

## ENQA FOLLOW-UP REPORT

### 2019

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## **ACQUIN FOLLOW-UP REPORT**

### **1 Purpose and structure and of the follow-up report**

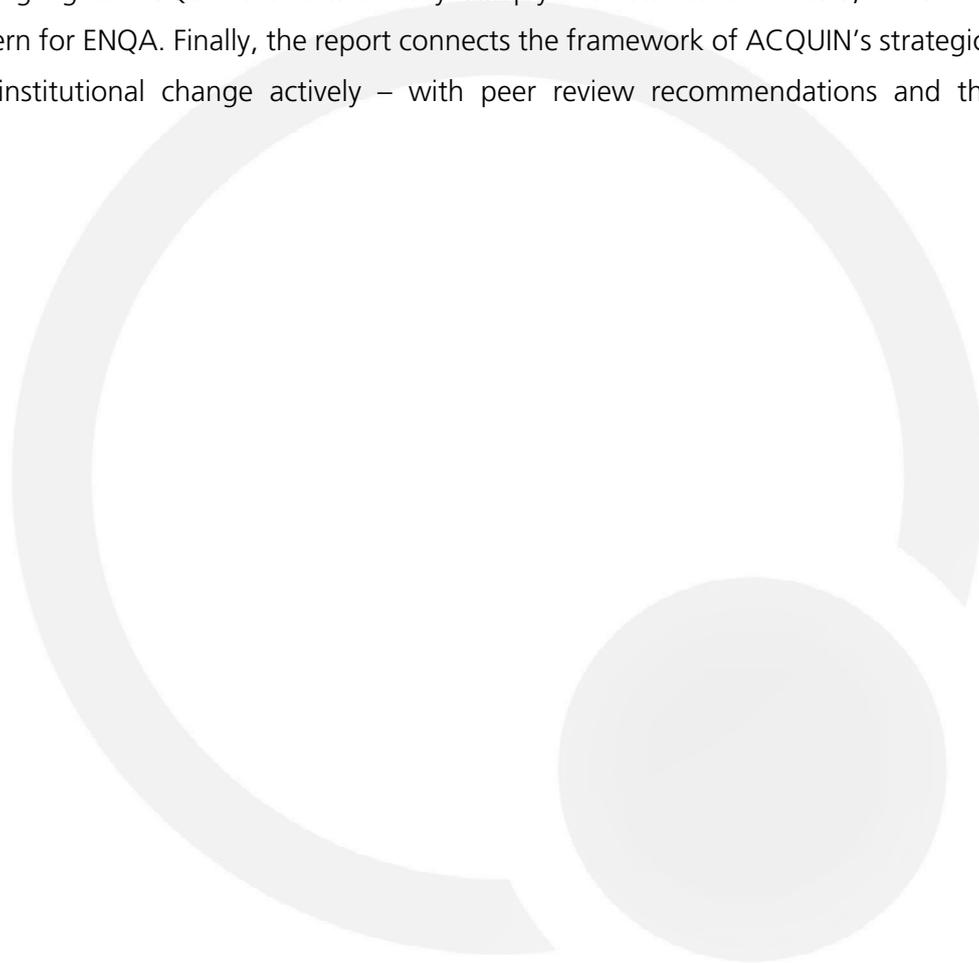
The follow-up report of the Accreditation, Certification and Quality Assurance Institute (ACQUIN) serves two purposes. First, it shall explain to ENQA and other external institutions, e.g. higher education institutions being association members of ACQUIN, how the agency currently organises and revises its work in terms of internal and external quality assurance procedures. Second, the report serves as a project schedule and an outlook for internal stakeholders and employees of ACQUIN, enabling them to focus on improving procedures and processes during the next two years.

At the time of preparing this report, ACQUIN is going through a fundamental revision of internal management structures and strategic setups, which are mainly triggered by changed external requirements.

In order to judge the agency's activities appropriately, it is crucial to take into consideration the legal context in Germany, which changed in 2018. Since then, accreditation decisions in Germany are not taken any more by accreditation agencies, but by the German Accreditation Council (GAC); agencies have the mere task to conduct review procedures and to prepare reports for the decision-making of the GAC.

With the Interstate Study Accreditation Treaty, coming into force on 1<sup>st</sup> January 2018, a new legal basis has been established for the accreditation system in Germany, following the resolution of the Federal Constitutional Court on 17<sup>th</sup> February 2016. The Standing Conference of the Ministers of Education and Cultural Affairs (KMK) has then agreed on the corresponding specimen decree. Key feature of the new system is the altered status of the GAC. The Foundation Accreditation Council is a joint institution of the states for accreditation and quality assurance in teaching and learning at German higher education institutions. One of the main responsibilities is the accreditation and re-accreditation of study programmes and internal quality assurance systems as well as other quality assurance procedures by awarding the foundation's seal. Further, the foundation authorises agencies being active in Germany. As a requirement for the authorisation, the agency must prove that it is reliably able to exercise the tasks of the assessment and the preparation of the review report; this is refutably assumed for agencies that are listed in the EQAR.

Taking the new status of ACQUIN in the German accreditation system into account, this follow-up report summarises briefly the steps of the last review conducted by the German Accreditation Council and the parallel renewal of the ENQA membership. With reference to the recommendations of the external review team, the follow-up report describes measures, which have been already taken to follow recommendations, or sketches plans and initiatives still to be implemented. In this context, the report highlights ACQUIN's efforts to fully comply with standard 3.4 ESG, which had been a major concern for ENQA. Finally, the report connects the framework of ACQUIN's strategic decisions – shaping institutional change actively – with peer review recommendations and the derived measures.



## **2 Description of the external review procedure**

In March 2016, ACQUIN went through the external review procedure of the German Accreditation Council. The agency had been assessed against the “Standards and Guidelines for Quality Assurance in the European Higher Education Area” (ESG; 2015) and the German Accreditation Council’s criteria. Based on the review report, the agency was granted a limited re-accreditation with conditions. After the fulfilment of conditions, ACQUIN received the status of a re-accredited agency until 30th June 2021.

Due to the combined review of GAC and ENQA, ACQUIN is also registered in EQAR until 30th June 2021. The membership in ENQA was reconfirmed on 14th February 2017 after an appeal procedure. The Board of ENQA had granted ACQUIN a membership under review, due to the perceived non-compliance with standard 3.4 ESG. Based on the appeal of ACQUIN against the decision, the ENQA Appeals and Complaints Committee (ACC) gave their statement to the ENQA Board on 8th August 2017 in which the committee recommended the Board to reconfirm ACQUIN’s membership in ENQA, i.e. to overturn its decision to designate ACQUIN a membership under review.

### **3 Findings and recommendations of external reviewers and GAC**

According to the review report, the review panel gained a positive impression from the agency and in particular from the persons involved in the committees and the head office. The reviewers state that ACQUIN is characterised by a communication-oriented culture, which prioritises interaction instead of fixed structures that are common in written management, even if more formalisation was found in comparison with the review before.

As a specific characteristic of ACQUIN, the review report mentions the multi-level structure with standing expert committees and the accreditation commission, which simplifies the relation to the subject communities and provides an observation across all disciplines through the accreditation commission. However, the peers state that this structure results in an increased internal demand of support and communication, to which even greater attention had to be paid in the future. In particular, the personal resources required attention.

The panel recommended that the German Accreditation Council should find ACQUIN to have substantially fulfilled the "Standards and Guidelines for Quality Assurance in the European Higher Education Area" (ESG). According to the evaluation by the panel, the ESG where

- full compliance has been achieved, were: 2.1, 2.2, 2.7, 3.2, 3.3, 3.7
- substantive compliance has been achieved, were: 2.3, 2.4, 2.5, 2.6, 3.1, 3.6
- partial compliance has been achieved, were: 3.4, 3.5.

The panel issued 17 recommendations, which are listed in the table below. Each recommendation is commented by mentioning the degree of fulfilment or ongoing initiatives at the moment of preparing this report. Coloured markings (green = fulfilled; yellow = partly fulfilled; red = not yet fulfilled) highlight, which recommendations still require some work.

**Recommendations of the peer review panel** (Printed matter GAC 45/2016, pp.63-64)

No.	Recommendation	ACQUIN comment/status report
1	<b>A schedule should be published analogous to the equivalence table of the German Accreditation Council for implementing the ESG Part 1 in the procedures outside of their fields of business (ESG standard 2.1).</b>	<p>Since 2018, accreditation procedures in Germany are regulated in a way that the ESG are incorporated. ACQUIN's procedures outside of this regulated sphere (international accreditation or certification procedures) directly apply the ESG part 1. Therefore, equivalence tables are no longer required.</p> <p><b>The recommendation is not applicable any more.</b></p>
2	<b>ACQUIN should ensure that the matter of potential inconsistencies between national guidelines and the ESG are raised in the reports (ESG standard 2.2).</b>	<p>Conflicts between ESG and national regulations are mentioned in reports. Reports also point out, if and how national standards are incommensurate with the ESG.</p> <p><b>The recommendation has been implemented.</b></p>
3	<b>ACQUIN should transparently lay out procedural steps and responsibilities for the audits in Austria for the public (ESG standard 2.3).</b>	<p>Since no audits have been conducted in Austria since 2016, the revision of existing guidelines and the publication of these documents is scheduled for 2019. There is no procedure of this type on the agenda of ACQUIN.</p> <p><b>The recommendation has not yet been implemented.</b></p>
4	<b>ACQUIN should increase the proportions of international experts in programme accreditation procedures, in particular if smaller subject communities are affected (ESG standard 2.4).</b>	<p>ACQUIN strives for the integration of international experts in review teams for all kind of assessment procedures. In particular, accreditation procedures with small subject communities, international experts are part of review teams. In procedures at foreign HEIs, teams are always composed of peers from</p>

		<p>Germany and national experts. Whereas system accreditation procedures always comprise international experts as well, review teams in national programme accreditation procedures show a lower participation of foreign peers. Due to language restrictions, ACQUIN systematically invites only peers from Austria and Switzerland. In accreditation procedures of joint programmes, experts from partner countries are involved according to the European Approach.</p> <p><b>The recommendation has been partly implemented.</b></p>
5	<p><b>ACQUIN should comprehensibly document for the public how the impartiality of experts and members of the committees is ensured (ESG standard 2.4).</b></p>	<p>Proposals and contracts of ACQUIN mention the criteria for the selection of experts according to the new Guidelines of the German Rector’s Conference, covering impartiality requirements. Reviewers sign a special “Impartiality and data protection form”. The same is true for international procedures of ACQUIN.</p> <p><b>The recommendation has been implemented.</b></p>
6	<p><b>ACQUIN should regularly offer events that prepare and/or further qualify experts for the procedures on a voluntary basis and make it possible to exchange experience (ESG standard 2.4).</b></p>	<p>The training of reviewers is crucial for thorough accreditation procedures. Since peer review teams gain even greater importance in the new system of accreditation in Germany, reviewer training is of high priority for ACQUIN. In 2018, two workshops were organised for representatives of member HEIs with the aim to make them familiar with the new accreditation procedures. ACQUIN also participated in special focus workshops and reviewer trainings, e.g. of the policy in Germany. In 2019, ACQUIN will develop new standardised concepts for expert training events. Already scheduled for March 2019, ACQUIN conducts a reviewer training workshop with the “Validation Organization for Study Programmes Architecture and Planning” (ASAP) in Berlin.</p>

		<b>The implementation of the recommendation is part of ACQUIN's 2019 project plan.</b>
7	<b>ACQUIN should also set out and publish criteria and responsibilities for selecting experts for the procedures of the audits in Austria, despite of the low demand in this field of activity (ESG standard 2.4).</b>	<p>The selection of experts for audits in Austria follows the general internal regulation for the recruitment of reviewers. The document "Verfahren und Kriterien der Gutachterbenennung" is published on ACQUIN's website.</p> <p><b>The recommendation has been implemented.</b></p>
8	<b>In the criteria for the impartiality of experts ACQUIN should clarify that a prior consultation of the higher education institution is excluded (ESG standard 2.4).</b>	<p>The criteria for the selection of experts directly follow the new Guidelines of the German Rector's Conference, covering impartiality requirements. Reviewers sign a special "Impartiality and data protection form". The criteria mention prior consultation of the assessed HEI as a reason for exclusion of experts. ACQUIN applies the same standards for procedures, which are not regulated by Interstate Study Accreditation Treaty and specimen decree in Germany.</p> <p><b>The recommendation has been implemented.</b></p>
9	<b>In order to ensure consistency between the committees, there should be institutionalised communication in fixed formats, such as meetings across disciplines or the chairs regularly participating in the accreditation commission's meetings. Measures and communication loops should be laid out in internal quality management (ESG standard 2.5).</b>	<p>Neither standing expert committees (SEC) nor accreditation commission (AC) take any binding accreditation decision in the new accreditation system in Germany (for international procedures they still do). However, the internal bodies have been asked for critical accompaniment of the new procedures. Therefore, a working group with representatives of SECs, AC and Board has been established to share experiences and to support the ACQUIN secretariat in developing new procedures and services. Further, joint meetings of the internal bodies take place at least every second year. In 2018, the joint meeting was part of a fundamental process of re-organisation.</p>

		<b>The recommendation has been implemented.</b>
10	<b>The guidelines for the Austrian audits should be published on the agency's homepage (ESG standard 2.5).</b>	<p>Since no audits have been conducted in Austria since 2016, the revision of existing guidelines and the publication of these documents is scheduled for 2019. There is no procedure of this type on the agenda of ACQUIN.</p> <p><b>The recommendation has not yet been implemented.</b></p>
11	<b>ACQUIN should ensure that the reports of the various procedure formats are easy to find on the homepage, for example through separate areas (ESG standard 2.6).</b>	<p>ACQUIN publishes reports of national and international procedures on its website. Searching specific HEIs, procedures and reports, users are able to use selection criteria and filters. As soon as the German Accreditation Council publishes reports of procedures according to the new regulation in Germany, ACQUIN will use DEQAR for the publication of international procedures' reports.</p> <p><b>The recommendation has been implemented.</b></p>
12	<b>ACQUIN should define a process with responsibilities and representation regulations for prompt publication of the reports (on the homepage and/or in the database of accredited study programmes) for each procedure format (for GAC criterion 2.7 also as a condition) (ESG standard 2.6).</b>	<p>A process for timely publications is well implemented and responsibilities are assigned in the ACQUIN secretariat. Reports are published on ACQUIN's website and data are entered in the database of accredited study programmes. With the new regulations, the GAC will publish on its own. For international procedures, ACQUIN will use the Database of External Quality Assurance Reports (DEQAR).</p> <p><b>The recommendation has been implemented.</b></p>
13	<b>In order to improve transparency, the complaints/appeals procedure should be incorporated into the procedure representations in the QM manual (ESG standard 2.7).</b>	<p>The appeals procedure of ACQUIN is portrayed with the relevant documents on the website of the agency. Complaint procedures are also part of the QM manual. Since decisions in accreditation proce-</p>

		<p>dures in Germany are now taken by the GAC, complaints against decisions have to be addressed to the GAC or administrative courts.</p> <p><b>The recommendation has been implemented.</b></p>
14	<p><b>The mission statement should be consistently taken into account in all of the agency's publications and should be published on the website (ESG standard 3.1).</b></p>	<p>The mission statement is published on the website of the agency. Since mission statement and statute are the documents, which outline the underlying principles of all the agency's activities, they are not abundantly reiterated in each publication, though.</p> <p><b>The recommendation has been implemented.</b></p>
15	<p><b>ACQUIN's activities regarding qualitative analysis of the results of its own work should be intensified and lead to publication (ESG standard 3.4).</b></p>	<p><i>See below (chapter 4 "Thematic analysis")</i></p> <p><b>The implementation of the recommendation is part of ACQUIN's 2019 project plan.</b></p>
16	<p><b>ACQUIN should submit a compilation of the amount of work for the activities related to and across procedures in the head office and demonstrate that the sub-subsequent filling of positions at the beginning of 2016 makes the human resources sufficient (ESG standard 3.5 and condition 2, criterion 2.4 GAC).</b></p>	<p><i>See below (chapter 4 "Internal processes")</i></p> <p><b>The implementation of the recommendation is part of ACQUIN's 2019 project plan.</b></p>
17	<p><b>ACQUIN should complete the description of core processes in the QM manual (ESG standard 3.6).</b></p>	<p>Core processes are still under revision, due to the changed context in the German accreditation system. After discussing with stakeholders and approval by internal bodies, revised and finalised processes will be part of the QM manual.</p>

	<p><b>The implementation of the recommendation is part of ACQUIN's 2019 project plan.</b></p>
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#### **4 ACQUIN's strategy and institutional change**

The recommendations of the review team are generally helpful and supportive for the continuous development of ACQUIN's strategic and operative management. At the same time, some of the recommendations from 2016 are not applicable any more three years later, since context variables have changed. Nevertheless, critical remarks and indicative findings are taken serious and borne in mind in the ongoing period of transformation and improvement.

##### *Transformation and stakeholder involvement*

The agency ACQUIN initiated in late 2017 a process of organisational revision and strategic realignment. Both streams were started with a **closed-door meeting** of ACQUIN's board members and secretariat employees in November 2017. Due to expected changes and uncertainties in the German accreditation system, the workshop was devoted to the development of scenarios for the future activities of ACQUIN. Based on a SWOT analysis, participants started to define future products and services of the agency, strategic focuses and organisational features. This also included the multi-level structure with standing expert committees and the accreditation commission, which had been evaluated by the external review of the GAC. Mindful of a politically intended cost reductions in the German accreditation system, different "what-if" scenarios with and without internal bodies of the agency were developed and discussed with the focus on functionality, profitability and sustainability.

Discussion and results of the closed-door meeting were presented to the **internal bodies of ACQUIN** in a **joint meeting** of accreditation commission, standing expert committees and Board in March 2018. These bodies, which are mentioned in the statues of ACQUIN, started a debate on the notion of quality in a rather mature system of quality assurance. Based on arguments in this discussion, ideas and proposals for strategic decisions and the development of products and services were elaborated in depth. Two main conclusions were that: 1) the multi-level structure of the agency should persist – as long as HEIs deem it best for their quality enhancement during ACQUIN procedures; and 2) the agency should establish services for HEIs, which are customised for each institution and take specific quality goals into account.

Secretariat, board members and representatives of ACQUIN's committees developed new models of (ESG-compliant) assessment procedures and services. Their proposals were presented to the **general assembly** in May 2018. The member HEIs of ACQUIN decided to implement these new models, such as procedures with tiered standing expert committee involvement, in a trial period and to evaluate them as soon as sufficient information (HEI feedback, etc.) is available.

### *Internal processes*

The intense discussions with various stakeholders triggered organisational adjustments in the secretariat of ACQUIN. These critical reflections took and still take into account the findings of the external review team concerning standard 3.5 ESG. Since the report states that the characteristic organisation of ACQUIN is demanding for staff and management of the agency, **organisational modifications** are gradually implemented. In particular, the "project organisation" of programme accreditation procedures was replaced by a "batch organisation", which reduces the spectrum of diverse tasks for each employee. At the same time, process cost calculations are going to provide better data for staff planning and resource friendly service provision. The new organisational settings will be evaluated in 2019. Thus, the internal quality management processes are adapted to new procedures and new survey as well as analysis tools are introduced for core processes of ACQUIN's work. Conceptual development and technical implementation are covered by ACQUIN's project plan 2019.

### *Thematic analysis*

The modification of internal processes, not only led by employees in the secretariat, but also by internal commissions and committees, allows the implementation of a new **agency policy for running thematic analyses**. This will be possible due to the new role of actors in decision-making procedures in programme and system accreditations.

While standing expert committees in the past had the position of "professional judges", who were able to overrule peer review teams and to propose deviating decisions to the accreditation commission, they now turned into "professional sparring partners". Since 2018, neither standing expert committees nor accreditation commission take binding decisions in German accreditation procedures. Therefore, they can support the secretariat with professional and procedural estimations, and they are able to discuss directly with peer review teams.

In fall 2018, the standing expert committees and the accreditation commission of ACQUIN proposed establishing a new **model of interlinking** peer review teams (in programme and system accreditation procedures) and ACQUIN's standing expert committees. Members of the committees will accompany reviews in order to feed their professional and procedural experience into the review process. Twice a year, members of the standing expert committees present their experiences and lessons learnt from "their" procedures to the committee colleagues. Standing expert committees shall discuss procedural features with regard to current subject community debates. Their findings are summarised and collected by the secretariat. The accreditation commission discusses once a year the collected findings from an interdisciplinary perspective. Both, subject related and interdisciplinary findings, are presented to the ACQUIN general assembly (HEIs), published on the ACQUIN website, and made available to the German Accreditation Council. This allows ACQUIN and the GAC to analyse procedures and to revise them, if necessary.

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