

Expert report

on the application of the Accreditation, Certification and Quality Assurance Institute (ACQUIN) for Accreditation and Assessment of the Compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) of 6 June 2010

- submitted on 31 January 2011 -

1. Basis of the Procedures

1.1 Legal Mandate

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

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

In order to promote the international recognition of the decisions taken by the Accreditation Council and by the accreditation agency, the Accreditation Council adopted the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* in the approval of its accreditation criteria, as approved by the ministers responsible for higher education at the Bologna follow-up conference in Bergen in May 2005. By including the *ESG Standards*, the Accreditation Council emphasised the central role of accreditation in implementing the objectives set for the Bologna Process, making it clear that quality assurance in higher education – and particularly accreditation – can no longer be exclusively orientated toward national standards or particular characteristics. Other important sources for the formulation of the criteria set by the Accreditation Council are the *Code of Good Practice* laid down by the *European Consortium for Accreditation* on 3 December 2004 and the *Guidelines of Good Practice* elaborated by the *International Network for Quality Assurance Agencies in Higher Education* in April 2005.

1.2 The German Accreditation System

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

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

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

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

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

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

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

2. Course of the procedure

With letter dated 3 June 2010, ACQUIN submitted its application for accreditation as an accreditation agency to the Accreditation Council. On 14 October 2010, ACQUIN submitted an explanatory statement for the application together with additional documents.

The following experts were nominated by the Accreditation Council in its resolution of 21 June 2010:

Prof. Peter Pirsch (Chairman), Leibniz University, Hanover, Institute for Micro-electronic Systems

Dr. Stephan Delplace, Secretary General EURASHE

Dr. Sabine Felder, Director of Bologna Coordination, Rectors' Conference of Swiss Universities (CRUS)

Dr. Bernd Kaßbaum, Metalworkers' Union Board – Department Education and Qualification Policy

Tobias Proske, Member of the Accreditation Council and student at the Wismar University of Applied Science

The expert group was supported by Mr Franz Börsch on behalf of the office of the Accreditation Council (Foundation for the Accreditation of Study Programmes in Germany).

On 5 October 2010, a preparatory meeting for the experts took place in Berlin during which the applicable criteria set by the Accreditation Council and the European Standards and Guidelines (ESG) have been presented and explained. Furthermore, this occasion

was used in order to develop the level of knowledge regarding the procedural aspects and the experts' understanding of their role.

On 6 December 2010, the expert group took part in an ACQUIN commission meeting in Zwickau. On 7 and 8 December 2010, an on-site visit took place at the head office of the Agency in Bayreuth, prior to which the expert group had a preliminary meeting on 6 December 2010. The expert group held discussions with the management of the Agency, members of the Accreditation Commission and the technical committees, with personnel of the office, with experts as well as with representatives of the higher education institutions that have already been involved in procedures carried out by the Agency and finally with students who have taken part in the procedures. The schedule is annexed.

The expert group submitted the enclosed report, dated 31 January 2011, with unanimous approval.

3. ACQUIN: Accreditation, Certification and Quality Assurance Institute

3.1 Establishment

The Accreditation, Certification and Quality Assurance Institute, ACQUIN e.V. (Reg. Assoc.), was established on 26 January 2001. A resolution from the Bavarian Rectors' Conference in May 2000 was pivotal in establishing an independent agency for the accreditation of study programmes offering Bachelor and Master degrees. The initiative of the Bavarian universities was taken up by representatives from universities and from universities for applied science from Baden-Württemberg, Bavaria, Austria, Saxony and Thuringia.

3.2 Organisation

The Accreditation, Certification and Quality Assurance Institute ACQUIN, is a registered association with recognised charitable status. By now its members include over 160 higher education institutions in Germany, Austria, Switzerland, Hungary and the USA, as well as research-oriented professional and trade associations.

ACQUIN is composed from the Board, the General Assembly, the Accreditation Commission, nine standing technical committees as well as expert groups arranged for individual procedures. As the Agency's central decision-making body, the Accreditation Commission is above all responsible for passing resolutions for the accreditation of study programmes and the internal quality assurance systems of higher education institutions as well as for assessment criteria and procedural principles. It is the technical committees' duty to appoint expert groups and to comment on their reports and proposed resolutions, respectively.

3.3 Facilities

ACQUIN's head office is located in a building on Brandenburger Straße 2 in Bayreuth. The premises consist of altogether 630 m² of office space and 150 m² of auxiliary spaces. Currently, three cellar rooms are being renovated in order to make additional space for the archival of documents. Each work station is appropriately fitted with furnishing, EDP and internet and telephone connection. As of 31 December 2009, ACQUIN's tangible fixed assets accounted for approximately € 56 K. This consists of office and business furnishings and equipment. In order to ensure its business continuity, ACQUIN has accumulated a reserve fund in the amount of approximately € 330 K which may cover periodic payments, such as wages and rent, for a period of approximately four months.

The personnel in the office currently consist of 22 employees, of which 14 employees with permanent posts, plus six student assistants. Three employees are employed part-time (1.75 of a full-time equivalent).

3.4 Scope of Activity

According to the by-laws, ACQUIN's primary tasks concern the accreditation of study programmes across disciplines and states and the development of further procedures for the evaluation and assurance of quality processes in higher education. ACQUIN conducts the procedures of programme accreditation as well as for system accreditation.

Within the period between 2006 and 2009, ACQUIN accredited over 500 study programmes at universities of applied science and almost 700 study programmes at universities in Germany. Internationally, ACQUIN operates primarily in Switzerland, Central and Eastern European countries (e.g. Russia) and the Arabic realm (e.g. Oman, Egypt).

4. Assessment

Preliminary remarks

ACQUIN's explanatory statement for the application, including all 35 appendices, were received in due time by the head office of the *Foundation for the Accreditation of Study Programmes in Germany*. However, it was demonstrated in the course of the on-site visit that the documents submitted by ACQUIN need to be supplemented by additional documents. The documents include documentation of the Business Process Optimisation (GPO), the portal concept ACQUIN 2.0, the workflow description "Assessment and Accreditation" as well as the Quality Assurance project with an abstract of the implementation of the intended measures for the GPO. These were subsequently filed upon the on-site visit along with the list of recurring conditions and recommendations for promoting the consistency of decisions mentioned in the application documents, as well as a compendium of the minutes of the 3rd meeting of the ACQUINUS GmbH advisory board.

Even though the subsequently filed documents lead to the revision of information on short notice, the expert group agreed that the above-mentioned documents are to be taken into extensive consideration for the Agency's evaluation.

The validity of the documents submitted by ACQUIN was assessed as being critical in general. This impression results primarily from the lack of profundity in the statements' reasoning and the incomplete preparation of information, especially with regard to internal workflow (see above). The annotations express most notably the Agency's demand for quality, without providing sufficient means by which these requirements will be incorporated in practice. Furthermore, the format of the documents lacks clarity, structure and reader-friendliness. Starting with the summarised treatment of several sub-criteria, which considerably impeded an assessment, through the not uncommonly false attribution of content to criteria ("Feedback Loops" under criterion 2.2 or "Appointment of Project Groups" under criterion 2.4, Facilities), considerable redundancies (the relevance of responses to higher education institutions) and a very sparse use of references on appendices and related criteria, the documents lack overall diligence. In a few cases, like with ESG standard 3.5 (Mission Statement), for example, the pleas are so short that an assessment solely on the basis of the explanatory statement for the application was hardly possible.

ACQUINUS GmbH, whose sole shareholder is ACQUIN, was founded at the end of 2006. The consultation of higher education institutions is the corporate purpose determined under the terms of ACQUINUS' by-laws. The function of the company is therefore not subject to review by the Accreditation Council. With regard to system accreditation and the Accreditation Council's resolution "Standards for Structuring the Relationship between

System Accreditation and Consultation Services" adopted on 30 October 2008, solely the relationship between ACQUIN and ACQUINUS GmbH is of interest in this context.

Summary

The expert group received a positive overall impression of the Agency's work. The expert group gained a sophisticated image of the Agency and its method of operation by means of the discussions with employees and the present ACQUIN committee members as well as from interviews with representatives of higher education institutions.

Positive emphasis is placed on the international activities of the Agency, as well as the measures taken toward the optimisation of business processes and the Agency's internal organisational structures initiated in the last year. In light of the Agency's expansion observed in the last year, these measures are urgently needed and, according to the experts, must consequently be pursued. This is also particularly valid for ACQUIN's internal quality management, which, considering the size of the Agency, requires a more vigorous systematisation of processes. Furthermore, the expert group sees further potential for development in the procedures for the appointment of experts and in the Agency's intended measures for the preparation of experts in procedures for accreditation.

With a few exceptions, ACQUIN complies with the quality standards provided by the criteria of the Accreditation Council and the European Standards and Guidelines (ESG). In consideration of the explanatory statement for the application submitted in writing, the documents subsequently submitted upon the on-site visit (see above) and the discussions and explanations provided in the course of the on-site visit, the expert group recommends the accreditation of the *Accreditation, Certification and Quality Assurance Institute (ACQUIN)*. However, the accreditation should be bound by the following conditions and recommendations.

Condition 1: ACQUIN's Guidelines for Programme Accreditation Procedures must state in a more explicit and transparent manner that the criteria set by the Accreditation Council form the central evaluation parameters for the accreditation of study programmes. The experts appointed by ACQUIN must be informed in an appropriate way that the assessment of every criterion has to be documented in the expert report. Furthermore, the guidelines regarding the annotations of the issued conditions must be aligned with the current policy position of the Accreditation Council.

Condition 2: ACQUIN must ensure and communicate in an adequate manner that the resolution of the Accreditation Council, "Standards for Structuring the Relationship between System Accreditation and Consultation Services" of 31 October 2008, is taken into account.

Condition 3: ACQUIN must prove the implementation of the measures designated in the Business Process Optimisation, submit a quality management system that defines systematic procedural steps and measures and document it outwardly.

Recommendation 1: ACQUIN should make it explicit in its guidelines (and the sample report structure) that accreditation is not a consultation process, but is to be understood primarily as the procedure for the appraisal of quality.

Recommendation 2: ACQUIN's guidelines for the procedures for system accreditation should include that one member of the expert group appointed by the Agency should be from abroad.

Recommendation 3: ACQUIN should implement a consistent procedure for the nomination of experts in all standing technical committees in order to ensure the expertise of experts technically as well as in respect to quality assurance and accreditation.

Recommendation 4: The measures for preparing and qualifying experts should exceed the current standard. Special preparatory measures should especially be adopted for experts taking part in procedures for the first time.

Recommendation 5: The quality management system implemented by ACQUIN should include systematic feedback from experts in the procedure for accreditation.

Furthermore, the expert group suggests that the internal agency internet portal (Moodle) also be used for a statistical analysis of data for the experts' use.

Recommendation 6: ACQUIN's complaints procedure should be refined. The complaints procedure should include details for respites and a special board of complaints with external participants should be provided.

4.1 Assessment based on the Criteria for the Accreditation of Accreditation Agencies

Criterion 2.1: Self-Image and Understanding of the Accreditation Task

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

Documentation

ACQUIN's understanding of quality is publicly documented on the website and in the Agency's brochure. According to ACQUIN, the Agency's primary concern is securing and promoting a culture of quality in higher education. As an accreditation agency operating across disciplines, states and types of higher education institutions, ACQUIN considers it its duty to enable variety in the provision of study programmes, to secure and to refine the quality of education and to ensure transparency in order to contribute to the internationalisation and flexibility in higher education. ACQUIN bases its work on a definition of quality that relates the achievement of goals with their legitimacy.

Academic freedom and institutional autonomy of higher education institutions pertain to the guiding principles of the Agency, which considers itself a body of self-administration for higher education institutions. The higher education institutions assume responsibility for the assurance and development of quality by means of the Agency's institutions and committees. The accreditation decision is based on publicly visible evaluation parameters, which adhere to the effective basic legal and political conditions, but do not, as regards content, possess the character of subject- or agency-specific standards.

Assessment

ACQUIN's understanding of quality is publicly documented and implicitly reflected in the structure, the procedure and the evaluation parameters applied by the Agency. The Agency's definition of quality is based on the model of a quality control loop, which aims for the continual improvement of quality. Even if the Agency's quality management system features a few defects with regard to classification and formalisation (see Criterion 2.5), the expert group could be satisfied that ACQUIN is orienting its operation toward the goal of quality improvement. Take, as examples, the employment of a Quality Representative and the Business Process Optimisation (GPO) begun in 2010, which was presented to the expert group upon the on-site visit.

The description of the procedure in the Agency's guidelines suggests, however, that ACQUIN's notion of accreditation is rather unclear: On the one hand, ACQUIN names the

assessment (evaluation) and establishment (accreditation) of the quality of a study programme (p. 4 of *Guidelines for Programme Accreditation Procedures*) as the purpose of the procedure for accreditation. On the other hand, it can be read elsewhere that the accreditation is to be understood as a cooperative, constructively critical consultation process (p. 16 of the above-mentioned *Guidelines*). ACQUIN's frequently quoted motto "By higher education institutions, for higher education institutions" on the one hand and its refraining from naming criteria which have to be definitively fulfilled by the higher education institutions (see also the assessment of criterion 2.2 on this) is very revealing as to the Agency's self-image, which is expressed as follows on p. 4 of the explanatory statement for the application: "The higher education institutions have direct influence on the understanding of the accreditation office, particularly via election of the Accreditation Commission, whose members are nominated and voted by the member higher education institutions." According to the Agency, this exercise of influence upon the understanding of ACQUIN's accreditation office results from the postulate of higher education autonomy that is also to be considered during accreditation. The impression gained in this context that ACQUIN considers itself on the one hand as a certifier, but on the other hand also to a significant extent as being a service provider for higher education institutions, has been enforced over the course of the on-site visit.

Conclusion

Criterion 2.1.1 is fulfilled

Recommendation

The expert group suggests the following recommendations:

Recommendation 1: ACQUIN should make it explicit in its guidelines (and the sample report structure) that accreditation is not a consultation process, but is to be understood primarily as the procedure for the appraisal of quality.

2.1.2: The agency accredits all higher education institutions and even all departments in case of admittance for programme accreditations.

Documentation

ACQUIN's standard to accredit across disciplines, states and higher education institutions is laid down in the preamble of the by-laws. As evidence, ACQUIN produced an overview of the procedures for accreditation carried out between 2006 and 2009. According to this overview, between 2006 and 2009, the Agency accredited over 500 study programmes at universities of applied science and almost 700 study programmes at universities. The following may serve as exemplary evidence of ACQUIN's accreditation activity across disci-

plines: 338 procedures were treated by the standing technical committee for “Humanities, Linguistics and Cultural Studies”; 320 procedures were treated by the standing technical committee for “Economics, Law and Social Sciences”; 244 procedures were treated by the standing technical committee for “Engineering” and 118 procedures were treated by the standing technical committee for “Mathematics and Natural Science” (see the table on p. 7 of the explanatory statement for the application).

Assessment

The overview summarising the procedures conducted by ACQUIN until now proves that the Agency accredits across types and across disciplines.

Conclusion

Criterion 2.1.2 is fulfilled

Criterion 2.2: Structures and Procedures

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

Documentation

The competences and responsibilities of ACQUIN's organs and committees as well as the constitution of its organs and committees are regulated in §§ 7-11 of ACQUIN's by-laws. Pursuant to § 6 para. 1 of the Agency's by-laws the association comprises the following organs: the Board, the General Assembly and the Accreditation Commission. Further committees are the standing technical committees and the expert groups (§ 6 para. 2 of the ACQUIN by-laws). The organisational structure of the Agency along with the function of the institutions and committees is also presented in the ACQUIN brochure.

The Board of the Agency manages the association's business, its funds and carries out its resolutions. It prepares the business plan, determines the admission of new members and recruits office employees.

The General Assembly is responsible for voting in members of the Board and the members of the Accreditation Commission. Furthermore, the General Assembly confirms the assessment criteria and procedural principles adopted by the Accreditation Commission.

The Accreditation Commission determines accreditation of study programmes (programme accreditation) and the internal quality assurance system of higher education insti-

tutions for teaching and learning (system accreditation). It determines the assessment criteria and procedural principles and ensures that these adhere to the laws and regulations. Furthermore, it appoints the standing technical committees and as per § 9 para. 7 of the by-laws, it assumes supervisory functions for the appointment of expert groups by the standing technical committees.

The Accreditation Commission is composed of the First Chair of the Board, four representatives of universities and universities of applied science each, as well as two representatives of professional practice and the students each.

All nine technical committees are standing committees of ACQUIN. The standing technical committees assume the task of appointing expert groups and ensuring the consistency of procedures with regard to the underlying evaluation parameters and the accreditation decisions. For this purpose, the standing technical committees elaborate their statement based on the expert reports and on the statement presented by the higher education institutions, which includes a recommendation for the resolution for the Accreditation Commission.

The standing technical committees consist of at least five members, of whom at least one is a representative of the universities of applied science and universities, one is a representative of professional practice and one a representative of the students.

The expert groups appointed for individual procedures of accreditation are tasked with assessing study programmes and quality assurance systems of teaching and learning, on the basis of the submitted self-documentation, taking into account the on-site assessment. The experts elaborate an expert report, which includes a strength/weakness analysis and suggests recommendations for the refinement of the study provision and the quality assurance system.

Expert groups for programme accreditation consist of three professorial representatives, one representative of professional practice and one representative of the students. Expert groups for system accreditation are comprised of three members with experience in the fields of higher education governance and internal quality assurance of higher education institutions, a representative of professional practice and a student member with experience in higher education institution self-administration and accreditation.

The composition of expert groups is based on the *Guidelines for Programme Accreditation Procedures* and on the *Guidelines for System Accreditation Procedures*, respectively, but not laid down in the by-laws of the Agency.

The assessment parameters underlying the procedure for accreditation and the rules of procedure are also documented in the *Guidelines for Programme Accreditation Proce-*

dures and the *Guidelines for System Accreditation Procedures*. Furthermore, the guidelines include information regarding the basic principles of the procedure for accreditation as well as specifications on standards for self-documentation of higher education institutions and for the expert reports.

Assessment

The competencies and responsibilities of the Agency's organs as well as their personnel composition are laid down in ACQUIN's by-laws and documented in the various ACQUIN brochures. The functional assignment of the tasks relevant for accreditation to single committees and organs can be considered as given.

The appointment of experts is delegated to the standing technical committee. Hence, the supervisory function of the Accreditation Commission is limited to assessing the appointment of experts after the procedure is completed (see the assessment of Criterion 2.2.3 on this).

To what extent the internal structures and procedures ensure the correct and consistent application of the "Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation" requires differentiated consideration, since the procedural practice pursued by ACQUIN is particularly unclear. To begin with, it can be established that the Accreditation Council's rules of procedure are substantially conveyed correctly by the Agency's guidelines.

In this regard, however, a few discrepancies are to be pointed out: It is specified in the *Guidelines for Programme Accreditation Procedures* that an accreditation with conditions may be issued, provided the study programme features insignificant defects. In the meantime, this regulation has been modified by the Accreditation Council. Rightly, a study programme can only be accredited with certain conditions if it is expected that the underlying defect can be remedied within a period of nine months (Cl. 3.1.2 of the resolution of the Accreditation Council *Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation* adopted on 8 December 2009).

In addition, it remains unmentioned in the *Guidelines for System Accreditation Procedures* that a member of the expert group should be from abroad, *as per Cl. 4.5 of the above-mentioned resolution*.

In its guidelines, ACQUIN does not provide a detailed description of the procedure but only a schematic illustration of the procedure process. Information regarding respites and decision rules are not at all reported in the guidelines or they are only rudimentarily available.

According to the experts, it is difficult to assess the extent to which the consistent application of the criteria for study programmes (Clause 2 of “Rules of the Accreditation Council...”) and of the criteria for system accreditation (Clause 5 of “Rules of the Accreditation Council...”) is ensured by ACQUIN. The explanatory statement for the application, the report from the Accreditation Council on the experiences gained during the period of accreditation and the survey of (a) representatives of higher education institutions that have been accredited by ACQUIN, (b) experts who were acting on behalf of ACQUIN, (c) members of the standing technical committee, (d) members of the Accreditation Commission, (e) members of the Agency’s Board and (f) employees of the Agency, served as sources of relevant information for the expert group. The surveys did not provide a completely consistent result: A few respondents were unsure if all the criteria of the Accreditation Council had always been consistently applied. On the other hand, the respondents were aware that the criteria of the Accreditation Council constitute the central evaluation parameters. According to the Accreditation Council’s report on experiences during the period of accreditation, the assessment reports provided by ACQUIN may not have always state as clearly as required that all criteria are subject to review in the procedure for accreditation.

In this regard, the significant influence of the standing technical committees may provide an explanation for the inconsistent consideration of the Accreditation Council’s criteria. It is the experts’ impression that, depending on the disciplinary culture, a different practice has been developed for assessing the expert reports and the statements of the higher education institutions. The discussions held with representatives of the standing technical committees in the course of the on-site visit suggested that the technical committees do not sufficiently communicate with one another in order to attain a consistent and comparable application of criteria. The Agency should be therefore expressly encouraged to convene meetings with all standing technical committees – which presently take place only once a year – more often or to organise additional concerted workshops in order to advance the rigour of the application of criteria.

The expert group considers the partly significant deviations between the recommendations of the experts and the proposed resolutions formulated by the standing technical committees to be problematic.

In this regard, the expert group recommends that the experts appointed by ACQUIN should be more involved in the assessment of the statements provided by the higher education institutions.

A closer inspection of ACQUIN’s guidelines prompted the expert group to make the following assessment: The evaluation parameters for the accreditation procedure are formu-

lated in the guidelines in such a manner that the application of the Accreditation Council's regulations does not appear to be the central objective. ACQUIN chooses not to document the exact wording of the Accreditation Council's accreditation regulations in the guidelines as an evaluation parameter for the accreditation of study programmes and internal quality management systems. Instead, in the guidelines, higher education institutions (and experts) receive a variety of information on the procedure for accreditation, which includes reference to the guidelines of the Accreditation Council.

The guidelines for programme accreditation list those criteria which are subject to assessment by ACQUIN ("ACQUIN checks..."). The facts and circumstances to be reviewed by ACQUIN are described in a rather general way, insufficiently depicting the Accreditation Council's criteria for the accreditation of study programmes. Therefore ACQUIN's assessment criteria are to be modified and amended in such a way that the correct and consistent application of the Accreditation Council's regulations is ensured. The annotations concerning the course of the procedures published in the Guidelines for Programme Accreditation Procedures provide information to the experts on the evaluation procedure and on the elaboration of the expert report. The Guidelines do not indicate that the Accreditation Council's regulations are primary requirements for accreditation and that, in the expert report, the assessment of a study programme is to be documented according to each individual criterion set by the Accreditation Council. Furthermore, the sample report structure handed out to the experts needs to be amended accordingly in order that the application of all the regulations of the Accreditation Council are ensured and documented.

In its explanatory statement for the application, ACQUIN underlines that, prior to an on-site visit, the experts receive the self-documentation of the higher education institution as well as any other documents relevant to the procedure (ACQUIN's guidelines, criteria of the Accreditation Council, Resolutions of the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder*, etc.), "whereby the expert group is comprehensively exposed to the assessment criteria and the procedure criteria" (p. 13 of the explanatory statement for the application). A little further the Agency states, "the assessment criteria, which form the basis of the procedures, are comprehensively described in the guidelines. . . . The applied routines, criteria and procedures ensure the correct application of the 'Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation' . . ." (p. 14 of the explanatory statement for the application).

The imprecise formulation and the coexistence of differing evaluation parameters are hardly suitable to comprehensively ensure the correct and consistent application of the "Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation" and to inform the higher education institutions and experts of the

underlying procedure criteria in a transparent manner. The Accreditation Council's progress report may serve as evidence of this statement given the following comment concerning the results of the assessment procedure under point 2.1.1: "The assessment report submitted by ACQUIN more often than not does not indicate whether all the Accreditation Council's criteria have in fact been considered when assessing a study programme."

When asked about the separation between consultation and certification activities, ACQUIN's representatives referred to Annex 32 (ACQUINUS GmbH) of the explanatory statement for the application, wherein it was determined that, by separating the ACQUIN's activity field 'accreditation' from ACQUINUS' field 'consultation', it may be excluded that ACQUINUS has delivered preliminary consultation services in a system accreditation procedure carried out by ACQUIN. In addition, an excerpt of the minutes of the 3rd meeting of the ACQUINUS GmbH advisory board was submitted to the expert group.

Since it is not evident whether Annex 32 is meant as a resolution of the board providing binding regulation, for instance and since the excerpt of the minutes handed over during the on-site visit only included the advisory board's *recommendations*, it is not proven – according to the experts – that the resolution "Standards for Structuring the Relationship between System Accreditation and Consultation Services", adopted on 31 October 2008 by the Accreditation Council, has been taken into account.

Conclusion

Criterion 2.2.1 is partially fulfilled

Recommendation

The expert group suggests the following recommendations:

Condition 1: ACQUIN's Guidelines for Programme Accreditation Procedures must state in a more explicit and transparent manner that the criteria set by the Accreditation Council form the central evaluation parameters for the accreditation of study programmes. The experts must be informed in an appropriate way that the assessment of every criterion has to be documented in the expert report. Furthermore, the guidelines regarding the annotations of the issued conditions must be aligned with the current policy position of the Accreditation Council.

Condition 2: ACQUIN must ensure and communicate in an adequate manner that the resolution of the Accreditation Council, "Standards for Structuring the Relationship between System Accreditation and Consultation Services" of 31 October 2008, is taken into account.

Recommendation 2: ACQUIN's guidelines for the procedures for system accreditation should include that one member of the expert group appointed by the Agency should be from abroad.

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

Documentation

The composition of both the Accreditation Commission and the standing technical committees of ACQUIN is regulated by the Agency's by-laws. The explanatory statement for the application (p. 11), the "Guidelines for Programme Accreditation Procedures" (p. 16) and the "Guidelines for System Accreditation Procedures" (p. 10) provide information on the composition of expert groups. According to the Agency's statements, scientific, professional and student representatives are each represented in the Accreditation Commission and expert groups. The standing technical committees comprise representatives of the higher education institution (teachers and students) and representatives of professional practice.

Assessment

ACQUIN involves stakeholders relevant for the fulfilment of tasks in the Accreditation Commission, the standing technical committees and the expert groups. What is not apparent, however, is why the composition of the expert groups is not regulated analogously with the provisions laid down in ACQUIN's by-laws concerning the composition of the Accreditation Commission and the standing technical committees.

Conclusion

Criterion 2.2.2 is fulfilled

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

Documentation

The experts appointed by ACQUIN as well as members of the Accreditation Commission and the standing technical committees are primarily involved in the procedures (regarding employees of the ACQUIN office, see the assessment of criterion 2.4).

(1) *Experts:* Experts acting on behalf of ACQUIN are appointed by the competent standing technical committee in accordance with § 10 para. 2 of the Agency's by-laws. The request

for experts occurs on behalf of the person in charge of the respective procedures of the corresponding standing technical committee. According to the Agency, this request already contains some information on the course of procedure and on the expert's role, self-image and function during the procedure for accreditation. As laid down in the by-laws, the Accreditation Commission assumes supervisory functions for the appointment of expert groups by the standing technical committees. According to ACQUIN, the consignment of documents relevant to the procedure (self-documentation of the higher education institution, ACQUIN's guidelines, the Accreditation Council's criteria, resolutions of the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder* etc.) and the preliminary meeting of the expert group prior to the on-site visit are the measures taken for preparing the experts. If required, project groups of the competent ACQUIN committees compile hand-outs, which provide the experts with additional information. According to the Agency's Business Process Optimisation's (GPO) internal analysis, improvement in briefing the expert groups is seen as a relevant point.

(2) Members of the Accreditation Commission and the standing technical committees: The general assembly appoints the members of the Accreditation Commission for a period of two years. ACQUIN has issued regulations for the election (Annex 9 of the explanatory statement for the application), which include the procedural details for the election of commission members. The members of the standing technical committees are appointed by the Accreditation Commission. The Agency's by-laws do not indicate any time limitation.

Assessment

According to the Agency's statement, the selection of experts ensues from the policy of a conscious and deliberate proceeding. According to ACQUIN's explanatory statement for the application, the selection procedure is supposed to be transparent to all participants, its processes comprehensively and consistently applied. In addition, the standing technical committees are obliged to "carry out the composition of the expert groups with combinations that enable the group to cover all aspects of the relative procedure . . ." (p. 12 of the application documents).

According to the expert group, the selection procedure in use at ACQUIN remains in fact rather vague. ACQUIN ensures the representation of the relevant stakeholders, assuring that representatives in the expert group are not convened from the state of residence of the applicant higher education institution or from neighbouring higher education institutions. However, apart from this, the Agency has not clearly defined any further qualitative selection criteria.

The selection of experts is based on unclear structures. Apparently, apart from a lack of

transparency, the appointment practice also lacks consistency in the nomination process for all standing technical committees. This realisation is also to be found in the internal analysis concerning the Agency's Business Process Optimisation (GPO) and it is in particular confirmed by the results of the survey of ACQUIN's standing technical committees. In this context it has been detected that the consultants, the standing technical committees and the persons in charge of the procedures act according to different procedures and it has been suggested systematising the existing criteria and putting them into writing.

Except the very first workshop that took place on 15 November 2010 to provide the experts with a preparatory briefing, ACQUIN has so far abstained from preparing the experts for their function in a way that goes beyond the instructions given during the two- or four-hour preliminary meetings carried out the day prior to the on-site visit. More extensive qualifying measures have not yet been taken into consideration by ACQUIN.* In terms of preparing experts, the Agency sees an apparent need for action. This is confirmed by the summary of the results of the activities carried out with the Public Administration Academy of Baden-Württemberg (Annex 26). According to the afore-mentioned document, the following measures should be treated as a priority: (a) the preparatory briefing of expert groups / preparation of the experts' work, (b) standardising the appointment of experts and (c) suitable application of experts.

Also, statements are given in ACQUIN's GPO that prove that the Agency is correspondingly aware of the problems in conjunction with the briefing. The afore-mentioned document identifies, among other things, a relatively high risk of error concerning the assessment and the compilation of the report by the experts.

The members of the Accreditation Commission are elected by the general meeting and the members of the standing technical committees are elected by the Accreditation Commission. In its explanations concerning criterion 2.5 (Internal Quality Management), ACQUIN introduces measures for ensuring the competence and expertise of members of the Accreditation Commission and standing technical committees. Thus, ACQUIN refers to the fact that the general meeting has the right to and is asked to propose candidates – supplemented by their resumes – during the election of members of the Accreditation Commission.

In addition, candidates are asked to explain their motivation and expertise (see p. 22 of explanatory statement for the application).

For the purposes of decision-making during the election of members of the standing tech-

* Note: In the meantime, the Agency has communicated that a second workshop will take place at the beginning of April 2011, subsequent to the general assembly.

nical committees, the Accreditation Commission also submits the resumes of the nominated persons, along with any additional information such as qualifications in academic self-administration, quality assurance etc.

Conclusion

Criterion 2.2.3 is partially fulfilled

Recommendation

The expert group suggests the following recommendations:

Recommendation 3: ACQUIN should implement a consistent procedure for the nomination of experts in all standing technical committees in order to ensure the expertise of experts technically as well as in respect to quality assurance and accreditation.

Recommendation 4: The measures for preparing and qualifying experts should exceed the current standard. Special preparatory measures should especially be adopted for experts taking part in procedures for the first time.

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

No relevance to this procedure

Criterion 2.3: Independence

2.3.1 The agency has a separate legal entity.

Documentation

ACQUIN has been registered as an association in the register of associations of the District Court of Bayreuth since 5 March 2001 (Annex 12 of the application documents). The first and second Chair as well as the Treasurer are on the Board as defined by § 26 BGB. Every member of the Board is authorised to solely represent in accordance with § 26 BGB (§ 7 para. 2 of ACQUIN's by-laws).

Assessment

The statements given by the Agency prove that it has a legal identity of its own.

Conclusion

Criterion 2.3.1 is fulfilled

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

According to § 3 para. 2 of the by-laws, ACQUIN is not pursuing any profits and is not striving for any benefit. The Agency is not primarily pursuing its own economic interests and its activities are disinterested. ACQUIN's charitable status was recognised by the competent tax office in Bayreuth. This precludes the realisation of profits. ACQUIN's charitable status is verified regularly by the tax office in Bayreuth (Annex 13). The annual financial statement includes a respective account for the allocation of resources, which proves prompt application of resources for tax-privileged purposes (p. 16 of the explanatory statement for the application).

Assessment

The Agency's information proves that ACQUIN is not profit-oriented. The annual financial statement and a selection of account statements available to the expert group demonstrate furthermore that the procedures for all accreditation procedures are carried out on a full cost basis.

Conclusion

Criterion 2.3.2 is fulfilled

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

The Agency states that, according to its by-laws, ACQUIN is free of state influence and independent in the spirit of academic tradition. The Agency pursues different measures for ensuring the impartiality of the persons acting on its behalf. Committee members do not participate in consultations and the passing of resolutions that concern the institution they belong to; this will be noted in the minutes (pp. 16-17 of the explanatory statement for the application). All experts appointed by ACQUIN must sign a statement of impartiality, data privacy and confidentiality before beginning a procedure. In addition, the applicant higher education institutions are granted the possibility, in each case, to file an objection against the nomination of possibly biased experts before the procedure.

Assessment

According to the expert group, the agency ensures the freedom from instructions of the organs in individual cases and the independence and impartiality of the persons working

for it. However, the expert group points out that the measures described by the Agency are not adequately transparent to the public. Thus, the practice, whereby possibly biased persons are not allowed to take part in the Agency's decision-making process, is only mentioned in ACQUIN's brochure, but not in the Agency's guidelines. Furthermore, none of the Agency's official documents (ACQUIN brochure, Guidelines for Programme and System Accreditation Procedures) suggest that the experts have to sign an impartiality statement.

The expert group was able to determine during the meeting of the Accreditation Commission, which the experts have attended, that ACQUIN consistently applies, in practice, the measures described above to ensure the independence and impartiality of those persons employed by it. In addition, ACQUIN has assured the expert group that the statement of impartiality, data privacy and confidentiality signed by the experts is invariably applied to every procedure.

From the experts' point of view, there is no direct influence from members of higher education institutions on the results of the procedure for accreditation. In fact, ACQUIN's member higher education institutions statutorily elect members of the Accreditation Commission; the latter are, however, not bound by instruction of the member higher education institutions.

Conclusion

Criterion 2.3.3 is fulfilled

Criterion 2.4: Facilities

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

Documentation

a) Personnel Equipment

Currently, office personnel consist of 22 employees and six student assistants. Fourteen employees hold permanent posts, 20 employees possess a university degree and three employees are employed part-time (1.75 of a full-time equivalent).

As a condition of employment, ACQUIN requires that employees have professional experience in science management, especially concerning teaching and learning as well as, if possible, in quality assurance. Profound knowledge and experience in project management, as well as in areas like quality management and process optimisation, are also desirable (explanatory statement for the application, p. 18). The number of the Agency's per-

sonnel has substantially grown since ACQUIN's last re-accreditation. When asked on the occasion of the on-site visit, general management and employees both confirmed that structural changes to the organisation and measures for the integration of new employees were inevitable. ACQUIN developed a vocational adjustment plan for newly appointed consultants that provides, among other things, a so-called mentoring programme and which establishes that the new consultant will carry out at least three procedures together with an experienced consultant. Only the fourth or, if necessary, the fifth procedure will be carried out by the new employ on his/her own (see Annex 14).

Feedback and development reviews take place at the end of the probationary period, six months before the end of the contract for fixed-term employees and, at the latest, after 5 years of employment at ACQUIN for employees with permanent posts. Specific purpose-related discussions may be held at any time if necessary. However, regular annual appraisal interviews (career development review) do not take place. So far, these interviews and reviews fell under the responsibility of the managing director. In order to respond to the growing number of employees and to provide comprehensive supervision of the personnel, the deputy managing director was entrusted with these responsibilities.

Employees with permanent posts are provided with the opportunity to take part in practical training and qualification measures. In doing so, ACQUIN supports employees in numerous ways, be it a leave of absence or special leave and/or financial support.

b) Material Equipment

Since March 2009, ACQUIN's registered office has been located in a building at Brandenburger Straße 2 in Bayreuth, which has been initially leased for ten years. A total of 630 m² office space and 150 m² auxiliary spaces have been at its disposal since then. Three conference rooms can be used for committee meetings and team conferences. Currently, three cellar rooms are being renovated in order to make additional space for the archival of documents. Each workstation is appropriately furnished and fitted with EDP and internet and telephone connections (explanatory statement for the application, p. 19).

As of 31 December 2009, ACQUIN's tangible fixed assets accounted for approximately € 56 K (Annex 15). This consists of office equipment and business facilities (EDP, telephone connection, etc.). In order to ensure its business continuity, ACQUIN has accumulated a reserve fund in the amount of approximately € 330K which may cover periodic payments, such as wages and rent, for a period of approximately four months. According to ACQUIN, the Agency is thus able to ensure its business activities without interruption, even if payment deferrals or similar problems may arise. Allowances for on-going accreditation procedures and outstanding holidays are to be accumulated at year's end.

Assessment

The agency is sustainably and adequately equipped for its function in all required functional areas in respect to personnel and material resources. Above all, positive emphasis is given to the vocational adjustment plan for new staff members, which ensures that expertise and know-how available in the office is systematically passed on to inexperienced employees.

In addition, in light of the discussions with the ACQUIN office, the expert group holds a very positive perception of the employees engaged at the Agency.

Conclusion

Criterion 2.4 is fulfilled

Criterion 2.5: Internal Quality Management

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

Documentation

The Agency states that the objective defined for ACQUIN's quality management is to fulfil a high standard on a sustained basis when carrying out the Agency's purpose of association, i.e. providing a contribution in enabling variety in the provision of study programmes, securing and developing the quality of education and ensuring transparency. ACQUIN's quality management is presented in Annex 16 of the explanatory statement for the application. The document lists some of the requirements and measures that serve to improve quality.

The explanatory statement for the application provides a more detailed description of the single measures illustrating them partly with examples (see pp. 21ff). Additional activities that are supposed to support the continued improvement of quality are presented under the heading "Further development since re-accreditation in 2006", including some of the aspects discussed by the expert report of the previous accreditation which have been put in relation to the adjustments and modifications implemented in the practice of accreditation in the meantime. ACQUIN refers also to the implementation of an internal internet portal (Moodle) which should provide consistent archival possibilities, enable systematic communication between committees and experts and facilitate publication. Furthermore, the Agency lists the conferences conducted in 2007, 2009 and 2010 in which different ac-

creditation-related topics were discussed. The results of the last conference in 2010 are illustrated in Annex 26 (Public Administration Academy of Baden-Württemberg).

During the on-site visit, ACQUIN handed over a summary of the planned measures for the Business Process Optimisation (GPO), the document “Procedure Instructions, Assessment and Accreditation”, which has not yet been approved and the document “QM Project” (as at 24 October 2010) – which include information about the strategy for implementation and about the relative responsibilities.

During the on-site visit, the Agency presented and explained in detail ACQUIN's Moodle portal to the expert group. The portal serves for the management of the entire administration and conduct of the accreditation procedures as well as a central communication platform for all user groups (expert groups, standing technical committees, the Accreditation Commission and head office) and as ACQUIN's central data storage.

Assessment

ACQUIN's quality management system, as it is documented in Annex 16, describes the Agency's standard of quality, which is implemented through measures that are not further specified. This constitutes one of the essential weak points in the approach ACQUIN has supported so far: The description of the quality management published on ACQUIN's website does not make it clear to the public what measures are employed in detail to ensure and implement the standard of quality. ACQUIN provides the explanations of the measures with reference to the corresponding activities carried out by the Agency only in its explanatory statement for the application, which is clearly not a part of the quality management. The following examples may illustrate that even the explanations included in the explanatory statement for the application are not always sound:

According to point 5 of the description of the quality management, ACQUIN takes measures to ensure that all expert groups have a comprehensive understanding of their assessment duties, including the purpose of assessment and the criteria to be applied to assessment and that the experts are aware of their role. Point 2.2 in the explanatory statement for the application may serve as evidence, stating that the preparation of experts in fact consists of consigning information material and a preliminary meeting of the experts the evening before the on-site visit. However, ACQUIN's guidelines do not include any information about the means or extent of preparation given to experts. The results of the assessment and accreditation procedure review conducted by the Public Administration Academy of Baden-Württemberg demonstrate that apparent deficiencies exist in the preparation process.

According to point 7 of the description of the quality management, ACQUIN carries out

continuous measures to improve the quality and to enhance its services. As an example, ACQUIN cites the expert groups' response after the on-site visit, which, according to ACQUIN's statement, accounts for further optimisation of activity (see p. 25 of the explanatory statement for the application). This is a generalising statement that is not qualified to account for the system and functionality of the quality management.

The above examples reflect clearly that the measures formulated by ACQUIN for the assurance and development of quality are not the result of a formalised quality management system, but that they originate – in a rather unsystematic way – from the Agency's standards of quality which definitely do exist. At present, ACQUIN's quality management system does not include any precise procedural steps, is not specifically defined and does neither include documentation for measures taken nor *systematic* feedback mechanisms. Only the activities conducted with the Public Administration Academy of Baden-Württemberg have enabled the means for an orderly quality system through the status analysis and formulation of measures.

However, the expert group gives positive emphasis to the fact that, in its GPO, ACQUIN already conducts analyses of defects, defines corresponding measures and has developed a project plan for the implementation of measures. Of particular importance, in the view of the expert group, are above all the measures set out in the document (a) for the briefing, (b) for the appropriate appointment of experts, (c) for the training plan for members of the standing technical committees and (d) for the completion of the process instructions.

However, the expert group points out that the process of the Business Process Optimisation – apparently initiated on the basis of the Public Administration Academy of Baden-Württemberg's report – of the Agency, which has clearly grown quite rapidly over the previous years, began relatively late.

According to the Agency and to the experts' impression, the experts appointed by ACQUIN have so far provided their feedback in a rather informal way. Until now, carrying out *systematic* surveys after completion of the procedure has not been an established practice of the Agency. Since experience has shown that collecting the experts' feedback on a systematic basis provides insight into shortcomings and opportunities for improvement in the procedural practice, the expert group considers that development is needed.

The expert group gives positive emphasis to the fact that ACQUIN has consigned an employee with expertise in quality management and who is also responsible for the coordination of the Business Process Optimisation including follow-up. In addition, the expert group welcomes the implementation of ACQUIN's Moodle portal and supports the Agency's efforts to integrate the portal in the future more thoroughly into the Agency's work-

flows – in particular with regard to the planned establishment of a pool of experts. In this regard, an analysis of statistic data concerning the expert's work should be carried out in the future. When selecting the experts, adequate consideration should be given to the experiences the experts have made so far in procedures carried out in the past.

Conclusion

Criterion 2.5 has not been met

Recommendation

The expert group suggests the following recommendations:

Condition 3: ACQUIN must prove the implementation of the measures designated in the Business Process Optimisation, submit a quality management system that defines systematic procedural steps and measures and document it outwardly.

Recommendation 5: The quality management system implemented by ACQUIN should include systematic feedback from experts in the procedure for accreditation.

Furthermore, the expert group suggests that the internal agency internet portal (Moodle) also be used for a statistical analysis of data for the experts' use.

Criterion 2.6: Internal Complaints Procedure

The agency has a publicly accessible, formalised internal procedure for reviewing accreditation decisions on application of a higher education institution.

Documentation

ACQUIN has a complaints procedure, which is made available on ACQUIN's website and allows higher education institutions (a) to object to the appointment of experts, (b) to comment on the results of an assessment and (c) to complain about the accreditation decision (see Annex 19).

If a higher education institution approaches ACQUIN with a complaint concerning the content of the accreditation decision, i.e. the objective or technical assessment of the study programme to be accredited, the procedure will be re-submitted to the accreditation commission in order to be discussed and decided upon on the basis of a new review.

Formal complaints not regarding content, which, for example, concern procedural questions or the collection of fees, will be submitted to the board in order to be discussed and decided upon. ACQUIN has intentionally decided not to appoint a special board of complaints. The Agency justifies this decision with special reasons that result from the structure of the Accreditation Commission and the low number of complaints (see Annex 19).

Assessment

With the possibility of allowing higher education institutions to make objections to the nomination of experts and to comment on the results of the assessment, ACQUIN complies with the corresponding guidelines of the Accreditation Council in accordance with Clauses 1.1.3 and 1.1.7 of the "Rules for the Accreditation of Study Programmes and for System Accreditation". According to the experts, the complaints procedure established by ACQUIN for objections to the accreditation decision is not functional. An important quality of independent complaints procedures consists in carrying out an alternative – not routine-driven – review by a third party, when the organs that have received the complaint (standing technical committee, Accreditation Commission) do not redress the objections. Therefore, the Agency should establish a small board of complaints that comprises external members from other quality assurance bodies or associations. The particular knowledge of the internal procedural workflow could be brought in by specially appointed members of the Agency's Accreditation Commission.

The current complaints procedure does not provide any information on respites that need to be adhered to for complaints.

In light of the concerns given, the expert group suggests refining the complaints procedure.

Conclusion

Criterion 2.6 is essentially met

Recommendation

The expert group suggests the following recommendations:

Recommendation 6: ACQUIN's complaints procedure should be refined. The complaints procedure should include details for respites and a special board of complaints with external participants should be provided.

Criterion 2.7: Reporting

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

Documentation

The procedure and assessment criteria for programme and system accreditation are described in the Guidelines for Programme Accreditation Procedures and in the Guidelines for System Accreditation Procedures. The Guidelines and ACQUIN's presentation bro-

chure are published on the website of the Agency. The names of the experts are published when entered into the database of the Accreditation Council. The committees involved in the procedure of programme and system accreditation are also described in the above-mentioned documents. According to the Agency, ACQUIN has established procedures, “which give appropriate accountability over its actions” (p. 32 in the explanatory statement for the application).

The system for internal quality assurance (Annex 16) is documented and publicly accessible on ACQUIN's website.

Assessment

In effect, ACQUIN publishes the names of the experts, all documents relevant to the conduct of the procedure and the decisions of the accreditation procedures carried out by the Agency.

However, the description of the assessment criteria is sparsely detailed, since the relation between the criteria set by the Accreditation Council and the evaluation parameters used by ACQUIN are not made adequately transparent in the Agency's guidelines (see the assessment of criterion 2.2).

The system for internal quality assurance (Annex 16) describes ACQUIN's standards of quality; however, it does not include information on measures and procedures carried out by ACQUIN in order to implement them. (see the assessment of criterion 2.5)

Conclusion

Criterion 2.7 is essentially met

4.2 Assessment based on European Standards and Guidelines (ESG)

2.1 Use of internal quality assurance procedures

STANDARD:

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

GUIDELINES:

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

Documentation

Considering the efficacy of internal quality assurance processes of higher education institutes is a key element of ACQUIN's procedure for accreditation, both for the procedures of programme accreditation as well as for the procedures for system accreditation. ACQUIN's guidelines for both procedures (Annex 3 and 4) are in line with the European Standards and Guidelines.

Programme accreditation:

The following elements are considered to be relevant to the quality of study programmes during the programme accreditation: (1) The study programme has clearly defined and valid goals, (2) the concept of the study programme allows for the (planned) achievement of the objectives, (3) the necessary organisational and resource-related requirements are met, (4) the plan is correspondingly implemented, (5) the higher education institution, upon implementation of recognised assessment methods, periodically reviews if the objectives of the study programme are reliably achieved and whether there is a need to modify the study programme, making improvements where necessary.

System accreditation:

Procedures for system accreditation assess whether the quality assurance systems for teaching and learning are suitable to ensure achievement of the qualification goals as well as compliance with the quality standards of the study programmes thereby creating a culture of quality that is underpinned by a broad consciousness for the quality of the higher education institution.

Assessment

ACQUIN's evaluation parameters and rules of procedure take into account the relevant Guidelines of the Accreditation Council concerning the assessment of the internal quality assurance procedures of the higher education institutions. The evaluation parameters documented in ACQUIN's guidelines ensure that the existence and efficacy of internal quality assurance procedures are subject to the accreditation procedures.

Conclusion

ACQUIN fully complies with standard 2.1

2.2 Development of external quality assurance processes**STANDARD:**

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

GUIDELINES:

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

Documentation:

ACQUIN is an association of more than 160 higher education institutions organised in the legal form of a registered association with recognised charitable status. ACQUIN members include higher education institutions in Germany, Austria, Switzerland, Hungary and the USA as well as specialised academic scientific societies and scientific professional associations. According to the Agency's by-laws, promoting and securing a culture of quality amongst higher education institutions is ACQUIN's highest concern. ACQUIN sees its mission as enabling variety in the provision of study programmes, in particular with the help of the procedure for programme accreditation and for system accreditation, as well as in securing and refining the quality of education and ensuring transparency in order to contribute to the internationalisation and flexibility in higher education.

The understanding of quality, the criteria for assessment and the rules of procedure for single fields of activity are bindingly laid down in the ACQUIN guidelines published on the Agency's website.

The objective and the quality assurance process applied by ACQUIN adhere to the procedure of programme and system accreditation based on the relevant resolutions of the Accreditation Council. The relevant stakeholders (representatives of higher education institutions, of professional practices and of students, as well as foreign experts) were involved in the development of the specifications of the Accreditation Council.

Assessment

The Agency's information brochure and the Agency's guidelines for the procedure of accreditation provide information about the objectives and requirements for higher education institutions as well as a description of the Agency's quality assurance procedure. At the level of both the Accreditation Council and also the Agency's organs, relevant stakeholders (representatives of higher education institutions, professional practice and students, as well as foreign experts) were involved in the elaboration of evaluation parameters and rules of procedure for the procedures of programme and system accreditation.

Conclusion

ACQUIN fully complies with standard 2.2

2.3 Criteria for decisions

STANDARD:

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

GUIDELINES:

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

Documentation

The accreditation decision of ACQUIN is based on publicly visible criteria, which adhere to the effective basic legal and political conditions, but do not provide any reference in terms of content (Annex 3 and 4). According to the Agency, ACQUIN does not apply any additional subject- or agency-specific criteria. In order to ensure the consistency of the criteria applied and in turn the comparability of the procedures, ACQUIN has established so-called standing technical committees, which formulate resolution recommendations for the

Accreditation Commission based on the expert report and the comments of the higher education institutions, respectively.

Assessment

The Agency adopts its decisions on the ground of explicit criteria and rules of procedure published on the Agency's website. The Agency is bound to these procedural principles by the guidelines of the Accreditation Council. The most important decision rules applied by ACQUIN for accreditation are also published and comply with the Guidelines of the Accreditation Council.

In the expert group's opinion, a consistent application of criteria is in fact largely applied. Nevertheless, it is the experts' impression that, depending on the disciplinary culture, a different practice has been developed for assessing the expert reports and the statements of the higher education institutions. In this regard, the significant influence of the standing technical committees explains the inconsistent consideration given to the criteria set by the Accreditation Council. It is the experts' impression that, depending on the disciplinary culture, a different practice has been developed for assessing the expert reports and the statements of the higher education institutions. The discussions held with representatives of the standing technical committees in the course of the on-site visit suggested that the technical committees do not sufficiently communicate with one another in order to attain a consistent and comparable application of criteria. The Agency should be therefore expressly encouraged to convene meetings with all standing technical committees – which presently take place only once a year – more often or to organise additional concerted workshops in order to advance the rigour of the application of criteria.

Conclusion

ACQUIN fully complies with standard 2.3

2.4 Processes fit for purpose

STANDARD:

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

GUIDELINES:

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

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

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task;
- the exercise of care in the selection of experts;
- the provision of appropriate briefing or training for experts;
- the use of international experts;
- participation of students;
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached;
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review;
- recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality

Documentation

The objectives associated with ACQUIN's quality assurance process should be reached by the Agency by the following measures:

1. The experts are appointed by ACQUIN's standing technical committees. The standing technical committees are obliged to carry out the composition of the expert groups with combinations that enable the group to cover all aspects of the relative procedure which result from the accreditation application and in particular from the self-description of the applicant higher education institution (see p. 7 of the explanatory statement for the application).
2. When compiling the single expert groups, the scientific requirements, the student interests and the professional prerequisites are to be considered in order to involve student members and representative of professional practice in addition to academic representatives. ACQUIN considers the international point of view of experts from abroad as being gainful and worthwhile.

This approach is reflected in the composition of many expert groups – in particular for system accreditation procedures – and in the committees.

3. The standing technical committees are not always able to establish expert groups that will evolve completely identical approaches to their function to carry out the assessment of study provisions and quality assurance systems subject to accreditation according to the same standards. Therefore, the standing technical committees were assigned the task of delivering their opinion concerning all expert reports and decision proposals, aimed at achieving a coherent assessment with regard to the standard of quality, without evening out the level of quality.

4. The following measures are taken in order to prepare the experts for the procedure: Initially, experts receive information on the chronological course of the procedure and its content, as well as on the function, the self-image and the duties of an expert during the procedure for accreditation. The consignment of self-documentation as well as other documents relevant to the procedure (ACQUIN guidelines, criteria of the Accreditation Council, resolutions of the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder*, amongst others) is subsequently carried out, whereby the expert group is supposed to be made broadly familiar with the assessment criteria and the rules of procedure. The on-site visit starts with a preliminary meeting of the experts, lasting between two and four hours. The purpose of this meeting is to explain the course of the procedure and to provide an occasion for an exchange on the self-documentation, for taking questions and for preparing in general the discussions and interviews that will be held with members of the higher education institutions.

5. ACQUIN applies a procedure with multiple stages based on the submission of a self-evaluation report by the higher education institution, the on-site visit, the creation of a report and the publication of the accreditation decision.

Assessment

According to the expert group, the procedure applied by ACQUIN is appropriate for providing a factual basis that is adequate for the accreditation decision. The composition of the expert groups ensures broad expertise by involving representatives of higher education institutions and professional practice, as well as students. Nevertheless, the guidelines elaborated by ACQUIN do not provide any information on the involvement of experts from abroad in expert groups, in the Accreditation Commission and in the standing technical committees. The only statement concerning this aspect is to be found on p. 7 of the explanatory statement for the application where the Agency explains that ACQUIN considers the international point of view of experts from abroad as being gainful and worthwhile and that its approach is reflected in the composition of many expert groups – in par-

ticular for system accreditation procedures – and well as in the committees. ACQUIN, however, does not provide any information on whether or not it acts on a case-by-case basis, or if the nomination of international experts is ensured as a rule.

ACQUIN's selection procedure remains comparably vague. ACQUIN ensures the representation of the relevant stakeholders, assuring that representatives in the expert group are not convened from the state of residence of the applicant higher education institution or from neighbouring higher education institutions. The Agency has not documented any qualitative criteria for selection such as knowledge and experience in quality assurance or in accreditation in particular. Furthermore, the selection of experts is based on vaguely defined criteria. Apparently, apart from a lack of transparency, the appointment practice also lacks consistency in the nomination process for all standing technical committees. This realisation is also to be found in the internal analysis concerning the Agency's Business Process Optimisation (GPO) and it is in particular confirmed by the results of the survey of ACQUIN's standing technical committees. In this context it has been detected that the consultants, the standing technical committees and the persons in charge of the procedures act according to different procedures and it has been suggested systematising the existing criteria and putting them into writing.

ACQUIN has so far abstained from preparing the experts for their function in a way that goes beyond the instructions given during the two- or four-hour preliminary meetings carried out the day prior to the on-site visits. The requirements and tasks related to the role of an expert are not conveyed by appropriate preparatory measures. ACQUIN explains that instead "a repeated understanding of the function and the self-image of the expert is mediated by nominating a speaker from amongst the expert group" (p. 8 of the documentation for application). However, it remains unclear in which way this is supposed to happen in detail. Apparently, the Agency sees the need for action regarding the preparation of experts. This is confirmed by the summary of the results of the activities carried out with the Public Administration Academy of Baden-Württemberg (Annex 26). According to the afore-mentioned document, the following measures should be treated as a priority: (a) the preparatory briefing of expert groups / preparation of the experts' work, (b) standardising the appointment of experts and (c) suitable application of experts. The question that arises in this regard is whether and to what extent ACQUIN will offer expanded measures for the preparation of experts in the future and if the agency disposes of a notion of the degree of obligation for these preparatory measures.

The expert group recommends introducing a consistent nomination practice for all standing technical committees that intensifies the measures for preparing and qualifying experts. Special preparatory measures should be particularly adopted for experts taking part

in procedures for the first time. In addition, ACQUIN's guidelines for procedures for system accreditation should also include that one member of the expert group appointed by the Agency should be from abroad.

The importance of the procedure for developing quality in higher education institutions is reflected in the procedures for programme and system accreditation applied by ACQUIN.

Conclusion

ACQUIN partially complies with standard 2.4

Recommendation I: ACQUIN's guidelines for the procedures for system accreditation should include that one member of the expert group appointed by the Agency should be from abroad.

Recommendation II: ACQUIN should implement a consistent procedure for the application of experts in all standing technical committees, in order to ensure the expertise of experts technically as well as in respect to quality assurance and accreditation.

Recommendations III: The measures for preparing and qualifying experts should exceed the current standard. Special preparatory measures should especially be adopted for experts taking part in procedures for the first time.

2.5 Reporting

STANDARD:

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

GUIDELINES:

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

Documentation:

According to Clause 1.1.9 of the resolution “Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation” adopted on 8 December 2010 by of the Accreditation Council, the publication of the assessment report is only provided for procedures initiated since June 2010.

During their first meeting, the experts receive a sample structure for the compilation of a report adhering to the sections in the guidelines. Every expert report includes a descriptive part and an analytical, evaluative part taking into consideration the guideline sections. It is ACQUIN’s concern that the reports contain both positive and negative aspects (see p. 9 of the explanatory statement for the application).

According to the Agency, the report includes all necessary information to allow its readers to comprehend the decision of the expert group without further background information (self-documentation, discussions during the on-site visit). General recommendations, which could contribute to optimisation, are thereby linguistically differentiated from the wording of conditions, whose fulfilment is necessary to achieve the objective. Decisions made by the Accreditation Commission that deviate from the experts’ assessment are provided with a justification and made accessible to higher education institutions.

The accreditation decision and a summarised assessment are then entered into the Accreditation Council’s database. For procedures initiated after 1 June 2010, ACQUIN releases the complete expert reports.

Assessment

Upon the publication of the summarised reports and all complete assessment reports – disclosed by procedure after 1 June 2010 – in the Accreditation Council's database, ACQUIN's decisions and the decision of the underlying assessment of study programmes (programme accreditation) as well as of internal quality assurance systems (system accreditation) are made accessible and adequately transparent to an interested public.

However, in the Accreditation Council's progress report it is pointed out that the assessment reports submitted by ACQUIN do not always indicate whether all of the criteria set by the Accreditation Council were in fact taken into consideration during the assessment of a study programme (see p. 2 of the report on experiences gained during the period of accreditation). This could also be attributed to the fact that not all of the Accreditation Council's criteria are included in the sample report structure mentioned by ACQUIN.

Conclusion

ACQUIN fully complies with standard 2.5

2.6 Follow-up procedures

STANDARD:

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

GUIDELINES:

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

Documentation

With regard to programme accreditation, the follow-up measures are essentially limited to the possibility of suspending procedures and to verifying whether the issued conditions are fulfilled. If study programmes are accredited with conditions or if procedures are suspended, the higher education institutions have the opportunity to take measures within a predetermined period of time that demonstrate that the points of criticism have been taken into account. Based upon the documents submitted by the higher education institution to support the implementation of the points of criticism, the competent standing technical committees (and if necessary, under second review by the expert group) verify whether

the required amendments have been carried out. The decision of the Accreditation Commission on the implementation of the points of criticism is based upon the statement of the standing technical committee.

System accreditation procedures may be suspended once in order to enable the implementation of improvements; an accreditation with conditions is not admitted.

The consideration of recommendations specified for accreditation by the higher education institutions is subject to review in both procedures as part of the re-accreditation.

Assessment

The follow-up measures conducted by ACQUIN are established and documented by the internal course of procedure. The way in which the implementation of the conditions is verified, as well as the specifications with regard to the resumption of suspended procedures, is not publicly documented. The review of the fulfilment of conditions and the review of the revised self-evaluation report in case of suspension ensure that the defects assessed by the experts are to be remedied by the higher education institutions. The experts recommend also making the follow-up procedures publicly accessible.

Conclusion

ACQUIN fully complies with standard 2.6

2.7 Periodic reviews

STANDARD:

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

GUIDELINES:

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

Documentation

Corresponding with the guidelines of the Accreditation Council, accreditation is a continual quality assurance process. The first accreditation of a study programme is issued for a period of five years; a re-accreditation for a duration of up to seven years. A first-time system accreditation is issued for a duration of six years; a re-accreditation for a period of eight years.

Assessment

The accreditation period in the procedure of programme and system accreditation, which is limited by the Accreditation Council's rules of procedure, involves a periodic revision in accordance with standard 2.7. However, the ACQUIN guidelines do not provide any information about the accreditation periods related to accreditation and re-accreditation.

The experts recommend also specifying the periods and deadlines related to accreditation and re-accreditation in the Agency's information material.

Conclusion

ACQUIN substantially complies with standard 2.7

2.8 System-wide analyses

STANDARD:

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

GUIDELINES:

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

Documentation

ACQUIN subjects its work to a steady process of reflection by taking part in international projects, initiatives and events. As an example, the Agency cites the following projects and publications:

1. The Benchmarking Project, a collaboration with the agencies Higher Education and Training Awards Council (HETAC, Ireland) and Australian Universities Quality Agency (AUQA, Australia), offers an intensive exchange and comparison of the methods applied by these three agencies (Annex 21).
2. ACQUIN collaborated with project partners the European University Association (EUA), the Higher Education Academy (United Kingdom) and the National University of Ireland (Ireland) on the QAHECA Project with a view to promote creativity in quality assurance in higher education. Approximately 30 European higher education institutions and accreditation agencies took part in this project. The results were published in 2009 and presented

at the HRK Autumn Conference as well as at the European Quality Assurance Forum (Annex 22).

3. Since it was founded, ACQUIN actively participates in the TEMPUS projects; a list of completed and on-going projects is included with the Agency's application documents (Annex 23).

4. Along with the Society for Technical Collaboration (GTZ - Gesellschaft für technische Zusammenarbeit), ACQUIN started a project concerning the modernisation of Ethiopian higher education institutions. Due to a lack of funding, the project was discontinued in 2009.

Furthermore, ACQUIN provides information about the results of the Agency's activities in its annual report (Annex 20) and through the publications of single staff members (Annex 33 to 35).

Assessment

By means of its accreditation activities on a national as well as international level, ACQUIN has access to a variety of facts and statistic information. Overall information and refinements of quality assurance are also available through collaboration on international projects within and outside of the EHEA. This comprehensive knowledge, which is available, was not used by ACQUIN to the desired extent for cross-system analysis as illustrated in standard 2.8. ACQUIN's annual report contains only an overview of the conducted procedures and projects as well as information for internal agency developments. Some of the publications of the staff members deal with specific accreditation problems.

The experts suggest that ACQUIN should, to a larger extent, use the comprehensive information available to the Agency for the use of system-oriented analysis and that it should make the corresponding results publicly available.

Conclusion

ACQUIN partially complies with standard 2.8

3.1: Use of external quality assurance procedures for higher education**STANDARD:**

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

GUIDELINES:

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

Documentation

See the statements concerning standards 2.1 to 2.8

Summary of the Assessment

The assessment with regard to Part II of the ESG shows that ACQUIN substantially complies with the standards 2.1 to 2.8.

Conclusion

ACQUIN substantially complies with standard 3.1

3.2 Official status**STANDARD:**

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

Documentation

ACQUIN has been registered as an association in the register of associations of the District Court of Bayreuth since 5 March 2001 (Annex 12 of the application documents). Furthermore, ACQUIN has been a formally recognised agency for the accreditation of Bachelor's and Master's study programmes by the *Foundation for the Accreditation of Study Programmes in Germany* since 2001. The Agency has been entitled since 2008 to accredit quality management systems (system accreditation) of higher education institutions in Germany along with programme accreditation.

Based on the Accreditation Council's decision to re-accredit ACQUIN, the Agency's full membership with the European Association for Quality Assurance in Higher Education (ENQA) was renewed in 2007.

The Federal Department of Economic Affairs (EVD) of Switzerland approved ACQUIN on 17 January 2008 to process the accreditation requests of the Swiss universities of applied science on its behalf.

In 2008, ACQUIN was admitted into the European Quality Assurance Register for Higher Education (EQAR).

Assessment

The Agency's statements show that ACQUIN is formally recognised as an accreditation agency by the competent bodies of the European Higher Education Area. The Accreditation Council's decision in the on-going procedure will confirm adherence to currently applicable criteria and rules of procedure, authorising the Agency to conduct programme and system accreditation procedures during the upcoming period of accreditation.

Conclusion

ACQUIN fully complies with standard 3.2

3.3 Activities

STANDARD:

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

GUIDELINES:

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

Documentation:

The accreditation of Bachelor's and Master's study programmes (programme accreditation) and the accreditation of internal quality assurance systems of higher education institutions (system accreditation) constitute ACQUIN's core business processes. ACQUIN accredited over 500 study programmes for universities of applied science and almost 700 study programmes for universities according to its own specifications between 2006 and 2009 (see p. 15 of the explanatory statement for the application). ACQUIN does not provide any information about the number of on-going procedures for system accreditation.

Internationally, ACQUIN operates in Switzerland, Central and Eastern European countries (e.g. Russia) and the Arabic realm (e.g. Oman, Egypt). In 2009, a memorandum (Annex

8) was finalised with a Kazakh accreditation establishment for continual cooperation, which entails, among other things, the first on-site visit to a higher education institution in Kazakhstan in 2010.

Assessment

ACQUIN regularly carries out external quality assurance procedures. Its activities focus on carrying out accreditation procedures for Bachelor's and Master's study programmes.

Conclusion

ACQUIN fully complies with standard 3.3

3.4 Resources

STANDARD:

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

Documentation:

a) Personnel Equipment

Currently, office personnel consist of 22 employees and six student assistants. Fourteen employees hold permanent posts, 20 employees possess a university degree and three employees are employed part-time (1.75 of a full-time equivalent).

b) Material Equipment

Since March 2009, ACQUIN has been located in a building at Brandenburger Straße 2 in Bayreuth. It consists of a total 630 m² office space and 150 m² auxiliary spaces for its disposal. Three conference rooms can be used for committee meetings and team conferences. Currently, three cellar rooms are being renovated in order to make additional space for the archival of documents. Each workstation is appropriately furnished and fitted with EDP and internet and telephone connections (explanatory statement for the application, p. 19).

As of 31 December 2009, ACQUIN's tangible fixed assets accounted for approximately € 56 K (Annex 15). This consists of office equipment and business facilities (EDP, telephone connection, etc.).

In order to ensure its business continuity, ACQUIN has accumulated a reserve fund for periodic payments, such as wages and rent, for a period of approximately four months. According to ACQUIN, the Agency is thus able to ensure its business activities without in-

terruption, even if payment deferrals or similar problems may arise. Allowances for on-going accreditation procedures and outstanding holidays are to be accumulated at year's end.

Assessment

Within the scope of the on-site visit, the expert group can also be convinced that the Agency employs a personnel and operational setup that ensures the efficient conduct of quality assurance procedures. In the expert group's opinion, the resources on hand for the refinement of procedures and processes are also sufficient.

In addition, the appointment of employees to the field of internal quality management and coordination of the Business Process Optimisation is also assessed positively.

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

Conclusion

ACQUIN fully complies with standard 3.4

3.5 Mission statement

STANDARD:

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

GUIDELINES:

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

Documentation

The objectives underlying ACQUIN's work are regulated in the Agency's by-laws (Annex 1) and are made publicly accessible on the Agency's website and in the information brochure (Annex 2).

ACQUIN's understanding of quality is publicly documented on the website and in the Agency's brochure. According to ACQUIN, the Agency's primary concern is securing and promoting a culture of quality in higher education. As an accreditation agency operating across disciplines, states and types of higher education institutions, ACQUIN considers it

its duty to enable variety in the provision of study programmes, to secure and to refine the quality of education and to ensure transparency in order to contribute to the internationalisation and flexibility in higher education. ACQUIN bases its work on a definition of quality that relates the achievement of goals with their legitimacy.

Academic freedom and institutional autonomy of higher education institutions pertain to the guiding principles of the Agency, which considers itself a body of self-administration for higher education institutions. The higher education institutions assume responsibility for the assurance and development of quality by means of the Agency's institutions and committees. The accreditation decision is based on publicly visible criteria, which adhere to the effective basic legal and political conditions, but do not feature any content of character as defined by subject- or agency-specific guidelines.

Assessment

ACQUIN's understanding of quality and its objectives are publicly documented and implicitly reflected in the structure, the procedure and the Agency's applied evaluation parameters for implementation. The Agency's definition of quality is based on the model of a quality control loop, which aims for the continual improvement of quality. Even if the Agency's quality management system features a few defects with regard to classification and formalisation (see assessment of standard 3.7), the expert group could be satisfied that ACQUIN is orienting its operation toward the goal of quality improvement. Take, for example, the employment of a Quality Representative and the Business Process Optimisation (GPO) begun in 2010, which was presented to the expert group upon the on-site visit.

The description of the procedure in the Agency's guidelines suggests, however, that ACQUIN's notion of accreditation is rather unclear: On the one hand, ACQUIN names the assessment (evaluation) and establishment (accreditation) of the quality of a study programme (p. 4 of *Guidelines for Programme Accreditation Procedures*) as the purpose of the procedure for accreditation. On the other hand, it can be read elsewhere that the accreditation is to be understood as a cooperative, constructively critical consultation process (p. 16 of the above-mentioned *Guidelines*). The motto often used by ACQUIN, "By higher education institutions, for higher education institutions" says a lot about the Agency's self-image, which, for instance, is expressed as follows on p. 4 of the explanatory statement for the application: "The higher education institutions have direct influence on the understanding of the accreditation office, particularly via election of the Accreditation Commission, whose members are nominated and voted by the member higher education institutions." According to the Agency, this exercise of influence upon the understanding of ACQUIN's accreditation office results from the postulate of higher education autonomy that is also to be considered during accreditation. The impression gained in this context

that ACQUIN considers itself on the one hand as a certifier, but on the other hand also to a significant extent as being a service provider for higher education institutions, has been enforced over the course of the on-site visit.

The expert group recommends that ACQUIN's aim, as publicly stated on its website, be further developed into a guiding principle and, furthermore, be published as a mission statement in English.

Conclusion

ACQUIN substantially complies with standard 3.5

3.6 Independence

STANDARD:

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

GUIDELINES:

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

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

Documentation

The Agency states that, according to its by-laws, ACQUIN is free of state influence and independent in the spirit of academic tradition. The Agency pursues different measures for ensuring the impartiality of the persons acting on its behalf. Committee members do not participate in consultations and the passing of resolutions, which concern their facilities; this is noted in the minutes. All experts appointed by ACQUIN must sign a statement of impartiality, data privacy and confidentiality before beginning a procedure. In addition, the applicant higher education institutions are granted the possibility, in each case, to file an objection against the nomination of possibly biased experts before the procedure.

Assessment

According to the expert group, the agency ensures the freedom from instructions of the organs in individual cases and the independence and impartiality of the persons working for it. However, the expert group points out that the measures described by the Agency are not adequately transparent to the public. Thus, the practice, whereby possibly biased persons are not allowed to take part in the Agency's decision-making process, is only mentioned in ACQUIN's brochure, but not in the Agency's guidelines. Furthermore, none of the Agency's official documents (ACQUIN brochure, Guidelines for Programme and System Accreditation Procedures) suggest that the experts have to sign an impartiality statement.

The expert group was able to determine during the meeting of the Accreditation Commission, which the experts have attended, that ACQUIN consistently applies, in practice, the measures described above to ensure the independence and impartiality of those persons employed by it. In addition, ACQUIN has assured the expert group that the statement of impartiality, data privacy and confidentiality signed by the experts is invariably applied to every procedure.

From the experts' point of view, there is no direct influence from members of higher education institutions on the results of the procedure for accreditation. In fact, ACQUIN's member higher education institutions statutorily elect members of the Accreditation Commission; the latter are, however, not bound by instruction of the member higher education institutions. The accreditation decisions fundamentally lie in the responsibility of the Agency.

Conclusion

ACQUIN fully complies with standard 3.6

3.7 External quality assurance criteria and processes used by the agencies

STANDARD:

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

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

GUIDELINES:

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

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

Documentation

The statements made by ACQUIN in its explanatory statement for the application concerning ESG standard 3.7 are only partially suitable to prove the fulfilment of standard 3.7 (see pp. 21ff of the explanatory statement for the application). The assessment parameters underlying the procedure for accreditation and the rules of procedure are also documented in the *Guidelines for Programme Accreditation Procedures* and the *Guidelines for System Accreditation Procedures* (see Annex 3 and 4). Furthermore, the guidelines include information regarding the basic principles of the procedure for accreditation as well as specifications on standards for self-documentation of higher education institutions and for the expert reports.

According to the guidelines, ACQUIN's procedures are based on a self-evaluation report by the higher education institution, a third-party assessment in the context of an on-site visit by an expert group consisting of representatives of the relevant stakeholder and an accreditation decision by the Accreditation Commission. Following the procedure, ACQUIN publishes the summarised assessment and the expert report which documents the accreditation decision and, if necessary, conditions and/or recommendations agreed upon in procedures which began after 1 June 2010. On the basis of the Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation

adopted on 8 December 2009, ACQUIN is held to verify, if necessary, the fulfilment of the conditions by the higher education institution. The precise processes for the procedures for programme and system accreditation are documented in Annex 25 (process description) of the explanatory statement for the application.

Procedure consistency is ensured, among other things, by the feedback statements submitted by the standing technical committees on every procedure for accreditation (application documents, expert report and feedback statement from the higher education institution).

ACQUIN is equipped with a multi-tiered formalised internal complaints procedure, which is publicly accessible on ACQUIN's website and gives higher education institutions the possibility to pose objections to the different elements in a procedure for accreditation and assessment carried out by ACQUIN (Annex 19).

Assessment

The assessment parameters and procedures applied by ACQUIN are bindingly regulated and publicly documented in the Agency's guidelines. The underlying procedure includes the procedural elements presented in standard 3.7 (self-evaluation report, external assessment, on-site visit, expert report and a follow-up procedures) and involves the relevant stakeholders.

With regard to the procedures conducted abroad by ACQUIN, the expert group is concerned that it is not clear which criteria are to underlie the assessment. According to the Agency, ACQUIN provides the higher education institutions and the experts in procedures conducted abroad with its guidelines and, if necessary, with any additional national specifications. However, ACQUIN does not publish any information about this practice on its website. In addition, ACQUIN's guidelines concerning the compilation of self-documentation include specifications according to which the applicant higher education institution, among others, should also comment on the compliance with the KMK Guidelines and the guidelines laid down by the Accreditation Council. These details may cause misunderstandings in procedures that exclusively affect higher education institutions outside Germany.

Conclusion

ACQUIN partially complies with standard 3.7

Recommendation IV: The evaluation parameters and rules of procedure for procedures that are to be conducted abroad should be transparently documented.

Recommendation V: ACQUIN's complaints procedure should be refined. The complaints

procedure should include details for respites and a special board of complaints with external participants should be provided.

3.8 Accountability procedures

STANDARD:

Agencies should have in place procedures for their own accountability.

GUIDELINES:

These procedures are expected to include the following:

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

Documentation

The Agency states that the objective defined for ACQUIN's quality management is to fulfil a high standard on a sustained basis when carrying out the Agency's purpose of association, i.e. providing a contribution in enabling variety in the provision of study programmes, securing and developing the quality of education and ensuring transparency. ACQUIN's quality management is presented in Annex 16 of the explanatory statement for the application. The document lists some of the requirements and measures that serve to improve quality.

The explanatory statement for the application provides a more detailed description of the single measures illustrating them partly with examples. Additional activities, that are supposed to support the continued improvement of quality, are presented under the heading "Further development since re-accreditation in 2006" (p. 36 of the explanatory statement for the application), including some of the aspects discussed by the expert report of the

previous accreditation which have been put in relation to the adjustments and modifications implemented in the practice of accreditation in the meantime. ACQUIN refers also to the implementation of an internal internet portal (Moodle) which should provide consistent archival possibilities, enable systematic communication between committees and experts and facilitate publication. Furthermore, the Agency lists the conferences conducted in 2007, 2009 and 2010 in which different accreditation-related topics were discussed. The results of the last conference in 2010 are illustrated in Annex 26 (Public Administration Academy of Baden-Württemberg).

During the on-site visit, ACQUIN handed over a summary of the planned measures for the Business Process Optimisation (GPO), the document "Procedure Instructions, Assessment and Accreditation", which has not yet been approved and the document "QM Project" (as at 24 October 2010) – which include information about the strategy for implementation and about the relative responsibilities.

During the on-site visit, the Agency presented and explained in detail ACQUIN's Moodle portal to the expert group. The portal serves for the management of the entire administration and conduct of the accreditation procedures as well as a central communication platform for all user groups (expert groups, standing technical committees, the Accreditation Commission and head office) and as ACQUIN's central data storage.

Assessment

ACQUIN's quality management system, as it is documented in Annex 16, describes the Agency's standard of quality, which is implemented through measures that are not further specified. This constitutes one of the essential weak points in the approach ACQUIN has supported so far: The description of the quality management published on ACQUIN's website does not make it clear to the public what measures are employed in detail to ensure and implement the standard of quality. ACQUIN provides the explanations of the measures with reference to the corresponding activities carried out by the Agency only in its explanatory statement for the application, which is clearly not a part of the quality management. The following examples may illustrate that even the explanations included in the explanatory statement for the application are not always sound:

According to point 5 of the description of the quality management, ACQUIN takes measures to ensure that all expert groups have a comprehensive understanding of their assessment duties, including the purpose of assessment and the criteria to be applied to assessment and that the experts are aware of their role. To support this, the Agency refers to the measures for preparing experts, which, in fact, consist solely of consigning information material and a preliminary meeting of the experts the evening before the on-site visit. However, ACQUIN's guidelines do not include any information about the means or extent

of preparation given to experts. The results of the review of the assessment and accreditation procedures conducted in concert with the Public Administration Academy of Baden-Württemberg suggest that apparent deficiencies exist in the preparation process.

According to point 7 of the description of the quality management, ACQUIN carries out continuous measures to improve the quality and to enhance its services. As an example, ACQUIN cites the expert groups' response after on-site visits, which, according to ACQUIN, accounts for further optimisation of activities. This is a generalising statement that is not qualified to account for the system and functionality of the quality management.

The above examples reflect clearly that the measures formulated by ACQUIN for the assurance and development of quality are not the result of a formalised quality management system, but that they originate – in a rather unsystematic way – from the Agency's standards of quality which definitely do exist. According to the experts, ACQUIN's present quality management system does not include any precise procedural steps, is not specifically defined and neither includes documentation for measures taken nor *systematic* feedback mechanisms. Only the activities conducted with the Public Administration Academy of Baden-Württemberg have enabled the means for an orderly quality system through the status analysis and formulation of measures.

However, the expert group gives positive emphasis to the fact that, in its GPO, ACQUIN already conducts analyses of defects, defines corresponding measures and has developed a project plan for the implementation of measures. Of particular importance, in the view of the expert group, are above all the measures set out in the document (a) for the briefing, (b) for the appropriate appointment of experts, (c) for the training plan for members of the standing technical committees and (d) for the completion of the process instructions.

However, the expert group points out that the process of the Business Process Optimisation – apparently initiated by the Public Administration Academy of Baden-Württemberg's report – of the Agency, which has clearly grown quite rapidly over the previous years, began relatively late.

The expert group gives positive emphasis to the fact that ACQUIN has consigned an employee with expertise in quality management and who is also responsible for the coordination of the Business Process Optimisation including follow-up. In addition, the expert group welcomes the implementation of ACQUIN's Moodle portal and supports the Agency's efforts to integrate the portal in the future more thoroughly into the Agency's workflows – in particular with regard to the planned establishment of a pool of experts.

According to the Agency and to the experts' impression, the experts appointed by AC-

QUIN have so far provided their feedback in a rather informal way. Until now, carrying out *systematic* surveys after completion of the procedure has not been an established practice of the Agency. Since experience has shown that collecting the experts' feedback on a systematic basis provides insight into shortcomings and opportunities for improvement in the procedural practice, the expert group considers that development is needed.

Conclusion

ACQUIN partially complies with standard 3.8