure, appoints the expert group for system accreditation, may make a statement on the selection of the feature random sample by the expert group and may formulate commissioned assessments for the programme random sample based on the preliminary report of the expert group .

The number and composition of the members of the AC^{Sys} is regulated in the articles of association. Its total of ten members comprises, in addition to the management board, five representatives from higher education institutions with proven expertise in the area of internal quality assurance systems in higher education institutions, one expert from professional practice who is currently responsible for internal quality assurance in a company, one expert from professional practice who is currently responsible for quality assurance at a higher education institution and who adds the perspective of the administration of a higher education institution, an expert for quality assurance in the area of higher education from a European foreign country, and a student who has already participated as an expert in programme accreditations.

For the composition of the complaints commission and its tasks, reference is made to the explanations under Criterion 2.6.

Assessment

The tasks and responsibilities of the bodies and their personnel are bindingly regulated in the articles of association of AQAS. In the view of the expert group, the individual tasks have been assigned to the individual committees in accordance with and as befits the purpose of their expertise. In particular, the assignment of the task of developing procedural principles and standards to the two accreditation commissions is, with regard to the task of ensuring compliance with laws and guidelines, suitable for ensuring correct and consistent application of the “Rules for the accreditation for study programmes and for system accreditation”. That the accreditation commissions are to be supported in this by the head office in order to assess the consistency of the commissions’ resolutions is also appropriate (see Annex I.5, p. 5).

The expert group finds that the agency’s own presentation of the criteria of the Accreditation Council is a good supplementation. The operationalisation in the form of guiding questions and assessment criteria offer both a good information basis for experts and higher education institutions and also contribute to the consistency of decisions in the accreditation commission. The consistent references to the resolutions of the Accreditation Council adequately provide transparency and the individual criteria of the Accreditation Council are thoroughly reflected in the assessment criteria (Annexes IV.1, pp. 42-48 and IV.3, pp.33-37 or 41-45). On the one hand, some of these and further resolutions of the

agency refer to resolutions of the Accreditation Council that have long since changed or been removed. On the other hand, in their concretisation, the agency's resolutions sometimes extend beyond the current provisions of the Accreditation Council and the agency itself, and thereby restrict the room for manoeuvre of higher education institutions (on this, see Annex 2).

In addition to the evaluation criteria based on the guidelines of the Accreditation Council, AQAS has also developed its own procedural structures for programme- and system accreditation. The special characteristics of these procedural structures can be summarised as follows:

- After the opening of procedures by the AC^{Prog} or AC^{Sys}, the head office forwards possible questions of the commissions in writing to the higher education institution, based on which it may revise the accreditation application again before it is presented to the expert group (see Annex IV.1, p. 16, Annex IV.3, p. 21, Annex III.7, p.2).
- Prior to the assessment, both commissions may also formulate commissioned assessments which, in the case of programme accreditation, are advised to both the experts and the higher education institution and that can be formulated to the experts in the system accreditation for the programme random sample based on the preliminary assessment report (see Application, p.17; Annex IV.3, p.23; Annex III.7, p.2).
- Furthermore, prior to the on-site visit, preliminary statements of the individual experts on the accreditation application of the higher education institution are given for acknowledgement (see Application, p. 18, Annex III.7, p. 4, Annex IV.1, p. 17, Cl. 14 or Annex IV.3, p. 22f., Cl. 19 and 25).
- For programme accreditation, a member of the commission is assigned to each procedure as a reporter who more intensively considers both the application of the higher education institution and the report on the accreditation application and takes a position on this in the meetings of the commission (see subsequent submission 15, p.1).

To gain an impression of the quality of these procedural steps, the expert group requested examples of all three aspects prior to the on-site visit. As a result, and particularly based on the discussions with surveyed representatives from the expert group and from higher education institutions, the expert group assesses the agency's own procedural practice as positive and without any contradiction to the rules of the Accreditation Council. The expert group finds that all procedural steps are comprehensibly derived from the quality understanding of AQAS and contribute to the structuring of a procedure that has the quality development and advancement by the higher education institutions at its core. The expert

group did not gain the impression that the procedural elements would have an unnecessarily delaying effect. The impartiality in the decision-making is also principally maintained, although the description of consultation services of AQAS, particularly for programme accreditation, in the articles of association (subsequent submission 01, § 11 para. 4) and the corresponding information brochure (Annex IV.1, p.5) are somewhat ambiguously formulated. For example, these stipulate that the members of the head office have the particular task of advising the applicants and that the agency's profile is marked by its consulting expertise. However, during the on-site visit, the expert group was convinced that such a consultation, which is also promised with the preparation of the offer (Annex III.2a, p.2), only involves procedural aspects and not content-related matters.

The expert group did express reservations concerning the markedly active role of both accreditation commissions in the procedures for programme- and system accreditation. Their early involvement and intensive participation surely promotes careful consideration of a study programme or internal quality assurance system of a higher education institution to be accredited. However, there was sometimes the impression that the commissions give themselves an assessing role when assessments and recommendations seem to more serve the opinion-building in the commission and are viewed less as a basis for decision-making. In this context, the expert group would prompt a critical consideration of the self-understanding of both commissions in order to place the assessment more clearly in the centre of the accreditation procedure.

The expert group also sees possible conflicts of interest in the roll of the management board chairman, who is also the chairman of both accreditation commissions and thereby ties the strategic association business to the accreditation activity. In principle, the expert group can understand the motivation of AQAS to develop the strategy of the association through this structure with consideration of experience in accreditation activity and to promote information exchange within the agency. During the on-site visit, the expert group also did not gain the impression that the accreditation activity was dominated by the strategic association business due to the current personnel in the committees and functions. The established (but not bindingly anchored) practice that the chairman takes on a moderating role in both accreditation commissions and makes no use of his/her voting rights, is assessed by the expert group as a possible way to ensure the avoidance of potential conflicts also with respect to certain individuals. However, particularly in view of international acceptance of the overlapping of personnel in the composition of the committees, AQAS should bindingly document this motivation, and, above all, the implementation of these structures.

AQAS should also prepare such documentation for the decision-making within the committees and select a kind of binding nature that is appropriate for the culture of the committees. The expert group acknowledges that the AC^{Prog} has already agreed upon a decision-making process for circulation resolutions. As, however, all decisions of the accreditation commissions can lead to significant consequences for higher education institutions, the resolutions of the committees should be fundamentally based on binding decision-making rules so as to also increase legitimacy and transparency of the decision-making.

The provided contracts for both procedures comply with the requirements of the Accreditation Council.

Result

Criterion 2.2.1 is partially fulfilled.

Recommendation

The expert group issues the following recommendation:

Condition 1: AQAS shows that it has adapted its resolutions and documents to the current provisions of the Accreditation Council. In this, it is to be ensured that the higher education institution's room for manoeuvre, which was consciously created by the Accreditation Council, is not restricted.

Recommendation 1: In view of the overlapping of personnel between the management board and accreditation commissions, AQAS should bindingly document the functions and decision-making competencies of the management board chairman in the agency's committees.

Recommendation 2: AQAS should bindingly document the modalities of the resolution-making in the accreditation commissions.

2.2.2 The agency involves representatives of interest groups (sciences, students and practitioners from the profession) relevant for the execution of the task.

Documentation

The composition of the agency's bodies is regulated in the articles of association (subsequent submission 01, § 6-9). According to this, representatives of academia, as well as professional practice and students participate in both accreditation commissions and in the complaints commission. The current composition of the two accreditation commissions confirms the participation of all relevant interest parties (Annex, pp. 9-10). The establishment of a complaints committee was decided by the general membership meeting on

17.10.2011.

The composition of the expert groups is also determined in the articles of association (subsequent submission 01, § 10) and is also the subject of individual resolutions of the accreditation commissions published in the information brochures (Annexes IV.1 and IV.3). According to this, all relevant interest groups are involved in the procedure of programme- and system accreditation.

Assessment

The articles of association and the current personnel in the committees confirm that AQAS has involved all relevant interest parties (academia, students and professional practice) in the two accreditation commissions and in the complaints commission. In correspondence with the tasks of both commissions, all three interest groups are thereby not only involved in decisions on the accreditation of study programmes and internal quality assurance systems of higher education institutions, but also in the designing of the procedures and the assessment criteria. The procedural structure for system accreditation was, in the past, determined by the management board. However, during the on-site visit, the expert group gained the impression that the newly established AC^{Sys} comprehensively considered these procedural rules during its constitution phase and that they were also confirmed by the commission through the binding documentation in the information brochure. The expert group particularly welcomes that the previously defined procedural rules are being further discussed based on first experiences with system accreditation made by the now work-capable committees and with participation of all stakeholders.

The expert group establishes that the expert groups for programme- and system accreditation comprises representatives of academia, professional practice and students. However, while expert groups for system assessment for system accreditation are appointed by the entire AC^{Sys}, only two members of the AC^{Prog} appoint experts for programme accreditation and for programme random samples, thereby excluding the participation of all interest groups. In its findings, the expert group did not have the impression that the quality of the procedures would have been negatively affected by this in the past. However, particularly for reasons of legitimacy, the appointment of expert groups should involve all interest groups relevant for task fulfilment.

Result

Criterion 2.2.2 is fulfilled.

Recommendation

The expert group issues the following recommendation:

Recommendation 1: AQAS should ensure the participation of all interest groups in the appointment of experts for programme accreditation and the programme random samples.

2.2.3 The competence of those involved in the procedures, with regard to all areas relevant for the assessment procedures of programme accreditation or system accreditation, is ensured by appropriate selection procedures and briefing.

Documentation

In its application, AQAS only incompletely treats the selection and preparation of all involved in the procedure (management board, commission members, expert groups, employees of the head office). Corresponding information can be mostly taken from the individual annexes and subsequently submitted documents.

Criteria for the selection of the management board members can be taken from the resolution "System of internal quality assurance of AQAS e.V." of 24.04.2008 (Annex I.5, p.2).

According to this, accredited academics with experience in the management of universities or universities of applied sciences should be appointed as members of the board. In addition, they should identify themselves with the objectives of the Bologna Process and share the understanding of quality formulated in the mission statement. Attention should be paid to the participation of personalities who have own experience through professional stations in business and in areas outside of the university that are relevant for graduates. Through the head office, the members of the management board are to be continuously informed of national and international developments that are relevant for the agency's work (Annex I.5, p. 3).

Information on the selection and preparation of the members of both accreditation commissions can be taken from § 8 of the articles of association (on documentation see Criterion 2.2.1). Further criteria can be derived from the resolution "System of internal quality assurance of AQAS e.V." of 24.04.2008 and the statements of the subsequent submissions (Annex I.5, Letter with the subsequent submissions).

According to this, it is the agency's demand for quality to win capable personalities for both accreditation commissions who identify with the objectives of the Bologna Process and share the understanding of quality of teaching and learning formulated in the mission statement. Furthermore, the academic members of the accreditation commissions and persons with professional experience should have subject expertise and professional ex-

perience that is relevant for the committee work. The student members of the accreditation commissions should, as a rule, have experience as student experts in accreditation procedures. According to the quality assurance system, the management board is to develop and update criteria for the recruiting of members of the accreditation commissions (Annex I.5, p. 4). For the composition of the AC^{Prog}, AQAS refers in the explanations with the subsequent submissions to a resolution by the management board of 07.09.2007, according to which each subject group includes at least two individuals from universities. By resolution of 07.12.2007, the management board also established that the members of the commission should have a “certain subject-related reputation, openness for different approaches, openness toward to the Bologna Process and a good overview of the subject in question” (Letter with the subsequent submissions, p. 2f.). It can also be taken from the statements regarding fulfilment of the ESG that the student members of the accreditation commissions are appointed by the student accreditation pool and are trained (Annex VI.2, p. 5). All members of the accreditation commissions should be regularly informed of the pertinent resolutions of the KMK (Standing Conference of the Ministers of Education and Cultural Affairs of the Länder), the Accreditation Council and the European bodies (Annex I.5, p. 4).

The selection procedure and preparation of experts primarily result from the articles of association (subsequent submission 01), the resolution “System of internal quality assurance of AQAS e.V.” of 24.04.2008 (Annex I.5), the resolution “Manual for experts in the accreditation procedure of AQAS” of 25.11.2008 (Annex III.7), various resolutions in both information brochures (Annexes IV.1 and IV.3), the statements in the application and the subsequently submitted resolutions on nomination and selection/appointment of the expert groups (subsequent submissions 02 and 02a).

Following the quality assurance system, both commissions decide on *procedures* for nominating and appointing for the selection of experts (see Annex I.5, p. 6). Corresponding resolutions were subsequently submitted (subsequent submissions 02 and 02a).

- For programme accreditation, the higher education institution is asked to create a subject profile of the expert group for the selection of experts. Names may not be mentioned. As part the opening of the procedure, the AC^{Prog} decides whether it will follow the profile suggestion of the higher education institution or change the profile. Based on decided subject profile, and with consideration of experts’ recommendations by members of the AC^{Prog}, a expert group is put together by the head office. The expert group is then confirmed by the chairman of the commission and a further member (subsequent submission 02a).

- The expert group for programme random samples in system accreditation is appointed correspondingly, whereby one expert is assigned the direction of the procedure. The expert group for system accreditation is appointed through the AC^{Sys} based on predefined profiles for the individual experts. One member of the expert group is appointed as chairman (subsequent submission 02).

Following the quality assurance system, *criteria* for nominating and appointing are also decided by both commissions (see Annex I.5, p. 6).

- For programme accreditation, such criteria are bindingly documented in the “Manual for experts” of 25.11.2008, as well as in the information brochures (Annexes III.7, p.2f and IV.1, p.20). Further criteria for experts are established in the articles of association (subsequent submission 01).

Pursuant to the articles of association, only experts qualified to assess study programmes based on disciplinary- and academic aspects may be appointed as members of the expert group. A member must represent the perspective of the individual professional field. The student member should have student experience in the field or environment of the study programme to be accredited (subsequent submission 01, §10 para. 3). According to the information in the manual, the student should also come from the same type of higher education institution as the applicant institution (see Annex III.7, p. 3).

The manual also stipulates that the experts come from various types of higher education institutions. For the nomination, the following criteria apply: “Openness to developments as part of the Bologna Process, active membership in the individual scientific community, reputation and disciplinary breadth, rather generalised than strongly specialised, openness to the pluralism of teaching opinions, desirable: experience in accreditation or evaluation, as well as international experience” (see Annexes III.7, p.2). Not all of these criteria are also listed in the information brochures (see Annex IV.1, p. 20) (see Criterion 2.3.3 on exclusion criteria).

In addition, the AC^{Prog} has decided special criteria for the composition of the expert group for the clustering of study programmes. The resolution “General procedural principles of AQAS” of 20.11.2007 states: “The disciplinary profile of the expert group must be as such that there is at least one expert academic/scientist who belongs to the individual discipline or subject group for each study programme” (Annexes III.7, p.9, IV.1, p.14, effective resolutions of the AC, p. 16).

- For system accreditation, criteria are described in the information brochure and bindingly documented by resolution of the management board that, in essence, reflect

Clause 4.5 of the procedural rules for system accreditation. According to this, expert groups for system assessment comprise three members with experience in the management of a higher education institution and internal quality assurance for higher education institutions, and the student member should have experience in self-administration of higher education institutions and accreditation. One member each should, if possible, have experience in the management of a higher education institution, in designing study programmes and in quality assurance of teaching and learning (subsequent submission 02). The criteria for the experts in programme random samples are identical to those stated for programme accreditation (Annex IV.3, p. 20) (see Criterion 2.3.3. on the exclusion criteria).

Following the quality assurance system, the head office project managers are responsible for preparation of the experts. As a measure, the quality assurance system also provides for experts training that should be offered once per year (Annex I.5, p.6).

- For system assessment in the procedure for system accreditation, AQAS stipulates in the application that expert groups are prepared through a one-day training session. The experts are acquainted with the general provisions for system accreditation and prepared for the concrete procedure. The contents of the training are listed in the application (Application, p.29 and Annex VI.2, p.4). In the quality assurance system, the assessment criteria lists are also referred to as a preparatory measure. In addition, an experts' manual is to be created when corresponding experience with the procedure has been made (Annex I.5, p. 6).
- According to the agency, the preparation for programme accreditation is oriented on a concrete procedure. The experts receive the application documents and further information material (summary of the application documents in writing, information brochure, experts' manual). There is also a preparatory meeting of the expert group on the day before the on-site visit (Application, p. 20f.). An example routine of such a training session is documented in Annex III.8.
In addition to other participatory circles, AQAS also invites past and potential experts to subject-related workshops offered by the agency since 2008. The agency finds that a general training is neither necessary nor useful as more and more experts have previous experience in accreditation and obligatory training sessions have been rejected (Application, p. 21).
- For preparing expert groups for the programme random samples in system accreditation, AQAS states in the application that these take place analogously to the programme accreditation. Through information material, the report on the first procedural

phase and possibly during the preparatory meeting, the experts are informed of the context of the system accreditation. AQAS determines the necessity of training in the individual cases (Application, p. 29).

With the statement of independence, all experts are informed of their tasks (Annex III.3, III.10, III.11).

For the selection and preparation of the staff at the head office, reference is made to Criterion 2.4.

Assessment

The expertise of all participants in the procedures attains significant importance in that AQAS develops measures for its assurance in the framework of the quality assurance system. However, the implementation of the measures provided for is not documented in all points in the application.

Specifically, the criteria defined for the composition of the management board is appropriate and suitable for ensuring the expertise of this body. The objectives and measures determined for the selection of the commission members are also suitable for guaranteeing expertise in both committees. In particular, the determination of criteria for the members of the AC^{Sys} as defined in the articles of association indicates the required expertise. For programme accreditation, there is also the challenge for AQAS as an interdisciplinarily-operating agency to guarantee a disciplinary breadth in the composition of the commission that corresponds with the activity spectrum of the agency. AQAS has chosen a flexible solution here in that the management board appoints the members and also determines their number. For this purpose, the disciplinary distribution of accreditation activity is regularly evaluated by the management board in coordination with the managing directors.

A comparison of the current composition of the management board and the accreditation commissions confirms the expertise and capability of these three committees. The expert group also received a positive impression of the interdisciplinary discussion culture in the AC^{Prog} and the appointment of reporters not belonging to the discipline for an accreditation procedure because this wide participation of all members of the commission promotes reciprocal learning in the context of the accreditation activity. The expert group also positively assesses the thorough preparation of the members of the AC^{Sys} in its constitution phase which has a lasting effect on the qualification of this committee. Nevertheless, the expert group recommends a consideration of the own role also within the committees and,

with regard to self-image, to respect the significance of the expert assessment in accreditation procedures (on this, see the discussion on Criterion 2.2.1).

Following the selection procedure and –criteria for experts for programme- and system accreditation, the appointment of qualified expert groups is ensured by AQAS. The expert group also positively assesses that higher education institutions in programme accreditation can prepare the appointment of the expert groups through disciplinary profile recommendations. Subsequently submitted examples of profile recommendations gave no indications of an influencing of the accreditation procedure. The recommendations of the higher education institutions were limited to the profiles of the study programmes to be accredited and did not too strongly restrict the number of potential experts (see subsequent submissions 11a-e). What could be improved overall is the comprehensibility of the selection criteria for programme accreditation, which is made difficult by the various presentations thereof in the articles of association, the manual and the information brochure.

In this context, the expert group notes that the appointment of expert groups for programme accreditation and programme random samples in system accreditation takes place under significant participation of the chairman of the management board. Such a procedure contradicts the practice of the agency to give the management board chairman a moderating role in the AC^{Prog} in that he/she waives voting rights.

In view of the activity focus of AQAS in the accreditation of teacher training study programmes, the expert group appreciates the efforts of AQAS to sufficiently consider the special requirements of such complex procedures through own provisions for cluster accreditations. However, the provisions for the extended composition of the expert groups do not completely correspond with the rules of the Accreditation Council and are to be adjusted to its current resolution framework. According to this, a sufficient assessment of all (partial-) study programmes is to be guaranteed when forming the expert group. The restriction to only one expert reviewer for each specialist subject represented in the cluster needs to be justified.

With regard to the preparation of the expert groups, the measures that AQAS provides for the system assessment in the system accreditation are suitable for also basic training experts for their activity. However, the expert group sees development potential with regard to the procedures for programme accreditation and programme random samples. Here, the reviewer preparation is solely related to the concrete procedure and thereby only partially fulfils the resolution of the Accreditation Council on “Preparation of experts in accreditation procedures” of 31.10.2008. The observation of AQAS that expert groups increasingly have experience in accreditation procedures is understandable. However, as a

thorough preparation of experts significantly contributes to the acceptance of an accreditation, and, for example, HEI-external or also international representatives may have little knowledge of the assessment activity or the accreditation system, corresponding offers should exist. AQAS itself has already defined an annual experts training as a quality measure for ensuring the high quality of its own procedures (Annex I.5, p. 6). Subject-related workshops with the participation of experts have also already been organised. A further differentiation of such offers, particularly for new experts, would benefit the quality and acceptance of AQAS' accreditation procedure.

The expert group positively assesses the detailed material on programme accreditation and welcomes that a corresponding experts manual is also to be created for system accreditation. In this context, the expert group particularly appreciates the role of the project managers in the accreditation procedure who are available to the expert groups at all times as capable contact partners.

Result

Criterion 2.2.3 is partially fulfilled.

Recommendation

The expert group refers to Condition 1 and also issues the following recommendation:

Recommendation 4: AQAS should take measures for the fundamental preparation of experts for programme accreditation

2.2.4 If the agency engages other organisations for the implementation of parts of the procedures, the correct implementation must be ensured by reliable rules and procedures.

Criterion 2.2.4 is not relevant in this procedure.

Criterion 2.3: Independence

2.3.1 The agency has a separate legal entity.

Documentation

AQAS was founded on 25 January 2002 with the legal status of a registered non-profit association and has been recognised as such since 13 May 2002 under No. VR 8059 in the register of associations of Bonn district court.

Assessment

The agency's statements confirm that AQAS has its own legal entity.

Result

Criterion 2.3.1 is fulfilled.

2.3.2 It does not work on a profit-oriented basis and carries out the accreditation procedures on full cost basis.

Documentation

Pursuant to § 2 of the articles of association, the agency pursues exclusively and directly non-profit purposes (subsequent submission 01). The annual business plan for AQAS e.V. is prepared by the association's management board together with the managing directors and the tax consultancy firm BDO Deutsche Warentreuhand AG Essen and passed by the general membership meeting. Additionally, AQAS voluntarily presents a balance sheet to inform members. The preparation of the business plan is normally oriented on a target/status quo comparison of the values of the previous year. Since 2009, the annual financial statement has been prepared according to business law, i.e. with consideration of the project terms and thereby according to the performance principle (see Application, p. 14).

For the year 2011, the agency calculates takings from accreditation (standard- and procedural fees) to the amount of €1,850,000 and membership fees to the amount of €6,800. From this, the item "external services" (expert costs, accreditation costs, travel expenses etc.) to the amount of €555,000 is subtracted with a remainder of €1,301,800. This stands against expenses for personnel, write-offs and other business expenses to the amount of €1,297,490. In the result, the plan income statement is balanced (Annex I.4).

AQAS bases the fees for the accreditation procedure on lump sums that include all personnel- and material costs tied to the procedure, as well as the costs of the on-site visit including travel and accommodations and expense allowances for the experts (Letter for the subsequently submitted documents, pp. 3-5).

Assessment

The non-profit activity of AQAS e.V. is given through the purpose of the association defined in the articles of association. It is confirmed by the responsible tax and revenue office in Bonn (Annex 08d).

The calculations on which the lump sums are based plausibly show that the procedure is carried out, in view of the total costs, on an absorbed cost basis. However, the expert group questions the reductions for member higher education institutions, also in view of the low member fees. The expert group acknowledges AQAS' argument that only few

procedures are carried out with non-members, that the actual expense in these procedures is higher and that there is a derivation or apportionment of the direct- and overhead costs related to the individual accreditation procedure. Nevertheless, a subsidising of member higher education institutions through non-members should be excluded in the future.

Result

Criterion 2.3.2 is fulfilled.

2.3.3 The agency ensures the freedom from instructions of the organs in individual cases and the independence and impartiality of the persons working for it.

Documentation

In the application, AQAS does not comment on the case-related instruction-freedom of the bodies and only comments on the impartiality of the experts. Corresponding information can be taken from individual annexes.

According to the mission statement, it is the goal of AQAS to ensure impartiality of the experts and committees in the procedure (Application, p. 5). For fulfilment of the ESG, the agency stipulates that both accreditation commissions act independently from the general membership meeting and thereby from the higher education institutions. Members of the committees are not involved in decisions affecting the own higher education institution (Annex VI.2, p. 15). In the application, it is stated that the complaints commission is independent (Application, p. 11).

By resolution of the AC^{Prog} of 20.11.2007, it is established for programme accreditation that experts and committees act independently in the procedure (Annex IV.1, p. 14). Corresponding exclusion criteria treat the impartiality of experts that are repeated in the experts' manual and in both information brochures (Annexes III.7, IV.1 and IV.3). The experts also sign a declaration of willingness to act as an expert in which they confirm their impartiality with regard to the individual procedure (Annexes III.3, III.10, III.11).

Assessment

Particularly during the on-site visit, the expert group was convinced that, despite the overlapping of personnel in the management board and accreditation commissions, the individual bodies and their members act freely and the accreditation activity is not determined by the strategic business of the association. The expert group also established that the decisions in the committees are made independently and impartially. Nevertheless, in view of the international acceptance of its procedures, AQAS should increase the binding

quality of both aspects and make it clear for outsiders.

In correspondence with the rules of the Accreditation Council, AQAS' complaints procedure provides for the possibility that higher education institutions may make objections to the impartiality of the experts (Annex I.3). However, in view of the structure of the corresponding procedure for programme accreditation there is the question of to what extent decisions can be impartially made when objections are evaluated by the head office in coordination with the member of the AC^{Prog} who also decided the appointment of the experts (for the documentation of experts appointment, see the comments on Criterion 2.2.3).

The experts' declarations of their willingness to act as experts are suitable for ensuring their impartiality. However, for programme accreditation, there are differences from the exclusion criteria in the "Manual for experts" in which e.g. relational or otherwise close ties to a member of the faculty and consulting activities or other involvement with regard to the study programme to be accredited are not found (see Annex III.7, p.2). There are also inconsistent statements for system accreditation. First, it is unclear as to whether the exclusion criteria described in the information brochure is binding exclusion criteria (Annex IV.3, p. 20). It is also not explicable why the criteria listed there differ from the impartiality declarations in which e.g. consulting services of the experts for higher education institutions are not questioned (see Annexes III.10 and 11).

For the structuring of the accreditation procedure, the expert group noted that both the AC^{Prog} and AC^{Sys} may formulate evaluation assignments to the experts prior to an assessment (see Criterion 2.2.1). At the same time, the expert group did not have the impression that this procedural practice influences the independence of the assessment of a study programme. However, the varying roles of the accreditation commissions and the experts in programme- and system accreditation should be respected.

Result

Criterion 2.3.3 is partially fulfilled.

Recommendation

The expert group issues the following recommendation:

Condition 2: AQAS presents binding exclusion criteria that ensure the independence of experts and that are listed in all relevant documents in a uniform manner.

Recommendation 5: AQAS should bindingly document how it ensures the instruction-freedom and independence and impartiality of its committees and its members.

Criterion 2.4: Facilities

The agency is sustainably and adequately equipped for its function in all required functional areas in respect of personnel and material resources

Documentation

Currently, a total of 19 persons are permanently employed at the head office of AQAS (status: October 2011). With one exception, all are employed full time. The head office is managed by two managing directors. Nine project managers are divided into two teams; each team is headed by a senior project manager as team manager. Six persons are permanently employed in the area of organisational assistance and administration. Four student assistants support the head office's work. A total of 13 employees support the accreditation procedures. The agency plans to fill a further project manager position and a second organisational assistance each starting 01.11.2011. A further project manager position is being currently advertised.

Information on the selection and preparation of the employees of the head office are described in the application documentation and also documented in the resolution "System of internal quality assurance of AQAS e.V." of 24.04.2008 (Annex I.5). The quality assurance system points out that personnel should be recruited based on agreed criteria and as part of a suitable procedure (Annex I.5, p. 5). According to own statements, AQAS considers relevant experience in higher education when recruiting project managers (Application, p. 35). Following the quality assurance system, new project managers are to be prepared for their activity through a mentor, sitting in on procedural lectures and the participation in a moderation training (Annex I.5, p. 5). The regular further training of the personnel takes place through participation in the closed meeting of the head office, different workshops, seminars and conferences which are offered for all employees or derived from the individual task areas (Annex I.5, p. 5, Application, p. 35f.). In addition, AQAS provides an annual budget of €300 per employee for individual further training not prompted by business operations (Application, p. 35).

The current office space capacity of 300 m² is to be expanded in April of the coming year due to the planned extension of personnel.

The workplaces are equipped with modern office technology and have Internet access. Further planning of the modernisation of the office structure includes the EDP structure.

Assessment

AQAS is adequately and sustainably equipped both with regard to human resources and material resources.

The expert group was impressed by the measures for initial training and qualification of employees of the agency. Both the comprehensive mentoring concept and the systematically provided options for further training and the successfully implemented team structure form the basis for the successful development of the clear and responsible role-understanding of the employees in the accreditation activity. This impression was confirmed all the more for the expert group in discussions with employees during the on-site visit.

In this context, the expert group positively assesses the dialogue-oriented feedback within the head office and toward the committees and management of the agency.

Result

Criterion 2.4 is fulfilled.

Criterion 2.5: Internal quality management

The agency continuously uses a formalised internal quality management system, which is suitable for assessing the effectiveness of the internal control processes and ensures the safeguarding and continuous improvement of the quality of the activity. It is publicly accessible and covers systematic internal and external feed-back processes.

Documentation

The internal quality assurance system of AQAS is documented through the management board resolution “The system of internal quality assurance of AQAS e.V.” of 24.04.2008 (Annex I.5). Some statements on the effectiveness of the system are described in the application and can be taken from the subsequently submitted internal annual reports (subsequent submissions 14a and b).

With its internal quality assurance system, AQAS pursues the two superordinate quality aims, (1) to establish AQAS e. V. on long term as an agency for quality assurance in the education sector through recognition of AQAS e. V. in the national and international context and (2) to secure the high quality of the quality assurance procedures carried out by AQAS e. V. AQAS assigns three quality demands each to these two superordinate aims and establishes corresponding quality measures to be implemented by the four internal actors (management board, AC^{Prog}, AC^{Sys}, head office), each with varying expertise and tasks.

The quality assurance system is fundamentally oriented on a quality loop that differentiates between the planning level (plan), the implementation level (do), the evaluation level (check) and the revision level (act) (Annex I.5, p. 1).

For external feedback, management bodies of the higher education institutions and experts are surveyed regarding the quality of the procedure carried out by AQAS at the end of the procedure. These surveys and the corresponding analyses are carried out on AQAS's commission by the Bonn Centre for Evaluation and Methods (zem). The results of the analyses are summarised in quarterly reports that the management board and head office receive. The external feedback also serves the feedback of the Accreditation Council e.g. in evaluation procedures. As internal feedback processes, monthly controlling reports on the financial development of the agency, annual feedback discussions with members of the accreditation commissions and institutionalised discussions within the head office are provided for (Annex I.5, p. 7). The head office also prepares an annual, internal report that is presented to the management board. This serves to reflect on the past year and derive measures for further development from results and experience (Application, p. 31). The reports for the years 2009 and 2010, which are oriented on the quality demands, were subsequently submitted by AQAS.

Measures for the removal of established weak points are decided by the management board, and responsibilities and schedules are set. The head office is responsible for the implementation of these resolutions and reports to the management board (Annex I.5, p. 7).

Assessment

Based on the quality understanding of the agency, the internal quality assurance system of AQAS is suitable for continuously improving the quality of the agency, particularly through the systematic external and internal feedback and the defined responsibilities of all involved in the accreditation procedures. The partially very ambitious quality measures are principally suitable for implementing the quality demands. As a result, and based on the provided for systematic documentation and reporting, the effectiveness of the internal controlling processes can be assessed.

During the on-site visit, the expert group was convinced that the system of internal quality assurance is consistently utilised and, in particular, the critical analyses in the internal annual reports form a good basis for the systematic analysis of the need for measures and for deriving measures in a targeted manner. The expert group appreciated the targeted and differentiated treatment of the results both of the external and internal feedback. Future feedback and observations related to the accreditation system should also be discussed by AQAS and used for further development.

The internal quality management of AQAS formalised through the binding structures for responsibilities, documentation and reporting, and the resolution of the management board, is currently not publicly accessible.

Result

Criterion 2.5 is partially fulfilled.

Recommendation

The expert group issues the following recommendation:

Condition 3: AQAS publishes its internal quality management system on its website.

Criterion 2.6: Internal complaints procedure

The agency has a publicly accessible, formalised internal procedure for reviewing accreditation decisions on application of a Higher Education Institution.

Documentation

All appeal- and complaints procedures for programme- and system accreditation are recorded in the same-named resolution of the management board of 26.09.2011 (Annex I.3). Further statements are documented in the articles of association and the two information brochures (subsequent submissions 01, Annexes IV.1 and IV.3).

Following the management board resolution, higher education institutions may raise objections to the members of the expert group, point out errors in the objective presentation of an assessment report, or appeal against accreditation decisions and the structure of the procedure. With appeals of higher education institutions against accreditation decisions, the responsible accreditation commission first decides on the accreditation anew based on the relevant documents and with consideration of the objections. If no agreement can be made with the higher education institution, then an own complaints commission decides. Pursuant to § 9 of the articles of association, this comprises an external representative of a different accreditation agency, two representatives of higher education institutions, a representative of professional experience and a student. Additionally, one member each from both accreditation commissions participate without voting rights (subsequent submission 01).

Both brochures contain information on deadlines for objections to accreditation decisions. According to this, the higher education institution in programme accreditation may object in writing within four weeks and, for system accreditation, within three weeks (Annex IV.1, p. 17 or Annex IV.3, p. 24).

The establishment of a complaints commission as a body of the agency was decided in the general membership meeting on 17 October 2011 (Letter with subsequently submitted documents, p. 1).

Assessment

The formalised procedures as described in the management board's resolution on the procedures for appeals and complaints, as well as the responsibilities of the complaints commission, are appropriate and comprehensibly documented.

However, the expert group critically assesses the permanent membership of one representative each from the AC^{Prog} and the AC^{Sys}, even though these individuals do not have voting rights. Their participation may secure information flow between the bodies of the agency. However, the expert group views the insufficient division between the different roles as being problematic and sees a possible endangerment of independent decision-making in the complaints commission. In addition, the expert group establishes that, contrary to the appeal-lodging higher education institution, both accreditation commissions can make statements ad personam through their representatives. For reasons of fairness toward the appellant, the expert group believes that every form of indirect possibility of influence of the decision of the complaints commission should be excluded.

There are also contradictory statements on the responsibilities contained in the resolutions on the routine of the accreditation procedure published in the two information brochures. According to these, the final decision regarding an objection is made by the management board of AQAS (Annex IV.1, p. 17 or Annex IV.3, p. 24).

The appeal- and complaints procedure is currently not publicly accessible on the website of the agency.

Result

Criterion 2.6 is partially fulfilled.

Recommendation

The expert group issues the following recommendation:

Condition 4: AQAS presents revised resolutions on the routines for accreditation procedures in which changes in the appeal- and complaints procedure are considered, and publishes its internal complaints procedure on its Internet site.

Recommendation 6: In the composition of the independent complaints commission, an overlapping of personnel with the further decision-making committees of the agency should be excluded.

Criterion 2.7: Accountability

The agency describes its procedures and appraisal criteria adequately in detail and publishes them. It publishes the names of the experts, the expert reports and the decisions of the accreditation procedures carried out by it.

Documentation

According to the mission statement, it is a demand of the agency to inform the interested public of procedures and results of the procedures (Application, p. 5). Furthermore, transparency of the quality assurance procedures carried out by the agency is formulated as a quality demand (Annex I.5). The procedures and assessment criteria of AQAS are described and bindingly documented in the two information brochures on programme accreditation and system accreditation (Annexes IV.1 and IV.3). These and other procedural materials, as well as further information on the agency, are published on the website of AQAS.

For each accredited study programme, AQAS publishes the names of the experts, the report (or an abstract for procedures with contract conclusion before June 2010) and the decision both on its own website and in the database of the Accreditation Council. As per the national guidelines, in the case of a negative accreditation decision, there is a corresponding statement to the Accreditation Council rather than a published statement. Every report follows a structure set by AQAS in which the evaluation criteria are assigned to the agency and, in addition to the assessment, also comprise the decision of the accreditation commission. An example report is enclosed in Annex III.6.

Assessment

The procedures and assessment criteria of the agency are described, among other places, in the information brochures in sufficient detail, published and available on the agency's website. AQAS also fulfils its obligation to publish the names of the experts, the report itself and the decisions of the accreditation procedures it has carried out. This is confirmed by the board report of the Accreditation Council on experience in the past accreditation period (Drs. AR 35/2011, p. 5).

During the on-site visit, the expert group gained the impression that the members of the AC^{Prog} intensively discuss decisions on the accreditation of study programmes (for the self-image of the committee, see Criterion 2.2.1). Here, justified deviations from the report decision recommendation are considered, as well as the striking of "irrelevant aspects" from the report. However, to fulfil the own quality demand of transparent procedures and decisions, particularly toward the higher education institutions, the formulation of the reports should remain unchanged and deviations in the accreditation decision should always

be transparently documented.

Result

Criterion 2.7 is fulfilled.

4.2 Assessment based on the European Standards and Guidelines (ESG)

In the development of its criteria for the accreditation of accreditation agencies, the Accreditation Council has fully observed the ESG. However, the assessment of compliance with ESG is undertaken in a separate section of the report, despite the fact that certain redundancies cannot be avoided.

The core business of AQAS is to carry out procedures for programme- and system accreditation for the awarding of the seal of the Accreditation Council. In these procedures, the agency is bound to the resolutions of the Accreditation Council. The resolutions of the Accreditation Council both for the procedural rules and criteria for the accreditation of agencies, study programmes and internal quality assurance systems of higher education are based on the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

For the assessment of the fulfilment of the ESG, the activity of AQAS in programme- and system accreditation and all further activities of the agency in the area of external quality assurance are relevant. This includes the accreditation procedures for foreign higher education institutions (see Annex VI.1) stated by AQAS. The corresponding procedural materials from which the assessment criteria, decision rules and procedural structures are derived have been subsequently submitted by AQAS (see Annex 16a-c). In content, they differ little from the rules and criteria for the awarding of the seal of the Accreditation Council, whereby the assessment criteria are more strongly oriented on the ESG and dispose with national framework provisions. For procedures with foreign higher education institutions, the AQAS awards its own seal.

For the extension of full membership in the ENQA and registration in the European Quality Assurance Register (EQAR), all activities will be considered in the following assessment of compliance with the ESG.

3.1 Use of external quality assurance procedures for higher education

STANDARD:

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

GUIDELINES:

The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions. The standards for external quality assurance

should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

2.1 Use of internal quality assurance procedures

STANDARD:

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

GUIDELINES:

The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met. If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

Documentation

It is a part of the quality understanding of AQAS to evaluate the suitability of the quality assurance procedures of the higher education institution for achievement of the goals set by the higher education institution (mission statement in the Application, p.5).

The accreditation procedures of AQAS are also based on the criteria of the Accreditation Council for the accreditation of study programmes and system accreditation. The effectiveness of the internal quality assurance processes of higher education institutions in programme- and system accreditation is considered in different ways: For programme accreditation, Cl. 2.9 (quality assurance and further development) directly refers to the internal quality management for a study programme and its effectiveness. The procedure of system accreditation in which the quality assurance processes of a higher education institution form the focus of assessment, genuinely raises the question of whether the quality management system of a higher education institution for teaching and learning is suitable for achieving the qualification aims and for ensuring the quality standards of the study programmes. AQAS has documented and published these assessment criteria for both procedures in its information brochures for programme- and system accreditation (Annexes IV.1 and IV.3). The criteria for accreditation procedures for foreign higher education institutions expressly refer to Standard 1.1 of the ESG (subsequent submission 16b, p. 4).

Assessment

All external quality assurance procedures of AQAS consider the effectiveness of internal quality assurance processes of higher education institutions. In this, the assessment criteria on which the accreditation procedures are based directly refer to the corresponding measures of the higher education institution and extensively consider their effectiveness.

Result

Standard 2.1 is fully complied with.

2.2 Development of external quality assurance processes

STANDARD:

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

GUIDELINES:

In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used. As external quality assurance makes demands on the institutions involved a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

Documentation

The purposes, objectives and process of accreditation procedures in Germany are fundamentally established by the Accreditation Council and the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder (Kultusministerkonferenz). The relevant interest groups (representatives of higher education institutions, practitioners of professions, students, and international experts) were involved in this.

On this basis, AQAS developed the objectives of the quality assurance procedures it carries out and formulated its quality understanding in the mission statement passed by the management board on 7 July 2007 (Application, p. 5). It is published in this form in the information brochures and on the agency's website. The objective of AQAS e.V. is also documented in the preamble of the articles of association (subsequent submission 01, preamble). According to this, accreditation procedures should allow diversity of study programmes, ensure the quality of these study offers and create transparency in order to contribute to international comparability and recognition, and to guarantee reliable orientation for study applicants. Furthermore it is stipulated that AQAS promotes the development of higher education study and contributes to quality improvement in that the accreditation procedures evaluate subject-/content-related quality standards and the job market orientation of academic degrees. The responsibility for teaching and learning, and the quality assurance thereof, lies with the higher education institutions.

Based on this quality understanding, AQAS has derived procedural principles and assessment criteria for programme- and system accreditation, and accreditation procedures

for foreign higher education institutions. Pursuant to § 8 of the articles of association, these are fundamentally decided within the agency by both accreditation commissions (AC^{Prog} and AC^{Sys}). Members of both commissions include representatives of higher education institutions, practitioners of professions and students (subsequent submission 01, § 8).

The procedures and assessment criteria are comprehensively described and bindingly documented in the two information brochures for programme accreditation and system accreditation, as well as the procedural materials for accreditation procedures for foreign higher education institutions (Annexes IV.1 and IV.3, subsequent submission 16b and 16c). These and other procedural materials, as well as further information on the agency, are also published on the website of AQAS.

Assessment

The agency's objectives, procedures and assessment criteria are described in sufficient detail, among other places, in the information brochures, published and accessible on the agency's website.

Particularly during the discussions, the expert group gained a positive impression of the quality understanding of AQAS and the implementation thereof in the accreditation activity of the agency. In this, AQAS bases its accreditation procedures on the approach of a "Fit-ness for and of purpose" model in which the aims of the higher education institution form the decisive assessment measure, and national and international framework conditions are thereby considered. While AQAS assumes responsibility for the process of accreditation, the main responsibility for profile and quality in teaching and learning lies solely with the higher education institutions. AQAS places quality advancement and –development by the higher education institution in the focus of the accreditation procedures and their structuring. The expert group recommends documenting this quality understanding, which forms the basis of the agency's work, more clearly in its outer presentation than has been the case until now.

The provisions of the articles of association and the current personnel in the committees shows that AQAS involves all relevant interest groups (academia, students and vocational practice) in both accreditation commissions. In correspondence with the tasks of both commissions, all three interest groups are thereby not only involved in the decisions on the accreditation of study programmes and internal quality assurance systems of higher education institutions, but also in the designing of the procedures and the assessment criteria. The structure of the procedure of system accreditation has been determined by the

management board in the past. However, during the on-site visit, the expert group was convinced that the newly established AC^{Sys} comprehensively discussed these procedural rules in its constitution phase, and the commission confirms the procedures through its binding documentation in the information brochures. At the level of the Accreditation Council, the relevant interest groups were involved in the derivation of the assessment criteria and procedural rules.

Result

Standard 2.2 is fully complied with.

2.3 Criteria for decisions

STANDARD:

Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

GUIDELINES:

Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

Documentation

For the awarding of the seal of the Accreditation Council, AQAS is bound in its accreditation decisions and the underlying assessment criteria and decision rules to the pertinent resolutions of the Accreditation Council, publicly accessible e.g. on the Internet.

On this basis, both the AC^{Prog} and the AC^{Sys} developed specific assessment criteria, decision-making principles and further procedural materials in order to increase the comparability and consistency of its accreditation decisions. These are documented and published, among other places, in the two information brochures. (Annex IV.1 and IV.3) AQAS has developed own assessment criteria for accreditation procedures for foreign higher education institutions which predominantly reflect the standards and guidelines for the internal quality assurance of higher education institutions (Part 1 of the ESG) (subsequent submission 16b).

The assessment criteria based on which the fulfilment of a criterion can be determined serve the experts as orientation for their assessment and preparation of the report. As part of its internal quality assurance system, AQAS has also set measures for ensuring subject-appropriate and consistent decisions of the accreditation commissions. These comprise, among other things, regularly informing all members of the accreditation commis-

sions of national and international provisions which should also expressly be considered in the draft decision templates for decisions for the commissions. Furthermore, the decisions of the accreditation commissions should be regularly evaluated for consistency and discussed in a feedback round with the members of the commissions (Annex I.5, p. 6).

The accreditation decisions of AQAS and the consistent application of its criteria and procedural- and decision rules is regularly evaluated by the Accreditation Council.

Assessment

AQAS' decisions for programme- and system accreditation are based on concrete, published criteria and decision principles that are oriented on the criteria and decision rules of the Accreditation Council or the Standards and Guidelines for Internal Quality Assurance within Higher Education Institutions (Part 1 of the ESG).

In the view of the expert group, the operationalisation of the criteria and standards using guiding questions and assessment criteria positively supplements the accreditation procedures of AQAS. They offer a good information basis for experts and higher education institutions and also contribute to a structuring of the decision-making in the accreditation commissions. The expert group also positively assesses the further measures of AQAS taken to systematically ensure the consistency of its decisions.

Result

Standard 2.3 is fully complied with.

2.4 Processes fit for purpose

STANDARD:

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

GUIDELINES:

Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes.

Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance. Amongst these elements the following are particularly noteworthy:

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task;
- the exercise of care in the selection of experts;
- the provision of appropriate briefing or training for experts;
- the use of international experts;

- participation of students;
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached;
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review; recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality

Documentation

The aim of the accreditation procedures of AQAS is to promote the further development of higher education study and to contribute to advancement of quality. AQAS' activity is based on a quality understanding that adheres to the following maxims: (1) The responsibility for teaching and learning and the quality assurance thereof lies with the higher education institutions. (2) The assessment of study programmes by AQAS is oriented on both the aims set by the higher education institution and the requirement standards to be fulfilled. (3) The accreditation procedures evaluate the (a) adequacy of the aims and expertise expressed therein, as well as the concept and (b) the suitability of the study programme, the resources, the organisation and the quality assurance procedures of the higher education institutions for achieving these aims. (4) The basis of the procedure is formed by the national and European qualification frameworks. (5) The procedure complies with national or European standards and (6) targets the comparability of study programmes and thereby equivalence not homogeneity (mission statement in the Application, p.5).

Based on these maxims, the accreditation procedures of AQAS follow a multi-stage process, the basis for which is the self-documentation of a study programme or an internal quality assurance system of a higher education institution by the higher education institution. For this, AQAS provides the higher education institutions with corresponding guidelines in which the assessment criteria are operationalised in the form of guiding questions (see Annexes IV.1, pp. 22-34 and IV.3, pp. 25-32).

For the subsequent assessment of a study programme or internal quality assurance system of a higher education institution, AQAS appoints one (programme accreditation) or several (system accreditation) expert groups. The composition of the expert groups is determined by the articles of association (subsequent submission 01, § 10) and is also the subject of individual resolutions of the accreditation commissions published in the information brochures (Annexes IV.1 and IV. 3). According to this, all interest groups relevant to the procedure for programme- and system accreditation (academics, practitioners of professions and students) are involved. The nomination and appointment of experts takes place through a regulated procedure and based on pre-defined criteria that are bindingly

documented in the procedural materials of the agency.¹ The experts confirm their independence in writing (Annexes III.3, III.10 and III.11). All experts are prepared for the accreditation procedures both in written form and personally (Annex VI.2, p. 4).

In all accreditation procedures of AQAS, the assessment of a study programme or internal quality assurance system of a higher education institution by the expert group takes place based on the analysis of the self-documentation of the higher education institution and an on-site visit to the higher education institution, comprising, among other things, separate discussions with the management of the higher education institution, teachers and students. Based on this evaluation, the accreditation commissions of AQAS then decide upon the accreditation of a study programme (AC^{Prog}) or an internal quality assurance system of a higher education institution (AC^{Sys}).

For each accreditation procedure, a subsequent report is prepared which comprises the assessment of the experts and the decision of the accreditation commission (see Standard 2.5 on publication of the reports). As per the rules of the Accreditation Council, an accreditation may also include conditions; the higher education institution must provide the AQAS with evidence of the fulfilment thereof (see Standard 2.6 on follow-up procedures).

As part of the multi-stage structure of its accreditation procedures, AQAS has developed special procedural elements that primarily serve the preparation of the on-site visit of a higher education institution. For example, accreditation procedures are formally opened by the AC^{Prog} or AC^{Sys}, whereby the higher education institution can revise the accreditation application again based on possible questions of the commissions before the application is presented to the expert group (see Annex IV.1, p. 16, Annex IV.3, p. 21, Annex I.5, p. 3, Annex III.7, p.2). Prior to the assessment, both commissions may also formulate evaluation assignments that are shared with the experts and the higher education institution (see Application, p. 17; Annex IV.3, p. 23; Annex III.7, p.2). Furthermore, preliminary statements of the individual experts on the accreditation application may be given prior to the on-site visit to the higher education institution for acknowledgement (see Application, p. 17, Annex III.7, p. 4, Annex IV.1, p. 17, Cl. 14 or Annex IV.3, p. 22f., Cl. 19 and 25). In addition, a member of the commission is assigned to each procedure in programme accreditation as rapporteur and intensively considers the accreditation application and takes a position on this in the meetings of the commission (see subsequent submission 15, p.1).

¹ See the subsequent submissions 02 and 02a on the procedures of appointment and the subsequent submission 01 and annexes III.7, IV.1 and IV.3 on the criteria for the selection of reviewers.

Assessment

The expert group was strongly convinced that the higher education institutions' own responsibility for the quality of teaching and learning forms the basis of AQAS' accreditation activity. From the maxims, it is equally clear that AQAS bases its work on both national and international guidelines and that its actions also consider the context of European developments as a whole. In this respect, AQAS carefully and responsibly carries out its tasks both for structuring and executing its accreditation procedures. The expert group finds that all procedural steps can be comprehensibly derived from the quality understanding of AQAS and contribute to the structuring of a procedure with the central purpose of developing and advancing quality by the higher education institutions. In addition to the usual procedural components of external quality assurance processes, the further procedural elements that AQAS has drafted based on the rules of the Accreditation Council promote this.

Adequate selection procedures and also preparatory measures ensure that the assessment of a study programme or internal quality assurance system of a higher education institution is carried out by qualified experts. The relevant interest groups, including students, are represented in the expert groups for all procedures.

However, in this context, the expert group suggests a reflection on the considerably active roles of both accreditation commissions, even though their early and intensive involvement surely promotes the careful consideration of the accreditation of a study programme or internal quality assurance system of a higher education institution.

Overall, the procedure is suitable for creating a sufficient data basis for the accreditation decision and, in particular, to fulfil the procedural purpose of promoting quality development by the higher education institution.

Result

Standard 2.4 is fully complied with.

2.5 Reporting

STANDARD:

Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

GUIDELINES:

In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership. Reports are sometimes

intended for different readership groups and this will require careful attention to structure, content, style and tone. In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations. There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers. Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

For each accredited study programme, AQAS publishes the names of the experts, the report (or an abstract for procedures with contract conclusion before June 2010) and the decision both on its own website and in the database of the Accreditation Council. As per the rules of the Accreditation Council, in the case of a negative accreditation decision, there is a corresponding statement to the Accreditation Council rather than a published statement. Every report follows a structure set by AQAS in which the assessment criteria of the agency are assigned and which, in addition to the assessment, also comprise the decision of the accreditation commission. An example report is enclosed in Annex III.6. For experts, AQAS has also developed a manual that informs them of the requirements for the preparation of the report (Annex III.7, p. 6).

Assessment

With the publication of the abstracts and final reports, the decisions of AQAS and the underlying assessments of study programmes (programme accreditation) or internal quality assurance systems of higher education institutions (system accreditation) are made easily accessible to the interested public. The expert group appreciates that AQAS has made efforts to ensure comprehensibility both through the unified structure of the reports and the information in the reviewer manual.

During the on-site visit, the expert group gained the impression that the members of the accreditation commission intensively discuss decisions on the accreditation of study programmes (on the self-evaluation of the committee, see Criterion 2.2.1). Here, justified deviations from the report decision recommendation are considered, as well as the striking of “irrelevant aspects” from the report. However, in order to fulfil the own quality demand of a transparent procedure and decisions, particularly toward the higher education institutions, the formulation of the reports should remain unchanged and deviations in the accreditation decision should always be transparently documented.

Result

Standard 2.5 is fully complied with.

2.6 Follow-up procedures

STANDARD:

Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

GUIDELINES:

Quality assurance is not principally about individual external scrutiny events: It should be about continuously trying to do a better job. External quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

Documentation

As per the Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation, decisions on accreditation may be issued under conditions. In this case, the higher education institution is obliged to fulfil the conditions and to present evidence of fulfilment in documented form. The deadline within which the higher education institution must present fulfilment is normally nine months. In the accreditation procedures of AQAS, the fulfilment of conditions for formal aspects is assessed by the head office, for content-related aspects by one or several members of expert group. The individual accreditation commission then decides regarding the fulfilment of the condition. After the decision, the higher education institution is informed of the decision in writing. Lacking evidence or non-fulfilment of a condition may lead to revocation of the accreditation. Fundamentally, the rules of the Accreditation Council do not provide for any structured follow-up procedure for recommendations. However, AQAS considers the higher education institution's treatment of the recommendations as part of reaccreditation. The follow-up measures for accreditation procedures for foreign higher education institutions are identical.

All follow-up measures are described and published both in the information brochures of AQAS and the procedural materials for accreditations of foreign higher education institutions (Annex IV.1 and IV.3, subsequent submission 16c)

Assessment

The follow-up measures provided for by AQAS are structured, transparently descriptive and serve the advancement and development of quality by the higher education institutions. Their consistent implementation is ensured through the regulated procedure.

Result

Standard 2.6 is fully complied with.

2.7 Periodic reviews

STANDARD:

External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

GUIDELINES:

Quality assurance is not a static but a dynamic process. It should be continuous and not “once in a lifetime”. It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

Documentation

In accordance with the guidelines of the Accreditation Council, the accreditation of a study programme or an internal quality assurance system of a higher education institution is set in a cyclical structure. The first-time accreditation of a study programme is awarded for a time period of five years, a reaccreditation for seven years. A first-time system accreditation applies for the duration of six years, a reaccreditation for seven years. Accreditations for foreign higher education institutions are also awarded for a restricted term.

AQAS has transparently published the accreditation terms for awarding the seal of the Accreditation Council in both information brochures (Annex IV.1 and IV.3). In the procedural materials for accreditation procedures for foreign higher education institutions, AQAS refers to the corresponding resolutions of the Accreditation Council (Annex 16c, p. 3).

Assessment

The restricted accreditation term in the procedures for programme- and system accreditation based on the procedural rules of the Accreditation Council results in a periodic repetition pursuant to Standard 2.7 that also applies to procedures in which the seal of the Accreditation Council is not awarded.

Result

Criterion 2.7 is fully complied with.

2.8 System-wide analyses

STANDARD:

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments etc.

GUIDELINES:

All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work.

Documentation

To identify frequent complaints in reaccreditation procedures, the agency undertook an internal evaluation of issued conditions in 2010. The summarised results of this evaluation are stated in the application (Application, p. 22). In addition, AQAS surveys the development of annually made accreditation decisions and collects statistics on accredited study programmes and ongoing accreditation procedures based on subject groups (Annex VI.2, p. 11f.). The latter is published on the agency's website.

At the end of the year, AQAS prepares a report that summarises the results and experience of the agency and which is made available to the management board and the employees. As part of its membership in international networks, AQAS participates in international projects, the findings of which are normally published in aggregated form and which normally also comprise a problem analysis. As an example, AQAS mentions the findings from the pilot procedure of the ECA project "Joint programmes: Quality Assurance and Recognition of Degrees Awarded (JOQAR)".

For opening the procedure, AQAS presents a progress report that, according to the agency, is prepared based on the annual internal reports (Annex VI.2, p. 8). This report analytically summarises internal developments at the agency and also the experiences of AQAS with the higher education institutions, as well as the results of external surveys.

Assessment

The expert group acknowledges that AQAS has individually analysed the results of its own activity with the analysis of the conditions, the summarising observations of the internal annual reports or the progress report on the opening of the accreditation procedure. With these reports, the agency has useful information also regarding timing that it can utilise for the reflection on and further development of its own activity.

AQAS has not used the available, comprehensive findings from a number of procedures

and statistical information for system-oriented analyses in the sense of Standard 2.8. Such analyses should take place at regular intervals so as to allow a better evaluation and consideration of observed developments, trends or also difficulties in the own work.

Result

Standard 2.8 is substantially complied with.

Overall assessment for Standard 3.1:

The assessment for Part II of the ESG shows that the agency fulfils Standards 2.1 to 2.8.

Result:

Standard 3.1 is fully complied with.

3.2 Official status**STANDARD:**

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

Documentation

AQAS was founded on 25 January 2002 with the legal status of a registered non-profit association and has been recognised as such since 13 May 2002 under No. VR 8059 in the register of associations of Bonn district court. By the decision of the Accreditation Council of 15 February 2007, the agency was certified for programme accreditation procedures and by the decision of 31 October 2008 for system accreditation procedures, and is thereby entitled to award the seal of the Accreditation Council. Since 19 November 2008, AQAS has been a full member of the ENQA, founding member of the ECA and, since 2010, also registered in the European Register (EQAR).

Assessment

The agency's statements confirm that AQAS has its own legal entity and is recognised by the responsible institutions in the European Higher Education Area. By decision of the Accreditation Council in the on-going accreditation procedures, the observance of the current criteria and procedural rules is confirmed and the agency is certified to carry out procedures for programme- and system accreditation for the next term.

Result

Standard 3.2 is fully complied with.

3.3 Activities**STANDARD:**

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

GUIDELINES:

These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

Documentation

AQAS regularly carries out accreditation procedures for study programmes and, since its founding, has accredited over 2,000 study programmes. Since its certification to carry out procedures of system accreditation, two contracts have been concluded with higher education institutions. The first procedure was opened in May 2010, the final decision is planned for November 2011. The second procedure is also to be opened in November 2011. In the next few years, AQAS anticipates a higher demand for system accreditation procedures (Annex VI.2, pp. 11-13).

Assessment

The statements confirm that AQAS regularly carries out accreditation procedures.

Result

Standard 3.3 is fully complied with.

3.4 Resources**STANDARD:**

Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

Documentation

Currently, a total of 19 individuals are permanently employed at the head office (status: October 2011). With one exception, all employees are employed full time. Two managing directors manage the head office. Nine project managers are divided between two teams; one senior project manager heads each team, respectively. Six individuals are permanently employed in the areas of organisational assistance and administration. Four student assistants additionally support the head office's work. A total of 13 employees sup-

port the accreditation procedure. The agency plans to fill a further project manager position and a second organisational assistant each starting 01.11.2011. A further project manager position is being currently advertised.

Information on the selection and preparation of the employees of the head office are described in the application documentation and also documented in the resolution "System of internal quality assurance of AQAS e.V." of 24.04.2008 (Annex I.5). The quality assurance system points out that personnel should be recruited based on agreed criteria and as part of a suitable procedure (Annex I.5, p. 5). According to its own statements, AQAS considers relevant experience in the area of higher education when recruiting project managers (Application, p. 35). Based on the quality assurance system, new project managers are to be prepared for their activity through a mentor, sitting in on procedures and participation in moderation training (Annex I.5, p.5). The regular further training of the personnel takes place through the participation in the closed meeting of the head office, different workshops, seminars and conferences offered for all employees or derived from the individual task areas (Annex I.5, p. 5, Application, p. 35f.). In addition, AQAS provides an annual budget of €300 per employee for individual further training not prompted by business operations (Application, p. 35).

The current office space capacity of 300 m² is to be expanded in April of the coming year due to the planned extension of personnel.

The workplaces are equipped with modern office technology and have Internet access. Further planning of the modernisation of the office structure includes the EDP structure.

Pursuant to § 2 of the articles of association, the agency pursues exclusively and directly non-profit purposes (subsequent submission 01). For the year 2011, the agency calculates takings from accreditation (standard- and procedural fees) to the amount of €1,850,000 and membership fees to the amount of €6,800. From this, the item "external services" (reviewer costs, accreditation costs, travel expenses etc.) to the amount of €555,000 is subtracted with a remainder of €1,301,800. This stands against expenses for personnel, write-offs and other business expenses to the amount of €1,297,490 (Annex I.4). Since 2008, AQAS has consistently presented a balance budget (Annex VI.2, p.14).

Assessment

AQAS is adequately and sustainably equipped both with regard to human resources and material resources. From the submitted annual reports of the agency and the presented business plan, it can be taken that the agency's operational activity is also sustainably secured through adequate financial resources.

AQAS has sufficient financial- and human resources for the further development of its own procedures and processes, and for the qualification of new employees.

In this context, the expert group particularly assesses the measures for initial training and qualification of employees of the agency highly positively. Both the comprehensive mentoring concept and the systematically provided options for further training and the successfully implemented team structure form the basis for the successful development of the clear and responsible role-understanding of the employees in the accreditation activity. This impression was confirmed all the more for the expert group in discussions with employees during the on-site visit.

The expert group also appreciates the dialogue-oriented feedback within the head office and toward the committees and management of the agency, also in matters of the further development of the procedures and processes.

Result

Standard 3.4 is fully complied with.

3.5 Mission statement

STANDARD:

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

GUIDELINES:

These statements should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

Documentation

AQAS formulated its objectives of quality assurance procedures and its quality understanding in the mission statement passed by the management board on 7 July 2007 (Application, p. 5). It is published in this form in the information brochures and the agency's website. The objective of AQAS e.V. is also documented in the preamble of the articles of association and defined there as the purpose of the association (subsequent submission 01, preamble and § 2).

According to this, accreditation procedures should allow diversity of study programmes, ensure the quality of these study offers and create transparency in order to contribute to international comparability and recognition, and to guarantee reliable orientation for study

applicants. Furthermore it is stipulated that AQAS promotes the development of higher education study and contributes to quality improvement in that the accreditation procedures evaluate subject-/content-related quality standards and the job market orientation of academic degrees (subsequent submission 01, preamble). AQAS' activity is based on a quality understanding that adheres to the following maxims: (1) The responsibility for teaching and learning and the quality assurance thereof lies with the higher education institutions. (2) The assessment of study programmes by AQAS is oriented on both the aims set by the higher education institution and the requirement standards to be fulfilled. (3) The accreditation procedures evaluate the (a) adequacy of the aims and expertise expressed therein, as well as the concept and (b) the suitability of the study programme, the resources, the organisation and the quality assurance procedures of the higher education institutions for achieving these aims. (4) The basis of the procedure is formed by the national and European qualification frameworks. (5) The procedure complies with national or European standards and (6) targets the comparability of study programmes and thereby equivalence not homogeneity (mission statement in the Application, p.5).

Assessment

Particularly during the discussions, the expert group received a positive impression of the quality understanding of AQAS and its implementation in the accreditation activity of the agency. AQAS thereby bases the accreditation procedure on the approach of a "fitness for and of purpose" model, following which the objectives of the higher education institutions form the decisive evaluation parameters, and national and international frameworks are considered. While AQAS assumes the responsibility for the process of accreditation, the main responsibility for profile and quality in teaching and learning lies solely with the higher education institutions. AQAS thereby places the improvement of quality and its development by the higher education institution in the focus of the accreditation procedure and its structure. The expert group recommends externally presenting this understanding of quality, which forms the basis of the agency's work, more strongly than up until now.

Result

Standard 3.5 is fully complied with.

3.6 Independence

STANDARD:

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

GUIDELINES:

An agency will need to demonstrate its independence through measures, such as

- its operational independence from higher education institutions and governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts);
- the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence;
- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Documentation

In the application, AQAS only partially comments on the independence and instruction-freedom of the association and its bodies. AQAS states that the supporting association is organised under private law and, according to the statements made by AQAS, acts freely from influence through the state or the ministries. Members of the committees are not involved in decisions affecting their own higher education institution. The agency also stipulates that both accreditation commissions act independently from the general membership meeting and thereby from the higher education institutions (Annex VI.2, p. 15). Further information on the instruction-freedom of the bodies and impartiality of the experts related to individual cases can be taken from the individual annexes. For example, according to the mission statement, it is the aim of AQAS to ensure the independence of the experts and committees in the procedure (Application, p. 5). As a general procedural principle for programme accreditation, the AC^{Prog} has also resolved that committees and experts are to act independently in procedures (Annex IV.1, p. 14).

AQAS has bindingly regulated the procedure for the nomination and appointment of experts. For programme accreditation, the higher education institution is asked to create a subject profile of the expert group for the selection of experts. Names may not be mentioned. As part the opening of the procedure, the AC^{Prog} decides whether it will follow the profile suggestion of the higher education institution or change the profile. Based on the decided subject profile and with consideration of recommendations for experts by members of the AC^{Prog}, an expert group is put together by the head office. The expert group is then confirmed by the chairman of the commission and a further member (subsequent submission 02a). The appointment of the expert group for system accreditation is undertaken by the AC^{Sys} based on provided profiles for the individual experts (subsequent submission 02).

Assessment

In the view of the expert group, there is no direct influence of members of higher education institutions on the results of the accreditation procedures. Pursuant to § 7 para. 5 of the articles of association, the general membership meeting can make recommendations for staffing of the accreditation commissions. However, the appointment is, pursuant to § 7 of the articles of association, the responsibility of the management board (subsequent submission 1).

The expert group acknowledges that the management board chairman is also the chairman of both accreditation commissions. Nevertheless, during the on-site visit, the expert group was convinced that, despite the overlapping of personnel in the management board and accreditation commissions, the individual bodies and their members act freely and the accreditation activity is not determined by the strategic business of the association. The expert group also established that the decisions in the committees are made independently and impartially. The expert group can principally understand the motivation of AQAS to develop the strategy of the association through this structure with consideration of experience in accreditation activity and to promote information exchange within the agency. During the on-site visit, the expert group also did not gain the impression that the accreditation activity was dominated by the strategic association business due to the current personnel in the committees and functions. The practice that the chairman takes on a moderating role in both accreditation commissions and makes no use of his/her voting rights, is assessed by the expert group as a possible way to ensure the avoidance of potential conflicts also with respect to certain individuals. However, particularly in view of international acceptance of the overlapping of personnel in the composition of the committees, AQAS should bindingly document this motivation – and, above all, the implementation of these structures. AQAS should also be able to present such bindingness with regard to the instruction-freedom of the bodies and the independence and impartiality of the committees and their members.

In this context, the expert group notes that the appointment of expert groups for programme accreditation and programme random samples for system accreditation takes place under significant participation of the chairman of the management board. Such a procedure contradicts the practice of the agency to give the management board chairman a moderating role in the AC^{Prog} in which he/she waives voting rights.

Through the selection procedure for experts for programme- and system accreditation, AQAS ensures the appointment of qualified and independent expert groups. The expert group also positively assesses that higher education institutions in programme accredita-

tion can prepare the appointment of the expert groups through disciplinary profile recommendations. The expert group was convinced that the profile recommendations do not lead to an influencing of the accreditation procedures. Corresponding recommendations of the higher education institutions are solely restricted to the profiles of the study programmes to be accredited and do not limit the number of potential experts.

Result

Standard 3.6 is substantially complied with.

3.7 External quality assurance criteria and processes used by the agencies

STANDARD:

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include

- a self-assessment or equivalent procedure by the subject of the quality assurance process;
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
- publication of a report, including any decisions, recommendations or other formal outcomes;
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

GUIDELINES:

Agencies may develop and use other processes and procedures for particular purposes. Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.

Agencies that make formal quality assurance decisions, or conclusions which have formal consequences should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

Documentation

With regard to the structure, routine and criteria of its accreditation procedures, AQAS orients itself on the relevant resolutions of the Accreditation Council and the European Standards and Guidelines (Annex VI.2, p. 16). On this basis, both the AC^{Prog} and the AC^{Sys} have decided specific assessment criteria, decision-making principles and further procedural materials in order to increase the comparability and consistency of its accreditation decisions. These are bindingly documented and published, among other places, in the two information brochures and in the procedural materials for accreditation procedures for foreign higher education institutions (Annex IV.1 and IV.3, as well as the subsequent submissions 16b and 16c).

The procedure itself follows a multi-stage process, the basis for which is the self-description of a study programme or an internal quality assurance system of a higher edu-

cation institution by the higher education institution. The results of the subsequent assessment of a study programme or internal quality assurance system of a higher education institution by experts, which always comprises an on-site visit, are summarised in a report and form the basis for the decision of the accreditation commissions. The agency publishes a final report that also includes the decision of the accreditation commission.

For the assessment of a study programme or internal quality assurance system of a higher education institution, AQAS appoints one (programme accreditation) or several (system accreditation) review groups. The composition of the review groups is determined by the articles of association (subsequent submission 01, § 10) and is also the subject of individual resolutions of the accreditation commissions (Annexes IV.1, subsequent submissions 02 and 16c). According to this, all interest groups relevant to the procedure for programme- and system accreditation (academics, practitioners of professions and students) are involved.

All appeal- and complaints procedures in programme- and system accreditation are recorded in the same-named resolution of the management board of 26.09.2011 (Annex I.3). Further statements are documented in the two information brochures and the procedural materials for accreditations for foreign higher education institutions (Annexes IV.1 and IV.3 and subsequent submission 16c).

Following the management board resolution, higher education institutions may raise objections to the members of the review group, point out errors in the objective presentation of an assessment report or appeal accreditation decisions and the structure of the procedure. With appeals of higher education institutions against accreditation decisions, the responsible accreditation commission first decides on the accreditation anew based on the relevant documents and with consideration of the objections. If no agreement can be made with the higher education institution, then an own complaints commission then decides. Both brochures and the procedural materials for accreditations for foreign higher education institutions contain information on deadlines for objections to accreditation decisions. According to this, the higher education institution in the programme accreditation may object in writing within four weeks and, for system accreditation, within three weeks (Annex IV.1, p. 17 or IV.3, p. 24 and subsequent submission 16c, p. 3). The establishment of a complaints commission as a body of the agency was decided in the general membership meeting on 17 October 2011 (Letter with the subsequently submitted documents, p. 1).

Assessment

AQAS has bindingly regulated and publicly documented both the procedures and the un-

derlying assessment criteria and decision principles. The structure of AQAS' procedures for programme- and system accreditation complies with Standard 3.7. The expert group assesses the clear application of the own quality understanding throughout the entire procedural routine as highly positive. Particularly the feedback from higher education institutions and reviewers convinced the expert group that the partially dialogue-oriented procedural elements significantly contribute to quality development and advancement of teaching and learning.

The formalised procedures as described in the management board's resolution on the procedures for appeals and complaints, as well as the responsibilities of the complaints commission, are suitable and comprehensibly documented. However, there are contradictory statements on the responsibilities contained in the resolutions on the routine of the accreditation procedure published in the two information brochures. According to these, the final decision regarding an appeal is made by the management board of AQAS (Annex IV.1, p. 17 or IV.3, p. 24 and subsequent submission 16c, p.3). In addition to correcting these contradictions, AQAS should also publish the appeal- and complaints procedure on its website.

In the composition of the review groups, AQAS involves all relevant interest parties, including students, in all accreditation procedures.

Result

Standard 3.7 is fully complied with.

3.8 Accountability procedures

STANDARD:

Agencies should have in place procedures for their own accountability.

GUIDELINES:

These procedures are expected to include the following:

1. A published policy for the assurance of the quality of the agency itself, made available on its website;
2. Documentation which demonstrates that:
 - the agency's processes and results reflect its mission and goals of quality assurance;
 - the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts;
 - the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are sub-contracted to other parties;
 - the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board);

an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.

A mandatory cyclical external review of the agency's activities at least once every five years.

Documentation

The internal quality assurance system of AQAS is documented through the management board resolution "The system of internal quality assurance of AQAS e.V." of 24.04.2008 (Annex I.5). Some statements on the effectiveness of the system are described in the application and can be taken from the subsequently submitted annual reports (subsequent submissions 14a and b).

With its internal quality assurance system, AQAS pursues the two superordinate quality aims, (1) to establish AQAS e. V. on long term as an agency for quality assurance in the education sector through recognition of AQAS e. V. in the national and international context and (2) to secure the high quality of the quality assurance procedures carried out by AQAS e. V. AQAS assigns three quality demands each to these two superordinate aims and establishes corresponding quality measures to be implemented by the four internal actors (management board, AC^{Prog}, AC^{Sys}, head office) each with varying expertise and tasks.

The quality assurance system is fundamentally oriented on a quality loop that differentiates between the planning level (plan), the implementation level (do), the evaluation level (check) and the revision level (act) (Annex I.5, p. 1).

For external feedback, management bodies of the higher education institutions and experts are surveyed regarding the quality of the procedure carried out by AQAS at the end of the procedure. These surveys and the corresponding analyses are carried out on AQAS's commission by the Bonn Centre for Evaluation and Methods (zem). The results of the analyses are summarised in quarterly reports that the management board and head office receive. The external feedback also serves the feedback of the Accreditation Council e.g. in evaluation procedures. As internal feedback processes, monthly controlling reports on the financial development of the agency, annual feedback discussions with members of the accreditation commissions and institutionalised discussions within the head office are provided for (Annex I.5, p. 7). The head office also prepares an annual internal report that is presented to the management board. This serves to reflect on the past year and derives measures for further development from the results and experience (Application, p. 31). The reports for the years 2009 and 2010, which are oriented on the quality demands, were subsequently submitted by AQAS.

Measures for the removal of established weak points are decided by the management board and responsibilities and schedules are set. The head office is responsible for the implementation of these resolutions and reports to the management board (Annex I.5, p. 7).

Corresponding exclusion criteria treat the impartiality of experts that are repeated in the experts' manual and in both information brochures (Annexes III.7, IV.1 and IV.3). The experts also sign a declaration to willingness to act as an expert in which they confirm their impartiality with regard to the individual procedure (Annexes III.3, III.10, III.11).

AQAS does not commission any other institutions or organisations with carrying out its quality assurance procedures.

Assessment

Based on the quality understanding of the agency, the internal quality assurance system of AQAS is suitable for continuously improving the quality of agency, particularly through the systematic external and internal feedback and the defined responsibilities of all involved in the accreditation procedure. The partially very ambitious quality measures are principally suitable for implementing the quality demands. As a result and based on the provided for systematic documentation and reporting, the effectiveness of the internal controlling processes can be assessed. During the on-site visit, the expert group was convinced that the system of international quality assurance is consistently utilised and that, in particular the critical analyses in the internal annual reports form a good basis for the systematic analysis of the need for measures and for deriving measures in a targeted manner. The expert group appreciates the targeted and differentiated treatment of the results both of the external and internal feedback. Future feedback and observations related to the accreditation system should also be discussed by AQAS and used for further development. The internal quality management of AQAS should be published on the agency's website.

The expert group finds the declarations of the experts of their willingness to act as experts suitable for excluding possible conflicts of interest among the experts. However, for programme accreditation, there are differences from the exclusion criteria in the "Manual for experts" in which e.g. relational or otherwise close ties to a member of the faculty and consulting activities or other involvement with regard to the study programme to be accredited are not found (see Annex III.7, p.3). There are also inconsistent statements for system accreditation. First, it is unclear as to whether the exclusion criteria described in the information brochure is binding exclusion criteria (Annex IV.3, p. 20). It is also not ex-

plicable why the criteria listed there differs from the impartiality declarations in which e.g. consulting services of the experts for higher education institutions is not questioned (see Annexes III.10 and 11). In this context, AQAS should present the binding criteria for ensuring independence of experts (exclusion criteria) in all relevant documents and in a uniform manner.

Result

Standard 3.8 is fully complied with.

Bonn, 1 February 2012

Accreditation of the Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen (AQAS, Agency for Quality Assurance through the Accreditation of Study Programmes, a non-profit organisation) in the year 2012

Procedure plan for the on-site visit

| 20.11.2011 | |
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| 18:00 | Internal preliminary discussion in the hotel |
| 20:00 | Internal dinner discussion |

| 21.11.2011 – Head office AQAS e.V. / Universitätsclub Bonn | |
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| 09:00 – 11:00 | Discussion with the management of the agency <i>(at the head office of AQAS – at the address Sürst 1 – 53111 Bonn)</i> |
| | <ul style="list-style-type: none"> ▪ Prof. Dr. Holger Burckhart, Management board chairman ▪ Doris Herrmann, Manager of Strategy & International Matters ▪ Dr. Verena Kloeters, Commercial manager |
| 11:00 – 11:30 | <i>Break & transfer to Universitätsclub Bonn</i> |
| 11:30 – 13:00 | Participation in the meeting of the accreditation commission Programme Accreditation and discussion with the members |
| | <ul style="list-style-type: none"> ▪ <i>see participant list</i> |
| 13:00 – 14:00 | <i>Lunch break, internal discussion</i> |
| 14:00 – 15:00 | Discussions with reviewers from procedures of the agency |
| | <ul style="list-style-type: none"> ▪ Prof. Dr. Ralf Kleinfeld, University of Osnabrück ▪ Prof. Dr.-Ing. Norbert Krudewig, University of Applied Sciences Koblenz ▪ Prof. Dr.-Ing. Peter Scharf, University of Siegen |
| 15:00 - 15:15 | <i>Break</i> |
| 15:15 – 16:15 | Discussion with representatives of study programmes that have been accredited |
| | <ul style="list-style-type: none"> ▪ Prof. Dr. Thomas Kaul (Prorector for teaching and learning at the University of Cologne) ▪ Prof. Dr. Richard Korff (Vice-president of the University of Applied Sciences Münster) ▪ Prof. Dr. Ulrich Deller (Catholic University of Applied Sciences NRW, Aachen) ▪ Prof. Dr. Thomas Feltes (R-University of Bochum) ▪ Dr. Gabriele Witter (Director of project office “higher education institution |

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| | development planning at the University of Bremen") |
| 16:15 - 18:15 | Internal final discussion of the first day |
| <i>approx. 19:30</i> | <i>Internal dinner discussion</i> |
| 22.11.2011 – Universitätsclub Bonn | |
| 09:15 – 10:45 | Discussion with staff of the head office * * subsequent discussions with both teams of the head office |
| | 09:15 – 10:00 Team 1 <ul style="list-style-type: none"> ▪ Ninja Fischer ▪ Dr. Simone Kroschel (Team manager) ▪ Simon Lau (System admin.) ▪ Dr. Guido Lauen ▪ Dr. Katarina Löbel ▪ Ulrich Rückmann 10.00 – 10.45 Team 2 <ul style="list-style-type: none"> ▪ Ronny Heintze ▪ Volker Husberg (Team manager) ▪ Dr. Anne Jordan ▪ Birgit Kraus ▪ Rosa Anna Nagel ▪ Katharina Schröder |
| <i>10:45 – 11:00</i> | <i>Break</i> |
| 11:00 – 12:00 | Discussion with members of the accreditation commission System Accreditation |
| | <ul style="list-style-type: none"> ▪ Prof. Dr. Ralf Haderlein, University of Applied Sciences Koblenz ▪ Prof. Dr. Manfred Hopfenmüller, University of Applied Sciences Regensburg ▪ Prof. Dr. Anja von Richthofen, Rhine-Waal University of Applied Sciences ▪ Prof. Dr. Marcus Siebolds, Catholic University of Applied Sciences NRW, Cologne ▪ Herr Kristian Onischka, TU Chemnitz |
| 12:00 – 12:30 | Discussion with the management of the agency |
| | <ul style="list-style-type: none"> ▪ Prof. Dr. Holger Burckhart, Management board chairman ▪ Doris Herrmann, Manager of Strategy & International Matters ▪ Dr. Verena Kloeters, Commercial manager |
| <i>12:30 – 13:00</i> | <i>Small lunch</i> |
| 13:00 – 16:00 | Internal final discussion of the expert group with preparation of the report |
| <i>starting 16:00</i> | <i>Departure</i> |

Participants in the accreditation commission for Programme Accreditation

Natural sciences, Mathematics

- **Prof. Dr. Urbaan Titulaer**, Johannes Kepler University of Linz
- **Prof. Dr. Stephan Steinlechner**, University of Veterinary Medicine Hannover, Foundation

Engineering, Informatics

- **Prof. Dr. Heiner Bubb**, Technical University Munich
- **Prof. Dr.-Ing. Martina Klocke**, University of Applied Sciences Aachen

Humanities and Social sciences

- **Prof. Dr. Christiane Eilders**, Heinrich Heine University Düsseldorf
- **Prof. Dr. Jens Haustein**, Friedrich Schiller University Jena
- **Prof. em. Dr. Wolfram Martini**, Justus Liebig University Gießen

Economics, Law

- **Prof. Dr. Franz Jürgen Marx**, Bremen University
- **Prof. Dr. Falk Roscher**, University of Applied Sciences Esslingen
- **Prof. Dr. Richard Sturn**, Karl Franzens University Graz

Teacher studies

- **Prof. Dr. Dietrich Benner**, Humboldt University of Berlin
- **Prof. Dr. Sonja Fielitz**, Philipps University of Marburg

Psychology, Social work, Health, Care

- **Prof. Dr. Margret Flieder**, University of Applied Sciences Darmstadt

Practitioners of professions

- **Dr. Christoph von der Heiden**, Chamber of Commerce East Westphalia
- **Horst Holzberger**, John Andrews Development Centre FORD Factories, Cologne

Students

- **Sebastian Enkelmann**, University of Leipzig
- **Detlef Heinrich**, Magdeburg-Stendal University of Applied Sciences

Resolutions of AQAS

This overview considers all resolutions contained in the annexes, as well as those in the overview “Valid resolutions of the accreditation commission of AQAS” (hereinafter “valid resolutions”), available on the website of the agency.

| | Reference | Assessment |
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| Criteria | | |
| Reference to the indicators mentioned in the resolution of the Accreditation Council of April 2004, research- and application-oriented profiles of Master’s study programmes (Drs.AR 2/2004) in the assessment criteria of AQAS for accreditation of study programmes, in the assessment criteria for a programme random sample as part of system accreditation, in the guidelines for preparation of an accreditation application and as a resolution of the accreditation commission for the equal status of research- and application-oriented profiles | Annexes III.7, p.11, IV.1, p. 26 and 43; IV.3, p.41, Annex IV.1, p. 37, Valid resolutions, p. 6 | The cited resolution of the Accreditation Council was revoked by resolution of 12.02.2010 through the “Norms for the Interpretation of the Common Structural Guidelines of the Länder” (Drs. AR 20/2010) |
| Criteria for admittance to Master’s study programmes in Federal States that provide for an opening for study applicants without a first graduate degree (e.g. assessment of the suitability of the applicant through an aptitude examination, duration of a profession of at least five years) as resolution of 11.10.2005 | Annex IV.1, p.37 Valid resolutions, p. 7 | Corresponding criteria are set neither through resolutions of the Accreditation Council nor by the KMK. For Federal States that provide for the admittance of professionally qualified individuals to Master’s study programmes, the criteria formulated by AQAS are restricting ² |
| Probationary test for practical components and extracurricular op- | Annex IV.1, p. 57 | The cited resolution of the Accreditation Council was re- |

² For example, Hessen, Rhineland-Palatinate and also Bremen either provide for no minimum duration or set these expressly shorter. In Bremen, an aptitude examination is also not an absolute requirement for acceptance to a Master’s study programme, which can also be achieved as part of a probationary study period.

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| <p>tions (resolution of the Accreditation Council “ECTS ability of practical components in a study programme” of 19.08.2005)</p> | | <p>placed with the resolution of 12.02.2010 by its “Norms for the Interpretation of the Common Structural Guidelines of the Länder” (Drs. AR 20/2010).</p> <p>A probationary test is no longer required. Traineeships as an extracurricular option are also no longer regulated.</p> |
| <p>Quantitative guideline on the use of Bachelor’s modules in Master’s study programmes (25%) (use of Bachelor’s modules in Master’s study programmes to equivalise previous knowledge. Resolution 18.05.2010)</p> | <p>Annex IV.1, p. 37 Valid resolutions, p.7</p> | <p>The Accreditation Council provides for the use of Bachelor’s modules in Master’s study programmes in exceptional cases. It does not set a quantitative guideline. (Drs. AR 20/2010)</p> |
| <p>“Distance learning courses must normally offer compulsory attendance phases for which credits are awarded. The reviewers should issue a recommendation as to whether and to what degree attendance phases should be made compulsory. This recommendation must be oriented on the objectives and the profile of the study programme. The students should take part, but do not have to. For those who do not take part, the module descriptions must provide for alternative study achievements so that the student may attain the required number of credit points.” (Compulsory attendance phases in distance learning courses- Resolution of 21.02.2006)</p> | <p>Annex IV.1, p. 38 Valid resolutions, p. 10</p> | <p>The resolution does not have a basis in the rules of the Accreditation Council or in the Common Structural Guidelines of the Länder.</p> <p>The Accreditation Council solely recommends that distance learning courses should normally include compulsory attendance time (Drs. AR 68/2007)</p> |
| <p>Orientation of content on the MBA Guidelines for the accreditation of MBA study programmes (e.g. admittance prerequisite 2 years professional experiences, further prerequisites for Executive Master of Business Administration); in the case of deviations, the higher education institution is obligated to provide reasons (MBA study programmes. Resolution of AC of 18.08.2009)</p> | <p>Valid resolutions, p. 9</p> | <p>There are no rules of the Accreditation Council for the accreditation of MBA study programmes; as per the Common Structural Guidelines of the Länder, admittance to further education Master’s study programmes normally requires 1 year of qualified professional experience.</p> |

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| <p>Explanatory obligation for non-graded modules as an exception as a resolution of 27.02.2007</p> | <p>Valid resolutions, p. 3</p> | <p>There are no rules of the Accreditation Council and the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder (Kultusministerkonferenz) regarding the number or the rationale of non-graded modules. The Common Structural Guidelines expressly provide for the successful completion of a module without an examination.</p> |
| <p>Decision rules</p> | | |
| <p>Suspension of the accreditation when a fault cannot be removed by the disciplinary area/faculty alone (rules regarding accreditation decisions as a resolution of the accreditation commission of 22.02.2010)</p> | <p>Annex VI.1, p. 39</p> | <p>Pursuant to Cl. 3.1.4 the “Rules for the accreditation of study programmes” an accreditation procedure can be suspended when it is to be expected that the higher education institution removes the faults within 18 months.</p> |
| <p>Deviating weighting of criteria in special, individual cases as a decision principle for programme accreditation (rules regarding accreditation decisions. Resolution of the accreditation commission of 22.02.2010)</p> | <p>Annex IV.1, p.40</p> | <p>The Accreditation Council does not provide for a weighting of criteria.</p> |
| <p>Procedural rules</p> | | |
| <p>Disposing of on-site visits for accredited Bachelor’s study programmes that have been supplemented by one practical semester without other major changes (resolution of the Accreditation Council “Accreditation of a study programme in accordance with § 8 of the agreements between the Accreditation Council and accreditation agencies in cases of the supplementation of a Bachelor’s study programme by one practical semester” of 05.01.2007.)</p> | <p>Annex IV.1, p. 60</p> | <p>The resolution was repealed by the resolution of 09.12.2009. The reference to the repealed resolution is, with regard to Cl. 3.6.3 of the “Rules for the Accreditation of Study Programmes” ambiguous. According to the clause, the agency evaluates major changes in study programmes so as to assess whether these changes compromise quality and, in this case, for new accreditation,</p> |

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| | | decides whether the procedure can be shortened. |
| An admittance requirement for system accreditation is a minimum number of study programmes to be accredited related to the number of students (resolution of the management board of AQAS of 29.08.2008) | Annex IV.3, p. 25 | This admittance requirement has no longer been effective since 10.12.2010. |
| Procedures for the selection of the feature random sample by resolution of the management board of 24.04.2008 (cited in the resolution of the accreditation commission for system accreditation of 10.05.2010 on the routine of the system accreditation) | Annex IV.3, p. 22 | With the version of 29.08.2008, this resolution was already amended by AQAS as part of the certification for system accreditation. |
| Early re-accreditation of study programmes only on presentation of empirical data and progress values of at least one entire study cohort (resolution of the accreditation commission of 19.02.2008) | Valid resolutions, p. 6 | The Accreditation Council does not restrict the timing of early reaccreditation |
| Criteria for the composition of the review group for clustering study programmes (resolution of the accreditation commission of 20.11.2007) | Annexes III.7, p.9 or IV.1, p.14, Valid resolutions, p. 16 | The statement on the number of members of the review group (at least one expert academic of the individual discipline or subject group) does not comply with the Special Rules for Procedures of Cluster Accreditation, according to which there a restriction to only one expert academic for each specialist discipline represented in a cluster for sufficient assessment of all (partial-) study programmes requires justification. |