

ENQA AGENCY REVIEW

CENTRAL EVALUATION AND ACCREDITATION AGENCY (ZEVA)

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EXECUTIVE SUMMARY

This external review report analyses how the Central Evaluation and Accreditation Agency (Zentrale Evaluations- und Akkreditierungsagentur, ZEvA) meets the expectations of the Standards and Guidelines for Quality Assurance in the European Higher Education Area 2015 (ESG). In addition to the agency itself and its stakeholders within Germany and overseas, the report is intended to inform the ENQA Board's decision on ZEvA's continued membership and to inform EQAR to support ZEvA's re-application to the Register.

ZEvA has a long history of external quality assurance activities, initially with a focus on Evaluation in Lower Saxony and Programme Accreditation across Germany, and now also including System Accreditation, Certification, accreditation of programmes outside the Bachelor's/Master's system, Audit in Austria, and International Accreditation. It was the first agency of its kind in Germany and the first to be approved by the German Accreditation Council (GAC) to undertake programme accreditation. More recently in 2018, a major reform of the German system of accreditation has reduced the role of ZEvA and other agencies with accreditation decisions now taken by the GAC directly. Together with a shift from programme to system accreditation, which is reducing the size of the accreditation market in Germany, the five years since the last external review have been dominated by these external changes and the agency's strategic response to them.

The review team engaged with ZEvA between January and July 2021, with an online site visit completed between April 27th and 30th, 2021. The review team were able to draw on a wide range of evidence and inputs, including a Self-Assessment Report, supporting evidence, publicly available information on the websites of ZEvA, the GAC and others, and the findings from meetings during the site visit. The review team found ZEvA to be an organisation that is continuing to grow, develop and flourish in many ways, despite the challenging environment that it was operating in. ZEvA's strength is its people and the depth of expertise they have – including staff, experts and members of the board and commissions. This partly comes from a long history but also from the culture that has been developed. This is evident from the number of staff who stay working with the agency or return after a break and the number of people who volunteer their time to support ZEvA's work.

ZEvA enjoys an excellent relationship with the Ministry of Science and Culture of Lower Saxony, which provides a solid foundation on which to build its Evaluation work further. This has been replicated internationally with a growing and sustainable portfolio of international activities now well-established too. These diverse activities and sources of income, together with a prudent approach to financial management over a number of years, have left ZEvA in a strong financial position. This has allowed ZEvA to demonstrate a high level of resilience through the Covid-19 pandemic and emerge still in a strong position.

The review team identified a number of areas where further progress can still be made. These largely relate to the small size of the organisation and a number of practices still being largely informal, under-resourced or in need of review following changes in the external environment. Moving forward, ZEvA needs to formalise and systematise its approach to strategic and operational planning, and to collecting and using stakeholder feedback. This needs to be accompanied by a review of operational procedures used internally to assure the quality of ZEvA's work and by a review of the responsibilities delegated across ZEvA's governance bodies. Overall, this will prepare ZEvA well for the future and address the areas of risk in the overall framework for internal quality assurance.

ZEvA must also address a particular area of weakness. There is very limited thematic analysis undertaken by ZEvA and this has resulted in a judgement of partially compliant for ESG 3.4. The review team heard and appreciated that several factors were limiting the resource that ZEvA could invest in

this area of work, but the vast knowledge base that ZEvA is accumulating through its external quality assurance activities is currently underutilised.

Overall, the review team concluded that ZEvA is rightly a well-respected agency that has a significant and important contribution to make to quality assurance in Germany and internationally. The review team were left optimistic about ZEvA's future and its ability to adapt to the changing environment that it finds itself in. This will require a greater focus on systematising and communicating the strategy that it chooses to pursue going forward, but none of the challenges highlighted in this report are insurmountable.

The review team has reached the judgement that ZEvA is fully compliant in all ESG, except four where the judgement is substantially compliant (3.1 Activities, policy and processes for quality assurance; 3.6 Internal quality assurance and professional conduct; 2.2 Designing methodologies fit for purpose; and 2.4 Peer-review experts) and two where the judgement is partially compliant (3.4 Thematic analysis and 2.7 Complaints and appeals).

The review team makes commendations to ZEvA in the following areas:

- The positive and supportive people-focused culture created by the agency for the benefit of its staff and stakeholders who work with them. (ESG 3.5)
- The commitment to staff wellbeing and professional development as recently demonstrated through the offer of professional Coaching for all staff. (ESG 3.5)

The review team makes recommendations to ZEvA in the following areas:

- Formalise the approach to agreeing, documenting and monitoring progress towards the strategic priorities of the agency. (ESG 3.1)
- Review and ensure a shared understanding of the responsibilities of the agency's board, commissions and management following a period of major change, including responsibility for approving new and revised external quality assurance methodologies. (ESG 3.1)
- Develop, assign resources to and implement a plan for thematic analysis of findings from across the range of the agency's QA procedures.
- Complete the review of operating procedures used by staff to guide the delivery of external quality assurance activities and monitor the effectiveness of their implementation. (ESG 3.6)
- Formalise and systematise the way in which feedback from stakeholders informs the agency's approach to strategic development and internal quality assurance.
- Establish a systematic approach to periodically and comprehensively reviewing each of the external quality assurance methodologies operated by the agency. (ESG 2.2)
- Clarify the agency's expectations for experts to engage with training, including a more robust mandatory requirement for newer experts to undertake initial training, and implement systems to record experts' engagement with training in order to monitor that these expectations are met. (ESG 2.4)
- Further develop the complaints and appeals procedure to include a more detailed operating procedure, the point of submission, expected timescales and authority delegated by the Board of Trustees to other governance and management bodies in handling complaints and appeals. (ESG 2.7)

In light of the documentary and oral evidence considered by it, the review team is satisfied that, in the performance of its functions, ZEvA is in compliance with the ESG.

INTRODUCTION

This report analyses the compliance of Central Evaluation and Accreditation Agency (Zentrale Evaluations- und Akkreditierungsagentur, ZEvA) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted between January and July 2021.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

ZEvA is currently a member of ENQA and listed in the European Quality Assurance Register (EQAR). ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015. As such, ZEvA has commissioned an external review from ENQA, which will also serve to inform an application to be relisted in EQAR.

As this is ZEvA's fourth review, including those previously coordinated by the German Accreditation Council, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

MAIN FINDINGS OF THE 2016 REVIEW

Since its establishment in 1995, three external reviews of ZEvA have been conducted by the German Accreditation Council (GAC) in 2005, 2010/11 and 2015/16, including specific consideration of ZEvA's compliance with the European Standards and Guidelines (ESG). On each occasion, the GAC renewed ZEvA's accreditation and ENQA granted or renewed ZEvA's membership. However, the reports from these reviews each include analysis, conditions and recommendations that collectively tell the story of an agency that has needed to change its focus or professionalise its operations on a regular basis.

Most recently in 2015/16, the GAC review team's impression of ZEvA's work was "overwhelmingly positive" and found the agency to be well-established and professional in its longer-standing areas of activity such as programme accreditation and evaluation. This was set in the context of significant changes to the overall balance of activity in ZEvA's portfolio with programme accreditation being superseded by system accreditation, and with international activity outside of Germany beginning to span several types of procedure but still growing at only a cautious pace. The review team concluded that these newer areas of activity would be central to the agency's development but were not yet sufficiently integrated into the agency's structures and processes, which raised questions for the internal quality assurance of this activity. More broadly, the review team observed a disconnect between the strategy paper 2015-2020 and progress that had been made in strategically reorienting the agency in light of its changing context and concluded their review by encouraging ZEvA to adopt a more proactive approach going forward.

The 2015/16 review determined ZEvA's compliance with the ESG (2015 version) to be as follows:

Five standards were fulfilled:

- 3.2 Official status
- 3.3 Independence
- 3.4 Thematic analysis
- 3.5 Resources
- 3.7 Cyclical external review of agencies

Five standards were substantially fulfilled:

- 2.1 Consideration of internal quality assurance
- 2.2 Designing methodologies fit for purpose
- 2.3 Implementing processes
- 2.5 Criteria for outcomes
- 3.1 Activities, policy and processes for quality assurance

Four standards were partially fulfilled:

- 2.4 Peer-review experts
- 2.6 Reporting
- 2.7 Complaints and appeals
- 3.6 Internal quality assurance and professional conduct

A progress report in November 2018 details where action had been taken and states that all recommendations had been implemented. The agency's self-assessment for the 2021 review only includes limited detail on the further progress made in the subsequent two years.

The ENQA Board required ZEvA to respond to 10 of the 12 recommendations resulting from the 2015/16 review and these are detailed alongside the findings of this report. The review team has specifically considered the progress made in each of these 10 areas over the last five years and included its observations with the analysis of ZEvA's current compliance where relevant.

REVIEW PROCESS

The 2021 external review of ZEvA was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The review team for the external review of ZEvA was appointed by ENQA and composed of the following members:

- **Professor Melita Kovacevic** (Chair), Head of the Laboratory for Psycholinguistic Research, Director of Doctoral programme, University of Zagreb, Croatia – nominee of EUA, the European University Association.
- **Dan Derricott** (Secretary), Head of Academic Policy and Quality Assurance, University College London (UCL), United Kingdom - nominee of ENQA, the European Association for Quality Assurance in Higher Education.
- **Dr Mark Frederiks**, Coordinator International Policy, Accreditation Organisation of the Netherlands and Flanders (NVAO), The Netherlands - nominee of ENQA, the European Association for Quality Assurance in Higher Education.
- **Marija Vasilevska**, Bachelor's degree student in political science, Ss. Cyril and Methodius University, North Macedonia – nominee of ESU, the European Students' Union, and member of the ESU Quality Assurance Student Experts Pool.

The review was coordinated, and the team were supported throughout, by Milja Homan, Project and Reviews Officer in the ENQA Secretariat.

Self-assessment report

Through the middle and latter parts of 2020, a working group of ZEvA's management team coordinated a self-assessment of the agency's fulfilment of the European Standards and Guidelines (ESG) and of its strengths, weaknesses, opportunities, and threats more generally. The self-assessment exercise was informed by both existing sources of information and the views of stakeholders gathered specially through questionnaires. The working group used its findings to draft a Self-Assessment Report

(SAR), which was finalised and supplied to the review team together with a selection of supporting evidence in January 2021. Following an initial review of the SAR, the review team requested a range of additional evidence, which the agency promptly provided in early March 2021. A full list of the evidence available to the review team is included in Annex 4.

The review team recognises and is grateful for the agency's resolve and focus in preparing the SAR and supporting evidence while adjusting its ways of working in response to the COVID-19 pandemic, and while the staff and stakeholders were personally managing the disruption and distress brought about by the pandemic.

The main working language of the agency review was English as reflected in the drafting of the SAR, the translation and supply of the SAR's annexes and the conduct of the site visit meetings without translation. Many of the documents supplied as evidence to the review team – through footnotes and hyperlinks in the SAR and upon the review team's request for additional evidence – were supplied in the original form in German. The review team took care not to place additional burden on the agency by requiring excessive amounts of translation. Instead, the review team made use of translation tools and of some review team members' fluency in the German language to review the evidence made available.

Evaluation of the SAR and supporting evidence

The review team found the SAR to be clear and concise in its description of the agency's context and activity. Where necessary, this included a helpful differentiation of practice for each of the external quality assurance activities within the scope of this review. In summary, the SAR provided a helpful introduction to ZEvA as it currently operates, and the review team were able to confirm that it was also an accurate and fair introduction through the review of evidence and meetings with stakeholders.

Site visit

An online site visit was undertaken between April 27th and 30th, 2021, for the review team to explore and triangulate the agency's fulfilment of the ESG with the agency's various stakeholders. Additional online meetings with the agency's nominated point of contact, the Managing Director, were held by the Secretary and by the full review team in advance of the site visit to plan the review and to aid the review team's understanding of the context within which the agency operates.

Due to circumstances beyond their control, ZEvA's Scientific Director was unable to attend the site visit and meet with the review team.

The discussions during meetings with stakeholders focused mainly on the lines of enquiry identified by the review team during the desk-based assessment of the agency's self-assessment report and supporting evidence.

During the online site visit the review team met with the following stakeholders in various groupings: the agency's executive and staff; members of the Board of Trustees, ZEvA Commission, Standing Evaluation Committee and Appeals Commission; academic, student and industry expert panel members; higher education institutions; and representatives of the Ministry of Science and Culture of Lower Saxony and the German Accreditation Council.

The full schedule of the site visit can be found in Annex I.

ENQA agency reviews usually involve an in-person site visit to the agency, however, the COVID-19 pandemic that first emerged in 2019 and impacted severely through 2020 and 2021 restricted the possibility of international travel and in-person meetings through the first half of 2021. With the agreement of the agency and ENQA, the review team took the decision to proceed with the entire

review online. This included the site visit, whereby all meetings were conducted using video conferencing technology.

The review team thanks all of the participants in the online site visit. All meetings were conducted with an open, reflective, and constructive approach on all sides, and this made for a useful, productive visit. In particular, the team thanks the agency's Managing Director, who acted as the contact person before and during the online site visit and coordinated the arrangements for the review overall.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

The German system of higher education is one of the most developed in the world and features a number of well-recognised institutions that excel in teaching and research. In practice, the system is mostly organised, regulated and funded by the 16 federal states (Länder) individually and sometimes collectively through the Standing Conference of Ministers of Education and Cultural Affairs (KMK). The agreements of the KMK together with the federal Higher Education Framework Act set the context within which each state operates and determine how much of the national quality assurance system is governed.

The higher education system is made up of several types of public and private institutions, with the largest and most recognised groups being universities, universities of applied sciences and universities of the arts.

There has been growth in tertiary education in Germany over the last decade but the proportion of 25-34 year-olds with a degree remains below the OECD (Organisation for Economic Cooperation and Development) average. Germany's long-standing strength in Vocational and Technical Education (VET) continues and this is demonstrated by the strength of universities of applied sciences alongside the more comprehensive universities. It also materialises as a higher proportion of students in Germany achieving degrees in the science, technology, engineering, and mathematics (STEM) disciplines compared to other OECD countries¹.

QUALITY ASSURANCE

Germany was a founding member of the Bologna process in 1999. Since then, most higher education provision has transitioned to the Bachelor's/Master's system in line with the European Qualifications Framework (EQF) and European Credit Transfer and Accumulation System (ECTS). Some disciplines leading to the regulated professions, such as teacher training, laws, and medicine, still operate outside of this system to varying extents.

The transition has been guided by the KMK, beginning with the publication of both a German Qualifications Framework for Higher Education and common guidelines across the Länder on the accreditation of bachelor's and master's degrees. The German Accreditation Council (GAC) was subsequently established in 2003 to implement the common guidelines through a national system of programme accreditation. From 2008, this also included system accreditation whereby a higher education institution could be awarded the authority to accredit its own programmes.

Until 2018, the GAC accredited a number of agencies to run accreditation processes and make accreditation decisions in line with its unified framework and criteria. As a result, a number of autonomous not-for-profit agencies were established in Germany and several from other European

¹ <https://www.oecd-ilibrary.org/docserver/a6d15622-en.pdf?expires=1623400661&id=id&accname=guest&checksum=9E2D940AB4468CB2C1DBCBB0E7AE3F5E>

countries also began to operate within the German system. At the time of this review, ten agencies were active in the German system, including ZEvA.

Since the last external review of ZEvA, there has been a fundamental change in the German system of accreditation following a ruling by the German Constitutional Court in 2016 that put the legal status of the system into question. Subsequently, the KMK agreed the “Interstate Treaty on the Organisation of a Joint Accreditation System to Ensure the Quality of Teaching and Learning at German Higher Education Institutions (Interstate Study Accreditation Treaty)” to provide a new legal basis and framework for accreditation in Germany, which was implemented from 1st January 2018. While much of the pre-2018 accreditation system remains recognisable, responsibility for taking the final decision to award accreditation has transferred from the individual agencies to the GAC. Furthermore, the GAC no longer accredits individual agencies but instead recognises any agency listed on the European Quality Assurance Register for Higher Education (EQAR). In practice, this means that higher education institutions are still free to choose an agency – from a wider pool – but their original submission and the report of the agency’s expert panel are then sent for consideration by the GAC.

A review of the revised arrangements had been planned to reflect on how well they were working. At the time of this external review of ZEvA, the scope of that review of the accreditation system was under discussion nationally.

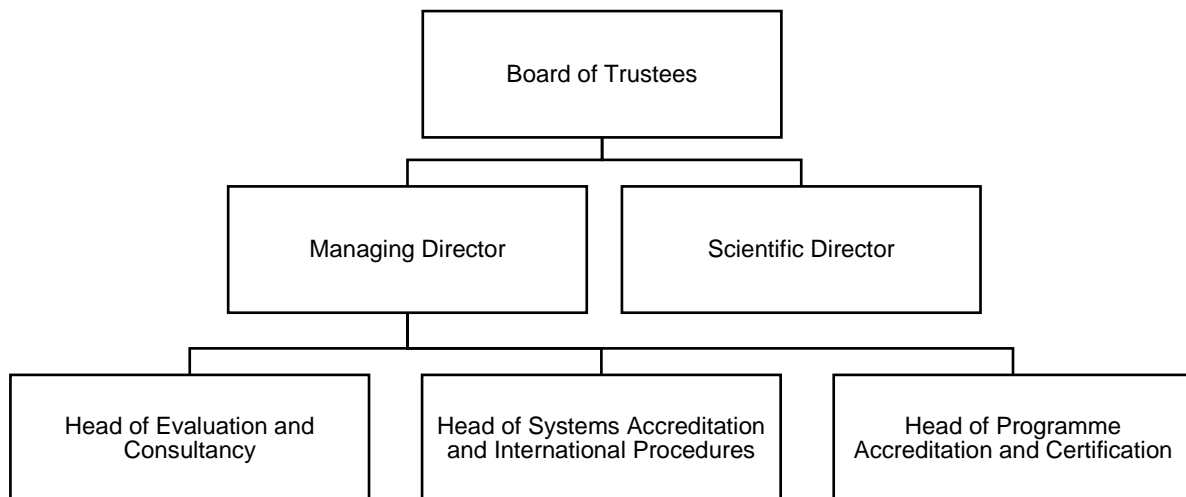
ZEvA

ZEvA was established in 1995 as the Central Evaluation Agency with the purpose of undertaking evaluations of teaching and learning at higher education institutions in Lower Saxony. It was established as a public institution of the state by the State University Conference of Lower Saxony (“Niedersächsische Landeshochschulkonferenz (LHK)”) and the Ministry of Science and Culture of Lower Saxony (“Niedersächsisches Ministerium für Wissenschaft und Kultur (MWK)”).

Since then, ZEvA has continued to evolve, grow, and diversify its activity. Following the introduction of Bologna and the German system of accreditation described above, it was the first agency of its kind in Germany and the first to be approved by the GAC to undertake programme accreditation in 2000. Subsequently, ZEvA has added a wider range of activities to its portfolio, including System Accreditation, Certification, accreditation of programmes outside the Bachelor’s/Master’s system, Audit in Austria, and International Accreditation.

ZEvA’S ORGANISATION/STRUCTURE

Since 2008, ZEvA has been incorporated as a not-for-profit foundation under federal state law and exists as a legal entity in its own right. The Foundation’s Board of Trustees exercises ultimate control of the organisation independently of any external body, in line with the requirements of ZEvA’s constitutional document, the Foundation Charter. The Board of Trustees appoints and delegates responsibility for the management of the agency to an Executive Board, comprising a Managing Director, who fulfils the functions of a Chief Executive, and a Scientific Director, who provides academic leadership within the agency and a permanent link to the scientific community in Lower Saxony. The Executive Board leads a staff of 19 who deliver the agency’s work day-to-day. The staff is organised into three sections, each led by a Head of Section, plus an administrative team that supports the full range of ZEvA’s work. At the time of the site visit, the management of the agency were organised as follows:



The Foundation Charter also establishes two further bodies that have responsibility for overseeing and deciding on the outcomes of ZEvA's external quality assurance activities. The Standing Evaluation Commission has this responsibility in relation to ZEvA's Evaluation activities and the ZEvA Commission has this responsibility for all other activities. The one exception to this is deciding on the formal outcomes of accreditations in Germany that are subject to the new accreditation system established in 2018, where the German Accreditation Council has taken the decision. Additionally, an Appeals Commission operates as a sub-group of the ZEvA Commission in order to independently consider appeals and complaints.

ZEvA'S FUNCTIONS, ACTIVITIES, PROCEDURES

ZEvA has a diverse portfolio of external quality assurance activities, which the review team has grouped and considered as follows:

Programme and system accreditation in Germany

- Programme accreditation in Germany (remaining procedures)
- Systems accreditation in Germany (remaining procedures)
- Programme accreditation in Germany (from 2018 onwards)
- Systems accreditation in Germany (from 2018 onwards)

To be recognised in the German higher education system, programmes must be accredited. The Federal States (Länder) have determined the requirements and criteria of the accreditation process, which are implemented through the German Accreditation Council (GAC). ZEvA undertakes programme accreditation procedures that, since 2018, result in a report for consideration by the GAC in reaching a decision about accreditation. Established higher education institutions can apply for system accreditation whereby they are enabled to accredit their own programmes. Similarly, ZEvA undertakes system accreditation procedures that result in a report for consideration by the GAC. Procedures that started before 2018 resulted in a decision being taken by the ZEvA Commission within a framework set out by the GAC.

Accreditation of programmes other than Bachelor/Master in Germany

- Accreditation of Joint Degree Programmes according to the European Approach
- Accreditation of study programmes outside of the Bachelor/Master-system
- Accreditation of Doctoral programmes

ZEvA undertakes specific, tailored accreditations of programmes leading to a Diploma, doctoral programmes and complex collaborative programmes that span several European partners. These follow a similar process to programme accreditation for bachelor's and master's programmes. This is a diminishing area of activity that is expected to cease completely with the increase in system accreditations.

Certification of Further Education

The increasingly diverse range of provision offered by higher education institutions does not always lead to full degree programmes that require accreditation. This includes opportunities for lifelong learning and further education which increase the accessibility of higher education. ZEvA offers a certification service for such provision, whereby institutions can submit their provision for external assessment. Part One of the ESG is used as the basis for these procedures with an element of adaptation depending on the type of provision.

International programme and institutional accreditation

Since 2016, ZEvA has undertaken 16 programme accreditation procedures in countries other than Germany and Austria. These use a framework developed by ZEvA, which is mapped closely to the ESG, and results in a 'quality seal' from ZEvA. This activity has since evolved into a framework for also accrediting institutions, which was first used in 2019 with a university of applied sciences in Iraq. The ZEvA Commission makes decisions about the outcomes of these procedures.

Quality Audits in Austria

ZEvA is licensed by the Austrian Ministry for Science, Education and Research as a quality assurance agency permitted to undertake audits of Austrian universities of applied sciences. The audits are delivered in line with requirements set out in Austrian regulation and map closely to the ESG. ZEvA has undertaken four such audits over the last five years.

Evaluation

- Institutional, programme, subject level and thematic evaluations

Within the State of Lower Saxony, ZEvA receives public funding to support higher education institutions with the evaluation of their teaching and learning activities. This has focused on specific projects with individual institutions or programmes but is increasingly moving towards cross-institutional projects with a thematic focus.

ZEvA'S FUNDING

Having originally been established as a public body in Lower Saxony to perform Evaluation activities, ZEvA had initially relied on public funding from the State of Lower Saxony to sustain itself. This funding remains an important source of income for ZEvA, but most income is now earned from fees charged to individual higher education institutions in relation to accreditation, certification, and audit procedures. ZEvA's income is now diversified across a range of activity but the largest area of activity, programme accreditation in Germany, is declining with the shift to system accreditation. This has required ZEvA to further diversify its income streams, with a particular focus on growing international activity, and control its costs.

FINDINGS: COMPLIANCE OF ZEvA WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

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

Evidence

External Quality Assurance Activities

ZEvA has a long history of undertaking external quality assurance activities, initially with a focus on Evaluation in Lower Saxony and Programme Accreditation across Germany, and now also including System Accreditation, Certification, accreditation of programmes outside the Bachelor's/Master's system, Audit in Austria, and International Accreditation. According to its Self-Assessment Report, ZEvA has undertaken the following activity since its last external review:

Type of procedure	Number of (study) programmes/procedures				
	2016	2017	2018	2019	2020
Programme Accreditation A ²	180	226	322	145	66
Programme Accreditation B ³	0	0	0	28	69
System Accreditation A	2	1	2	3	2
System Accreditation B	0	0	0	0	2
Accreditation according to the European Approach	0	1	0	0	1
International Programme Accreditation	25	4	20	7	11
International Institutional Accreditation	0	0	0	0	1
Institutional Audit	3	0	1	0	0
Evaluation	2	0	2	1	2
(Programme) Certification	3	2	0	0	0
(Institutional) Certification	0	0	0	0	1

The Self-Assessment Report asserts and all groups during the site visit confirmed that the focus of ZEvA's activity continues to change, as partly foreseen in the previous external review in 2015/16. The shift from programme accreditation to system accreditation in Germany is gradually but dramatically reducing the amount of activity required by agencies in the German system. Instead, the system's emphasis is moving to the capacity and capability of higher education providers to assure the quality of their own provision more autonomously. While this may open new opportunities for agencies to support capacity-building and professional development activity among quality assurance professionals within institutions, these are unlikely to match the scale of activity undertaken to date in programme

² A: In accordance with the GAC criteria valid before 2018

³ B: In accordance with the criteria of the new legislation effective from January 2018

accreditation. Since the last external review of ZEvA, the 2018 legislative changes to the German system of accreditation have further reduced the role of accreditation agencies in favour of a stronger role for the German Accreditation Council.

The review team heard from ZEvA's Board, management, staff, and commissions that ZEvA was still deliberately pursuing a long-term goal of introducing new activities alongside its original evaluation and accreditation activities. ZEvA's international accreditation activity has grown since the last external review and now forms a prominent part of its portfolio. The review team heard from the German Accreditation Council, the Ministry of Science and Culture of Lower Saxony and higher education institutions that this diversity of activity and involvement in international accreditation – where ZEvA must maintain its expertise and competence in a broader range of responsibilities and assessment criteria than required by the German system – brings added value and richness to its work in Germany.

For an agency of ZEvA's size, the number and diversity of external quality assurance activities is large and complex, especially when applied separately at programme and institutional levels. In several meetings during the site visit, the review team explored the distinctiveness of ZEvA's approach to external quality assurance that provided a common thread through these activities. ZEvA's own staff were more reserved in their assessment given the increasingly strict system of accreditation in Germany that limited agencies in being distinct. However, ZEvA's stakeholders were more confident and celebratory of ZEvA's commitment to really understanding the provision under review regardless of the particular methodology being applied. In particular, the higher education institutions who met with the review team were clear in their praise for ZEvA as an agency that they could rely on to meet their particular needs and deliver the procedure as agreed, while not compromising on the standards or rigour of the process. The review team heard several times during the site visit that ZEvA's business often came through word-of-mouth recommendations and from higher education institutions returning to ZEvA based on their positive previous experience. This is in addition to the depth and richness of expertise developed within ZEvA as a result of the diverse range of activities undertaken, as noted above.

Consultancy

Within the scope of the state-funded Evaluation work carried out by ZEvA in Lower Saxony, there is the possibility for higher education institutions to request tailored support for a particular area of interest. ZEvA provided the review team with details of three such consultancy projects undertaken with two universities since its last external review in 2015/16. This forms the main part of the consultancy work undertaken by ZEvA and much like consultancy in other contexts, the projects are based on a specific identified need and approach agreed with the individual institution. These consultancy projects are viewed and managed by the agency separately to the external quality assurance activities undertaken in the form of Evaluation, Accreditation, Certification and Audit.

During meetings with the agency's management and with the Ministry of Science and Culture of Lower Saxony, the review team heard that the Ministry wished for the work they funded to benefit a greater number of higher education institutions in the State. This was the subject of discussions about the future strategy for ZEvA's Evaluation work but if agreed, this support for individual institutions would need to be funded through different means if it were to continue.

Additionally, ZEvA has undertaken work outside of Germany that would more accurately be described as consultancy than an external quality assurance activity, namely the evaluation of a pilot master's programme in South Korea and the certification of a United Nations organisation's provision as having equivalency to higher education provision. The review team heard from ZEvA's management that its priorities for international activity focused on accreditation and audit rather than consultancy work such as this, and that the small scale of this work could be intensively managed to ensure no conflict of interest with its external quality assurance activities.

Strategic Development

ZEvA's mission statement is published on its website and sets out a clear purpose to "carry out quality assurance tasks in the tertiary education sector and thereby promote quality development in studies and teaching". However, this is not accompanied by clear and explicit goals and objectives and the Self-Assessment Report provides very little detail on ZEvA's strategic priorities or how these translate into the daily work of the agency.

Upon the review team requesting additional evidence regarding strategic and operational planning, ZEvA confirmed that strategic plans had been developed for specific areas of business – namely international and systems accreditation, with an Evaluation strategy also in development – but no overall document setting out strategic and operational plans currently existed or was in use. As such, the review team established the agency's approach to strategic planning as a priority line of enquiry for the site visit.

During the site visit, the management team were also able to describe several current priority areas for development: economic sustainability through greater efficiency, establishing a long-term plan for Evaluation, growing voluntary engagement, and enabling staff to work across activities. These corresponded with the themes identified by staff, the Board, and stakeholders during the site visit when the review team asked about ZEvA's current priorities.

ZEvA's management and staff confirmed during the site visit that its annual retreats and its regular team and management Jour Fixe meetings were a focal point for discussing, agreeing, and monitoring its priorities. The review team requested and were able to examine the minutes and other outputs from a sample of the retreats and meetings over the last four years.

The annual retreat in February 2017 considered discussion papers from each Head of Section on the status and future direction of activities in their area, namely: programme accreditation, system accreditation, certification, and internationalisation. Some of these papers proposed objectives to be met by 2021. These papers were available to the review team, but not minutes of the corresponding discussions, and it is not clear that these translated into an approved plan.

The review team had access to comprehensive minutes of the discussions during the annual retreats in January 2019 and February 2020. These discussions reflected on the current state of several external quality assurance activities and a number of internal operational matters following a significant change in the leadership of the agency.

In discussions with the management team during the site visit, the review team heard that ZEvA was in the process of formulating a strategic and operational plan. It was anticipated that this would take most of 2021 to complete and there were some emerging ideas about the process for developing and approving the contents of these plans, but these ideas were not yet developed enough for the review team to consider in detail.

The Foundation Charter sets out the formal duties of the most senior bodies of ZEvA, the Executive Board and Board of Trustees, including the drafting and approval of the Business Plan, respectively. The review team interpreted business planning in a broad way to encompass the strategic and associated financial planning of the agency. The review team heard during the site visit that in practice, the Board of Trustees approves the financial budget each year and is involved in steering the direction set out in strategic papers on particular areas of activity, but it has not recently received or approved an overarching strategic or operational plan.

The Foundation Charter does not formally task the Board of Trustees with monitoring the performance of the organisation towards its goals or in achieving its mission, beyond what might be inferred from its responsibility for appointing and dismissing members of the Executive Board. In

discussions with the Board of Trustees, the review team heard differing views on the extent to which it fulfils a supervisory and decision-making role, as opposed to an advisory role, and that such formal, systematic monitoring typically focused on the financial performance of ZEvA.

Governance

ZEvA's Foundation Charter sets out the bodies forming ZEvA's organisational and governing structures: the Board of Trustees, the Executive Board, the ZEvA Commission and the Standing Evaluation Committee. Additionally, ZEvA has an Appeals Commission which is appointed by and makes recommendations to the ZEvA Commission. In addition to the high-level composition and responsibilities set out in the Foundation Charter, there are statutes and rules of procedures for each of the five bodies that provide some detail on their operation.

The review team met with members of each of these bodies during the site visit and discussed their responsibilities and interdependencies at length. The review team found that the responsibilities set out in the Foundation Charter, statutes and rules of procedures broadly matched the understanding held by the members of those bodies. Additionally, the review team observed from discussions that:

- The Executive Board holds much of the decision-making responsibility for both the operation of the organisation and its future direction. In particular, the Managing Director's role is akin to that of a Chief Executive, and they are responsible for steering the organisation. The Scientific Director also reports directly to the Board but has a focus on providing academic leadership rather than managerial responsibility.
- The Board of Trustees meets twice each year, and its role is largely viewed as advisory beyond the specific decisions set out in the Foundation Charter with regards to approving the budget, accounts, and appointments to other bodies with ZEvA. There was some difference of opinion between the members of the Board of Trustees that met with the review team about the extent to which they have been and should be involved more closely in decisions about strategy and direction.
- Before the 2018 accreditation reforms, ZEvA made decisions about programme and system accreditation through its commissions. These responsibilities have since been transferred to the German Accreditation Council and ZEvA has combined three commissions into one: the ZEvA Commission. The ZEvA Commission still has responsibility for approving expert panels involved in accreditation activities but its responsibilities beyond that now largely relate to ZEvA's other procedures (excluding Evaluation). The role of the ZEvA Commission and the ways in which it can now contribute more widely to the development of ZEvA's work, in light of its workload being reduced, are still developing as the full impact of the 2018 changes is now felt.
- The Standing Evaluation Commission is a long- and well-established forum for ZEvA to seek scientific advice and input into its programme of Evaluation work. It also serves as a productive space to bring together the interests of different stakeholders (i.e. the Ministry, universities, and the scientific community) in agreeing where ZEvA should focus its time and resources for Evaluation work. As the ZEvA's new Evaluation Strategy is finalised, the Standing Evaluation Committee will be well-placed to oversee ZEvA's progress towards the overarching goals of this strategy as well as the implementation of individual projects and to provide the Board of Trustees with assurance on these.
- The Appeals Commission takes a thoughtful and rigorous approach to considering appeals and complaints. Formally, it makes recommendations back to the ZEvA Commission, which is then

tasked with making a final decision on the outcome of the appeal or complaint. The review team had access to evidence summarising each of these outcomes and the decisions made by the ZEvA Commission. However, the review team heard that the ZEvA Commission was not fully aware of its responsibilities in this respect, and that there were different views between the commissions and ZEvA's management on how complaints regarding people (rather than process) would be handled.

- Responsibility for approving new and revised methodologies and criteria for ZEvA's external quality assurance activities is not formally assigned to any of these bodies. The review team heard in several meetings that it was not clear to all stakeholders who had this responsibility. The review team heard that, in practice, the commissions have an advisory role, and it is the management team of ZEvA (the Executive Board plus the Heads of Sections) that grants approval where such a decision is formally made.

Stakeholder Engagement

ZEvA's origins as an evaluation agency in Lower Saxony are still visible throughout its organisation and governance. Members of the Board of Trustees are appointed by the Lower Saxony Conference of Universities (LHK) in agreement with the Ministry for Science and Culture of Lower Saxony (MWK), and the membership of the Standing Evaluation Commission includes representatives of these bodies. In return, ZEvA is well-represented in various scientific, governmental, and representative bodies in Lower Saxony, usually through the Scientific Director who has specific responsibility for acting as an academic conduit for ZEvA with these bodies. The review team was able to confirm these assertions from the Self-Assessment Report through discussions with representatives of these various bodies and with ZEvA's management, Board of Trustees, and commissions.

The ZEvA Commission draws its membership from a wider range of higher education institutions, professions, and student representative bodies within and beyond Lower Saxony. These bring a diverse range of perspectives into much of ZEvA's external quality assurance activity. The review team was able to review the Statute of the Commission and meet with several of its members during the site visit.

The review team heard from ZEvA's staff that they are actively engaged in networks of accreditation agencies in Germany and with the work of the German Accreditation Council directly. This was confirmed in discussions with the German Accreditation Council, who valued and welcomed the work of ZEvA. While relationships have understandably been strained by the legislative changes to the German accreditation system in recent years, the review team found a constructive and productive attitude from ZEvA in understanding and cooperating with the German Accreditation Council as it became more familiar and confident with its new responsibilities.

According to the Self-Assessment Report, ZEvA also draws on feedback from the experts and higher education institutions that participate in its external quality assurance activities. In discussing this further with ZEvA's staff, commissions, and experts and with a range of higher education providers, the review team heard that this feedback was routinely collected and analysed for accreditation procedures but was collected more informally for other areas of activity. The review team also heard from ZEvA's staff that issues from this feedback were addressed in Jour Fixe meetings as they arose but the agency's approach to systematically aggregating, analysing, and acting upon the feedback was limited.

Analysis

External Quality Assurance Activities and Consultancy

It is clear that ZEvA undertakes a range of external quality assurance activities on a regular basis. It does this in an organised and thoughtful way that balances the needs of higher education institutions with ZEvA's own standards and those of any regulatory regime the institution is operating in.

ZEvA is held in high regard by its diverse range of stakeholders. While the agency must remain competitive on pricing in the German and international markets for quality assurance, it has chosen to prioritise its credibility, rigour, and customer-oriented approach. By taking the time to understand the nature of the provision and institution under review each time, ZEvA has become distinct in its approach by acting as a genuine partner to and conduit in-between the various parts of the system it is operating in (institution, accreditation body, government, public), rather than simply offering a time-limited service.

There is no recommendation or suggestion for improvement to add in this regard, but the review team would simply encourage ZEvA to be more self-aware and confident in the quality and distinctiveness of its own work. There is much to be proud of and ZEvA should find a way to capture, articulate and promote this as it seeks to build its presence in new and existing markets.

The review team is satisfied that ZEvA takes a careful and considered approach to conducting its consultancy work separately to its external quality assurance activities.

Strategic Development

ZEvA has over 25 years' experience of adapting to changing and often challenging circumstances. This is evident from its reputation, successful entry to new markets and financial resilience through a global pandemic. The size of the organisation has enabled its leaders to closely manage its activities and development. The review team therefore appreciates that the approach taken to date has largely served ZEvA well.

The minutes of more recent corporate retreats do not indicate a clear and explicit link between the discussions on future development and any specific objectives, targets or measures agreed as a result of previous discussions in 2017, but they do show an agency that protects time for reflective discussions about those same core areas of activity and encourages participation from all staff.

Looking forward, ZEvA faces serious challenges as the size of the market for programme accreditation in Germany continues to decrease in favour of system accreditation. There are also fundamental questions about the future direction of ZEvA's evaluation and international work, which are the subject of current discussions within ZEvA. Each of these requires careful consideration of the investment and organisational development needed to achieve ZEvA's ambitions, and there will need to be decisions taken about the prioritisation of investment across these areas when resources are limited.

ZEvA already accepts that in a German system where opportunities to increase income are constrained by regulation and market force, they will need to focus on controlling costs. This is already being pursued through a focus on digitising the organisation and, like all organisations, will need to factor in decisions on future ways of working in a post-Covid-19 era. ZEvA is also actively thinking about the ways in which its staff can work in a more agile way across different types of procedures and about the future structures and responsibilities of its commissions. Furthermore, ZEvA is considering how it will invest in both its physical and digital infrastructure.

The review team therefore concludes that taking a long-term view of ZEvA's priorities and associated operational and financial planning, which brings all the competing demands together and secures buy-in at all levels of the organisation, is essential. The current activity-specific approach goes some way

to achieving this but is not enough by itself. A more formalised and systematised approach to developing, agreeing, implementing, and monitoring progress towards ZEvA's priorities is necessary for ZEvA to maximise its future success and to become fully compliant with standard 3.1. This should involve a clear role for the Board of Trustees in approving, promoting, and assessing progress towards the priorities. It does not, however, need to restrict ZEvA's ability to operate in an agile and responsive way to new opportunities, and it does not need to be an overly bureaucratic process.

Governance

Through the site visit, the review team found that the Managing Director, who sits at the centre of the organisation and is responsible for coordinating the various internal bodies, had a very clear understanding of how each part of the organisation operates in theory and in practice. However, this understanding was not consistently shared across the organisation and there was some confusion about important responsibilities such as setting strategy, approving external quality assurance procedures, and making decisions about appeals and complaints. This appeared to be exacerbated by the changing nature of the ZEvA Commission's role within the organisation.

ZEvA's governance structures have evolved in recent years as a result of the changes to its operating environment. In particular, the functions of the commissions have needed to change as certain responsibilities for making accreditation decisions have transferred from the accreditation agencies to the German Accreditation Council. By combining three of the commissions, ZEvA has taken action to preserve the contribution of important stakeholders in its work and to open new opportunities for the commissions to have greater input into the development of ZEvA and its external quality assurance activities, as opposed to spending all the available time making decisions about individual procedures.

The confusion about the current responsibilities and the relationship between different bodies in ZEvA's organisational structure can, therefore, be partly attributed to these changes and judged understandable. However, there are some responsibilities that were unclear to some (complaints and appeals) or missing completely from the schedules of responsibilities (approving methodologies and criteria) that would not have been impacted by these recent changes and may indicate some longer-standing ambiguity. While the review team did not observe specific problematic incidents that had arisen as a result of this, ZEvA is operating an increasingly complex portfolio of activities and will want to mitigate the risk of misunderstandings causing problems in the future.

The ESG do not prescribe how an agency should organise itself and the review team has taken care not to expect a certain model of governance. ZEvA is structured around a Board of Trustees as the ultimate governing body of the foundation, which is "responsible for all matters of the Foundation of fundamental importance for both evaluation and accreditation" (Foundation Charter). Many matters are delegated to the Executive Board and to the commissions, but the Board of Trustees retains ultimate accountability and will want to be assured that the responsibilities delegated to those bodies are being fulfilled effectively. This is a typical governance structure in a not-for-profit organisation and in many quality assurance agencies. The review team therefore sought to confirm whether the Board of Trustees has clear visibility of the performance of the bodies to which it delegates responsibility and whether it has information to enable it to judge the overall performance of ZEvA. It also sought to confirm whether the involvement of stakeholders in the governance of ZEvA was effectively achieved through the Board of Trustees.

During the site visit, the review team met four of the seven members of the Board of Trustees across four different meetings and spoke with ZEvA's management about their interaction with the Board of Trustees. The review team were also able to see how the discussions among staff at the annual retreats and the development of strategy papers for particular areas contributed to the business of the Board of Trustees, via the Executive Board. It was clear to the review team that the high calibre of members of the Board of Trustees enabled them to engage effectively in steering the most important decisions

about the agency's direction, especially where these had significant financial implications. It was also clear that the Board of Trustees had effectively intervened where it had concerns. However, the extent to which the Board of Trustees has a 'supervisory' role compared to an 'advisory' role was the subject of debate between its members when meeting with the review team. From these discussions with the Board of Trustees and with the management team, the review team were left with the impression that the Board of Trustees' role was largely advisory in practice, except when a subset of members felt strongly enough to encourage a more directive approach.

This could represent a good approach to governance whereby the Board of Trustees is not too involved in the management of the organisation. However, from across these discussions and in the context of the findings about strategic planning already discussed above, the review team concluded that the Board of Trustees could be better informed and more methodical in its approach to seeking assurance that ZEvA's overall performance and health as an organisation was positive and expected to remain positive in the future. Specifically, in the absence of the Board of Trustees taking an active role in approving and monitoring an overall strategic plan for the agency and any performance indicators associated with these, it is difficult to see what measures the Board of Trustees is judging the work of the Executive and its commissions against. It is also difficult to see the wider strategic context and prioritisation that the Board of Trustees has in mind when undertaking one of the regular decision-making tasks required of it: approving the financial budget and accounts of ZEvA.

Overall, the review team concludes that the governance structure is broadly working and allows ZEvA to operate in an organised way. However, there is a need to undertake a holistic review of the responsibilities of its various governing, academic, and executive bodies in order to document the changes since 2018, to address areas of confusion that could leave ZEvA vulnerable, and to help members of those bodies fully understand and fulfil their roles. The recommendation to undertake this review is made together with the recommendation to formalise ZEvA's approach to strategic planning in order to ensure that ZEvA's clear and explicit goals and objectives translate into the daily work of the agency, as required by this standard. While not a formal recommendation, the review team would add a suggestion directly to the Board of Trustees that it consider its own role overseeing the strategic direction of ZEvA in collaboration with the Executive Board.

Stakeholder Engagement

Notwithstanding the review team's view above that the responsibilities of these bodies require some review and clarification, ZEvA is reaping considerable benefit from the involvement of stakeholders in its governing and academic bodies. This ongoing engagement helps to build deep, lasting, and meaningful relationships with stakeholders that have a reciprocal benefit and goes a long way in enabling ZEvA to conduct its work in a way that continues to meet the needs of its beneficiaries.

There is room for improvement in the way that ZEvA makes use of stakeholder feedback about individual external quality assurance activities. Specifically, experts and higher education institutions involved in quality assurance procedures are sometimes asked to offer feedback on the individual procedures, but this is not always systematically aggregated, analysed and acted upon. This is discussed further in ESG 3.6 and ESG 2.2, but the recommendations there have relevance to this standard too.

Panel recommendations

Formalise the approach to agreeing, documenting and monitoring progress towards the strategic priorities of the agency.

Review and ensure a shared understanding of the responsibilities of the agency's board, commissions and management following a period of major change, including responsibility for approving new and revised external quality assurance methodologies.

Panel suggestions for further improvement

The Board of Trustees should consider its own role overseeing the strategic direction of ZEvA in collaboration with the Executive Board.

Panel conclusion: Substantially compliant

ESG 3.2 OFFICIAL STATUS

Standard:

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

Evidence

ZEvA was incorporated in 2008 as a not-for-profit foundation under German and federal state law and exists as a legal entity in its own right. This status is confirmed by the Foundation Certificate and the constitution of the foundation – namely the purpose, asset management and internal organisation – is set out in the Foundation Charter. Both the Certificate and Charter were available to the review team. The Foundation's Board of Trustees exercises ultimate control of the organisation independently of any external body.

According to the Self-Assessment Report, ZEvA is recognised by the German Accreditation Council (GAC) as an agency able to undertake accreditations because of its inclusion in the European Quality Assurance Register for Higher Education (EQAR). This follows the 2018 legislative changes that moved away from the GAC directly approving and accrediting specific agencies. The GAC confirmed this when meeting with the review team and continues to make many accreditation decisions based on an assessment by ZEvA. Similarly, ZEvA is recognised by the Austrian Ministry for Science, Education and Research as a quality assurance agency permitted to undertake audits of Austrian universities of applied sciences.

In Lower Saxony, ZEvA receives public funding each year to undertake evaluation work with higher education providers in the state. This funding continues to be granted by the Ministry of Science and Culture in recognition of ZEvA's role as a quality assurance agency in the state. While it is possible that this funding and ZEvA's relationship with the Ministry could change in the future, the review team heard from the Ministry that there were no plans for such a change, but rather both parties were seeking to establish a longer-term and more strategic view of the Evaluation work.

Analysis

ZEvA's legal basis is clear and well-established as a Foundation in Lower Saxony. This enables the agency to conduct its business autonomously if this contributes towards the charitable purpose and objectives set out in the Foundation Charter.

ZEvA is recognised as a quality assurance agency by the Ministry of Science and Culture of Lower Saxony, the German Accreditation Council and the Austrian Ministry for Science, Education and Research. This recognition allows ZEvA to regularly undertake different forms of external quality assurance activity across these different jurisdictions.

Overall, the review team is satisfied that ZEvA clearly fulfils this standard.

Panel conclusion: Fully compliant

ESG 3.3 INDEPENDENCE

Standard:

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

Evidence

ZEvA's organisational independence is demonstrated through its legal basis as an independent, autonomous Foundation. The Foundation Charter and the Self-Assessment Report note that ultimate control of the organisation is exercised by the Board of Trustees, with responsibility for the development and management of ZEvA delegated to the Executive Board. Members of the Board of Trustees are appointed by the Lower Saxony Conference of Universities (LHK) in agreement with the Ministry for Science and Culture of Lower Saxony (MWK) based on a proposal by a selection committee, except for one member that is appointed directly by the Ministry as ZEvA's founder. According to the Self-Assessment Report, members of the Board of Trustees do not represent the bodies that appointed them, but act as individuals in the best interests of ZEvA.

In discussions with ZEvA and the Ministry about the Evaluation work supported by public funds, the review team heard that current discussions about the future strategic direction and resourcing were collaborative and based on working together as partners. This provided reassurance that the inclusion of a Ministry-nominated member of the Board of Trustees was not compromising the organisational independence of ZEvA.

Throughout the site visit, the review team discussed ZEvA's approach to designing and operating its external quality assurance activities. The review team heard from staff, commission members, experts, and the German Accreditation Council that ZEvA was free to determine its procedures and select experts without external interference, as long as the approach met the expectations of any regulations governing a specific activity. Most notably, the German accreditation system – both before and after the 2018 changes – requires accreditation agencies to test programmes or institutions against standard criteria agreed across the Federal States and to meet certain expectations with regards to the process, such as the composition of expert panels.

In practice, ZEvA's management team makes decisions about the criteria and methodology to be applied in cases where ZEvA has discretion to determine these. ZEvA's commissions have specific responsibility for approving the appointment of expert panels upon a recommendation from the Project Officer in ZEvA's staff coordinating the procedure.

Responsibility for deciding on the formal outcomes of external quality assurance activities rests with the relevant commission appointed by the Board of Trustees. Specifically, the ZEvA Commission's Statute details its primary responsibility as making formal decisions in accreditation, certification, and validation procedures and in quality audit procedures, except for accreditation decisions taken by the German Accreditation Council since 2018. Similarly, the Standing Evaluation Commission is tasked with adopting Evaluation reports with their recommendations for quality assurance. Throughout the site visit, the review team heard from staff, experts, and members of the commissions that where ZEvA decided on the final outcome of a procedure, it was always the commissions that took such decisions upon the advice of expert panels and ZEvA's staff.

Analysis

ZEvA has a long history of operating external quality assurance activities in collaboration with stakeholders while retaining ultimate responsibility and accountability for them. As ZEvA's portfolio of activity has grown and become more diverse through the addition of new procedures domestically

and internationally, the same underlying approach has been retained and served the agency well. Specifically, the establishment and utilisation of commissions as points through which the development of procedures can be informed and the formal outcomes can be decided. This ensures clarity, transparency, and independence operationally.

More generally, ZEvA's existence as a separate legal entity in the form of a Foundation serves it well. The appointment of members to the Board of Trustees is undertaken by stakeholder bodies, but this does not result in them exercising undue influence over the decisions of the Board.

Through discussions with members of the Board of Trustees, representatives of the Ministry (including the Ministry-nominated member of the Board of Trustees) and ZEvA's management, the review team found no evidence of undue influence from third parties impacting the decisions they took as a Board.

There are no concerns about the organisational independence of the Board, management, and commissions in fulfilling their responsibilities.

Panel conclusion: Fully compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

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

2015/16 review recommendation

The agency could highlight with even greater clarity how and to what extent the findings from its analyses could be used in its daily work and for the benefit of the higher education institutions.

Evidence

The 2011 external review of ZEvA by the GAC found it to be fully compliant with the predecessor standard (2.8 System-wide analysis) of the 2005-2015 ESG but recommended that ZEvA "institutionalise a structured analysis of the insights gained through the different procedures for quality assurance". In 2015/16, the external review by the GAC recognised a number of publications that had been developed in the intervening years that analysed the findings it had gained through its activities. Standard 3.4 was deemed to be fulfilled, but the recommendation above was made to encourage further attention on the impact of such work.

In the Self-Assessment Report for this 2021 review, ZEvA emphasized two areas of activity as demonstrating compliance with the standard. First, the thematic evaluations of practice in higher education institutions in Lower Saxony, which form part of ZEvA's Evaluation work, one of the external quality assurance activities within the scope of this review and itself being assessed against the ESG. Specifically, three publications were cited:

- An evaluation of dual-study concepts (combining academic study and vocational training) in 2016, which evaluated higher education institutions' (HEI) approaches to dual-study, the acquisition of skills and their differentiation from other study programmes. The two-year project involved 11 higher education institutions and produced individual reports for each institution as well as the overall summary report cited as a thematic analysis.
- An evaluation of 'Open Paths to Study' funding in 2017, whereby the Ministry commissioned ZEvA to evaluate the impact of funding it had made available for HEIs to increase participation amongst

first-generation students over the preceding six years. The project ran through 2016 with the 11 higher education institutions that had been in receipt of the funding and were required by the Ministry to participate in the evaluation.

- An evaluation of examination systems in 2019, which aimed to identify how assessment methods were becoming more diversified, less reliant on traditional examinations and more embedded into the learning process itself. This pilot study involved three universities.

Each of these thematic evaluations involved the appointment of an expert panel specific to this activity and drew upon self-assessments produced by HEIs specifically for the evaluation. The overall reports from each do not cite other reports resulting from previous ZEvA procedures as a source of evidence.

The second area of activity emphasized in the Self-Assessment Report was the publication of journal articles and contributions to conference proceedings by the agency's staff. Three examples were included that reflected on various aspects of ZEvA's activity, which are a mixture of disseminating the findings and experiences from ZEvA's Evaluation projects and more methodical reflections on the experiences of conducting accreditation procedures internationally.

The review team paid careful attention to determining whether the outputs from the thematic evaluation projects undertaken by ZEvA could be considered as thematic analysis in the way that is described in this standard and guideline. The review team also wanted to understand whether ZEvA's approach to thematic analysis had made use of the findings from the QA procedures other than Evaluation, which totalled 1,128 out of the 1,135 procedures that ZEvA reports it had completed between 2016 and 2020. As such, the review team established the agency's approach to thematic analysis as a priority line of enquiry for the site visit.

The review team had extensive discussions about thematic analysis throughout the site visit with ZEvA's management, staff, and commission members, and with higher education institutions and the Lower Saxony Ministry of Science and Culture.

The thematic Evaluation projects cited in the Self-Assessment Report have been valuable in contributing to quality development in Lower Saxony according to the Ministry of Science and Culture. The review team heard that there is a push towards more thematic projects involving a greater number of institutions, rather than projects with individual institutions. The review team also heard clearly from the management team that they consider Evaluation to be an external quality assurance activity that results in decisions about and recommendations to higher education institutions, which confirmed that Evaluation was appropriately included in the scope of this review.

The review team heard that ZEvA had not undertaken analysis beyond that listed in the Self-Assessment Report and detailed above; there are no analyses of the outcomes of procedures outside of Evaluation, including accreditation.

ZEvA's management and staff recognised that not much thematic analysis work had been undertaken in recent years. They were of the view that there is limited resource and staff time available to deliver this work, which is compounded by the competitive domestic market that ZEvA operates in and demands a lean approach and low cost. Furthermore, ZEvA is of the view that there is little demand from higher education institutions for thematic analysis and for ZEvA to support the development of their quality assurance systems, even as the move to system accreditation places more emphasis on institutions building their capacity for quality management.

There were a number of possible themes suggested by ZEvA during the site visit for future thematic analyses, including further work on dual-study programmes and international procedures. However, these are not yet documented in a plan with resources identified and assigned, and it was not clear that these would markedly be different in approach to previous thematic Evaluation projects.

Furthermore, ZEvA hopes to make use of moving to a new IT system for managing its procedures by extracting and reporting a greater range of statistical and management information, but this is some time away.

Towards the end of the site visit, the review team were supplied with notes from ZEvA's annual retreats for staff in relation to another line of enquiry. The most recent retreat took place in February 2020 and included an item on preparations for this ENQA review, for which the notes of the discussion suggest that ZEvA recognised it had neglected thematic analysis in recent years.

Analysis

The review team dedicated a considerable amount of time assessing ZEvA's approach to thematic analysis, taking time to understand the agency's particular context and approach rather than expecting to find a standard approach or typical types of evidence.

ZEvA was initially established as an Evaluation Agency in Lower Saxony to help institutions fulfil their obligations to undertake regular evaluation of their teaching and learning activities in order to enhance their quality. These activities have evolved since 1995 with a greater focus on thematic, multi-institution projects more recently, compared to the projects with individual institutions that had previously dominated. However, they remain an external quality assurance activity and are considered against Part 2 of the ESG in this review alongside accreditation, certification, and international procedures. The Evaluation activities do help ZEvA to contribute to the reflection on and the improvement of quality assurance policies and practices beyond the institution(s) under review to some extent, but the review team concluded that they are not providing a higher-level analysis of the findings of external quality assurance activities.

In looking beyond Evaluation for other activities that would demonstrate compliance with this standard, the review team welcomed the contribution made to debates on quality and quality assurance through the publication of articles and contributions to conferences. These demonstrate that there is the analytical mindset and skill set within ZEvA's staff to undertake a thematic analysis. However, the articles and conference contributions do not themselves constitute or evidence an established, systematic approach to analysing the findings of external quality assurance activities.

The review team found no further evidence during the site visit that ZEvA had undertaken analysis of the general findings of their external quality assurance activities. In particular, there was no evidence available to the review team to demonstrate how the findings from ZEvA's largest areas of activity had been analysed and learned from.

ZEvA's management team acknowledged these gaps in discussions with the review team. ZEvA's circumstances in recent years, with major disruptions to staffing and from the Covid-19 pandemic, and more generally in terms of the competitive market for accreditation in Germany, go some way to explaining why ZEvA could not commit the resource to undertake as much thematic analysis in the last two or three years. However, ZEvA confidently assured the review team throughout site visit that it was in good financial health and while maintaining a prudent approach to financial management, it was able to invest in business development and its infrastructure. Furthermore, it was clear to the review team that even without the resource constraints, ZEvA saw limited value in producing thematic analysis of the kind expected by this standard because of the low demand for it by higher education institutions, and it had not prioritised it in recent years. In summary, the lack of activity in this area is partly due to resourcing constraints but also partly due to decisions deliberately taken by the agency.

In responding to the review team's questions about thematic analysis, ZEvA cited intentions in several areas, including a number of analyses that were planned, the benefits that would be gained from a better management information system and the support offered to staff to publish articles or undertake doctoral research. However, these did not form part of a coherent and approved plan to

commence activity in this area and ZEvA confirmed that their limited staffing resource would not be able to deliver this work alongside an increasingly busy workload in response to high demand for ZEvA's services.

Overall, the review team concludes that there is some limited evidence of the findings from certain, small-scale activities being used to contribute to the reflection on and the improvement of quality assurance policies and practices. However, these reports are typically the outputs of those external quality assurance activities rather than an analysis of findings from across procedures. They can only therefore demonstrate compliance with parts of this standard and guideline in a minor way. Furthermore, the vast majority of ZEvA's activity in the last five years has not benefited from any such thematic analysis. The review team could not see an achievable plan in place to address these issues and to demonstrate greater compliance with this standard in the future.

Before addressing the recommendation below, the review team encourages ZEvA to reconsider its view on the value of thematic analysis. ZEvA has over 25 years' experience and has completed thousands of procedures. It is the expertise from this work that is so important to ZEvA's stakeholders and more should be made of this by collecting and analysing the findings from the various procedures. It is difficult to dedicate the resources to such analysis, but there is a lot of potential value in further building the already strong credibility of the agency and its staff, not only in individual procedures but also in discussions about the future of higher education and quality assurance.

Panel recommendations

Develop, assign resources to, and implement a plan for thematic analysis of findings from across the range of the agency's QA procedures.

Panel conclusion: Partially compliant

ESG 3.5 RESOURCES

Standard:

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

Evidence

Human Resources

According to the Self-Assessment Report, ZEvA employs 19 staff, five of whom were in administrative support roles. The review team met with most of these staff during the site visit and was supplied with the role descriptions of senior staff upon requesting them. In meeting with staff during the site visit, the review team explored their experiences of working for ZEvA and the extent to which their capacity allowed them to manage the agency's work successfully. The latter was a particular area of interest as the Self-Assessment Report noted a number of pressures in recent years that had put their staff under strain. Specifically, ZEvA's SWOT analysis identified scarce staffing levels as the biggest weakness and had already prompted ZEvA to increase staffing levels ahead of submitting the Self-Assessment Report.

In discussions with staff at all levels in ZEvA, the review team found a recognition that the last three years or so in particular had been challenging. During this time, the leadership of ZEvA had changed for the first time since being established in 1995 and a small but critical group of senior staff departed ZEvA for new opportunities or owing to prolonged illness. This was happening at the same time as

the 2018 changes to the German accreditation system were being navigated and was compounded by the Covid-19 pandemic that impacted from early 2020.

The review team heard from a number of staff about the introduction of a provision for all staff to be able to access Coaching with a professional coach. Those staff who had taken up the offer were able to focus their five sessions on an area of their choice to support their professional development. The experiences of staff so far had been particularly positive and ZEvA had committed to continuing with Coaching, albeit with further iterations also focusing on the organisational development needs of ZEvA as well as the individual preferences of staff.

In asking staff about their motivations for and experiences of working for ZEvA more generally, the review team heard an overwhelmingly positive view of ZEvA as an employer of choice. The review team noted that several staff had left ZEvA to pursue new opportunities only to return subsequently, and that other staff with experience elsewhere in the German higher education sector had specifically sought to work for ZEvA because of its role, reputation, and credibility.

Financial Resources and Infrastructure

ZEvA is confident about its financial position and asserts in its Self-Assessment Report that this continues to be the case through the Covid-19 pandemic. The review team requested and were supplied with ZEvA's financial statements for 2018 and 2019, budget plans for 2020 and 2021, and preliminary draft budget for 2022. The review team also discussed the financial health of ZEvA with its management and Board of Trustees, and with the Ministry of Science and Culture of Lower Saxony who provide approximately 25% of ZEvA's income through recurrent funding for Evaluation.

The review team found that ZEvA's external context drives much of its financial strategy. Specifically, the accreditation market in Germany requires accreditation agencies to remain competitive on price as well as quality, and the overall size of the market is contracting as more higher education institutions opt for a single system accreditation procedure in place of many programme accreditation procedures. This means the growth and additional income that can be achieved from ZEvA's domestic accreditation work is limited, and it has instead focused on controlling costs within this work and diversifying income streams through new external quality assurance activities.

This prudent approach to financial management has allowed ZEvA to generate a reasonable annual surplus for a number of years, which had resulted in a healthy financial reserve being available for investment. The review team heard that this was allowing an investment in ZEvA's digital infrastructure and was intended to fund a future growth in office space. However, the Covid-19 pandemic has resulted in a financial loss in each of the last two years, which has been offset by parts of the funds held in reserve. ZEvA's management reported that demand for their QA procedures remained healthy, despite the pandemic, and they expected to return to a positive financial outcome in the next financial year.

Analysis

ZEvA benefits from having a high calibre and well-established team of staff at all levels. This was both evident to the review team and confirmed by ZEvA's stakeholders, who believe its strength is the expertise and integrity of its people. In turn, this has helped to establish ZEvA as an appealing place to work and resulted in a number of staff choosing to stay for long periods of time or returning after a short spell elsewhere. The culture that has been created within ZEvA is focused on recruiting, retaining and developing talented people who add considerable value to the agency's work.

This culture and the resilience of ZEvA's staff has been tested recently through a series of organisational and staffing changes, and through the Covid-19 pandemic. There has undoubtedly been an impact on staff, but this was effectively recognised and responded to by ZEvA's management

through a series of interventions, including investment in additional Project Officer roles. The introduction of Coaching as one such intervention is evolving into an established element of ZEvA's support for the professional development of staff and stands out as an impressive, distinctive provision that should be built upon further.

ZEvA has pursued a strategy of diversifying its income over a number of years, largely in response to the changing German accreditation market. Together with prudent financial management, this has enabled the organisation to remain sustainable and to build a reserve through the generation of surpluses over a number of years. ZEvA's financial position has remained resilient through the Covid-19 pandemic and the outlook remains positive.

Overall, the review team concludes that ZEvA has adequate and appropriate resources in place to carry out its work.

Panel commendations

The positive and supportive people-focused culture created by the agency for the benefit of its staff and stakeholders who work with them.

The commitment to staff wellbeing and professional development as recently demonstrated through the offer of professional Coaching for all staff.

Panel conclusion: Fully compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

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

2015/16 review recommendation

ZEvA's internal quality assurance system should be updated and expanded to incorporate all of the procedure types offered by the agency.

Evidence

ZEvA outlines its principles for and overall approach to internal quality assurance (IQA) in its Quality Manual, which was last updated in October 2020, shortly before this review. The Quality Manual serves as ZEvA's IQA policy. It brings together ZEvA's understanding of quality as it expects to find it in higher education institutions and the measures in place to ensure its quality assurance activities remain effective and credible in searching for and evaluating that concept of quality.

The review team requested the guidelines for IQA cited in the Quality Manual as an additional source of evidence before the site and these were provided in the form of a Handbook. However, ZEvA noted these guidelines were now outdated and included large sections that were still to be revised following the 2018 changes to the accreditation system in Germany. ZEvA stated that the guidelines were under review and a new Handbook would subsequently be developed at the end of 2021. Additionally, the review team requested and were supplied with examples of training for expert peer reviewers, the contract and code of conduct for expert peer reviewers, and examples of questionnaires issued to higher education institutions and expert peer reviewers at the end of a procedure.

The current version of the Quality Manual and the handbook containing IQA guidelines are comprehensive in their coverage of ZEvA's activities, which suggests the recommendation from the previous review had been addressed before the 2018 changes to accreditation again left the guidelines in need of further development.

During the site visit, the review team discussed various aspects of IQA at length with ZEvA's management, staff, commissions, and experts, as well as with higher education institutions.

Documentation of operating procedures

The review team heard from staff that there is an embedded approach amongst staff to planning and reflecting on the delivery of procedures. This begins with a clear plan of the hours needed to undertake the work and involves the use of fortnightly Jour Fixe meetings to discuss and resolve issues that arise. Staff confirmed that their draft reports are reviewed by the head of their team or the Managing Director before they are shared more widely in order to ensure consistency of approach. The review team heard very little about the use of documented operating procedures or the IQA guidelines from ZEvA's management and staff, other than confirming that they needed revision.

Evaluation and systematic review of external quality assurance methodologies

The review team heard from ZEvA's Management Team that responsibility for reviewing and improving each methodology rests with them collectively, led by the Head of Section in charge of that activity.

The review team heard from staff and higher education institutions that ZEvA collects feedback from participants in a systematised way for some but not all procedures. This is undertaken for programme accreditation, which is the area with the largest number of procedures. However, some smaller scale procedures collect feedback more informally through conversations and interviews, and this feedback is not systematically captured, aggregated, and reported in the same way. The Evaluation team has responsibility for administering and analysing the results of the questionnaires that are issued. Where a procedure is subject to a quantitative evaluation by its participants, the results of these are considered at the annual corporate retreats.

Jour Fixe meetings are used to monitor the operation of ZEvA's methodologies and provide an opportunity to discuss and collectively resolve issues as they arise, which helps towards greater consistency of approach. These have been especially useful as ZEvA has adapted to the new accreditation system in Germany and the evolving requirements of the German Accreditation Council.

Staff confirmed that the annual corporate retreats are a major focal point for reflecting on and agreeing improvements to the methodologies, with the largest areas of activity (accreditation, evaluation, international) included on the agenda each year. Additionally, some methodologies are shaped by strategy papers developed for those areas of business in consultation with the Board of Trustees.

During the site visit, the review team requested and were supplied with the papers for and minutes from a selection of four Jour Fixe meetings and the three most recent annual corporate retreats. These show that the methodologies are routinely considered with each being the subject of team-wide discussions lasting around two hours. These discussions are sometimes informed by a discussion paper shared in advance, which draws together issues that have arisen through the year and the changing external context, challenges, and opportunities.

ZEvA's management, staff and commissions confirmed that the procedures are not subject to a periodic holistic review and development exercise, except when forced by regulatory changes. There is no schedule to indicate when each methodology will be reviewed in a more substantial way than responding to the issues arising in a particular year. The strategy papers fulfil this role for certain

methodologies to some extent, but they are typically – and rightly – more focused on business development in that area of activity.

Stakeholder feedback on ZEvA as a whole

The review team heard from ZEvA's management, staff, and stakeholders that feedback on ZEvA's organisation, work and impact more generally is collected continuously through informal and formal dialogue with stakeholders. It was not clear to the review team how this was systematically gathered and analysed, but ZEvA is a small enough organisation that the Management Team are likely to engage with most of this feedback and see the themes arising from it. The SWOT analysis and Self-Assessment undertaken for this review were first developed by staff and feedback was then sought from stakeholders to help refine it.

Management Information

While ZEvA relies heavily on its projects database and IT systems for the control, monitoring and improvement of its work, these systems are not performing as well as ZEvA had expected and are currently being replaced. As part of a wider focus on digitisation, it is hoped that a new system will provide more management information and insight about ZEvA's operations that can then be used to inform its continuous improvement.

Recruitment and training of experts

Staff confirmed that it is not a mandatory requirement for experts to undertake training before participating in a procedure, but it is highly recommended. ZEvA's training for experts has run more frequently and in different formats and locations to increase the accessibility for experts. However, the quality of data available to ZEvA on which experts had completed training with ZEvA or another agency was limited, and it was not possible for ZEvA to confirm the percentage of experts who had been trained. There is an embedded approach to ensuring that experienced experts make up at least 50% of review teams in order to promote consistency of approach and to support the induction of newer experts.

Analysis

The significant regulatory changes and competitive market for accreditation in Germany, combined with a focus on diversification that has introduced several new external quality assurance activities to ZEvA's portfolio, has required the organisation to continuously reflect, adapt and improve. This is evident from the incremental changes in each of ZEvA's activities that the review team heard about during the site visit, that are evident in the outcomes of Jour Fixe meetings and corporate retreats, and that are documented through the various iterations of guidance on ZEvA's methodologies.

The review team can conclude that ZEvA is an organisation committed to maintaining the quality of its activities, and to learning from and improving these activities. However, there is further room for improvement to ensure that current risks to the IQA system are addressed.

The IQA system relies on the documentation and implementation of standard operating procedures in the IQA guidance. ZEvA recognises that these are in need of review and this work is underway. It is important that this is completed in a timely manner and that ZEvA's management monitors how effectively they are being implemented. This is particularly important as ZEvA makes the positive move to utilise its staff across multiple areas of activity, meaning that they might engage with certain methodologies less frequently. This will also help to secure ZEvA's response to the recommendation from the last review which was addressed but is now relevant again.

Similarly, the IQA system relies on expert peer reviewers being trained to fulfil their responsibilities, but this is not being implemented robustly. While the review team could only assume from various

remarks made during the site visit that uptake for training was still very low, it is just as concerning that ZEvA could not say what proportion had been trained. ZEvA's expectations of experts to complete training are not clear enough and are certainly not strong enough to justify any assurance being taken from expert training as a tool for internal quality assurance.

Feedback from stakeholders is an essential source of insight into the effectiveness and quality of ZEvA's work. However, the approach to collecting and using this feedback is too informal in places and risks important themes not being identified by the agency's management. The review team expects that no more time is needed to collect the feedback, but simply that the approach to capturing, collating, and analysing this needs to be more systematic and standardised across different activities and teams. ZEvA should also pay more attention to asking its stakeholders for more holistic feedback about its effectiveness and impact as a partner in quality assurance and improvement; such questions are unlikely to be appropriate in the evaluation of a single procedure but are important to ask in other ways to inform the strategic development of the organisation.

The current approach to reviewing and continuously improving the different methodologies is itself effective and having a positive impact. However, there is more that ZEvA can do to ensure its methodologies remain wholly fit-for-purpose over time through a more holistic and systematic review after several years of operating them. This can form a schedule that spreads the review of each methodology over a period to ensure the work remains manageable.

Overall, the review team concludes that ZEvA has a policy and system in place for internal quality assurance, and that this is proving to be effective in many ways. However, the implementation of certain aspects of the IQA system is not secure and there are missed opportunities to step back from the daily activities of the agency and reflect on their continued fitness-for-purpose. These areas must be addressed before ZEvA can become fully compliant with this standard.

Panel recommendations

Complete the review of operating procedures used by staff to guide the delivery of external quality assurance activities and monitor the effectiveness of their implementation.

Formalise and systematise the way in which feedback from stakeholders informs the agency's approach to strategic development and internal quality assurance.

Additionally, the recommendations made for ESG 2.2 and ESG 2.4 are particularly relevant and important to this ESG:

- *Establish a systematic approach to periodically and comprehensively reviewing each of the external quality assurance methodologies operated by the agency.*
- *Clarify the agency's expectations for experts to engage with training, including a more robust mandatory requirement for newer experts to undertake initial training, and implement systems to record experts' engagement with training in order to monitor that these expectations are met.*

Panel conclusion: Substantially compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

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

Evidence

As a well-established quality assurance agency – and the oldest such agency in Germany – ZEvA has undergone a number of external reviews. The German Accreditation Council (GAC) undertook such reviews in 2005, 2010/11 and 2015/16 with specific consideration of ZEvA's compliance with the European Standards and Guidelines (ESG). On each occasion, the GAC renewed ZEvA's accreditation and ENQA granted or renewed ZEvA's membership.

The review team for this 2021 external review of ZEvA has considered the outcomes and recommendations of these reviews and has reached a view on the progress made towards the recommendations made in 2015/16 throughout this report. This is partly informed by the 2018 progress report from ZEvA to ENQA, which shows that progress had been made towards each recommendation to a greater or lesser extent.

Analysis

ZEvA's engagement with external reviews at least every five years and its development over time in line with the recommendations resulting from these reviews demonstrates clear and full compliance with this standard.

Panel conclusion: Fully compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

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

2015/16 review recommendation

The expert group recommends that all quality assurance procedures offered by the agency in the higher education sector are clearly aligned with the ESG Standards from Part I and that this is made transparent.

Evidence

ZEvA has a diverse portfolio of external quality assurance activities. According to the Self-Assessment Report, each activity aligns clearly with the different elements of Part One of the ESG. Several activities go even further and use criteria that are directly derived from the ESG. ZEvA has mapped the alignment between the criteria used in each of its activities and Part One of the ESG, which can be found in Annex 5 of this report.

In verifying this alignment, the review team considered the manuals produced for each activity, including the criteria used to assess a programme or institution, along with a range of reports sampled from the repository on ZEvA's website.

Accreditation and Certification

Programme and system accreditation activity in Germany is undertaken in accordance with criteria issued by the Conference of Ministers of Education and Cultural Affairs (KMK), which was updated in line with the January 2018 changes, and under the direction of the German Accreditation Council (GAC). There is a clear mapping between the previous and new versions of the criteria and Part One

of the ESG. For certification and the accreditation of programmes outside the Bachelor/Master system, ZEvA adopts a similar approach to that used in programme and system accreditation.

The manual for programme accreditations undertaken since January 2018 clearly positions the accreditation process as one that tests the criteria set out by the KMK. The criteria are split into 'formal' and 'academic' categories to differentiate areas requiring a binary judgment of compliance and areas requiring a more holistic judgement of the institution's own approach, respectively. The template self-assessment completed by HEIs ensures that information relevant to these criteria, and therefore Part One of the ESG, are available for scrutiny. The report produced by the expert panel and the decision taken by the GAC are based on the institution's fulfilment of the criteria.

ZEvA's approach to system accreditation adopts a similar approach to programme accreditation and draws on the same KMK criteria. There is a particular focus on criterion 17, which requires that the institution's quality management system "guarantee the systematic implementation" of the formal and academic criteria, thereby ensuring the benefits of programme accreditation are still achieved through the institution's own internal quality assurance activities.

In terms of addressing the effectiveness of internal quality assurance processes, the report template for both programme and system accreditation requires the expert panel to summarise the institution's approach and provide an assessment of the strengths and development needs for each area. The system accreditation process specifically assesses the extent to which "the quality management system ensures the systematic implementation of the formal and academic criteria" (criterion 17). The reports reviewed by the review team show a comprehensive approach is taken to the assessment of this effectiveness and sometimes results in expert panels recommending that accreditation is not granted.

International Procedures and Audit in Austria

ZEvA has more scope to determine the approach it takes to programme and institutional accreditation and audit outside of Germany. These processes and their outcomes are decided under the auspices of the ZEvA Commission rather than external bodies, except for the regulation governing how Audit is undertaken with Austrian higher education institutions. There is a consistent approach to the documentation of the procedures in published manuals, including criteria that explicitly align to Part One of the ESG. Similarly, the reports resulting from these procedures consistently use a standard template that requires the author to include an analysis of the strengths and development needs for each area as well as a description of the approach taken. This helps to serve the more developmental focus of these procedures, compared to accreditation procedures that place more emphasis on assessing compliance with minimum expectations.

Evaluation

ZEvA's longest standing activity, Evaluation, is typically focused on quality development instead of formally assessing against a particular national framework or set of criteria. According to the Self-Assessment Report, ZEvA's website, the manuals for each type of Evaluation and a range of example reports, the nature and focus of an Evaluation activity can vary depending on the needs of the higher education. In some cases, this will involve the holistic evaluation of an institution, discipline, or programme, which will more explicitly draw on a set of criteria that can easily and fully map to Part One of the ESG. In other cases, and more often than not in recent years, the Evaluation will focus on a particular theme in one or more institutions. The review team heard repeatedly during the site visit that more emphasis was being placed on cross-institutional evaluations of particular themes. In such cases where the focus is more thematic, the spirit of Part One of the ESG is evident in the focus and approach, but there is not always a comprehensive coverage of all aspects.

Evaluation procedures are particularly focused on addressing the effectiveness of a higher education institution's approach to quality assurance. This is an important aspect in fulfilling the purpose of Evaluation to help institutions improve quality.

Analysis

ZEVA operates a diverse range of procedures for an agency of its size and a number of these are required to comply with strict regulatory criteria. This brings complexity and the risk of divergence, however, ZEVA has developed its procedures coherently with a number of common features. The focus of each activity, except for thematic evaluations, is aligned to Part One of the ESG and the standardised approach to reporting ensures that clear analysis and outcomes are provided for each area. This ensures that each procedure addresses the effectiveness of the higher education institution's approach.

The focus of thematic evaluation necessarily differs from the more comprehensive focus of other procedures. The review team were satisfied that the spirit of Part One of the ESG could be seen in the approach taken, in terms of always looking for a student-centred approach to learning and a clear approach to the management and assurance of quality.

Overall, the review team were able to conclude that ZEVA does consider the institution's approach to internal quality assurance in each of its methodologies, that the distinct aspects of Part One of the ESG are covered within this, and that the methodologies result in an assessment of the effectiveness of the approach taken by the institution.

Panel conclusion: Fully compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

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

2015/16 review recommendation

The agency should provide information on the procedure for the accreditation of doctoral programmes in a transparent and appropriate way and be able to demonstrate that the procedure can achieve its objectives.

Evidence

According to the Self-Assessment Report, ZEVA takes a number of factors into consideration in the design of its methodologies. These include the purpose, the regulatory requirements, the need to remain cost-effective and competitive, and feedback from stakeholders on previous procedures completed. In discussing the design of methodologies during the site visit with ZEVA's management, staff, experts and commissions, the review team heard that the Jour Fixe meetings and annual corporate retreats are used by staff to reflect the different procedures and decide how they can be improved. The review team heard from higher education institutions, the German Accreditation Council and the Ministry of Science and Culture of Lower Saxony that ZEVA's reputation and credibility were strong as a result of the high-quality work delivered, including the fact that the methodologies were effective in fulfilling their purpose.

Within ZEvA's portfolio, some procedures are strictly controlled by the requirements of external bodies and others are completely within the control of ZEvA. Nonetheless, the review team took care to consider each procedure in the context of this standard as the implementation of those more strictly controlled procedures still allows some scope for ZEvA's interpretation and distinctiveness.

The Self-Assessment Report highlighted a number of challenges related to the implementation of the revised national system for accreditation, which were impacting the design of ZEvA's programme and system accreditation methodologies. ZEvA recognised that these were to be expected following such a significant reform of the system and confirmed that it was actively engaged with GAC working groups to address some of the challenges identified. The review team heard a range of opinions throughout the site visit about the merits of the reformed accreditation system, but these mostly recognised that the transition would take time as each actor understood their new role.

The review team asked repeatedly throughout the site visit about the distinctive features of ZEvA's approach to external quality assurance. As was the case with the SWOT analysis undertaken for the Self-Assessment Report, ZEvA's stakeholders more confidently recognised that ZEvA took great care in understanding the particular provision that was under review before and during the procedure being completed. ZEvA's own staff were more modest in recognising this initially but agreed that it was an approach they were proud of. While this approach is not explicitly referenced in the manuals for each methodology, the review team were able to observe how there was sufficient time and flexibility in the design of the methodologies to allow this.

While it was evident how the different methodologies had evolved incrementally over time through a well-established approach to continuous improvement that addressed particular issues, the review team were unable to see how the agency periodically stepped back to review a methodology holistically to ensure it remained fit-for-purpose overall. In discussing this with ZEvA's management and staff during the site visit, the review team heard that no timeframe existed for more comprehensively reviewing each methodology. Some methodologies in the areas of International Procedures and System Accreditation benefitted from a more holistic review as part of the development of strategy papers, but these understandably focused more on the strategic and business development of the activity overall rather than the design of the methodology.

It was also unclear from the Self-Assessment Report and supporting evidence, who in ZEvA had the responsibility and authority to approve the methodology and criteria used for each external quality assurance activity. The review team explored this during the site visit with ZEvA's management, staff, Board of Trustees, and commissions. In most cases, the question could not be answered easily or at all. Only the management team were able to answer that it would be them, but this is not a documented and formal responsibility delegated to them by the Board of Trustees. The ZEvA Commission and the Standing Evaluation Commission may be consulted on revisions to the methodologies and criteria but had no role in approving them.

Following the recommendation of the last external review of ZEvA (see above), the review team considered ZEvA's approach to the accreditation of doctoral programmes and the information available about this. The process mirrors that used for accreditation of bachelor's and master's programmes in the German system, however the accreditation decision is taken by ZEvA rather than the German Accreditation Council. The process, which is carried out in Lower Saxony, is adjusted to take account of the specific Guidelines and criteria for the accreditation of doctoral programs in Lower Saxony⁴. While the information available on ZEvA's website makes this situation clear, there is not a distinctive procedure in place for the accreditation of doctoral programmes.

⁴ https://www.mwk.niedersachsen.de/startseite/hochschulen/studium/bologna_prozess_in_niedersachsen/der-bologna-prozess-in-niedersachsen-19110.html

Analysis

ZEvA's methodologies are well-documented and well-implemented as noted under other standards in this report. This is the result of many years of experience and incremental refinement as each methodology has matured. It is also helped by the existence of several methodologies that deliberately serve different purposes, ranging from the accreditation of programmes through to thematic evaluations across several institutions, which avoids the risk of trying to serve too many purposes in a single methodology. The credibility and strong reputation that ZEvA enjoys with its different stakeholder groups demonstrates how effectively it designs its methodologies and delivers its individual procedures in line with the purpose of the methodology.

There has been considerable change in the German accreditation system since the last external review of ZEvA, which has required the agency to adapt and relaunch its largest areas of activity. The review team were conscious of this in reviewing ZEvA during the transition phase, but with three years of accreditation activity completed in the new system, there was a large enough volume of evidence and experience to engage with. There are a number of challenges related to the implementation of the new system as different bodies, including ZEvA, settled into their revised roles and identified how best to work with each other. The review team felt that none of these challenges were unexpected or insurmountable, and noted that they were resulting in a constant focus on the purpose, design, and fitness of the accreditation methodologies in recent years. There are no formal recommendations in this report relating to the transition between accreditation regimes, but the review team encourages ZEvA to continue engaging with its stakeholders in an open, constructive, and collaborative manner to help ensure the system across the Federal States evolves and matures in the best way possible. There will be opportunities for ZEvA to ensure its distinctive approach to external quality assurance is more explicitly designed into its accreditation methodologies, while still aligning to the regulatory requirements, and the review team would encourage the agency's senior staff to feel confident in pursuing these opportunities.

There continues to be a question about the existence of specific guidance on the methodology for accrediting doctoral programmes. The situation does not appear to have changed since the previous review in that the programme accreditation guidelines are used across Bachelor's, Master's and doctoral programmes. The very small scale of this activity made it challenging for the review team to reach a firm conclusion about this work, but the arrangements appeared, on balance, to be appropriate.

Overall, the review team found a portfolio of external quality assurance activities that each had a clear purpose and a methodology that appeared to be effectively designed to fulfil that purpose. However, it was not possible for ZEvA or the review team to be fully assured of this because there is no process in place to periodically review the fitness-for-purpose of each methodology in a way that is comprehensive. There is a more regular focus on continuous improvement through Jour Fixe meetings, corporate retreats and for some methodologies, stakeholder feedback, but this does not go far enough and risks some aspects being overlooked. This is an important aspect of internal quality assurance where the agency should step back from its daily business to reflect on how well a methodology has worked in recent years, drawing together all of the insight and evidence available to it, much as it would expect from a higher education institution in system accreditation. Taken together with the recommendation earlier in this report to ensure that responsibility for approving new and revised methodologies is more clearly delegated and discharged, ZEvA will be able to evidence how its methodologies remain fit-for-purpose and in all likelihood, will identify further opportunities to enhance them. Without this in place, there is a gap in ZEvA's management of risk, and this standard cannot be fully met.

Panel recommendations

Establish a systematic approach to periodically and comprehensively reviewing each of the external quality assurance methodologies operated by the agency.

Panel conclusion: Substantially compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

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

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

2015/16 review recommendation

The procedure for the accreditation of doctoral programmes should (even if it is not a stand-alone procedure) be defined and presented externally, just as the other quality assurance procedures offered by ZEvA, in a way that renders the procedure components (self-evaluation, external assessment, reporting and follow-up) transparent.

Evidence

ZEvA produces and publishes a manual for each external quality assurance activity, which clearly sets out how it will be delivered and what is expected from the different participants in the process. These manuals are supported by documentation that cuts across methods, including the Quality Manual and Code of Conduct for Experts. Collectively, these determine the framework for implementing each activity in a consistent way and the review team found them to be clear and useful. In some cases, ZEvA's own materials are accompanied by criteria or regulation that are determined nationally in Germany and Austria, and these interdependencies are made clear.

There is considerable diversity across ZEvA's external quality assurance activities but there are also common components that bring them together. These include the use of self-assessments, external assessments by expert panels that include a site visit, and the production and publication of a report. The expert panel may choose not to undertake a site visit when reaccrediting a programme but instead to ask questions by correspondence. For accreditation in Germany, the process is supplemented by further stages whereby the German Accreditation Council (GAC) decides on the formal outcome of an application for accreditation and publishes this, together with the expert panel's report, on its own website.

The nature of the follow-up process varies across the methodologies because of their diverse purposes and because responsibility for deciding and following up on formal outcomes rests with the GAC for accreditation. Where ZEvA has responsibility for undertaking the follow-up, it does so consistently in accordance with the manual for the methodology in question.

The agency's follow-up procedure for accreditation relates primarily to deficiencies identified by the expert panel that could result in conditions being imposed by the GAC or accreditation being refused. Specifically, ZEvA offers HEIs the opportunity to enter the 'Quality Improvement Process' whereby

they can address the deficiencies before a revised report is prepared for submission to the GAC. Take-up of this by HEIs has been mixed and has typically appealed to those HEIs with the most severe deficiencies; others prefer to maintain the intended timescales and accept the conditions attached to the accreditation by the GAC.

Analysis

ZEvA makes effective use of its manuals and supporting documents to determine how its procedures will be delivered. There is a clear and well-understood expectation within the agency that each procedure must be planned and delivered in a consistent way in line with these documented requirements. The review team heard throughout the site visit that the role of ZEvA staff as Project Officers was essential to ensuring the consistency, and ZEvA's decision to enable staff to work across multiple areas of activity will only serve to further enhance this consistency of approach.

The review team were able to quickly become familiar with the various methodologies in use by ZEvA because they embed common elements, including the clear use of self-assessment, external assessment by experts, site visits, reports and follow-up. These pre-defined features are implemented consistently using templates, standard operating procedures, and training for experts – notwithstanding the review team's concerns about the latter aspects in respect of ESG 3.6 and 2.4, respectively.

Overall, the review team concluded that all the evidence available pointed towards a consistent and effective implementation of ZEvA's methodologies, and as such, full compliance with this standard.

Panel conclusion: Fully compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

2015/16 review recommendation

ZEvA should specify and publish clearly designed procedures for the selection, nomination, and appointment of its experts for all of the quality assurance procedures it offers in accordance with the requirements from ESG Standard 2.4 and the corresponding guidelines.

ZEvA should intensify its efforts to increase the proportion of experts who take part in the agency's preparatory seminars.

Evidence

ZEvA sets out the requirements for each external quality assurance activity in a manual, including the requirement in each for a panel of expert peer reviewers to undertake an external assessment of the programme or institution concerned. The composition of expert panels varies according to the activity, but broadly they all comprise academic, industry and student members and they are always supported by a member of ZEvA's staff in the role of Project Officer. According to the Self-Assessment Report, there is close cooperation with the Student Accreditation Pool and labour and industry bodies in Germany to source new experts, as well as with the State Rectors Conferences to source senior academic experts.

The role and responsibilities of experts are set out in a contract and code of conduct, both of which were available to the review team, alongside the manuals for each external quality assurance activity.

These make clear that there is a requirement to declare potential conflicts of interest so that these can be assessed and managed appropriately. The manuals also confirm that higher education institutions can review the proposed expert panel composition and raise objections where a conflict of interest exists.

The SWOT analysis in the Self-Assessment Report noted the large, qualified network of experts as one of the main strengths of ZEvA.

The review team discussed the recruitment, management, and quality of experts during the site visit with ZEvA's management, staff, commissions, and experts themselves, as well as with higher education institutions and the German Accreditation Council. The review team heard consistently throughout the visit that the depth and breadth of experience amongst its pool of experts added considerable benefit to the quality and reputation of ZEvA's work. The process for recruitment and selection was largely informal and based on Project Officers canvassing for interest through networks or directly with potential experts more so than open calls, but this had resulted in a large and loyal pool of experts being built over many years.

The review team heard that a number of ZEvA's external quality assurance activities did allow for international experts to be engaged and there were numerous examples of this happening successfully. The requirement for proficiency in the German language typically meant that international experts were usually from other German-speaking countries nearby.

Training of experts

The Self-Assessment Report noted the range of training that is offered to experts by ZEvA directly and by third parties, such as the Student Accreditation Pool and labour union pools. However, it was silent about the proportion of experts taking up training, which was the focus on the recommendation above from the 2015/16 review. The Self-Assessment Report noted a mandatory requirement for experts to take part in preparatory seminars for system evaluation procedures but did not cite a similar requirement for the other external quality assurance activities that represent 98.9% of ZEvA's activity in the last five years.

The review team requested a summary of the training activity delivered in the last three years and the percentage of experts trained. A list of five training sessions attended by a total of 73 experts over the three years was supplied along with a commentary noting that there were 3,400 experts in the database, of which around 500 were engaged each year. The commentary also noted that "ZEvA also considers experiences in the accreditation system as training" and there was a reliance on experts being trained elsewhere, which allowed them to ensure that a minimum of 50% of expert panels were "experienced". No confirmation was provided of the total proportion of experts who had participated in a training session delivered by ZEvA or elsewhere.

The review team discussed the training of experts at length during the site visit with ZEvA's management, staff, and experts. The review team heard that more importance was placed on ensuring 50% or more of the panel were experienced rather than being trained, and that no formal requirement for training was enforced. The review team also heard that the quality of data held about each expert's training was extremely limited and could not be analysed to determine the percentage of experts trained.

Commission members as experts

During the site visit, the review team also explored the recruitment, training, and support for members of the ZEvA Commission and the Standing Evaluation Commission, which decide on the formal outcomes of a number of ZEvA's external quality assurance processes. The review team heard that members were typically sourced from among experienced experts or senior leaders in higher

education institutions in Lower Saxony, including student experts and leaders. There was no specific training provision in place for members of the commissions, but they were supported informally to become familiar with their role and responsibilities when first appointed.

Analysis

The use of experts is well-embedded across ZEvA's external quality assurance activities, building on many years of recruiting and retaining a large pool of experts. This includes a particularly effective approach to engaging experts from student and professional communities in partnership with national pools and representative bodies. More recently, experts have been able to engage across different types of procedures, which have further enriched their perspective and contributions, which in turn has helped to build ZEvA's reputation as a reliable, high-quality agency. The Self-Assessment Report, manuals and example reports considered by the review team raised no concerns in relation to student involvement in expert panels. ZEvA is right to consider its expert pool as one of its strengths.

Some progress has been made towards the recommendation from the last external review to increase the proportion of experts who take part in training, but this is not enough and is difficult to quantify. There has been an increase in the number, location, and online delivery of training in order to improve the accessibility of training, but this has not been matched with a stronger requirement for experts to undertake training before joining a panel. When considered together with the extremely limited records held on each expert's participation in training, the review team must conclude that ZEvA still has room for improvement in its approach to training before it can be fully compliant with this standard. Furthermore, this represents a risk to the agency's approach to internal quality assurance given that reliance is placed on training in order to secure the robust implementation of its methodologies.

The panel would encourage ZEvA to think about the support offered to members of its commissions who are making decisions on the formal outcomes of processes. There is a need for internal quality assurance in these decision-making processes and it may be that a strengthened training and development provision for expert panels could be extended to benefit new commission members. This will be particularly useful in securing the implementation of any revised responsibilities for the commissions following the review recommended in ESG 3.1

Panel recommendations

Clarify the agency's expectations for experts to engage with training, including a more robust mandatory requirement for newer experts to undertake initial training, and implement systems to record experts' engagement with training in order to monitor that these expectations are met.

Panel suggestions for further improvement

Consider how members of the commissions can be more systematically supported to understand and fulfil their roles in line with the expectations of the agency.

Panel conclusion: Substantially compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

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

2015/16 review recommendation

The criteria for the accreditation of doctoral programmes should be clearly defined and published.

Evidence

The manuals published by ZEvA for most of its methodologies include the criteria that are used to assess the programme or institution under review and to reach a decision on the final outcome. In the case of accreditation in Germany and Audit in Austria, these criteria are determined nationally and adopted by ZEvA. For all other processes, ZEvA determines the criteria to be used in consultation with the relevant commission. According to the Self-Assessment Report, the criteria for other methodologies that require a more bespoke focus (e.g. thematic evaluation) are determined in advance of a procedure being delivered.

The review team discussed the approval, clarity and application of the criteria in each process with ZEvA's management, staff, experts, and commissions, and with higher education institutions. The review team heard that each of ZEvA's procedures always had clear criteria before a procedure commenced. The review team heard from staff that their regular Jour Fixe meetings and the well-established practice of all reports being proofread by a senior member of staff enabled greater consistency in the application of the criteria. Furthermore, there was a great deal of emphasis placed on ZEvA's model of its staff, as Project Officers for every procedure, drafting reports on behalf of the expert panels, which allowed them to strive for consistency throughout the process.

ZEvA draws directly on the guidelines and criteria for the accreditation of doctoral programmes issued by the Lower Saxony Ministry of Science and Culture. There is no additional document authored by ZEvA that interprets the criteria. This is a similar approach to the accreditation of bachelor's and master's programmes, whereby ZEvA directly uses the criteria issued by the German Accreditation Council.

Analysis

ZEvA takes care to ensure that clear criteria are in place before any procedure is started, whether these are derived from standardised criteria or developed specifically for the procedure in question.

As well as supporting expert panels to understand and consistently apply the criteria when making judgements, ZEvA deliberately relies on its staff to act in the critical role of Project Officer for each procedure. Project Officers hold the responsibilities often found in similar Review Secretary or Team Coordinator roles elsewhere, but they also have a coordination and management role with the expert panel. This enables ZEvA to ensure consistency in the application of its criteria throughout a process. Further safeguards, such as the proofreading of reports by senior staff, provide additional assurance.

The continued reliance on criteria published by the Ministry for the accreditation of doctoral programmes signals that ZEvA has chosen not to accept the recommendation from the last external review (see above). However, it is important to note that there were no recent examples of ZEvA undertaking accreditations of doctoral programmes for the review team to evaluate.

Overall, the review team found ZEvA to be wholly professionalised and disciplined in reaching the final outcomes of its procedures, or making recommendations to the German Accreditation Council, based on a consistent application of the approved criteria. As such, the review team can conclude that ZEvA is fully compliant with this standard.

Panel conclusion: Fully compliant

ESG 2.6 REPORTING

Standard:

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

2015/16 review recommendation

ZEVA should ensure that the complete expert reports are published in all of the quality assurance procedures it offers. In the handbook concerning external evaluations of higher education institutions, the agency should avoid giving the impression that reports may, where applicable, not be published in full upon the request of the higher education institution.

Evidence

According to the Self-Assessment Report, all reports are published in full and make use of standardised drafting processes and templates. The review team were able to access the archive of ZEVA's reports published on their website, which confirmed a common structure was in use. As well as summarising the context, process and outcomes of the procedure, the report template requires the author to present the evidence, analysis and findings in a way that helps the reader to learn more about the quality of the programme or institution under review.

The Quality Manual sets out a policy requiring all draft reports to be read by a senior member of staff, in addition to the Project Officer drafting the report, before they are finalised and shared more widely. The review team heard from ZEVA's management and staff that this was a central aspect of their approach to the internal quality assurance of reports and was well-embedded across all activities. In addition, higher education institutions are invited to comment on the factual accuracy of reports before they are published.

Accreditation procedures in Germany are conducted in line with the requirements of the German Accreditation Council (GAC), including the use of standardised report templates issued by the GAC. These reports and accreditation outcomes are published by the GAC on their own website, and this is complemented by the publication of reports on the ZEVA website too. The review team heard from the GAC that ZEVA was regarded as a reliable, well-established agency that did not give any cause for concern. The review team heard from ZEVA's management, staff, commissions, and Board of Trustees, and from the GAC, that the implementation of the new accreditation regime had required all parties to adapt to their revised roles and work through the operational issues that naturally arise from a change of this size and complexity. A productive working relationship had helped to resolve and learn from a small number of these issues in relation to ZEVA's accreditation reports. The review team heard from ZEVA's staff that this learning is shared between them through their regular Jour Fixe meetings and annual corporate retreats.

According to the manual for the accreditation methodologies, higher education institutions can enter the Quality Improvement Process in order to address weaknesses and recommendations highlighted by the expert panel before their findings are finalised for consideration by the GAC. The review team reviewed a sample of reports for higher education institutions that had made use of this process and discussed the process with ZEVA's staff and experts. The review team heard and confirmed in the reports that the Quality Improvement Process was documented and revisions to the outcome were evident to the reader. This ensures transparency in the process and in the basis upon which the final accreditation decisions are reached.

Analysis

There is a well-established and systematic approach to the drafting and confirmation of reports across ZEvA's various external quality assurance activities. Several principles underpin this common approach, including that ZEvA's staff undertake the drafting on behalf of the expert panel, that there is always an additional senior manager who reviews the draft report, and that standard templates are used consistently.

Reports are published upon the conclusion of all procedures, including Evaluation procedures where the previous external review had raised concerns. They are clear and transparent in detailing the findings of the expert panel. Where ZEvA makes a decision about the final outcome of a procedure, this is also published by ZEvA. Where the GAC makes this decision, it is published on the GAC's website as well as ZEvA's.

In summary, the review team can conclude that ZEvA's reports are effective in providing information to society about the activities of an institution and in enabling the purpose of each external quality assurance activity to be fulfilled.

Panel conclusion: Fully compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

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

2015/16 review recommendation

ZEvA should define a complaints and appeals procedure for all of the quality assurance procedures offered by the agency and should publish these in a prominent position on the agency's website. The procedure should allow for objections to formal decisions as well as complaints about the way procedures are conducted.

Evidence

ZEvA's website briefly outlines its approach to appeals and complaints. Additionally, the manuals for its various methodologies highlight the possibility to appeal or complain and direct readers to the information online. ZEvA allows higher education institutions to appeal a formal outcome decided by the ZEvA Commission within one month of the decision or to complain about the procedural aspect of ZEvA's work. All complaints and appeals are received and considered by a dedicated Appeals Commission.

According to the Self-Assessment Report, ZEvA's Appeals Commission (or sometimes also translated to Revision Commission) is a sub-group of the ZEvA Commission. The Appeals Commission is not listed in the Foundation Charter as a statutory body within ZEvA but there are Rules of Procedure in place outlining its purpose, responsibilities, and composition. The Self-Assessment Report and the Rules of Procedure confirm that the Appeals Commission has an advisory function and that the ZEvA Commission retains responsibility and authority for making decisions in response to an appeal of its original decision. This demonstrates a clear relationship and route for decision making in relation to appeals of decisions made by the ZEvA Commission. However, it is not clear from the documentation how the Appeals Commission relates to the Standing Evaluation Commission for appeals concerning Evaluation or to the Executive Board for complaints concerning a staffing or operational matter.

The 2018 changes to the German accreditation system mean that ZEvA no longer makes formal accreditation decisions at the end of the process. This has removed many decisions from the scope of what was previously considered by the Appeals Commission. Appeals of accreditation decisions under the new processes are instead directed to the German Accreditation Council.

The review team asked ZEvA for the more detailed operational procedure setting out how ZEvA handles appeals and complaints, but no further documentation existed beyond what was available on ZEvA's website and in the Rules of Procedure for the Appeals Commission. The review team also asked for details of the complaints and appeals made since ZEvA's last external review and received this for fifteen appeals and one complaint.

During the site visit, the review team discussed appeals and complaints with ZEvA's management, staff, Appeals Commission and ZEvA Commission. The review team heard that there is no specific contact to whom complaints and appeals are directed, but these are usually received by the Project Officer responsible for the procedure or the Managing Director. It was not explicitly clear in the guidance to higher education institutions who they should contact if it is inappropriate to address this to the Project Officer they are liaising with. Once received, appeals and complaints are initially reviewed and coordinated by ZEvA's office, usually the Managing Director, before being presented to the Appeals Commission for consideration.

The review team observed confusion between various parts of ZEvA's organisation about how decisions are then taken in response to the recommendations of the Appeals Commission. The Appeals Commission's recommendations in relation to appeals of decisions by the ZEvA Commission are considered by the ZEvA Commission and the review team saw evidence of this having happened several times in recent years. However, members of the ZEvA Commission appeared unaware that this was a part of their responsibilities and had been happening. Furthermore, the review team observed ambiguity about whether the Appeals Commission would consider appeals against the decisions of the Standing Evaluation Commission and which body would make a final decision about these.

The review team also heard from the Appeals Commission that they are not well-placed to consider complaints about the conduct of staff in the first place, despite there being no alternative route for considering these in ZEvA's procedure. This contradicted the view of ZEvA's management who suggested all appeals and complaints would be considered by the Appeals Commission.

Analysis

An Appeals Commission was in place at the time of the 2015/16 external review of ZEvA and its operation was governed by its Rules of Procedure. However, at that time, the appeals process did not cover all of ZEvA's external quality assurance activities and did not differentiate and allow complaints about the way procedures are undertaken. The recommendation above was made in response to this and the review team for this 2021 external review paid careful attention to the progress made by ZEvA towards fulfilling it.

ZEvA has developed its approach in the last five years by making clear that all external quality assurance activities are within the scope of its appeals procedure and that complaints can be made about the way in which ZEvA delivers its activity. While the 2018 changes to the accreditation system have reduced the volume of decisions taken by ZEvA and that are open to appeal, a number of appeals and complaints have been considered and decided upon since the last external review.

However, there is still a lack of detail available about the management and consideration of appeals and complaints when this is typically a more prescribed process to ensure transparency, ease of access and fairness throughout. This poses a risk to the robust implementation of the process and to the credibility of the formal outcomes decided upon by ZEvA. There was a lack of clarity on all parts about

who would take the final decision in relation to complaints about the conduct of ZEvA's staff. This may be the result of so few complaints having been received to test the process, but this must be addressed. The review team concludes that ZEvA cannot be fully compliant with this standard until these risks are addressed and a fuller, clearer, more detailed appeals and complaints procedure is produced and transparently published.

Panel recommendations

Further develop the complaints and appeals procedure to include a more detailed operating procedure, the point of submission, expected timescales and authority delegated by the Board of Trustees to other governance and management bodies in handling complaints and appeals.

Panel conclusion: Partially compliant

CONCLUSION

SUMMARY OF COMMENDATIONS

The positive and supportive people-focused culture created by the agency for the benefit of its staff and stakeholders who work with them. (ESG 3.5)

The commitment to staff wellbeing and professional development as recently demonstrated through the offer of professional Coaching for all staff. (ESG 3.5)

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

3.1 Activities, policy and processes for quality assurance	<p>Substantially compliant with two recommendations:</p> <p>Formalise the approach to agreeing, documenting and monitoring progress towards the strategic priorities of the agency.</p> <p>Review and ensure a shared understanding of the responsibilities of the agency's board, commissions and management following a period of major change, including responsibility for approving new and revised external quality assurance methodologies.</p>
3.2 Official status	<p>Fully compliant with no recommendations.</p>
3.3 Independence	<p>Fully compliant with no recommendations.</p>
3.4 Thematic analysis	<p>Partially compliant with one recommendation:</p> <p>Develop, assign resources to, and implement a plan for thematic analysis of findings from across the range of the agency's QA procedures.</p>
3.5 Resources	<p>Fully compliant with no recommendations.</p>
3.6 Internal quality assurance and professional conduct	<p>Substantially compliant with two recommendations:</p> <p>Complete the review of operating procedures used by staff to guide the delivery of external quality assurance activities and monitor the effectiveness of their implementation.</p> <p>Formalise and systematise the way in which feedback from stakeholders informs the agency's approach to strategic development and internal quality assurance.</p>
3.7 Cyclical external review of agencies	<p>Fully compliant with no recommendations.</p>

2.1 Consideration of internal quality assurance **Fully compliant** with no recommendations.

2.2 Designing methodologies fit for purpose **Substantially compliant** with one recommendation:

Establish a systematic approach to periodically and comprehensively reviewing each of the external quality assurance methodologies operated by the agency.

2.3 Implementing processes **Fully compliant** with no recommendations.

2.4 Peer-review experts **Substantially compliant** with one recommendation:

Clarify the agency's expectations for experts to engage with training, including a more robust mandatory requirement for newer experts to undertake initial training, and implement systems to record experts' engagement with training in order to monitor that these expectations are met.

2.5 Criteria for outcomes **Fully compliant** with no recommendations.

2.6 Reporting **Fully compliant** with no recommendations.

2.7 Complaints and appeals **Partially compliant** with one recommendation:

Further develop the complaints and appeals procedure to include a more detailed operating procedure, the point of submission, expected timescales and authority delegated by the Board of Trustees to other governance and management bodies in handling complaints and appeals.

In light of the documentary and oral evidence considered by it, the review team is satisfied that, in the performance of its functions, ZEvA is in compliance with the ESG.

SUGGESTIONS FOR FURTHER DEVELOPMENT

The Board of Trustees should consider its own role overseeing the strategic direction of ZEvA in collaboration with the Executive Board. (ESG 3.1)

Consider how members of the commissions can be more systematically supported to understand and fulfil their roles in line with the expectations of the agency. (ESG 2.4)

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

Kick-Off Meeting: Monday 19 April 2021

#	Time (CET)	Group	Attendees
	16:30 – 17:30	Private team meeting	
00	17:30 – 18:30	Agency contact person	Henning Schäfer , Managing Director
	18:30 – 19:00	Private team meeting	

Day I: Tuesday 27 April 2021

#	Time (CET)	Group	Attendees
	10:00 – 11:30	Private team meeting	
	11:30 – 14:00	Private preparation time and Lunch (no meeting)	
01	14:00 – 14:45	Chair and Heads of Agency	<ul style="list-style-type: none"> • Prof. Dr, Ulrich Teichler, University of Kassel, Chair of the Board of Trustees • Henning Schäfer, Managing Director
	14:45 – 15:00	Break	
02	15:00 – 16:30	Management Team (including the team responsible for the preparation of the SAR)	<ul style="list-style-type: none"> • Henning Schäfer, Managing Director • Dr. Torsten Futterer, Head of Evaluation • Anja Grube, Head of Systems Accreditation and International Procedures • Dr. Dagmar Ridder, Head of Programme Accreditation and Certification
	16:30 – 16:40	Break	
	16:40 – 17:30	Private team meeting	

Day 2: Wednesday 28 April 2021

#	Time (CET)	Group	Attendees
	08:45 – 09:15	Private team meeting	
03	09:15 – 10:00	Staff involved in programme accreditation in Germany	<p>Academic staff:</p> <ul style="list-style-type: none"> • Stefan Claus • Monika Topper • Dr. Barbara Haferkorn • Ailina Schwenk • Malte Huylmans • Dr. Antje Kuhle <p>Administrative Staff:</p> <ul style="list-style-type: none"> • Stefanie Weimann
	10:00 – 10:15	Break	
04	10:15 – 11:00	Staff involved in areas of work other than programme accreditation	<p>Academic staff:</p> <ul style="list-style-type: none"> • Leonie Pessara (International) • Jürgen Harnisch (Evaluation) • Michael Weimann (System Accreditation) <p>Administrative Staff:</p> <ul style="list-style-type: none"> • Melanie Pöppel
	11:00 – 11:15	Break	
05	11:15 – 12:00	German Accreditation Council	<ul style="list-style-type: none"> • Prof. Dr.-Ing. Hans-Joachim Bargstädt, Chair • Katrin Mayer-Lantermann, Head of Legal Affairs
	12:00 – 13:00	Break / Lunch	
	13:00 – 13:30	Private team meeting	
06	13:30 – 14:15	Ministry of Science and Culture of Lower Saxony	<ul style="list-style-type: none"> • Prof. Dr. Tina Cornelius-Krügel, Head of Department 2: Universities, member of the Foundation Board of Trustees • Christof Schiene, Department 2, Head of the unit for Higher Education Development, Quality Assurance and Teacher Education, member of the Standing Evaluation Commission
	14:15 – 14:30	Break	

07	14:30 – 15:30	Expert Panel Members	<p>Academic experts:</p> <ul style="list-style-type: none"> • Prof. Dr. MHEd. Telse Iwers, University of Hamburg (Programme and Systems Accreditation, International Procedures) • Prof. Dr. Martin Stein, University of Münster (Evaluation) • Prof. Dr. Erich Keller, University of Applied Sciences of the Deutsche Bundesbank (Programme Accreditation and Audit) <p>Industry experts:</p> <ul style="list-style-type: none"> • Burkhard Wagener, Specialist lawyer for tax law (Programme Accreditation) • Andreas Tielmann, Lahn-Dill Chamber of Industry and Commerce (Evaluation) <p>Student experts:</p> <ul style="list-style-type: none"> • Christoph Abels, Student at Hertie School of Governance (Programme and Systems Accreditation, International Procedures) • Maike Grüneberg, Student at Technical University Munich (Programme Accreditation)
	15:30 – 15:45	Break	
	15:45 – 16:00	Private review team meeting	
08	16:00 – 17:00	Members of ZEvA Commission and Standing Evaluation Commission	<p>ZEvA Commission:</p> <ul style="list-style-type: none"> • Prof. Dr. Hans-Jörg Jacobsen, Leibniz University Hanover • Prof. Dr. Gustav Rückemann, Steinbeis University • Dr. Anke-Peggy Holtorf, Health Outcomes Strategies GmbH • Joshua Derbitz, Student at RWTH Aachen University <p>Standing Evaluation Commission:</p> <ul style="list-style-type: none"> • Prof. Dr. Gunther Brenner, Technical University Clausthal
	17:00 – 17:15	Break	
09	17:15 – 17:30	Agency contact person / Managing Director	<ul style="list-style-type: none"> • Henning Schäfer, Managing Director
	17:30 – 18:30	Private team meeting	

Day 3: Thursday 29 April 2021

#	Time (CET)	Group	Attendees
	08:45 – 09:15	Private team meeting	
10	09:15 – 09:45	Appeals Commission	<ul style="list-style-type: none"> • Prof. Dr. Jürgen Schlaeger, Humboldt University Berlin • Anika Bittner, Student at University of Göttingen
	09:45 - 10:00	Break	
11	10:00 – 11:00	Meeting with HEIs (1 of 2) <i>Meeting focused on programme and system accreditation</i>	<ul style="list-style-type: none"> • Anika Morgret, co-ordinator accreditation, Faculty of Economic and Social Sciences, University of Applied Sciences Osnabrück (Programme Accreditation) • Amira Mira, university development planning Officer, Jade University of Applied Sciences (Programme Accreditation) • Prof. Dr. Meik Friedrich, Vice President for Study Programmes, Instruction and Research, University of Applied Sciences Weserbergland (Programme Accreditation) • Rainer Stephan, quality management officer, University of Wuppertal (Programme Accreditation) • Jan-Christian Möller, officer for quality development, reporting and revision, University of Ulm (System Accreditation) • Judith Szász, officer for quality management and accreditation, Baden-Wuerttemberg Cooperative State University (System Accreditation) • Dr. Sören Pape, head of quality management in study and teaching, University of Freiburg (System Accreditation)
	11:00 – 11:15	Break	
12	11:15 – 12:15	Meeting with HEIs (2 of 2) <i>Meeting focused on evaluation, audit and international</i>	<ul style="list-style-type: none"> • Prof. Dr. Wolfgang Arens-Fischer, head of the Institute for Dual Studies, University of Applied Sciences Osnabrück (Evaluation of dual study programmes) • Prof. Dr. Nils Fölster, Professor for Mechanical Engineering, University of Applied Sciences Osnabrück (Evaluation of Exam Systems) • Olga Okulova, Director, Centre for International Accreditations and Network Programmes and Anna Degalchuk, Academic Director of Bachelor Programme in Political Science and World Politics, Higher School of Economics St. Petersburg, Russian Federation (International) • Rasha Alkabbanie, Coordinator of ISO and Accreditation, Tishk International University Erbil, Kurdish Autonomous Region, Iraq (International) • Dr. Victoria Reinhardt, curriculum manager, Faculty of Social Sciences, University of Leipzig (European Approach) • Dipl. Ing. Christian Dusek, Head of Academic Board, University of Applied Sciences Wiener Neustadt (Audit)

			<ul style="list-style-type: none"> • FH Prof.in Mag.a Barbara Ender, Head of quality management and legal affairs, University of Applied Sciences for Health Professions Upper Austria (Audit) • Dr. Florian Krause, scientific officer, Institute of Interdisciplinary Work Science, Leibniz University Hanover (Certification)
	12:15 – 13:15	Break / Lunch	
	13:15 – 14:00	Private team meeting	
13	14:00 – 15:00	Foundation Board of Trustees	<ul style="list-style-type: none"> • Prof. Dr. Ulrich Teichler, University of Kassel, Chair of the Board of Trustees • Prof. Dr. Jürgen Schlaeger, Humboldt University Berlin • Prof. Dr. Jürgen Kohler, University of Greifswald
	15:00 – 15:15	Break	
14	15:15 – 15:40	Agency contact person / Managing Director	<ul style="list-style-type: none"> • Henning Schäfer, Managing Director
	15:45 – 17:30	Private team meeting	

Day 4: Friday 30 April 2021

#	Time (CET)	Group	Attendees
	09:00 – 10:00	Private team meeting	
15	10:00 – 11:00	Management Team	<ul style="list-style-type: none"> • Henning Schäfer, Managing Director • Dr. Torsten Futterer, Head of Evaluation • Anja Grube, Head of Systems Accreditation and International Procedures • Dr. Dagmar Ridder, Head of Programme Accreditation and Certification
	11:00 – 13:00	Private review team meeting (including lunch)	
16	13:00 – 14:00	Final de-briefing meeting with key staff and Board members of the agency to inform about preliminary findings	<ul style="list-style-type: none"> • Prof. Dr. Ulrich Teichler, University of Kassel, Chair of the Board of Trustees, Prof. Dr. Jürgen Schlaeger, Member of the Board of Trustees, Henning Schäfer, Managing Director and the staff of ZEvA.

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

1. Background and context

ZEVA has been established in 1995 as an evaluation agency of the state of Lower Saxony and has started to engage in accreditation procedures in 1998. Since 2008, ZEVA acts as an independent foundation under civil law. Its mission is to further the quality of teaching and learning in higher education in Germany and abroad.

ZEVA offers a wide range of quality assurance procedures such as programme accreditation, institutional or systems accreditation, evaluation of academic subjects, institutional evaluation, thematic evaluation, institutional audits, certification of further education and validation of non-academic tertiary education. Most of these procedures are offered in Germany and other countries of the EHEA but also in countries outside of the EHEA.

ZEVA has been a member of ENQA since 2000 and is applying for ENQA renewal of membership.

ZEVA has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2008 and is applying for renewal of EQAR registration.

2. Purpose and scope of the evaluation

This review will evaluate the extent to which ZEVA fulfils the requirements of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Consequently, the review will provide information to the Board of ENQA to aid its consideration of whether membership of ZEVA should be reconfirmed and to EQAR to support ZEVA application to the register.

2.1 Activities of ZEVA within the scope of the ESG

In order for ZEVA to apply for ENQA membership and for registration in EQAR, this review will analyse all activities of ZEVA that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is independent of whether the activities are carried out within or outside the EHEA and whether they are obligatory or voluntary.

The following activities of ZEVA have to be addressed in the external review:

- Programme accreditation in Germany (remaining procedures)
- Systems accreditation in Germany (remaining procedures)
- Programme accreditation in Germany (from 2018 onwards)
- Systems accreditation in Germany (from 2018 onwards)
- Evaluation (institutional, programme, subject level and thematic evaluation)
- Certification
- International accreditation (programme and institutional)
- Quality audits in Austria
- Accreditation of Joint Degree Programmes according to the European Approach
- Accreditation of study programmes outside of the Bachelor/Master-system

3. The review process

The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with the Guidelines for ENQA Agency Reviews and the requirements of the EQAR Procedures for Applications.

The evaluation procedure consists of the following steps:

- Formulation of the draft Terms of Reference for the review;
- Finalising the Terms of Reference for the review following EQAR's Eligibility Confirmation (if relevant);
- Nomination and appointment of the review panel;
- Self-assessment by ZEvA including the preparation and publication of a self-assessment report;
- A site visit by the review panel to ZEvA;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the Board of ENQA and their decision regarding ENQA membership;
- Follow-up of the panel's and/or the Board's recommendations by the agency, including a voluntary progress visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts (at least one of which is currently employed by an ENQA member agency), an academic employed by a higher education institution, a student member, and eventually a labour market representative (if requested). One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency under review. In this case, an additional fee to cover the reviewer's fee and travel expenses is applied.

The panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The ENQA staff member will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the Board of ENQA are not eligible to serve as reviewers.

ENQA will provide ZEvA with the list of suggested experts and their respective curricula vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards the ZEvA review.

3.2 Self-assessment by ZEvA, including the preparation of a self-assessment report

ZEvA is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency's QA activities (whether within

their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.

- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which ZEvA fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat which has four weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the Guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within two weeks. In such cases, an additional fee of 1000 EUR will be charged to the agency.
- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule which shall be submitted to the agency at least two months before the planned dates of the visit. The schedule is to include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is usually 2,5 days. The approved schedule shall be given to ZEvA at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by ZEvA in arriving in Hannover, Germany.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency or the granting or reconfirmation of ENQA membership.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings concerning each ESG. A draft will first be submitted to the ENQA review coordinator who will check the report for consistency, clarity and language, and it will be then submitted to ZEvA usually within 10 weeks of the site visit for comment on factual accuracy. If ZEvA chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter, the review panel will take into account the statement by ZEvA and finalise and submit the document to ENQA.

The report is to be finalised within three months of the site visit and will normally not exceed 40 pages in length.

When preparing the report, the review panel should also bear in mind the EQAR Policy on the Use and Interpretation of the ESG to ensure that the report will contain sufficient information for the Register Committee for application to EQAR.

For the purpose of applying for ENQA membership, ZEvA is also requested to provide a letter addressed to the Board of ENQA outlining its motivation for applying for membership and the ways

in which ZEvA expects to contribute to the work and objectives of ENQA during its membership. This letter will be taken into consideration by the Board of ENQA together with the final evaluation report when deciding on the agency's membership.

4. Follow-up process and publication of the report

ZEvA will receive the expert panel's report and publish it on its website once the Board of ENQA has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the Board. ZEvA commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting a follow-up report to the Board of ENQA within the timeframe indicated in the Board's decision on membership. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

The follow-up report could be complemented by a small-scale progress visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered to be of particular importance or a challenge to ZEvA. Its purpose is entirely developmental and has no impact on the judgement of membership and/or judgment of compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

5. Use of the report

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.

The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether ZEvA is in compliance with the ESG and can thus be admitted/reconfirmed as a member of ENQA. The report can also be used for registration on EQAR, and is designed to serve these two purposes. However, the review report is to be considered final only after being approved by the Board. Once submitted to ENQA and until it is approved by the Board, the report may not be used or relied upon by ZEvA, the panel, or any third party and may not be disclosed without the prior written consent of ENQA. The approval of the report is independent of the decision of the ENQA Board on membership.

6. Budget

ZEvA shall pay the review related fees as specified in the contract between ENQA and ZEvA.

It is understood that the fee of the progress visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it.

In the event of a second site visit required by the board of ENQA and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as the travel and subsistence costs related to the second site visit will be charged to the agency.

7. Indicative schedule of the review

Agreement on terms of reference	June 2020
Appointment of review panel members	October 2020
Self-assessment completed	31 December 2020
Pre-screening of SAR by ENQA coordinator	January 2021
Preparation of site visit schedule and indicative timetable	February 2021

Briefing of review panel members	March 2021
Review panel site visit	April 2021
Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	Early June 2021
Draft of evaluation report to ZEvA	July 2021
Statement of ZEvA to review panel if necessary	July 2021
Submission of final report to ENQA	August 2021
Consideration of the report by Board of ENQA	September 2021
Publication of report	September/October 2021

ANNEX 3: GLOSSARY

ENQA	European Association for Quality Assurance in Higher Education
EQA	external quality assurance
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area</i> , 2015
GAC	German Accreditation Council
HE	higher education
HEI	higher education institution
IQA	internal quality assurance
KMK	Standing Conference of Ministers of Education and Cultural Affairs
Länder	The 16 Federal States of Germany
LHK	State University Conference of Lower Saxony
MWK	Ministry of Science and Culture of Lower Saxony
QA	quality assurance
SAR	self-assessment report
ZEVA	Central Evaluation and Accreditation Agency (Zentrale Evaluations- und Akkreditierungsagentur)

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY ZEVA

Reference #	Document	Language
SAR Annex 1	Foundation Certificate	English
SAR Annex 2	Foundation Charter	English
SAR Annex 3	Rules of Procedure Foundation Council	English
SAR Annex 4	Rules of Procedure Executive Board	English
SAR Annex 5	Rules of Procedure ZEvA-Commission	English
SAR Annex 6	Rules of Procedure Standing Evaluation Commission	English
SAR Annex 7	Rules of Procedure Appeals Commission	English
SAR Annex 8	Mission Statement of ZEvA	English
SAR Annex 9	ZEVA's Quality Handbook	English
SAR Annex 10	Comparison ZEvA Criteria to ESG	English
SAR Annex 11	GAC Comparison Criteria to ESG	English
SAR Annex 12	SurveyMonkey Evaluation Results	German
SAR Link 1	ZEVA Website:	German & English
SAR Link 2	Website German Accreditation Council (GAC):	German
SAR Link 3	Archive GAC Website for the previous accreditation system:	German
SAR Link 4	Standing Conference of Ministers of Education and Cultural Affairs (KMK)	German
SAR Link 5	Interstate Treaty on the Organisation of a Joint Accreditation System to Ensure the Quality of Teaching and Learning at German Higher Education Institutions (Interstate Study Accreditation Treaty)	German
SAR Link 6	Specimen Decree Pursuant to Article 4, Paragraphs 1 – 4 of the Interstate Study Accreditation Treaty (MRVO)	German
SAR Link 7	Lower Saxony Higher Education Act.	German
SAR Link 8	Lower Saxony Higher Education Act - unofficial English version:	German
SAR Link 9	Guidelines and Criteria for the Accreditation of Doctoral Programmes in Lower Saxony:	German
SAR Link 10	German Higher Education Framework Act (HRG)	German
SAR Link 11	Austrian Higher Education Quality Assurance Act	German
SAR Link 12	Lower Saxony Foundation Register	German
SAR Link 13	General Auxiliary Conditions for Grants for Institutional Support	German
SAR Link 14	ZEVA Quality Handbook	German
SAR Link 15	ZEVA Manual - Programme Accreditation (Germany)	German
SAR Link 16	ZEVA Manual - System Accreditation (Germany)	German
SAR Link 17	ZEVA Manual - Certification/Validation	German
SAR Link 18	ZEVA Manual - International Programme Accreditation	English
SAR Link 19	ZEVA Manual - International Institutional Accreditation	English
SAR Link 20	ZEVA Manual - Quality Audits Austria	German
SAR Link 21	ZEVA Manual - Evaluation of Study Programmes	German
SAR Link 22	ZEVA Manual - Quality Audit/Institutional Evaluation	German
SAR Link 23	ZEVA Manual - Evaluation Exam Systems	German
SAR Link 24	ZEVA Manual - Evaluation Dual Study-Programmes	German
SAR Link 25	ZEVA Manual - Evaluation MINT-Programmes	German
SAR Link 26	ZEVA Manual - Consultancy	German
#001 - #058	Evidence referenced in SAR footnotes	
100	ZEVA's summary response to the Panel's first request for additional evidence	English

I01a	Internationalisation Strategy	German
I01b	Minutes of annual retreat 2019 for the internationalisation strategy	German
I01c	Strategy Systems Accreditation	German
I02	A thematic analysis on our international procedures: Internationale Akkreditierung von Studiengängen. Verfahren, Befunde, Wirkungen (Grube/Petersen)	German
I03a	Financial statement 2018	German
I03b	Financial statement 2019	German
I03c	Budget plan 2020	German
I03d	Budget plan 2021	German
I03e	Preliminary budget plan 2022	German
I04	Job Descriptions of the Management Team	English
I06	Guidelines for Internal QA (no longer in use)	English
I07a	Agreement ZEvA/MWK	German
I07b	Accreditation Report HBK Braunschweig	German
I08	List of providers that have engaged with the Quality Improvement Process as part of accreditation (between October 2019 and January 2021)	English
I09a	Accreditation Report Ostfalia	German
I09b	Accreditation Report HAWK Hildesheim/Holzminde/Göttingen	German
I09c	Accreditation Report Systems Accreditation RFH Köln	German
I10a-1	Institutional accreditation Tishk University (Example of: Detailing the report regarding the fulfilment of a pre-condition)	German
I10a-2	Institutional accreditation Tishk University (Example of: Detailing the decision regarding the fulfilment of a pre-condition)	German
I10b	Evaluation Leuphana University (Example of: The final report of an evaluation procedure where a second assessment was agreed upon as a follow-up.)	German
I10c	Evaluation HS Osnabrück (Example of: An evaluation report detailing the outcome of a follow-up under chapter 7.)	German
I11a	Agenda for Experts Training	German
I11b	Presentation for Experts Training	German
I11c	Seminar on Accreditation of Joint Programmes - Agenda	German
I11d	Seminar on Accreditation of Joint Programmes - Presentation 1	German
I11e	Seminar on Accreditation of Joint Programmes - Presentation 2	German
I11f	Seminar on Accreditation of Joint Programmes - Presentation 3	German
I11g	Seminar on digital examination	German
I11h	Seminar on E-Portfolio examination	German
I12a	Experts Contract	English
I12b	Handout for Experts (Code of Conduct)	English
I13	GAC Feedback on Accreditation Reports	English
I14a	Questionnaire for Experts at the end of an EQA activity	German
I14b	Questionnaire for HEIs at the end of an EQA activity	German
I16	List of consultancy work	English
I17	ESG comparison (new - replacing SAR Annex 10)	English
I18	List of Experts training Seminars 2018-2020	English
I19a	List of Complaints and Appeals since 2016	German
I19b	Folder of all recommendations of the Review Commission and ZEKo/SAK decisions (x34 files)	German
I20a	User's handbook ZEvA Connect	German
I20b	Introductory video ZEvA Connect	German
I21a	Minutes from Jour Fixe meeting 2019-12-16	German
I21b	Minutes from Jour Fixe meeting 2020-01-13	German

I21c	Minutes from Jour Fixe meeting 2019-02-02	German
I21d	Minutes from Jour Fixe meeting 2021-02-08	German
I22a	Corporate retreat results 2017	German
I22b	Corporate retreat results 2019	German
I22c	Corporate retreat results 2020	German

OTHER SOURCES USED BY THE REVIEW TEAM

ZEVA's website: <https://www.zeva.org/>

The German Accreditation Council's website: <https://www.akkreditierungsrat.de/en/welcome-german-accreditation-council>

ANNEX 5. ZEVA'S MAPPING TO PART ONE OF THE ESG

	Programme Accreditation (Old System)	Systems Accreditation (Old System)	Accreditation Doctoral Programmes Lower Saxony	International Programme Accreditation	International Institutional Accreditation	Quality Audits Austria	Certification	Institutional Evaluation
Source	GAC Regulations "Regeln des Akkreditierungsrats für die Akkreditierung von Studiengängen und für die Systemakkreditierung"	GAC Regulations "Regeln des Akkreditierungsrats für die Akkreditierung von Studiengängen und für die Systemakkreditierung"	"Leitlinien und Kriterien für die Akkreditierung von Promotionsstudiengängen in Niedersachsen", issued by the Ministry of Science and Culture	ZEVA Manual "External Assessment of Study Programmes"	ZEVA Manual "Institutional Accreditation"	ZEVA Manual "Leitfaden Qualitätsaudit Austria"	ZEVA-Manual "Zertifizierung und Validierung"	ZEVA Manual "Leitfaden zum institutionellen Audit (Quality Audit)"
ESG 1.1	Criterion 2.9	Criterion 6.3	Chapter 2, "Qualitätssicherung"	Chapter 5, Criterion 6	Chapter 5, Criteria 1, 2	Chapter 4, Criterion 1	Chapter 4, Criterion 1	Chapter 5.2 , Part 1: Strategic Orientation and Part 2: Study and Teaching - Criterion 2.1 "Leitbild für die Lehre"
ESG 1.2	Criteria 2.1-2.4	Criteria 6.1-6.2	Chapter 2, "Studieninhalte"	Chapter 5, Criteria 1, 2	Chapter 5, Criterion 3	Chapter 4, Criterion 2	Chapter 4, Criterion 2	Chapter 5.2 , Part 2: Study and Teaching (and Programme Accreditation)
ESG 1.3	Criteria 2.3-2.5	Criteria 6.2-6.3	Chapter 2, "Allgemeine Ziele des Promotionsstudiengangs", "Organisationsstruktur"	Chapter 5, Criterion 5	Chapter 5, Criterion 3	Chapter 4, Criterion 2	Chapter 4, Criterion 2	Chapter 5.2 , Part 2: Study and Teaching - Criterion 2.6 "Evaluation des Prüfungswesens" and Criterion 2.2 and 2.3 "Studienrelevante Betreuungsleistungen"
ESG 1.4	Criteria 2.2, 2.3, 2.8, 2.9	Criterion 6.2	Chapter 2, "Zugang, Auswahl und Zulassung"	Chapter 5, Criteria 2, 6, 7	Chapter 5, Criterion 3	Chapter 4, Criterion 2	Chapter 4, Criterion 2	Chapter 5.2 , Part 2: Study and Teaching - Criterion 2.5" Teilzeitstudium und Weiterbildung" and Criterion 2.12 "Internationalisierungsstrategie"
ESG 1.5	Criterion 2.7	Criterion 6.2	Chapter 2, "Organisationsstruktur", "Betreuung"	Chapter 5, Criterion 3	Chapter 5, Criterion 5	Chapter 4, Criterion 2	Chapter 4, Criterion 2	Chapter 5.2 , Part 1: Strategic Orientation - Criterion 1.10 "Qualitätsorientierte Personalpolitik" and Part 2: Study and

								Teaching - Criterion 2.10 "Lehr- und Prüfungskompetenz des wissenschaftlichen Personals"
ESG 1.6	Criteria 2.4, 2.7	Criterion 6.2	Chapter 2, "Organisationsstruktur", "Betreuung"	Chapter 5, Criterion 4	Chapter 5, Criterion 4	Chapter 4, Criterion 2	Chapter 4, Criterion 2	Chapter 5.2 , Part 2: Study and Teaching - Criterion 2.2 and 2.3 "Studienrelevante Betreuungsleistungen"
ESG 1.7	Criterion 2.9	Criterion 6.4	Chapter 2, "Qualitätssicherung"	Chapter 5, Criterion 6	Chapter 5, Criterion 3	Chapter 4, Criterion 2	Chapter 4, Criterion 2	Chapter 5.2 , Part 2: Study and Teaching - Criterion 1.4 "Digitales Campusmanagementsystem"
ESG 1.8	Criterion 2.8	Criterion 6.6	Chapter 2, "Organisationsstruktur"	Chapter 5, Criterion 7	Chapter 5, Criterion 3	Chapter 4, Criterion 2	Chapter 4, Criterion 2	Chapter 5.2 , Part 2: Study and Teaching - Criterion 2.11 "Information der Öffentlichkeit"
ESG 1.9	Criterion 2.9	Criterion 6.3	Chapter 2, "Qualitätssicherung"	Chapter 5, Criterion 6	Chapter 5, Criterion 3	Chapter 4, Criterion 2	Chapter 4, Criterion 1	Chapter 5.2 , Part 2: Study and Teaching - Criterion 2.6 "Evaluation des Prüfungswesens", Criterion 2.7 "Lehrveranstaltungsevaluation" and Criterion 2.8 "Evaluation der Studienprogramme"
ESG 1.10	Section 3	Section 7	Chapter 1, "Akkreditierung von Promotionsstudiengängen"	Chapter 4	Chapter 3	"Hochschul-Qualitätssicherungsgesetz Österreich (HS-QSG)", esp. § 22	Chapter 5	Chapter 5.2 , Part 2: Study and Teaching - Criterion 2.6 "Evaluation des Prüfungswesens", Criterion 2.8 "Evaluation der

ENQA AGENCY REVIEW 2021

THIS REPORT presents findings of the ENQA Agency Review of the Central Evaluation and Accreditation Agency (ZEvA), undertaken in 2021.

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European Association for
Quality Assurance in Higher Education