ENQA AGENCY REVIEW: AGENCY FOR QUALITY ASSURANCE AND ACCREDITATION AUSTRIA (AQ AUSTRIA)

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EXECUTIVE SUMMARY

This report analyses the compliance of the Agency for Quality Assurance and Accreditation Austria (Die Agentur für Qualitätssicherung und Akkreditierung Austria, AQ Austria) with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It is based on an external review conducted between November 2018 and April 2019.

AQ Austria is responsible for externally quality assuring all post-secondary higher education institutions in Austria. The agency’s remit comprises a large array of legally regulated functions in the field of external quality assurance. As this is AQ Austria second review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the Guidelines for ENQA Agency Reviews aim at constant enhancement of the agencies.

AQ Austria elaborated a self-assessment report which was very clear and comprehensive, with numerous and detailed appendixes, and that provided a substantial portion of the evidence that the panel used to draw its conclusions in this report.

The 2019 external review of AQ Austria was conducted in line with the process described in the Guidelines for ENQA Agency Reviews and in accordance with the timeline set out in the Terms of Reference. The following activities of AQ Austria have been addressed in this review:

- Quality Audits of internal quality management systems at Austrian public universities and at universities of applied sciences (compulsory) and in EHEA countries.
- Institutional and programme accreditation at Austrian private universities and universities of applied sciences (compulsory)
- Voluntary accreditation of continuing education study programmes at Austrian higher education institutions
- System accreditation and programme accreditation in Germany (compulsory)
- International programme accreditation (voluntary); Institutional accreditation in Switzerland;
- Voluntary Evaluation of programmes at HEIs (in Austria and abroad)

Regarding the Notification of foreign study programmes offered in Austria, some comments will be made, but this procedure will not be assessed, following what was agreed between AQ Austria, ENQA and EQAR.

Summary of the Team’s assessment, recommendations, commendations, and suggestions for further development:

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE - PANEL CONCLUSION: FULLY COMPLIANT

Suggestions for further development

- The panel suggests that the agency pursues further its reflection about the way to combine its regulatory and enhancement roles vis-à-vis certain parts of the HE system.
- The panel suggests that the agency develops its vision on its consultancy/support activities (e.g. through data collection or training), which could be distinguished more cautiously from the quality assurance activities which are provided by AQ Austria.
Panel commendations:
- The panel commends the agency for its efforts to develop an inter-sectoral dialogue among the different parts of the HE system and it encourages them to pursue that further through integrative approaches to QA across the all HE system, namely in its future strategic plan.

ESG 3.2 OFFICIAL STATUS - PANEL CONCLUSION: FULLY COMPLIANT

ESG 3.3 INDEPENDENCE - PANEL CONCLUSION: FULLY COMPLIANT

ESG 3.4 THEMATIC ANALYSIS - PANEL CONCLUSION: SUBSTANTIALLY COMPLIANT

Panel recommendations
- The panel recommends that the agency structurally embeds the practice of the publication of thematic analyses in its work programme, providing overview reports which bring together the results of its quality assurance processes, demonstrating their relevance for major quality issues in higher education in order to raise awareness among the HE sector and to better inform society.
- The panel recommends the team to develop further its thematic analyses by focusing on QA in a broader sense such as in issues like internationalization, employability, active learning, and pedagogical innovation. This could be done by using specialized software and tools devoted to content and qualitative analysis.

ESG 3.5 RESOURCES - PANEL CONCLUSION: FULLY COMPLIANT

Suggestion for further development:
- The team considers that the agency could be more proactive in planning the audits and voluntary reviews by developing long term plans as proposals for different institutions.

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT - PANEL CONCLUSION: SUBSTANTIALLY COMPLIANT

Panel recommendations
- The team considers that internal QA of the agency could be better linked to regular analytical work and that the feedback collected from different stakeholders should be analysed in a more systematic way.
- The team considers that the agency should reflect about the impact of external communication tools used by the agency, notably its website.

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES - PANEL CONCLUSION: FULLY COMPLIANT

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE - PANEL CONCLUSION: SUBSTANTIALLY COMPLIANT

Panel recommendations
- The team considers that the agency should address some of the standards that are not currently covered by some of the procedures, especially as regards audits and international programme accreditation. In particular, attention should be given to the coverage of standards 1.2 and 1.8 in some procedures, as it is recognized by the agency itself.
- Furthermore, it should reflect critically about its understanding of some of those standards and the way these are effectively covered by the existing procedures. In particular, the coverage of standard 1.3 seems incomplete, especially in international accreditations.

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE - PANEL CONCLUSION: FULLY COMPLIANT

ESG 2.3 IMPLEMENTING PROCESSES - PANEL CONCLUSION: SUBSTANTIALLY COMPLIANT
Panel Recommendation:
- The panel recommends that AQ Austria takes a more proactive role in the dissemination and implementation of follow up of the public universities.

ESG 2.4 PEER-REVIEW EXPERTS - PANEL CONCLUSION: FULLY COMPLIANT

Panel commendations
- The team commends the agency for the systematic presence of not only students, but also representatives of the labour market in the review panels for programme accreditation procedures.
- The team commend the agency for the systematic use of foreign experts in the review procedures, which has contributed to make the evaluations for robust and credible.

ESG 2.5 CRITERIA FOR OUTCOMES - PANEL CONCLUSION: SUBSTANTIALLY COMPLIANT

Panel Recommendation:
- The panel recommends that the agency develops more explicit criteria in the case of audits, namely in what refers to the way they address ESG requirements more directly.

ESG 2.6 REPORTING - PANEL CONCLUSION: FULLY COMPLIANT

Suggestions for further development:
- The panel suggests the agency to develop a database of reports and decisions to make more accessible for all stakeholders the results of its QA activities.
- The panel suggests the agency to strengthen its efforts to disseminate the results of its QA activities with students and employers.

ESG 2.7 COMPLAINTS AND APPEALS - PANEL CONCLUSION: FULLY COMPLIANT
INTRODUCTION

This report analyses the compliance of the Agency for Quality Assurance and Accreditation Austria (Agentur für Qualitätssicherung und Akkreditierung Austria, AQ Austria) with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It is based on an external review conducted between November 2018 and April 2019.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA’s regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

As this is AQ Austria second review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the Guidelines for ENQA Agency Reviews aim at constant enhancement of the agencies.

MAIN FINDINGS OF THE 2014 REVIEW

The previous ENQA review took place just two years after AQ Austria had been established, which was a significant factor in the analysis and assessments reached at that time. At that time, AQ Austria had started several accreditation processes in Austria and abroad, but at the time of the review most were still underway.

In the light of the self-evaluation report, the documented and oral evidence considered, the review panel at that time concluded that the AQ Austria complied with the ENQA membership criteria in the following manner:

ENQA criterion 1

a) ENQA criterion 1 / ESG Part 2: Use of external quality assurance procedures for higher education substantial compliance
   - Sub-criterion Use of internal quality assurance procedures (ESG 2.1) substantial compliance;
   - Development of external quality assurance processes (ESG 2.2) full compliance;
   - Criteria for decisions (ESG 2.3) full compliance;
   - Processes fit for purpose (ESG 2.4) substantial compliance;
   - Reporting (ESG 2.5) substantial compliance;
   - Follow-up procedures (ESG 2.6) substantial compliance;
   - Periodic reviews (ESG 2.7) substantial compliance;
   - System-wide analyses (ESG 2.8) partial compliance
b) ENQA criterion 1 / ESG 3.1., 3.3 Activities - substantial compliance;
c) ENQA criterion 2 (ESG 3.2) Official status - full compliance;
d) ENQA criterion 3 (ESG 3.4) Resources - full compliance;
e) ENQA criterion 4 (ESG 3.5) Mission statement - substantial compliance;
f) ENQA criterion 5 (ESG 3.6) Independence - full compliance;
g) ENQA criterion 6 (ESG 3.7) External quality assurance criteria and processes used by agencies - full compliance;
h) ENQA criterion 7 (ESG 3.8) Accountability procedures - substantial compliance;
i) ENQA criterion 8 Consistency of judgements, appeals system and contribution to ENQA aims - full compliance;
Hence, the panel concluded at that time that AQ Austria was sufficiently compliant to have its full membership of ENQA confirmed for an additional period of five years and acknowledged the contribution of AQ Austria to the development of higher education institutions through the enhancement of their quality.

Despite that overall assessment, the review panel made some recommendations for further development:

- Modify properly the intensity of the evaluation process depending on the effectiveness of the IQA system applied, independently from the type of HEI;
- Design a transparent criterion for amendments of accreditation procedures, depending on the type of amendment requested, since it is not perfectly understood by the HEIs;
- The implication of negative results in the audit process for public universities should be made more transparent;
- Increase the availability of information about the assessment reports for all stakeholders;
- Establish an adequate follow-up procedure for audit in public universities;
- System-wide analysis should be performed and results should be published;
- Medium-term goals have to be included in a strategic plan, as well as a risk management plan;
- Although an IQA system of AQ Austria is being developed right now, it is important to speed up the process of its implementation;
- It is desirable that AQ Austria develops its training opportunities for evaluators and continues to collaborate with ÖH in providing student evaluators and stakeholder consultancy. We recommend that joint trainings for all evaluators, including students, are considered.
- Due to the participation of international experts, careful preparation (training) is needed to understand properly the Austrian Higher Education system.

Moreover, and although it was not in the authority of decision by AQ Austria, there were some other issues that the panel at that time considered to restrict the development of QA in the Austrian Higher Education System, namely:

- Impossibility of conditional initial programme accreditation;
- The link between audit and accreditation for universities of applied sciences and its consequences;
- The incomplete integration of the higher education system under the same quality assurance policy performed by AQ Austria (university colleges of teacher education, philosophy and theology universities, IST Austria, cross-border studies under current legislation);
- The possibility to have common quality assurance assessment regulations for all the HEIs, independently of their types (public, private or applied sciences universities).

**REVIEW PROCESS**

The 2019 external review of AQ Austria was conducted in line with the process described in the **Guidelines for ENQA Agency Reviews** and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of AQ Austria was appointed by ENQA and composed of the following members:

- Jon Haakstad (Chair), Senior advisor - Norwegian Agency for Quality Assurance in Education (NOKUT) (retired from the agency), Norway (ENQA nominee)
- Pedro Teixeira (Secretary), Professor at University of Porto, Faculty of Economics and Director of the Centre for Research on Higher Education Policies (CIPES), Portugal (EUA nominee)
The review panel was initially provided with all relevant background information by January 2019, including the self-assessment report prepared by AQ Austria (which included a long list of appendixes). After a preliminary analysis based on the information provided in the SAR, the panel conducted a site visit in February-March 2019 to deepen the portrait presented in the self-assessment and clarify any outstanding issues. After the visit, the panel produced this final report based on the self-assessment report, site visit, and its findings. In doing so, it provided an opportunity for AQ Austria to comment on the factual accuracy of the draft report. The review panel confirms that it was given access to all documents it wished to consult and all people it aimed to interview throughout the review. Not all relevant documentation was available in English and some was available only in German, but most of the panel member could at least get the gist of all the documents provided. The panel as a whole was, nevertheless, able to consult all necessary information.

Self-assessment report

AQ Austria elaborated a self-assessment report which was very clear and comprehensive, with numerous and detailed appendixes, and that provided a substantial portion of the evidence that the panel used to draw its conclusions in this report.

The self-assessment report is the result of a process which was initiated in 2016. The self-assessment was one component of a comprehensive analysis that took place between 2016 and 2018. In 2016 AQ Austria started an evaluation of the HS-QSG with the purpose to assess whether the legal provisions were appropriate for the agency to perform its role defined by the law. This process was accompanied by a revision of AQ Austria’s mission statement. Five years after starting operations, the leadership of the agency considered that it was adequate to revise all its quality assurance processes, a process that started in early 2017. The combination of the three analyses provided a good opportunity to take stock of the developments of the agency and its activities since becoming operational and since the last ENQA review.

The elaboration of AQ Austria’s SAR was based on a process of self-reflection in the Board and in the secretariat, in which relevant external stakeholders have been involved. AQ Austria envisaged to use this self-reflection process to review its state of development, to assess the agency’s strengths and challenges, and to implement initiatives that could support the agency’s continued development.

The Board began the process at a meeting on the 13th December 2017 by setting up a working group in charge of organizing the self-assessment and drafting the self-assessment report. The group consisted of four members of the Board, the Managing Director, and three members of the Secretariat (from different departments). This was followed by initial discussions in the Board and in the Secretariat in February 2018 about the strengths and weaknesses of the agency and its procedures. Then, the working group started the self-assessment by considering the recommendations of the last ENQA review (including the comments made by EQAR), by collecting and assessing relevant information such as the outcomes of the discussions during the revision of the mission, and the results of the evaluation of the HS-QSG and of the internal quality management through the biennial quality reports. The working group collected feedback from stakeholders by analysing feedback to reviews conducted between 2013 and 2015, analysing statements to the evaluation of the Act on Quality...
Assurance in Higher Education and by collecting feedback at a meeting with stakeholders in September 2018.

The working group reported on the progress of the self-assessment to the Board at its meetings in May and September 2018 and to the secretariat at the regular staff meetings and at specific staff meetings in February, September, and October 2018. A draft report was presented to and discussed by the General Meeting at late October 2018 and the Board adopted the report at its meeting in mid-November 2018.

The exercise of self-assessment benefited from the aforementioned revision of all quality assurance procedures that was developed alongside the SAR. Furthermore, the agency conducted several analyses internally: (Informal) complaints against external experts, activities of the appeals committee, duration of accreditation procedures.

The self-assessment report was comprehensive, accurate, and informative and served as a valuable source of information to the panel. The appendixes included in the SAR were very useful, which were also complemented by additional information that the team has consulted on the agency’s website.

Site visit
The Review panel spent three days in Vienna, from the 27th February to the 1st of March. Some members arrived on the first day of the site visit and some the evening before (due to limited flight connections). The departure date for the team members was the evening of the last day or the day after. During those days, the panel had the opportunity to meet with a wide range of stakeholders on the new premises of AQ Austria. The agency prepared an initial draft programme for the site visit and the final version was defined in close cooperation between the managing director of AQ Austria and the chair and secretary of the panel and the ENQA review coordinator. The visit was well planned and organized. The programme included interview sessions with members of the Board and the General Meeting, the managing director of AQ Austria and a number of staff members, and members of the review panels. The panel also met various stakeholders, including representatives of the Ministry of Education, leaders of higher education institutions from the different sectors, quality managers from different higher education institutions, student representatives, and external stakeholders. An overview of the meetings is available in Annex 2.

The staff of the agency demonstrated high professionalism during the entire review process and provided excellent assistance to the panel regarding all matters. At the end of the site visit, the panel held an internal meeting where it agreed on the preliminary conclusions relating to the level of compliance of AQ Austria on each of the standards in part 2 and 3 of the ESG. The secretary of the panel then drafted the report in cooperation with the rest of the panel. The draft report was submitted to AQ Austria for factual verification in April 2019 and with reference to ENQA standards AQ Austria was given two weeks to comment on the report.

**Higher education and quality assurance system of the agency**

**Higher education system**
The Austrian higher education system is a diverse system that includes public and private sectors of higher education and different types of higher education institutions such as universities (the oldest part of the system), and more recently established universities of applied sciences and university colleges of teacher education. According to the current information, the Austrian higher education system consists of 69 institutions, notably:
- 22 public universities, including the Danube University Krems (DUK) which is a public university for continuing education
- 13 private universities
- 21 universities of applied sciences
- 9 Public University Colleges of Teacher Education
- 4 Private University Colleges of Teacher Education

In 2006 it was also established the Institute of Science and Technology Austria (IST Austria), with the main purpose of developing of new fields of research and postgraduate education by offering PhD programmes and postdoctoral programmes.

According to the information provided in the SAR presently there are around 278,000 students enrolled in public universities (including the Danube University Krems). Furthermore, there are circa 13,000 students enrolled in private universities, 52,000 students enrolled in universities of applied sciences, and around 13,000 students are enrolled in university colleges of teacher education. Enrolment numbers in continuing education programmes amount to approximately 40,000.

On the other hand, in recent years there has been the emergence of HEIs providing foreign degree programmes in Austria. Precondition for foreign HEIs to be entitled to offer degree programmes is the inclusion on a list that is regulated by AQ Austria. Currently there are 341 programmes provided by 52 higher education institutions from 22 countries. Comprehensive and reliable data on enrolment numbers is not available.

In Austria two parallel systems for regular degree programmes coexist. On the one hand, we have the programmes within the ‘Bologna degree-structure’, namely: Bachelor programmes consisting of 180-240 ECTS credits, Master programmes that amount to 120 ECTS at universities and 60 to 120 ECTS at universities of applied sciences, and Doctoral qualifications (that can only be issued by public and private universities based on doctoral programmes of at least three years of study). On the other hand, there are the ‘traditional’ degree structure with the Diplom granted upon completion of ‘long cycle’ programmes of 240 to 360 ECTS credits, which still exist mainly in the fields of law, medicine, arts and music.

<table>
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<th>The Austrian Degree System</th>
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<tr>
<td>University Colleges of Teacher Education</td>
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<tr>
<td>Universities of Applied Sciences</td>
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<tr>
<td>Universities</td>
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</table>

In addition to these aforementioned qualifications, Austrian HEIs offer continuing education programmes, which have various denominations. These are called ‘university course’ (Universitätslehrgang) at public and private universities, ‘continuing education course’ (Lehrgang zur Weiterbildung) at universities of applied sciences, and ‘higher education programme’ (Hochschullehrgang) at university colleges of teacher education. Some of these courses may lead to Master degrees, which are, however, not equivalent to Master degrees of the ‘regular’ degree.
programmes. These programmes are non-equivalent since students may enroll without prior Bachelor’s degree. Furthermore, graduates of these programmes are not per se eligible for admission to PhD programmes.

QUALITY ASSURANCE
The various laws on public universities, private universities, universities of applied sciences and on university colleges of teacher education establish guidelines for internal quality management. Two legal provisions apply to all sectors: HEIs are required to set up quality management systems and they have to implement course-evaluation by students. Those laws do not regulate in detail the design of the internal quality management systems; nor do the agency’s regulations prescribe a specific design of the internal quality management systems of HEIs.

Some features of internal quality management have been identified in the triennial report on the state of development of quality assurance at Austrian HEIs which was published by AQ Austria in 2016 but whose main results are still valid as far as general features are concerned:

- The policy documents and reports of the HEIs clearly demonstrate that the original focus on quality assurance is increasingly being extended to the perspective of quality enhancement, and the HEIs are endeavoring to establish a quality culture.
- The responsibility for quality management at the HEIs is generally located at the management level.
- Operational quality management tasks are defined and assigned to one or more staff positions or administrative units. The implementation is adapted to the respective framework conditions and the range of tasks depends on the size of the HEI.
- The internal structures required by law have been established at all universities of applied sciences, and many private universities have carried out structural reforms since 2012. The new audit procedures for public universities and universities of applied sciences support the further development of higher education institutions and promote the professionalism of QA processes and their documentation.
- The internal quality assurance procedures cover the entire spectrum of activities of the HEIs. They refer to organizational units, persons and the range of activities of the HEIs. Most of the procedures are subsumed under the term “evaluations”.
- Regular revision of study programmes is clearly one focus of HEIs’ internal quality assurance and enhancement activities. In general, the decision-making in revising programmes is separated from the operational level. The revision processes include participation of internal and external expertise.
- The quality assurance activities in research are comprehensive. Many quality assurance tasks are located in the research support service, since external quality assurance of third-party-funded research projects plays a central role. The state of development of internal quality management measures at HEIs correlates with the extent and sophistication of research activities.
- In addition to the compulsory external procedures, many HEIs carry out voluntary external quality assurance procedures; they are part of the internal quality assurance and development portfolio. This primarily includes program accreditation and certification by common QM models.

Since 1st March 2012, external quality assurance is based on the legal document HS-QSG. This act introduced a major reform of external quality assurance in the Austrian higher education system aimed at strengthening mutual trust between the three higher education sectors of public universities
including the Danube University Krems, private universities and universities of applied sciences, and at fostering mutual recognition in order to support mobility between the sectors. These objectives were to be achieved through:

- common (minimum) standards for higher education;
- abolition of the fragmentation of bodies and procedures in external quality assurance and thus ensuring better integration and coordination of the different higher education sectors;
- establishment of a cross-sectoral external quality assurance and accreditation agency;
- cross-sectoral regulation of framework conditions for quality assurance procedures;
- establishment of common assessment areas for quality assurance procedures that apply across sectors.
- legal regulation for the notification of foreign degree programmes.

However, the university colleges of teacher education were not covered by this act.

In organisational terms the three previously existing quality assurance agencies were merged into just one body that is AQ Austria. Before 2012, external quality assurance was characterized by a sector-specific configuration, both in terms of purpose and procedure as well as in organisational terms. Regarding processes and procedures, whereas public universities were not subject to compulsory external quality assurance, private universities and universities of applied sciences had to undergo accreditation at institutional level and at programme level. In this context, accreditation equalled the licence of operation. Regarding the organizational framework, three quality assurance agencies existed: the Austrian Accreditation Council for Private Universities, the University of Applied Sciences Council for the university of applied sciences (both performing the tasks of statutory bodies), and a third agency the Austrian Quality Assurance Agency AQA operated in all sectors but not with any statutory function.

Based on HS-QSG, various external quality assurance procedures are applied in the Austrian higher education system:

- Public Universities have to obtain certification of their internal quality management system through a quality audit every seven years. The certification decisions are not linked to any legal or financial consequences. The universities can commission AQ Austria or another internationally recognised independent agency, for example an agency listed on EQAR.
- Private universities have to obtain institutional accreditation (equals licence for operation) by AQ Austria every six or twelve years. New degree programmes must also undergo accreditation; however, re-accreditation of degree programmes is part of the institutional re-accreditation.
- Universities of Applied Sciences have to obtain institutional accreditation (equals licence for operation) by AQ Austria. New degree programmes must also undergo accreditation; however, re-accreditation of degree programmes is part of the institutional re-accreditation. In this case institutional re-accreditation is applied only once after six years and thereafter the audit scheme applies. However, legal consequences apply because the validity of the institutional accreditation status depends on a positive certification of the internal quality management system.
- In 2014, the HS-QSG was amended by way of introducing compulsory programme accreditation was implemented for the newly established PhD programmes at DUK.
- In addition, new regulations for the notification of degree programmes offered in Austria by foreign higher education institutions.
Table 2 External Quality Assurance at Higher Education Institutions according to HS-QSG

<table>
<thead>
<tr>
<th>HEIs/ Procedures</th>
<th>Quality Audits</th>
<th>Institutional Accreditations</th>
<th>Programme Accreditations</th>
<th>Annual reports</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Universities</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Danube University Krems</td>
<td>X</td>
<td>X (only for PhD Programs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Private Universities</td>
<td></td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Universities of Applied Sciences</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>

All procedures with statutory functions (i.e. accreditation of private universities and universities of applied sciences and their programmes and also accreditation of the doctoral programmes at DUK) have to be carried out by AQ Austria. As far as the non-statutory quality audits are concerned, public universities and universities of applied sciences can choose either AQ Austria or other agencies for conducting the audits.

Hence, despite the fact that the implementation of HS-QSG introduced a common framework for quality assurance in Austrian higher education, significant differences between the three higher education sectors covered by HS-QSG still persist in terms of purposes, legal consequences, procedures and actors.

It is noteworthy that quality assurance of the university colleges of teacher education is not covered by HS-QSG and thus outside the remit of AQ Austria. The institutions have to organize evaluations at institutional level by external experts every seven years. Nonetheless, it is not necessary to commission a quality assurance agency with the review. Moreover, there are no mandatory external quality assurance processes for IST Austria or the Philosophical-Theological Universities.

AQ Austria

AQ Austria was established on the 1st March of 2012 as the national quality assurance agency for higher education in Austria through the Act on Quality Assurance in Higher Education (HS-QSG). The Agency became operational in July 2012. Following its creation, the agency started conducting its accreditation and audit procedures based on provisional regulations.

The three subsequent years were characterized by typical activities and challenges for establishing a new organization. In parallel AQ Austria designed new accreditation-ordinances and audit-guidelines which were approved by the Board in June 2013. In 2015 after the adoption of the ESG2015, AQ Austria had to introduce only minor changes. The agency could take advantage of the fact that the 2013 regulations were designed in parallel with the process of revising of the ESG and consequently the new developments at European level could be considered immediately.

The years 2013 and 2014 were characterized by two external reviews of AQ Austria by the German Accreditation Council and by ENQA. Although the self-assessment for the ENQA review took place right in the implementation phase of the new agency, it was a good opportunity to analyse its establishment and initial activities. The certification by the German Accreditation Council and the reconfirmation of full membership by ENQA and subsequent inclusion on EQAR was very important to the consolidation of the agency and its international recognition.
After implementing its compulsory external quality assurance procedures at national level in 2013, AQ Austria started its activities in the fields of thematic analyses, voluntary external quality assurance procedures and consultancy (both in Austria and abroad).

In 2014 AQ Austria took up a new function by taking over from the ministry the responsibility for the notification of foreign degree programmes offered in Austria. Educational institutions that are accredited as post-secondary in their country of origin or country of domicile shall have the right to offer their degree programmes in Austria, provided that they are accredited degree programmes in their country of origin or country of domicile and that these degree programmes and academic degrees are comparable to Austrian degree programmes and academic degrees. Offering such degree programmes shall be subject to notification. A notification shall require the submission of official documents certifying that the educational institution is accredited as post-secondary in its country of origin or country of domicile together with the legal basis of this accreditation. Additionally, the foreign institution has to submit official documents certifying as well the accreditation of the degree programme in question in the country of origin or country of domicile. In these situations, AQ Austria acts as the notification office. In 2018 the relevant legal regulation was repealed by the Constitutional Court and AQ Austria terminated its activities by the end of the year. Since this activity has been interrupted and new regulations were not in place at the time of the review it was agreed with ENQA and EQAR that the activities related to the notification of foreign degree programmes should not be covered by this external review of AQ Austria.

Foreign degree programmes that are to be offered in collaboration with Austrian educational institutions shall require, prior to the start of the programme, a certification issued by AQ Austria that ensures that the activities undertaken at the Austrian educational institution and the components of the foreign degree programmes meet international academic standards. The certification shall be issued on the basis of an external evaluation conducted by AQ Austria according to international standards.

AQ Austria was not only the successor of the three former quality assurance agencies, it also, to a greater or lesser extent, inherited their tasks. According to its legal mandate, AQ Austria is responsible for all higher education institutions in Austria (§ 1 Abs. 1 HS-QSG). The agency’s remit comprises a large array of legally regulated functions in the field of external quality assurance, which encompasses the accreditation of higher education institutions and their programmes (private universities and universities of applied sciences), audits of the internal quality management systems (public universities and universities of applied sciences), supervision of accredited institutions, notification of foreign degree programmes, consultancy, and thematic analyses as well as international collaboration (§ 3 HS-QSG).

Regarding private universities and universities of applied sciences AQ Austria acts as public authority as regards accreditation and supervision. As regards audits at public universities and universities of applied sciences, and also as regards voluntary evaluation activities and advice to higher education institutions AQ Austria acts as one service provider among others.

**AQ Austria’s Organisation/Structure**

The Agency for Quality Assurance and Accreditation Austria is incorporated under public law. Its bodies, their powers and composition are legally determined. AQ Austria’s organisational structure is legally determined by the HS-QSG and consists of the Board, the General Meeting, the Governing Committee, and the Appeals Committee. The bodies are supported by a secretariat.
The Board of AQ Austria is the central independent decision-making body of the agency. This committee of experts is in particular responsible for all decisions regarding accreditation and certification, procedural guidelines and standards, supervision responsibilities vis-à-vis accredited educational institutions in Austria. Because of the various types of quality assurance processes, the Board possesses regulatory as well as non-regulatory competencies. The Board is made up of fourteen members, of that eight are academics (at least half of them must be foreign members), two are students (of the two one from abroad) and four members come from the professional practical field. Members of the Board act in their personal capacity and must operate without instruction by any stakeholder groups which underlines the independent decision-making. The term of office is five years with the possibility of one reappointment. From among its members the Board elects a President and a Vice-President for a term of five years. The President chairs the Board and the agency and also represents the agency in public.

In addition to the Board, two bodies serve the main purpose of involving stakeholders, namely the General Meeting comprising 23 representatives of stakeholder organisations and the Governing Committee comprising 5 members from among the general Meeting. The General Meeting assembles the relevant stakeholder groups including: The Advisory Council for Economic and Social Affairs (six representatives); the Austrian Students’ Union (three representatives), the Universities Austria (six representatives), the Association of Austrian Universities of Applied Sciences (four representatives), the Austrian Private Universities’ Conference (two representatives), and the Federal Ministry of Education, Science and Research (two representatives). The representatives are appointed by the federal minister at the nomination of the respective organisations for a period of five years with reappointments being allowed. The General Meeting elects a chairperson from the group. Among the duties of the General Meeting are, in particular, the election of the Governing Committee, the nomination and appointment of the Appeals Committee, and the nomination of ten members of the Board.

The Governing Committee is the agency’s strategic advisory body. It consists of five members who are elected by and from among the General Meeting. There is one member representing respectively the public university sector, the private university sector and the sector of the universities of applied sciences. Furthermore, there are also representatives from students and the professional organizations. The members serve a five-year term, with reappointments being allowed. The Committee exercises its advisory function through communicating informed views, especially with regard to the methodologies and standards of the agency as well as regarding the annual budget, the annual report, job applications and the rules of operation.

The operations of the Agency are largely supported by the Secretariat. The secretariat of AQ Austria is led by the managing director, who handles the day-to-day operations of the agency. The secretariat is subdivided into four departments, each of which is led by a department manager. Currently 33 staff (approx. 29 FTE) are employed. The employees have qualifications and work experience in teaching, research, university management, and quality assurance. New staff is provided with an induction programme that covers training, shadowing, mentoring, information materials and visits, and project work. AQ Austria puts emphasis also on staff development and applies a policy that includes annual staff interviews, support measures, and development measures. Every member of staff is expected to participate in 1 to 3 support and/or development measures per year.

There is also an Appeals Committee, but the details about this body will be presented in the analysis of standard 2.7.
AQ Austria’s Functions, Activities, Procedures

According to its legal mandate, AQ Austria is responsible for externally quality assuring all post-secondary higher education institutions in Austria (public universities, universities of applied sciences, private universities (with the exception of university colleges of teacher education, the Institute of Science and Technology Austria (IST Austria) and the universities for philosophy and theology).

The agency’s remit comprises a large array of legally regulated functions in the field of external quality assurance, which encompasses the accreditation of higher education institutions and their programmes (private universities and universities of applied sciences), audits of the internal quality management systems (public universities and universities of applied sciences), consultancy and thematic analysis. Since 2014, the agency is also responsible for the notification of foreign study programmes offered in Austria.

In addition to its legal functions within Austria AQ Austria is also active abroad. It is recognized by the German Accreditation Council for conducting accreditation procedures in Germany, and also by the Kazakh ministry for conducting accreditation procedures in Kazakhstan. AQ Austria also collaborates with universities in other EHEA countries by way of offering programme accreditation and consultancy services.

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

The following activities of AQ Austria have been addressed in the external review:

- Quality Audits of internal quality management systems at Austrian public universities and at universities of applied sciences (compulsory) and in EHEA countries.
- Institutional and programme accreditation at Austrian private universities and universities of applied sciences (compulsory)
- Voluntary accreditation of continuing education study programmes at Austrian higher education institutions
- System accreditation and programme accreditation in Germany (compulsory)
- International programme accreditation (voluntary);
- Institutional accreditation in Switzerland;
- Voluntary Evaluation of programmes at HEIs (in Austria and abroad)

Regarding the Notification of foreign study programmes offered in Austria, some comments will be made, but this procedure will not be assessed, following what was agreed between AQ Austria and ENQA, due to the aforementioned justification that this activity has been interrupted and new regulations were not in place at the time of the review.

AQ Austria’s Funding

The funding of AQ Austria is regulated by law and originates from the federal budget and from own revenues resulting from fees for the reviews and other income. The annual budget is negotiated with the ministry. The total expenditures in 2018 were around 2.8 million euros with around 1.9 million euros being supplied by the government and a bit less than a million euros of revenues generated by the agency. The draft budget for 2019 presents a total of expenditures of around 2.8 million euros with a slight increase in the funding supplied by the government (less than 40,000 euros more) and an
expected decline of around 10% in the income generated by the agency’s activities (expected around 900,000 euros).

The agency may decide freely how it spends its funds. As usually the case with this type of organizations, staff costs are the biggest budget item, representing more than half of the total expenditure (around 1.6 million €). The operational costs are slightly above 400,000 € and the costs with the remaining structure of the agency (Board, Complaints Committee, and Experts) amount to a value above 600,000 €, though expected to decline by more than 10% in 2019 (mainly due to an expected reduction of costs with experts). The other items in the budget correspond to smaller expenditures such as staff development (17,000 euros), publications (15,000 euros) and for events (50,000 euros).
FINDINGS: COMPLIANCE OF AQ Austria WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG Part 3: Quality Assurance Agencies

ESG 3.1 Activities, Policy, and Processes for Quality Assurance

Standard:

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

2014 review recommendation

In the previous review it was noted that “Medium-term goals have to be included in a strategic plan, as well as a risk management plan.”

Evidence

As the national quality assurance agency AQ Austria’s main legal obligations are to conduct external quality assurance procedures and related activities. Since its foundation AQ Austria has conducted approx. 600 external quality assurance procedures. Based on its legal mandate and elaborating this further AQ Austria’s goals and objectives cover aspects such as support to higher education institutions in continuous quality enhancement, providing impulses to the development of the higher education system and providing information about the quality of higher education to the public. They are laid down in a mission statement which also contains the major principles that the agency adheres to in its day-to-day operations.

AQ Austria has developed a strategy. The current one was adopted in 2016 by revising the 2014 version and is valid until 2021. The strategy contained four main goals:

1. to establish itself in Austria and internationally as a competence-center in questions related to quality of HEIs and higher education and to make a substantial contribution to the further development of the entire Austrian higher education system, beyond the boundaries of the subsystems.
2. to support public universities through consultancy services and the conduct of audit and other quality assurance procedures in their continuous quality enhancement.
3. to shape constructively the conflict between regulatory and supervisory functions and supporting role in quality development existing in the sector of universities of applied sciences.
4. To strengthen its role as a quality assurance agency regarding the private sector and to contribute to the differentiation and further development of this sector, while ensuring European quality standards.

For every goal, relevant activities have been defined. The implementation of the strategy has been monitored by regular overviews about the operations tabled at Board meetings and by annual implementation reports to the Board. The Board has discussed whether adjustments were
necessary. The second major way of operationalizing the mission was the design of the quality assurance procedures and the choice of other activities.

Stakeholder involvement has been a key feature of AQ Austria and this attained through various forms. As regards the governance of the agency, the Board as the main decision-making body benefits from stakeholders’ expertise because four members have to be nominated from the field of professional practice. Since all members of the Board act in their personal capacity this might not be considered stakeholder-involvement in the narrow sense. However, the perspective of experts from the various stakeholders’ areas add important views to the higher education and quality assurance experts from academia. In the case of the General Meeting there is a formal way of representation of stakeholder organisations in AQ Austria’s governance, which consists of 23 representatives from 11 stakeholder organisations. Consequently, the Governing Committee is composed by representatives of stakeholder-organisations as well. Differently from the regulations for the Board, the law explicitly stipulates that members act as representatives of the respective organisations. The management of the agency attends the meetings of the General Meeting and discusses its activity-report and current topics. In addition, AQ Austria organizes an annual meeting of all bodies of the agency, notably the Board, the General Meeting including the Governing Committee and the Appeals Committee together with senior staff. The purpose is to exchange experience and to discuss current topics. Stakeholder expertise is also used of in the external quality assurance procedures, mainly the accreditation procedures and evaluation procedures. Experts from the field of professional practice regularly form part of the expert panels. AQ Austria involves stakeholders also in its analytical work. Finally, and beyond these formalized ways of involving stakeholders, AQ Austria meets regularly with the main stakeholder organizations namely uniko, ÖPUK, FHK, ÖH, and the ministry at least on an annual basis and discusses any topics of relevance.

These activities also help AQ Austria to fulfil its mission, in particular to support the development of the Austrian higher education system as a whole and in order to contribute to cross-sectoral standards for quality and quality assurance. These roles in triggering cross-sectoral discussions about quality of higher education institutions and in making quality standards more comparable are highly valued by the institutions and the stakeholders.

Nonetheless, the Agency also faces some challenges, notably the double-role of acting as statutory body with a supervisory function and as provider of quality assurance services and expertise with a supportive function. AQ Austria acknowledged that for a private university and a university of applied sciences it is not natural to collaborate with an agency for the purpose of its own development when the agency is at the same time the accreditation authority. Whereas these institutions value the role of the agency as regards providing a cross-sectoral communication platform and the cross-sectoral thematic analyses they, at the same time hesitate to commission the agency with any non-regulatory projects or reviews on an individual basis. Hence, it is more difficult for AQ Austria to make full use of its potential to reach its aims in these two sectors.

Another challenge results from the fact that AQ Austria has been established in a partially competitive national quality assurance system. As regards accreditation of private universities and universities of applied science and their programmes it is solely AQ Austria that performs this statutory function. Different from this the non-statutory function of audit of internal quality management systems at public universities and universities of applied science can be performed by AQ Austria or other internationally recognized quality assurance agencies that have to be registered with the ministry. This unique situation impacts on AQ Austria’s activities in the field of analyses and reporting. As regards thematic analyses AQ Austria had to realize that the level of knowledge about an institution
necessarily depends partly on whether an agency conducted a review or other activities at the institution or not.

Concerning the involvement of stakeholders in the agency’s governance and day-to-day operations AQ Austria considers the clear distinction of using independent stakeholders’ expertise in the Board and in expert panels from the formal stakeholder representation in the General Meeting and the Governing Committee as well functioning solution to guarantee both stakeholder involvement and independence of the agency. This distinction and in particular the principle that Board members must not act on behalf of the nominating organization but contribute to the discussions from their professional perspective serves as a core guarantee of the independence of the agency.

As it was aforementioned, in 2014 AQ Austria assumed a new function by taking over from the ministry the responsibility for the notification of foreign degree programmes offered in Austria. Whereas the notification procedure as such was no quality assurance procedure and thus not governed by the principles of ESG AQ Austria has applied ESG in specific cases. For instance, when the foreign HEI collaborated with an Austrian educational institution in providing the programme AQ Austria had to evaluate activities of the Austrian partner. By the end of 2015 the first round of reviews of Austrian partners was accomplished. As it was explained before, in 2018 the relevant legal regulation was repealed by the Constitutional Court and this activity was finished by the end of last year. A new legal regulation shall come into force in 2019 of which details were to be released soon. Since this activity has been interrupted and new regulations were not in place yet it was agreed with ENQA and EQAR that the activities related to the notification of foreign degree programmes would not be covered by this review.

Analysis
AQ Austria is mandated with a broad range of activities. As stipulated in the law AQ Austria conducts not only external quality assurance procedures based on the ESG, but also thematic analyses, reporting and consultancy such as supporting a HEI in developing its internationalization strategy or supporting a HEI in the preparation of an external review. Whereas the distinction between quality assurance and activities in the fields of analyses and reporting should be straightforward the distinction between quality assurance based on ESG and consultancy recently caught attention. AQ Austria describes its various activities on its website by also making explicit reference to whether or not the activities are within the frame of quality assurance in the sense governed by ESG.

Consultancy activities have become more important, according to the agency’s strategy. This will require greater attention to the differentiation between consultancy and enhancement, especially in the relationship with HEIs going through QA procedures with AQ Austria.

The Agency has been trying to develop an integrative approach regarding different sectors in the HE system. This has been an important role, notably in contributing for greater inter-sectoral communication and for the dilution of previously existent borders in Austrian QA. However, under the present legal framework, differences still persist and the agency seems to be embedded in that context by specifying its strategic objectives by sector and not by mission or type of activities.

Moreover, it has to balance different roles regarding different sectors or even the same sector. This combination of regulatory and enhancement roles that has been ascribed to the agency by the current legal framework has been challenging, especially regarding private universities and universities of applied sciences. It creates a duality in the relationship with the agency that it is not easy to handle. The team understood that the agency is aware of that, though it is still finding the adequate way to approach this challenge.
One of the main objectives has been to strengthen its role as a competencies center in QA. This effort to strengthen its capacity in analysis and advice, relevant for enhancement, has been very important, especially since it was mentioned in the last ENQA review.

AQ Austria is particularly concerned with stakeholder involvement, which is attained in various forms, namely through the different bodies and consultation with experts. During the site visit the team could identify a general appreciation for these efforts of the agency.

The Agency has also developed an internationalization strategy, though this is 6 years old (2013). The team considers that some attention should be given to this matter in order to update it and to take into account relevant developments in Austria and abroad. In fact, the Agency also faces competition from other internationally recognized agencies and this is an important challenge that needs to be monitored in the near future.

**Suggestions for further development**

- The panel suggests that the agency pursues further its reflection about the way to combine its regulatory and enhancement roles vis-à-vis certain parts of the HE system.
- The panel encourages that the agency develops its vision on its consultancy/support activities (e.g. through data collection or training), which could be distinguished more cautiously from the quality assurance activities which are provided by AQ Austria.

**Panel commendations:**

- The panel commends the agency for its efforts to develop an inter-sectoral dialogue among the different parts of the HE system and it encourages them to pursue that further through integrative approaches to QA across the all HE system, namely in its future strategic plan.

**Panel conclusion: fully compliant**

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<thead>
<tr>
<th>ESG 3.2 OFFICIAL STATUS</th>
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<tr>
<td><strong>Standard:</strong></td>
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<tr>
<td>Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.</td>
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**Evidence**

AQ Austria is a legal entity under public law with the HS-QSG as a legal basis. The legal mandate and the responsibilities of AQ Austria are stipulated in the law, namely being responsible for external quality assurance of all higher educational institutions except the colleges of teacher education, IST Austria and the Philosophical-Theological Universities. The law also stipulates the bodies of the agencies and regulations concerning its funding. Last but not least also some basic principles of the quality assurance procedures are defined in line with the ESG, such as predefined standards, appointment of external experts, publication of results, etc.

Regarding the official status it’s noteworthy that, in addition to the legal basis in Austria, AQ Austria has also been approved by the German and by the Swiss Accreditation Councils as an accreditation agency in the two countries since 2013 and 2018 respectively (see annexes 08 and 09). From 2012 the agency was also recognized as accreditation agency by the Kazakh ministry but AQ Austria terminated its accreditation activities in Kazakhstan in 2018.
The formal recognition as quality assurance agencies by public authorities in Austria is based on the legal definition of AQ Austria’s mandate and on the legal consequences of its accreditation decisions. For private universities and universities of applied sciences accreditation by AQ Austria equals the prethe licence to operate as HEI and through programme accreditation to offer programmes. For public universities and universities of applied sciences the certification of internal quality management systems by the Quality Audit is recognized as being compulsory.

Analysis
Based on the evidence provided by the agency, it is clear that AQ Austria has a clear legal basis. Activities involving external programme and institutional accreditation, quality audits, and the quality assurance of foreign institutions offering degrees in Austria are activities carried out for regulatory purposes. Additionally, the agency is allowed to offer voluntary quality assurance services to higher education institutions. This has been recognized through legal documents in Austria and also through the recognition of AQ Austria’s activities in other countries such as Germany, Switzerland and Kazakhstan. The legal evidence confirms that the agency fully complies with this ESG and the international recognition reinforced this status and enhanced its credibility, namely in the German-speaking world.

Panel conclusion: fully compliant

ESG 3.3 INDEPENDENCE

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

2014 review recommendations
In the EQAR previous report it was mentioned that “The Register Committee noted that formal approval of accreditation decisions by the Minister in charge of higher education does not include the possibility to change or to ask for a revision of AQ Austria’s decision. The Minister could, however, deny an accreditation approval, although this has not happened so far. The Register Committee noted that this could be a constraining factor in the independent activity of the agency and warrants further attention in the next review of the agency.”

Evidence
The foundation of AQ Austria’s independence is to be seen in its establishment as legal entity under public law with its own legal basis that regulates the agency’s responsibilities, structure and governance, funding, and operations.

Regarding organisational independence, the Law explicitly stipulates that the Board is the central decision-making body and that this body is not subject to any instructions. This is at the core of the agency’s independence because the Board is the body responsible for all relevant decisions regarding quality assurance procedures, the appointment of the Director and the Deputy Director, and the decision upon the budget. Neither the General Meeting nor the Governing Committee as bodies of stakeholders are involved in any way in the agency’s day-to-day operations, in particular not in the accreditation and certification decisions. The process of nomination of Board members is also crucial for the agency’s independence. Ten members are nominated by the General Meeting by a two-thirds
majority which ensures a broad agreement of all stakeholders. Four members are formally nominated by the Minister of Science.

Regarding financial independence, a large part of the agency’s resources (around 2/3) comes from the Federal Government and it is approved as a lump-sum. The other third part of the budget comes from income generated from the agency’s activities, that includes the fees paid by the HEIs (most of it) and the revenues from consultancy (a very small part).

Regarding operational independence, the legal framework under which AQ Austria operates stipulates that the Board is responsible for deciding upon procedures and standards. Consequently, the Board designs the procedures by considering the relevant legal stipulations and also appoints the external experts.

Finally, in what refers to independence of formal outcomes, the independence of the Board in decision-making is enshrined in the legal framework and is explicitly highlighted again with respect to accreditation decisions. Hence no other body of the agency or external body can interfere in the decision-making; accreditation decisions must be approved by the responsible Minister and can only be withheld for reasons of unlawfulness or conflict with “overarching political deliberations”.

**Analysis**

Regarding the formal approval of accreditation decisions, and although the government can have a final say, this seems to be of very limited application and only in exceptional situations. Moreover, the team did not identify any form of interference of the government in the processes and decisions of the agency. This view was corroborated unanimously by all stakeholders interviewed by the team.

On the level of financial dependency, a large part of the agency’s resources comes from the Federal Government, which incurs a level of dependence on this government. However, this is approved as a lump-sum and there were no indications that this constituted a vehicle for government’s interference in the daily activities of the agency.

The operational independence from external stakeholders is largely guaranteed through the legislation and the internal procedures of the agency. The Governing Board, which includes representatives of the different stakeholder groups, is not involved in the development of the procedures or in the daily management of AQ Austria, which is guaranteed by the managing director and by the secretariat.

The appointment of external experts is undertaken independently from third parties. All members also abide to a code of ethics that aims to ensure that potential conflicts of interest are avoided, which is also previously screened by the agency’s staff. Moreover, and although there is a wide representation of the different relevant stakeholders in the review panels, the formal outcomes of all reviews remain the responsibility of the agency. The fact that the agency uses extensively foreign reviewers also contributes to that independence.

Overall, the team concluded that the framework seems sufficiently robust to ensure the autonomy of the Agency in its organizational, operational, and deliberative dimensions.

**Panel conclusion: fully compliant**
ESG 3.4 THEMATIC ANALYSIS

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

2014 review recommendations
In the previous report by EQAR it was pointed out that “It is within AQ Austria’s legal mandate to carry out system-wide and cross-sector analyses of the Austrian higher education system. The review panel noted that the agency is working on its first report on the development of quality assurance in Austria and that a separate department has been set up within the Agency for these tasks. Since the work is in progress, AQ Austria has not yet produced documentation that can evidence substantial compliance with this standard. This matter requires attention in the future but the Register Committee noted that preparatory work is in train.”

Evidence
AQ Austria sees it as a strength that the analysis and reporting task has been enshrined in law. Consequently, a separate, yet small department was established in the secretariat, which is responsible for this area of activities. In principle the work is organized on a project-base so that almost all staff can be involved. However, it is fair to say that in the first years after establishing the agency the workload of establishing the organisation and its quality assurance procedures and growing numbers of reviews hampered the development of the department. In addition, two structural decisions turned out to be not favourable. On the one hand the managing director was also head of the department and on the other hand two staff were assigned partly to this department and partly to the accreditation department. Since time was often pressing in the accreditation procedures the two colleagues were not able to invest as much time in the analytical work as originally planned. Consequently, the agency changed the structure. The department has now its own head, and staff is assigned solely to this department, also staff resources have been raised by 1 FTE. However, in principle the organisation of the work shall be kept as it is which means that analyses are conducted in project groups that consist of colleagues from all departments. In addition, in 2018 the agency implemented a new policy: Every member of the accreditation and audit departments has to conduct one small thematic analysis per year, either alone or in cooperation with other colleagues. The topics of these small analyses, which will be done in addition to the larger ones, will be agreed upon within the secretariat.

The SAR and annexes provided some examples of thematic analysis, mainly in German. The reports produced thus far tend to focus on the results of QA processes and related issues in HE, such as the recognition of competencies and learning or continuing education programs. According to the law, AQ Austria develops comprehensive reports on QA in HEIs once every 3 years. The first report is available on the agency’s website, and the team was provided with the draft version of the second reports (the one referring to 2018).

Today the agency can confirm that it benefits from the recent analytical projects carried out, particularly the evaluation of the HS-QSG and the thematic analyses of the procedures because most relevant results were used for the revision of the strategy and the revision of the procedures.
Analysis

The examples of thematic analysis provided indicate that AQ Austria’s analysis has focused on the results of QA processes and some meta-analyses of those activities. Additionally, there are a few examples of thematic analyses covering issues such as the recognition of competencies and learning or continuing education programs.

The examples presented were a bit limited in number and, especially, in scope. The analyses are essentially concerned with some QA processes and procedures and the way HEIs deal with some processes such as recognition and validation of competencies. There is very limited analysis about the effects of QA processes in Austrian HE and in the different sectors of the HE system and about the effectiveness of current QA processes in improving the effectiveness and innovativeness of Austrian HEIs. The team also did not find any evidence of extensive use of statistical and specialized software tools to map, systematize, and identify patterns of behavior in AQ Austria’s activities.

Furthermore, the team did not find examples of reports that are common in other agencies and are regarded as good practices such as the impact of QA in issues like internationalization, employability, active learning, and pedagogical innovation. It would be relevant for the agency to reflect upon the attention of HEIs to those aspects and the extent of which the activities of AQ Austria may (or may not) be contributing to stimulate or change the way Austrian HEIs approach those issues. QA is not an end in itself, but mainly a system aiming to improve the system and the focus and the effectiveness of educational activities in reviewed HEIs.

Given that this was a major objective and that it was referred in the previous review and in the strategic plan, the current outcomes are a bit limited and the team considered that, despite visible progress, this is an area that will require significant attention in the coming years.

Panel recommendations

- The panel recommends that the agency structurally embeds the practice of the publication of thematic analyses in its work programme, providing overview reports which bring together the results of its quality assurance processes, demonstrating their relevance for major quality issues in higher education in order to raise awareness among the HE sector and to better inform society.
- The panel recommends the agency to develop further its thematic analyses by focusing on QA in a broader sense such as in issues like internationalization, employability, active learning, and pedagogical innovation. This could be done by using specialized software and tools devoted to content and qualitative analysis.

Panel conclusion: substantially compliant

ESG 3.5 RESOURCES

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

Evidence

As far as human resources are concerned, AQ Austria employs 33 staff (29 full-time equivalents). Since 2012 the quantity of staff has increased slightly. Three positions were added, one due to the new task of notification of foreign degree programmes, one in order to support international activities (which
is self-funded), and one in the backoffice. The secretariat is organized in four departments, notably the departments for accreditation, for audit and consultancy, for analyses and reporting, and finally the department for administration that includes also the back office for procedures and projects. Although every staff member is assigned to a department and hence specializes in certain procedures or projects all staff, as a matter of principle might also conduct reviews or projects in other departments. This is to widen experience and expertise of staff and it also helps to balance uneven distribution of workload between the departments over time. Staff plays a critical role for professional, correct, and timely conduct of all activities. Hence, AQ Austria puts efforts in staff recruitment and staff development procedures as explained in chapter 3.4. Staff retention is high; during the last four years only three staff left the agency.

In addition to staff also the members of the Board play a crucial role in performing the agency’s tasks. As stipulated in the law the Board consists of 14 experts in higher education. This number not only guarantees a broad representation of different perspectives and experiences in the decision-making body, but also their engagement in different working groups such as the one for the revision of the procedures or the self-assessment in preparation of the ENQA review etc. It also helps distributing the heavy workload in preparing more than 100 decisions on review cases and numerous other decisions per year.

Regarding material resources, there were relevant recent changes. The secretariat has moved at the end of 2018 to the new premises, where the site visit took place, which have expanded significantly the space available and improved the working conditions of the staff. The previous premises comprised an area of approximately 700 sqm with individual offices available for the majority of employees and a private, security-protected data network with appropriate servers, 13 PC workstations, 19 laptop workstations, and 6 further laptops. A meeting room was also available for meetings, workshops and training seminars. The new premises comprise approximately 1000 sqm and there is more space and more rooms available for meetings. The agency uses a central data storage system that has been developed into a document management system, and a document platform with restricted external access. Also, a library of about 2.500 titles is available to the staff.

In what concerns the financial resources, and as explained before, the funding of AQ Austria is regulated by law and originates from the federal budget and from own revenues resulting from fees for the reviews and other income. Around 2/3 of the agency’s income are supplied by the federal government and the other third through income generated from the agency’s activities.

The agency has significant financial autonomy, being able to decide freely on how it spends its funds. The main costs are by far the staff costs, plus the operational costs, the expenditures with experts, and with the Board. Other expenditures are rather small for the size of the budget.

Analysis
During the discussions that the team has had with the agency there was the general perception that the current human resources are regarded by AQ Austria as sufficient. The panel agrees with this and considers that the agency has the quantity and the quality of human resources needed to fulfil its mission adequately.

Regarding resources, the main limitation refers to the the planning due to the fact that there are not fixed application dates for accreditation requests and private universities can submit applications at any time (and the process has to be finished by the agency within nine months). Although the agency, with support of the institutions, keeps record of envisaged applications, institutions sometimes have to change plans at short notice and postpone applications for various reasons, which disturbs the
planning of resources. As regards accreditation applications by universities of applied sciences planning is easier because, due to funding decisions by the ministry, the applications are submitted within a time-span of around three months. Thus, normally the agency knows in advance how many applications can be expected, though most of them are submitted within a period of two months which means that they have to be processed in parallel. Other reviews like audits and voluntary procedures are not foreseeable. The only type of procedures that is foreseeable is institutional reaccreditation. Therefore, planning of physical resources has to be renewed almost on a quarterly basis and, though human resources are regarded as sufficient, there may be peaks of work in which staff is overburdened, especially since this can not be complemented by short-term recruitment given the specificity of the tasks and of the expertise required. In spite of these challenges, however, it is the panel’s assessment that the agency has the necessary human resources to execute their tasks in a satisfactory way.

Regarding financial resources, there were also no major issues and the agency seems to be satisfied by its level of funding. The panel found no evidence to dispute this conclusion. The main issue again here is the fact that the timing of decision on the annual budget takes place at a time when the agency does not know yet the level of work it will face. This makes planning of physical and financial resources challenging, though the team did not identify this as a major issue and certainly not one that could create major difficulties to the fulfilment of the agency’s mission and a stable and effective development of its activities.

**Suggestion for further development:**
- The team considers that the agency could be more proactive in planning the audits and voluntary reviews by developing long term plans as proposals for different institutions.

**Panel conclusion: fully compliant**

**ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT**

<table>
<thead>
<tr>
<th>Standard:</th>
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<tbody>
<tr>
<td>Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.</td>
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**2014 review recommendations**

In the previous report by EQAR it was mentioned that “The Register Committee noted that AQ Austria’s internal quality assurance processes have recently been put in place and that they have not yet been tested. The implementation of the internal quality assurance system is expected to be addressed in the next external review of the agency.”

**Evidence**

AQ Austria uses an internal quality management system which was developed in 2013/14 and revised in 2016. The system addresses processes including:

- Management processes
- Strategic Management of the agency
- Management of core processes
- Staff management
- Financial management
- Core processes
For each process/section AQ Austria defined a ‘quality standard’ stating the agency’s expectations as regards the nature of the item or the conduct of the process. Referring to the quality standards AQ Austria defined measures and instruments to be used in order to assess whether the standards are met. The responsibilities for applying the measures and instruments are also laid down in the quality management system.

The instruments used vary and cover activities such as: provision of relevant information; training activities in the wider sense (training and briefing for external experts, induction for Board members and staff, staff development); accreditationsWiki (AkkreditierungsWiki)\(^1\) and templates; regular internal meetings (department meetings, staff meetings, management meetings, meetings of staff and presidency, meetings of all agency bodies); internal and external workshops; analyses of external feedback based on feedback surveys for HEIs and external experts; regular meetings with stakeholders for gathering feedback.

Mainly two ways are applied to make use of the information gathered and of the results of the internal quality management: Firstly, feedback from reviewed HEIs and external experts as well as experience made by review coordinators are fed back to department meetings in order to be able to make immediate use of it as far as practical questions of conduct are concerned. Secondly, feedback from reviewed HEIs and external experts is analyzed on an annual basis and discussed by the Board. The Board also discusses the Quality Report on a biennial basis that presents the results from the quality management processes applied.

Based on its mission statement, AQ Austria sees itself as a learning organization that sets high quality standards for its own activities, ensures the achievement of its goals through professional conduct and develops its own activities further through regular reflection. External quality assurance at higher education institutions as understood and performed by AQ Austria is not regarded as a technical box-ticking exercise based on quantitative data. Notwithstanding the fact that designing methodologies fit for purpose and consistent application of these are at the core of professionalism of a quality assurance agency one has to take into account that review procedures that are based on peer review place people in the focus of the reviews. This is the reason why AQ Austria considers information, training and briefing as core and puts huge emphasis on the competences of people involved in its activities. This starts with the experts and comprehensive training and briefing activities, continues with the staff development activities for staff and especially the review coordinators and covers also the members of the agency bodies, in particular the members of the Board. New Board members

\(^{1}\) This is a database developed by the agency that contains relevant information on background and meaning of certain criteria, typical issues arising and regular decisions in the QA processes. It aims to support panel members in their activities.
receive an induction meeting that helps them to familiarize with the legal framework of the agency and its activities, the role of the Board and the individual members, the standard procedures of the Board, and finally actual topics and future developments.

Internally once a year the presidency of the agency holds a formal meeting with the secretariat in order to discuss the collaboration and the communication between Board and secretariat and also in order to discuss actual and future developments. Also, once a year all bodies of the agency meet in order to discuss actual topics and developments.

Guaranteeing consistent application of regulations has to go beyond fostering a common understanding. In order to support consistent conduct AQ Austria supports the conduct with descriptions of standard operating procedures and various templates etc. In addition to the consistent application of the regulations the agency also has to adhere to basic principles such as impartiality and tolerance. Hence AQ Austria applies codes of conduct for all people involved that highlight these topics.

AQ Austria does not collaborate with subcontractors.

Analysis
The agency has clearly defined processes and procedures for all its activities. It has also established structures for assuring and enhancing the quality and integrity of its work.

Moreover, the panel recognises the efforts achieved by the agency to implement processes for internal quality assurance taking into account the ESGs. In the SAR the agency listed the recommendations of the previous ENQA review and indicated whether those have been implemented and justified its decision to follow (or not) those recommendations. Efforts have been made in order to implement most of recommendations, despite some legal constraints.

The panel found clear evidence of the consolidation of the work of the agency as a result of internal quality assurance processes which clearly comply with the ESG. A next step in the development of the agency may be to assume a more strategic approach to its internal quality assurance.

The agency has in place an internal quality assurance system based in both external and internal feedback mechanisms. The external feedback mechanisms are developed and focused upon the direct stakeholders in order to promote the continuous improvement of programme assessments. External communication is an integral part of IQA IQA system, but there were no evidences on how the agency is managing the quality of external communication – what are the targets, means and activities, and how are they “continuously improving” the area. Regarding the internal feedback, AQ Austria carries out regular meetings about the development of the assessment procedures. However, the team agrees with the agency that internal QA of the agency could be better linked to regular analytical work and that the feedback collected from different stakeholders (including internal) should be analysed in a systematic way.

One of the positive features of the agency’s internal quality management is its scope that covers all management processes, core processes, and also support processes, since these processes have a significant impact on the quality of the core processes. Another important feature is that it focuses on processes and instruments that are critical for the quality of the core processes such as the quality assurance procedures conducted at higher education institutions. Hence, it is not limited to regular ex post analyses or evaluations. Apart from the design of the external quality assurance procedures the system addresses the competences of all individuals involved in the agency’s activities and the
professional conduct. The system seems reasonably well developed for the dimension and breadth of activities developed.

Panel recommendations
- The team considers that internal QA of the agency could be better linked to regular analytical work and that the feedback collected from different stakeholders should be analysed in a more systematic way.
- The team considers that the agency should reflect about the impact of external communication tools used by the agency, notably its website.

Panel conclusion: substantially compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

<table>
<thead>
<tr>
<th>Standard:</th>
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<tr>
<td>Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.</td>
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</table>

Evidence
The Legal Framework stipulates that AQ Austria has to undergo regularly an external evaluation against international standards. So far, AQ Austria has been evaluated by the German Accreditation Council in 2013 and by ENQA in 2014. Due to legal changes in the German Accreditation system, notably the recognition as agency for the German accreditation system through the inclusion in EQAR, AQ Austria will not pursue the renewal of its the external evaluation by the German Accreditation Council, as it has become unnecessary even if it operates in Germany.

Analysis
The review panel has confirmed the commitment of the agency and of the Federal Government in following this ESG, as expressed in the Austrian legislation, and also in the meetings during the site visit. AQ Austria is committed and required to undergo a cyclical review to renew its membership by demonstrating compliance with the ESG and the steps taken to follow up on any recommendations provided. This is also confirmed by the fact that this is the second review by ENQA and that the agency has submitted itself to other reviews in the past.

Panel conclusion: fully compliant

ESG Part 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

<table>
<thead>
<tr>
<th>Standard:</th>
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<tr>
<td>External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.</td>
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</table>

Evidence
According to its legal mandate, AQ Austria is responsible for all post-secondary higher education institutions in Austria. This includes mainly public universities, universities of applied sciences, and private universities. The agency’s remit comprises the accreditation of higher education institutions
and their programmes (private universities and universities of applied sciences), audits of the internal quality management systems (public universities and universities of applied sciences), consultancy and thematic analysis. In addition to its legal functions within AQ Austria is also active abroad, namely in Germany and Switzerland. Below we will analyse in more detail the main quality assurance procedures developed by AQ Austria, highlighting the criteria used in those reviews and the extent of which they cover the various standards of parte 1 of ESG.

1. **Quality Audits of internal quality management systems at Austrian public universities and at universities of applied sciences (compulsory) and in EHEA countries.**

The objective of the audit is to confirm that the higher education institution has established its quality management systems pursuant to the statutory provisions. The quality management system supports the higher education institution in ensuring and enhancing the quality of its activities. Furthermore, the audit shall provide impulses for the further development of the higher education institution's quality management system. The quality management system is assessed using five standards, which define the requirements for a functioning quality management system, and are the following:

1 - The higher education institution has an understanding of its concept of quality and a quality management strategy, which is part of its internal management;

2 - The higher education institution has established a quality management system, which is derived from its quality management strategy, and has defined the structures, responsibilities, and competences for implementing the quality management system;

3 - The higher education institution implements quality management measures on the basis of the defined objectives in the fields of studies and teaching and assesses their contribution to the achievement of the objectives and to the enhancement of the quality in those fields;

4 - The higher education institution implements quality management measures on the basis of the defined objectives in the fields of research or the advancement and appreciation of the arts or applied research and development and assesses their contribution to the achievement of the objectives and to the enhancement of the quality in those fields;

5 - The higher education institution implements quality management measures on the basis of the defined objectives in the field of human resources and assesses their contribution to the achievement of the objectives and to the enhancement of the quality in those fields. The results of this assessment contribute to the adaptation of the implemented measures.

2. **Institutional and programme accreditation at Austrian universities of applied sciences (compulsory)**

AQ Austria has developed specific criteria for institutional and programme accreditation of universities of applied sciences, which are rather similar to those developed for the private universities. The details of the main procedures applying to the universities of applied sciences will be presented below, highlighting the criteria covered in those procedures.

In the case of the Criteria for the institutional initial accreditation, the aspects covered are the following: Profile and objectives; Development plan; Organisation of the university of applied sciences; Course offerings; Degree programme and degree programme management; Counselling and support for students; Applied research and development; Staff; Funding; Infrastructure; Co-operations; Quality management system, and Information. In the case of the Criteria for re-accreditation, overall,
the process covers most of the same items as above, with the exception of that of Degree programme and degree programme management.

In the case of the Criteria for the accreditation of degree programmes, the aspects covered are the following: Development and quality assurance of the degree programme; Degree programme and degree programme management; Staff; Funding; Infrastructure; Research and development/development and appreciation of the arts; and Co-operations. There are also additional Criteria for the accreditation of joint degree programmes and jointly offered degree programmes and also a set of additional specific criteria for the accreditation of degree programmes to be offered at another site as the institutionally accredited site.

3. **Institutional and programme accreditation at Austrian private universities (compulsory)**

AQ Austria has developed specific criteria for institutional and programme accreditation of private universities, which are rather similar to those already presented for the universities of applied sciences. The details of the main procedures applying to private universities will be presented below, highlighting the criteria covered in those procedures.

In the case of the Criteria for the institutional initial accreditation, the aspects covered are the following: Profile and objectives; Development plan; Organisation of the private university; Course offerings; Degree programme and degree programme management; Counselling and support for students; Research and development/development and appreciation of the arts; Staff; Funding; Infrastructure; Co-operations; Quality management system, and Information. In the case of the Criteria for re-accreditation, overall, the process covers most of the same items, with the exception of that of Degree programme and degree programme management.

AQ Austria has developed specific criteria for the accreditation of master and bachelor programs in private universities, which are rather similar to those already presented for the universities of applied sciences.

AQ Austria has developed specific criteria for the accreditation of doctoral programs in private universities (as universities of applied sciences cannot award this type of degree). The main criteria covered in this procedure are the following: Development and quality assurance of the degree programme; Research; Supervision and counselling services; Degree programme and degree programme management; Staff and Funding.

AQ Austria has developed Criteria for the accreditation of certificate university programmes leading to the award of an academic degree, which cover the following issues: Development and quality assurance of the degree programme; Course and course management; Staff; Funding; and Infrastructure.

In the case of private universities, AQ Austria has also defined special provisions for the accreditation of joint degree programmes and jointly offered degree programmes as well as of degree programmes offered at a site different from the accredited site, which are similar to those presented above for the universities of applied sciences.

4. **Voluntary accreditation of continuing education study programmes at Austrian higher education institutions**

In order to fulfil its mission to offer services on request of HEIs the agency, AQ Austria has developed in collaboration with a university a scheme for the voluntary accreditation of continuing education programmes. The main criteria adopted in these reviews are similar to those adopted in other
programme review procedures already described above. The dimensions covered in this respect are the following: Quality goals and their implementation; Staff; Internal Quality Assurance; Financial resources and Infrastructure; and Cooperation. After the pilot-review no further reviews of this kind have been conducted so far.

5. System accreditation and programme accreditation in Germany (compulsory)

AQ Austria also performs system and programme accreditation procedures in Germany. The rules for this type of review are defined by the “Specimen decree pursuant to Article 4, paragraphs 1 – 4 of the interstate study accreditation treaty (Resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany of December 7, 2017)”. This decree regulates the details of the formal criteria, of the academic criteria as of the procedure of the interstate study accreditation treaty. Provided no specific provisions have been agreed, the provisions of the programme accreditation also apply for training courses at state and state-recognised colleges of cooperative education that lead to the qualification designation “Bachelor”. A Bachelor's degree that has been accredited on the basis of this (specimen) decree is equivalent, according to higher education law, to the Bachelor’s degree from a higher education institution. The forms of accreditation are the procedures relating to system accreditation, programme accreditation or alternative accreditation procedures. This document defines a set of criteria which generally cover the following issues: Formal criteria for study programmes and Academic criteria for study programmes and quality management systems.

6. International programme accreditation (voluntary)

AQ Austria has also defined procedures for the accreditation of programmes within the EHEA. The procedures are rather similar to those applied within Austria and the aspects analysed cover the main following issues: Study programme and programme management; Staff; Internal Quality Assurance; Financial resources and Infrastructure; Research and development and appreciation of the arts; and National and international Cooperation.

7. Institutional accreditation in Switzerland

AQ Austria also performs institutional accreditation procedures in Switzerland. In this case, the review procedures are organized according to five dimensions that can be summarized in the following way: Strategy of the Internal Quality Assurance System; Governance; Education, Research and Services to Society; Resources; Internal and External Communication.

The extent of which each of the standards of ESG part I are addressed in the various procedures of AQ Austria has been summarized by the agency in table 3 (below).

Table 3: AQ Austria’s procedures and ESG - Mapping table

<table>
<thead>
<tr>
<th>ESG 1.1</th>
<th>Audit</th>
<th>Institutional Accreditation</th>
<th>Programme Accreditation</th>
<th>Accreditation Continuing Education Programmes</th>
<th>International Accreditation</th>
<th>Program Accreditation (D)</th>
<th>System Accreditation (D)</th>
<th>Institutional Accreditation, (CH)</th>
</tr>
</thead>
<tbody>
<tr>
<td>§15 (12)</td>
<td>Standards 1, 2</td>
<td>§15 (1) No 2</td>
<td>(25)</td>
<td>Standard 1.1</td>
<td>§14</td>
<td>§17</td>
<td>1.1-1.4</td>
<td></td>
</tr>
<tr>
<td>ESG 1.2</td>
<td>Standard 3</td>
<td>§15 (4) No 2</td>
<td>§17 (1) No 1</td>
<td>§11, 12, 13</td>
<td>§17</td>
<td>3.2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ESG 1.3</td>
<td>Standard 3</td>
<td>§15 (5) No 5, 7</td>
<td>§17 (2) No 5, 7</td>
<td>(23) g</td>
<td>Standards 1.2-1.6</td>
<td>§12, 15</td>
<td>§17</td>
<td>3.4</td>
</tr>
<tr>
<td>ESG 1.4</td>
<td>Standard 3</td>
<td>§15 (5) No 9-11</td>
<td>§17 (2) No 9-11</td>
<td>(23) e,g,i,j,k,l,m</td>
<td>Standards 1.7-1.9</td>
<td>§§5, 6, 12, 14</td>
<td>§17</td>
<td>3.4</td>
</tr>
</tbody>
</table>
Analysis
The development of different procedures for QA has led many agencies to reflect upon the congruency and complementarity of these procedures when taken as a whole. Thus, and although we need to reflect upon the specific coverage of each of the ESGs of Part 1 and the way each procedure covers each ESG, we also need to reflect upon the overlap and possible gaps. This is relevant because too much overlap will lead to fatigue, repetition and routinization. By contrast, the fact that there is in Austria a sectoral approach to QA in HE that still prevails, the coverage of each procedure differs, as some apply to the whole system and others to only parts of it.

In the case of AQ Austria, whereas institutional reaccreditation covers also the programmes, the audits procedures focus on internal quality management. What is common to both systems is that the most important function of programme accreditation is to form a basis for the initial state approval, meaning that these procedures take place when an already accredited institution wants to introduce a new programme. Thus, the agency considers that the effectiveness of the internal quality management system at programme level does not have to be addressed with the same level of detail as in the procedures at institutional level. In order to adjust that, AQ Austria took this into account at the recent revision of the procedures.

AQ Austria has been trying to foster quality enhancement of HEIs in several ways. One relevant tool is via the internal quality management systems of HEIs and in particular their effectiveness. In this respect, the agency not only wants to ensure that these systems match high national and international standards, but also that they improve the quality of higher education provision and other related activities developed within the HE context. These efforts also aim to strengthen the primary responsibility of higher education institutions for the quality of their activities.

Regarding IQA 1.1. – Policy for Quality Assurance, this is covered systematically by AQ Austria procedures, which address the capacity of HEIs to have a policy for quality assurance and integrate that in their strategic management. This is clearly addressed both in the institutional and in the programme accreditation procedures. This is also visible in the analysis of quality management both at the macro (institutional) and at the micro (programme/course) levels.

Regarding IQA 1.2. – Design and Approval of Programmes, this is also clearly covered in the national procedures for programme and institutional accreditations. Nonetheless, AQ Austria admits that IQA 1.2 is missing in current regulations on international accreditation and accreditation of continuing education programmes. The guidelines for international accreditation include at least a part of 1.2 (clear learning outcomes, compliance with qualification framework etc), just opening and approval of programmes is missing.

In the case of IQA 1.3. – Student-centred learning, teaching, and assessment, this is covered in several of the procedures, notably in the programme and institutional accreditation. Nonetheless, though the

| ESG 1.5 | Standards 3, 5 | §15 (8) | §17 (3) | (24) | Standards 1.1-1.2 | §12 | §17 | 4.2, 4.3 |
| ESG 1.6 | Standard 3 | §15 (6), (9), (10) | §17 (4), (5) | (26) | Standard 4 | §12 | §17 | 4.1 |
| ESG 1.7 | Standard 2 | §16 (11) No 2 | §17 (1) No 2 | (23) n; (25) b | Standard 3 | §14 | §18 | 2.2 |
| ESG 1.8 | n/a | §15 (13), § 16 (12) | §15 (13), § 16 (12) | (23) m,n | Standard 4 | §14 | §18 | 5.1, 5.2 |
| ESG 1.9 | Standard 3 | §15 (4) No 2, (12) | §17 (1) No 2 | (25) | Standard 4 | §14 | §18 | 3.2 |
| ESG 1.10 | Rule 7 | §9 (2) | §9 (2) | (17) | Rule 3.5 | §26 | §26 | ----------- |
table presented by the agency indicates that the IQA 1.3. (student-centred learning, teaching and assessment) is covered by standards 1.2-1.6 in international accreditation, the part the standard requesting that the “programmes are delivered in a way that encourages students to take an active role in creating the learning process” does not seem to be fully covered.

As far as IQA 1.4. – Student Admission, Progression is concerned, this is particularly covered by programme accreditation and in the German and Swiss procedures and more implicitly in the institutional accreditation, through the assessment of quality assurance management procedures and the way they interplay with the governance of the institution.

In the case of IQA 1.5. – Teaching staff, this is clearly covered in all the main procedures, namely in the institutional and programme accreditation, in the voluntary accreditation, and in the accreditation procedures following the German and Swiss guidelines.

As regards IQA 1.6. – Learning Resources and Student Support, this is covered in its pedagogical/learning dimension and its more psychological/sociological dimension. These dimensions are explicitly covered in the institutional and programme accreditations. Its coverage seems more latent in the German and Swiss procedures.

As regards IQA 1.7. – Information Management - this is systematically covered in all the main procedures, namely in the institutional and programme accreditation, in the voluntary accreditation, and in the accreditation procedures following the German and Swiss guidelines.

In the case of IQA 1.8 - Public Information, this is also covered in several of the main procedures. Nonetheless, it is absent in international accreditation and it is also missing in Audit procedures and in Programme accreditation in Germany.

In the case of IQA 1.9. – On-going monitoring and periodic review of programmes, this is also clearly covered in institutional and programme accreditation for UAS and Private HEIs, with the definition of detailed and systematic re-accreditation procedures on both cases.

Finally, regarding IQA 1.10 – Cyclical External Quality Assurance, this is explicitly covered by all the procedures, including the audits of public universities, though it is omitted in Swiss institutional accreditation.

Overall, one could say that these criteria are well covered by institutional and programme accreditation procedures for UAS and Private Universities, which arguably represent the core of AQ Austria’s quality assurance activities. The coverage is also rather comprehensive in the case of the German and the Swiss procedures and in the voluntary accreditation of programmes. The coverage is a bit more limited or less explicit in the international programme accreditation. To a large extent, the weakest coverage is in the audit procedure established to public universities, where a lot of those criteria are only assessed in a very indirect and implicit way, since the system tends to aim mainly at verifying the existence of certain processes of internal quality assurance.

When assessing the consideration of ESG Part 1 in external quality assurance procedures, AQ Austria considers that it is important to go beyond the piecemeal assessment of each compulsory quality assurance review and to assess them as a whole since they are designed to complement each other.

AQ Austria addresses internal quality management systems of higher education institutions and their effectiveness not only as part of the various compulsory external quality assurance procedures in Austria. In addition, two other activities of AQ Austria focus mainly on internal quality management of HEIs. On the one hand, AQ Austria collects and analyses annual reports on recent developments
from all accredited HEIs, with results from the internal quality management system being one important part of those reports. According to the feedback collected by the team from representatives from UAS and private universities, the value of those reports seem to be questionable and it was unclear for the HEIs the actual analytical contribution provided by AQ in this respect.

On the other hand, AQ Austria publishes a triennial analysis of the state of development of internal quality management in Austrian HEIs. The information gathered seems relevant, though the team was unsure how much it actually contributed to nurture the public discourse about good practices in quality management in Austrian HEIs, especially given its limited dissemination among various stakeholders.

Panel recommendations
- The team considers that the agency should address some of the standards that are not currently covered by some of the procedures, especially as regards audits and international programme accreditation. In particular, attention should be given to the coverage of standards 1.2 and 1.8 in some procedures, as it is recognized by the agency itself.
- Furthermore, it should reflect critically about its understanding of some of those standards and the way these are effectively covered by the existing procedures. In particular, the coverage of standard 1.3 seems incomplete, especially in international accreditations.

Panel conclusion: substantially compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

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

2014 review recommendation
In the previous review it was noted that AQ Austria should “Modify properly the intensity of the evaluation process depending on the effectiveness of the IQA system applied, independently from the type of HEI.” Moreover, it should “Design transparent criteria for amendments of accreditation procedures, depending on the type of amendment requested, since it is not perfectly understood by the HEIs.”

Evidence
The purposes of the quality assurance processes carried out by AQ Austria are defined by the agency considering the corresponding legal provisions as far as compulsory processes are concerned. In general, the purposes of the various processes have in common to assess the extent of which the focus of the review - programme, institution, or internal quality management system, complies with pre-defined standards or criteria.

The way AQ Austria addresses the effectiveness of internal quality management systems of higher education institutions necessarily varies between the different quality assurance procedures applied by the agency and depends on the subject matter of the procedure and on its purpose:
- Audit, Institutional Accreditation (in Switzerland): The purpose of these procedures is to evaluate and certify the effectiveness of the internal quality management system of a higher education
institutions. Hence, the internal quality management system and its effectiveness are the subject matter of the procedure.

- Institutional Accreditation (in Austria): The purpose of institutional accreditation of universities of applied sciences and private universities is to assess whether all accreditation criteria are complied with. The list of criteria is similar to many others for accrediting institutions and covers the institutions’ internal quality management system.

- Programme Accreditation (in Austria), Voluntary Accreditation of Continuing Education Programmes at higher education institutions (in Austria), International Programme Accreditation (in the EHEA), Programme Accreditation (in Germany): The purpose of programme accreditation at universities of applied sciences and private universities is to assess whether all accreditation criteria are complied with. The list of criteria is similar to many others for accrediting programmes and covers the institutions’ internal quality management system.

- System Accreditation (in Germany): The purpose of system accreditation is to evaluate the effectiveness of the internal quality management system in teaching and learning of a higher education institution. Hence, the internal quality management system and its effectiveness as such are subject matter of the procedure.

The legal consequences of each type of review varies. There are no legal consequences as far as audits at public universities, the voluntary accreditation of continued education programmes, or international accreditation are concerned. By contrast, there are direct legal consequences such as (precondition for) state approval as far as compulsory accreditation procedures are concerned.

Another aspect that is common to all review processes is to support the HEI in promotion of its quality, either at the programme or at the institutional level. However, the extent to which enhancement is fostered varies according to the type of process and it tends to be stronger in processes at the institutional level.

Despite differences in the purposes or legal consequences of the review processes, all of them follow the common pattern of external quality assurance in the European Higher Education Area: self-assessment, external assessment by peer review experts including a site visit, a report written by the peer review experts and published, and finally a follow-up. Based on this common pattern the design of the processes varies in detail in order to serve the specifics of the purposes.

The specifics of accreditation and audit trigger differences mainly regarding the criteria or standards used in the procedures.

In order to serve the purpose of audits AQ Austria applies a short list of only 5 standards that are formulated in a broader and more generic way than accreditation criteria. The standards address core aspects of a quality management system such as definition of responsibilities and structures, of its demonstrable effectiveness and of its further development. Nevertheless, since audits lead to a certification’s decision the standards are, though generic, formulated in a way that makes possible a positive or negative decision on its effectiveness. AQ Austria aims to consider the particular subject matter of an audit, namely the internal quality management system and its further development. Internal quality management systems may vary significantly due to differences of the HEI in terms of profile, size, structure and internal culture. Because such systems have to consider the specific needs of the given institution, standards for evaluating internal quality management systems necessarily have to provide leeway for the institutions.

In order to serve the purpose of accreditation AQ Austria applies a list of criteria that address the common features of good quality of an institution with all its areas of activities or of an internal quality
management system or of a programme and that also address the various formal legal requirements which are also relevant for approval of the institutions and their programmes. In addition, the criteria contain elements that serve the dimension of quality enhancement such as the design and application of internal quality assurance processes in order to further develop programmes of the accreditation ordinance for universities of applied sciences. Likewise for private universities. The accreditation criteria are more detailed than the audit standards because they address a much broader range of activities of the institutions.

The explanations regarding accreditation criteria also apply for the other accreditation procedures of AQ Austria, namely voluntary accreditation of continuing education programmes, international accreditation and accreditation in Germany and in Switzerland.

In order to apply procedures fit for purpose and in accordance with its mission and the legal requirements AQ Austria, has strived to involve external stakeholders in its activities, namely in the revision process of its procedures. At an early stage strengths and weaknesses of the procedures and whether the procedures were fit for purpose were discussed with experts from the higher education sectors. The agency also utilized the evaluation of the HS-QSG that it had conducted in 2016/17 and that revealed interesting observations and perceptions of the QA procedures and the agency’s activities in general and which were of particular relevance as regards the balance of assurance and enhancement dimensions in the QA procedures. The new regulations were designed by consulting in various occasions with stakeholders as usually done by AQ Austria. This included consultations processes such as: a survey among HEI as regards needs for revision, discussion with experts from the HEIs about general questions of the procedures, and a public consultation. The new regulations were presented in public workshops.

Analysis
AQ Austria performs a broad range of quality assurance procedures and the objectives of the individual procedures are clearly defined.

AQ Austria has developed a balanced and flexible approach aiming at compliance and enhancement, which are necessary and complex features of any QA system. The current framework also tries to balance consistency and diversity, which are important aspects given the institutional and sector diversity and the tradition of segmented approaches to QA in the Austrian regulatory framework.

At the level of each individual procedure, the agency invests in the clear definition and communication of each procedure. The agency tries to adapt the procedures as much as possible to local needs and specificities. This is done in close collaboration with different stakeholders. During the visit, the panel identified a broad appreciation for the efforts of the agency to interact closely and fruitfully with higher education institutions and other stakeholders.

Wherever relevant, the agency invests in the extensive preparation of new procedures, sometimes with pilots, in order to fine-tune the evaluation schemes. Once the procedures are implemented the agency also invests in the further development of each evaluation scheme.

Panel conclusion: fully compliant

ESG 2.3 IMPLEMENTING PROCESSES

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

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

**2014 review recommendation**

In the previous review it was noted that AQ Austria should “Establish an adequate follow-up procedure for audit in public universities.”

**Evidence**

All external quality assurance procedures regularly carried out by AQ Austria follow predefined regulations that are published on the agency’s website:

- Decree on the Accreditation of Universities of Applied Sciences 2019
- Decree on the Accreditation of Private Universities 2019
- Guideline for the Audit of Higher Education Institutions’ Quality Management Systems
- Guidelines for the Voluntary Accreditation of Courses of Continuing Higher Education
- Guidelines International Accreditation
- Specimen decree pursuant to Article 4, paragraphs 1 – 4 of the interstate study accreditation treaty (Resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany of December 7, 2017)
- Guidelines for Institutional Accreditation in Switzerland

In order to foster professional and consistent conduct the various regulations are supplemented by explanatory information that guide higher education institutions and external experts. An overview about the way the aforementioned steps and instruments are regulated in the respective processes has been prepared by the agency through the following table:

### Table 2: Procedural steps and ESG - Mapping table

<table>
<thead>
<tr>
<th></th>
<th>Audit</th>
<th>Compulsory Accreditation in Austria</th>
<th>Accreditation Cont. Education Programmes</th>
<th>International Programme Accreditation</th>
<th>Programme/ System Accreditation (GER)</th>
<th>Institutional Accreditation (CH)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Self-Assessment by HEI</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>External assessment by peers</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Site-Visit</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Published Report</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Follow-up</td>
<td>X (voluntary)</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>

All external QA procedures carried out regularly by the Agency follow predefined and publicized regulations (namely through its website). All procedures follow the same and usual steps:
Analysis
The panel confirms that each review process performed by AQ Austria is based in a framework that is reliable, publicized, and pre-defined. The evidence collected in the interviews with different stakeholders indicate that those review processes are regarded in general as useful and implemented consistently. The team concurs with this view. On the other hand, the representatives of UAS and Private HEIs have expressed criticisms about the relevance and usefulness of the annual reports, which are excessively detailed and do not seem to provide any particular positive feedback to existing QA processes either in the agency or for the institutions themselves.

The panel confirms that the review processes considered in the ToR include the four steps required by the ESG. In the case of audits in public universities, only a voluntary follow-up workshop is applied and very few HEIs seem to have applied to it. Although the previous report had the recommendation about the need of establishing an adequate follow-up procedure for audit in public universities, the team did not identify any changes regarding that recommendation. Although the team agrees that this is a relevant limitation, it also concurs with the agency that it is explained by the existing legal regulations and that AQ Austria has in fact no mandate to require universities to go through a follow-up process (though a few have applied to that, following the audit process).

The whole system is characterised by a differentiated approach depending on the type, status and the ownership of the institution. This follows from the existing legal framework that states the application of different approaches according to the type of institutions.

Panel recommendation:
- The panel recommends that AQ Austria takes a more proactive role in the dissemination and implementation of follow-up of the public universities.

Panel conclusion: substantially compliant

ESG 2.4 PEER-REVIEW EXPERTS

<table>
<thead>
<tr>
<th>Standard:</th>
</tr>
</thead>
<tbody>
<tr>
<td>External quality assurance should be carried out by groups of external experts that include (a) student member(s).</td>
</tr>
</tbody>
</table>

2014 review recommendation
In the previous review it was noted that “It is desirable that AQ Austria develops its training opportunities for evaluators and continues to collaborate with ÖH in providing student evaluators and stakeholder consultancy. We recommend that joint trainings for all evaluators, including students, are considered.” Moreover, it was also noted that “Due to the participation of international experts, careful preparation (training) is needed to understand properly the Austrian Higher Education system.”
Evidence
AQ Austria’s standard procedure is to carry out all external quality assurance processes by engaging external experts. Whenever deviating from this practice, the Board of AQ Austria has to give reasons for this deviation and take a formal decision that ensures a transparent course of action. Deducing from its mission AQ Austria considers the role of external experts crucial in order to achieve the ultimate goals of the procedures and in order to make external quality assurance meaningful for institutions. Consequently, AQ Austria puts external experts at the core of the external assessment and makes great efforts in composing expert panels, briefing the experts and supporting the panels in the course of the procedure.

AQ Austria applies formal regulations for composing expert panels and selecting experts. When composing the expert panel, the Board aims to ensure that all aspects relevant for the procedure will be reviewed, considering the specific features of the HEI and the Austrian higher education system. The Board considers special requirements on a case-by-case basis and aims for diversity in the composition of the expert panel, ensuring that their current activities cover the following fields of competence. These include aspects such as academic and artistic qualifications relevant to the programs and institutions being assessed, international experience, professional experience, experience in quality management and quality assurance in higher education, experience in higher education management and organisational structures, and experience in teaching as well as in the development, implementation, and evaluation of curricula. The weight of each of these criteria varies according to the specific types of evaluations.

The composition of a panel in reviews at programme level normally comprises four members. In the case of audit panels and panels for an institutional accreditation normally comprises five to six members. Regarding the composition of panels, a student-expert is always included as a member of the panel and in the case of reviews at the programme level an expert from the professional field is also mandatory.

The Board nominates experts on suggestion of the secretariat. When selecting experts the secretariat draws upon its database of approx. 1,600 experts and searches experts with competencies not yet represented in the database. In selecting student experts AQ Austria collaborates with the student expert pools of the student unions of Austria, Germany and Switzerland and also with ESU.

Regarding the composition of the panel, AQ Austria gives significant attention to the independence and impartiality of the experts ensured in the course of the selection process in several steps. First, the secretariat checks for potential conflicts of interest during the search for experts. Following their appointment, AQ Austria asks the respective institution to examine possible conflicts of interest and incompatibilities. Subsequently, each expert confirms his or her impartiality in a no-conflict-of-interest declaration, which must be signed before the commencement of the review process.

The work of the experts is the core component of every quality assurance process. Therefore AQ Austria considers the preparation of the experts of utmost importance. The preparation and training of the experts comprises the following elements:

- Preparatory information - Experts are provided with the SAR submitted by the institution and in addition with various preparatory and guiding material such as information on the Austrian higher education system, all relevant regulations by AQ Austria and extracts from relevant laws, timeline of the process, draft programme of the site visit, template for the report, etc.
- Training seminars for nominated experts - The intended learning outcomes are knowledge of the Austrian higher education system and the quality assurance framework; knowledge of the
various steps and criteria/standards of the quality assurance processes; role of the expert; behaviour of the expert, detailed knowledge of the respective case and preliminary discussion of next steps. Since 2015 AQ Austria has organized 17 training seminars.

- Electronic briefing session of the panel (approx. four to two weeks before the site visit) - This session focuses on the material submitted by the institution and whether the experts will need additional information, the time line of the whole process, and the organisational preparation of the site visit.
- Physical briefing session usually the day before the interviews of the site visit begin - This session focuses on the preparation of the site visit in terms of topics to be discussed and the division of responsibilities within the panel.
- Debriefing session after the end of the site-visit - This session focuses on the main findings and the writing of the report.

In addition to these regular training and briefing activities AQ Austria once organized a training seminar for potential external experts that hadn’t been nominated yet. The intended learning outcomes were the same as for the regular training seminar with more emphasis on the role of experts in general and without any reference to actual procedures. However, since the participants would be expected to participate in regular trainings as well, this approach was too costly and currently AQ Austria has no plans to repeat this activity.

AQ Austria also emphasises the involvement of foreign experts in the processes, given that the size of the country would make many institutions reluctant to accept Austrian experts in the reviews. Hence in the beginning AQ Austria nominated almost solely foreign experts, with the exception of experts from the field of professional practice. Since 2014 AQ Austria started nominating/deploying more Austrian experts and the institutions have become more used to it and some have explicitly welcomed this new approach. AQ Austria sees this as a positive development with regard to its relationship with the Austrian higher education institutions.

For a national agency of a small country that predominantly uses foreign experts this is a challenge in financial and organizational terms. Nevertheless, the agency has sought to increase the number of experts undergoing such training. In recent years almost all experts nominated to a certain procedure participated in one of the training seminars. A second challenge related to foreign experts is the need to be familiarized with the legal framework of higher education in Austria. In this respect, the agency has been faced with complaints by institutions about experts lacking knowledge about the Austrian framework but found out that many of these complaints did not refer really to the legal framework but rather to particular traditions evolved in the Austrian higher education sector. Consequently, AQ Austria sensitises the experts regarding such topics. In general, AQ Austria feels reassured of the effectiveness and relevance of its activities by the positive feedback on the training seminars.

Analysis
The experts that the review panel interviewed were positive about the training and guidance they received from AQ Austria. Their evidence fully supported the agency’s claim that experts receive adequate training for their tasks. According to the team the agency has a good approach to the training of experts, being very supportive throughout the various phases of their involvement, namely during the preparation and the reporting phases.

In all procedures under review, AQ Austria includes a student in the panel. Professionals also take part in all external review procedures on a regular basis. The panel commends the agency for its consistent involvement of students and professionals in its quality assurance procedures, which may be a very
important complement to the academic and scientific concerns of the more academically oriented reviewers.

The agency has procedures in place in order to make sure conflicts of interest are avoided. Moreover, the agency has also used extensively foreign reviewers as a very effective way to increase the independence of the review teams. Since the previous ENQA review, the agency has attracted and trained a large number of experts from outside the Austrian higher education system.

Panel commendations

- The team commends the agency for the systematic presence of not only students, but also representatives of the labour market in the review panels for programme accreditation procedures.
- The team commends the agency for the systematic use of foreign experts in the review procedures, which has contributed to make the evaluations robust and credible.

Panel conclusion: fully compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

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

Evidence

AQ Austria carries out its quality assurance processes according to pre-defined regulations that contain not only criteria or standards but all relevant procedural rules as well. The Board of AQ Austria therefore enacted the decrees and guidelines for the quality assurance processes it carries out which are published on the website. In order to ensure consistent conduct of the quality assurance processes AQ Austria emphasizes:

- Common understanding of all regulations - In 2016 AQ Austria introduced a new instrument in order to support a common understanding of the various regulations by organizing seminars for private universities and universities of applied sciences specifically on the application procedure, on drafting the SAR and on interpretation of criteria that seemed to create difficulties in interpretation. AQ Austria used the recent revision of its procedures to add information on the interpretation and application of procedural rules, standards, and criteria to the decrees and guidelines. This guiding material combined various previously existing manuals of that kind and added more material where it was considered necessary based on experience.
- In the SAR, the Agency discusses the need for establishing a “balance between precision and flexibility” in criteria and assessments. The panel finds that this balance is struck very well in the criteria for all types of accreditations: they are clear, reasonably detailed and fit for purpose. This balance, however, is hard to detect in the criteria for the audit. Of the five criteria that are listed, only one of them (no. 3) explicitly addresses teaching and learning. The others address QA strategy, organisation of the QA system, R&D and human resource. Moreover, criterion no. 3 lacks any specificity, speaking generically about having defined objectives and measuring the achievement of these objectives.
• Support to the experts by review-coordinators - One and sometimes two coordinators are assigned to a process. Apart from organisational aspects of the process the coordinators play an important role in briefing the experts, in particular as regards assuring correct and consistent understanding of the criteria. The coordinator supports the chairperson in ensuring that the site visit is conducted in an orderly manner and in particular that all relevant topics are discussed. During the drafting of the report the coordinator takes care that all relevant aspects are addressed and that the assessments are fair, correct and consistent.

• Training of review-coordinators - It goes without saying that the coordinators play a crucial role in guaranteeing the consistent application of all regulations. Staff development is regarded as a priority of AQ Austria, namely all questions related to understanding or interpretation of regulations and criteria and their correct and consistent understanding and application in department meetings. In addition, the accreditation department runs a database which is called ‘accreditationWiki’ that contains relevant information on background and meaning of certain criteria, typical issues arising and regular decisions. Whether or not accreditationWiki will be used in the future as well is currently under question because the content is integrated in the explanations added to the new ordinances.

• Preparation of the Board’s decisions - After the final report has been submitted to the agency, the coordinator in collaboration with the head of department prepares the submission to the Board containing a report on the whole process and a summary of the report and the statement by the institution. In addition, the submission contains an assessment of whether or not all regulations have been applied correctly and whether or not, based on the comments of the institution the Board should deviate from the proposal by the experts. This submission is also approved by the Director. For every decision a member of the Board is assigned as rapporteur who in addition to the coordinator gives introductory remarks on the case. This instrument has turned out to be very effective and helpful because it gives, in addition to the report by the review coordinator a second view on the case by somebody who was not involved in the conduct of the procedure.

Analysis
The Board defines guidelines that are then implemented through pre-defined regulations that contain not only criteria or standards but all relevant procedural rules. In order to ensure consistency of procedures, the agency strives for a common understanding of all regulations through multiple tools (workshops, seminars, information and guidelines), through the training of coordinators of reviews, and a careful preparation of the decisions by the Board.

During the site visit the review panel was able to confirm that the criteria and protocols are public and easily accessible to all stakeholders. There is also extensive consultation and dissemination before an evaluation starts, both to the institutions and to the reviewers involved in the procedures. The views expressed in the various meetings held with the panel indicated a positive disposition towards the consistency and fairness of the different review processes.

The secretary of each review panel has an important role in the consistent application of the evaluation frameworks. Based on feedback from the higher education institutions, the role of the secretary in guaranteeing consistency among reports is valued positively, namely through the feedback provided to the review teams. This is also complemented by the available wiki tool that was also regarded as useful in the development of consistent procedures.

The procedures seem to be based in defined and public criteria and the agency has been addressing the issue of consistency in the various phases of the process – preparation, review, decision. But the
panel finds the lack of explicity in the audit criteria a clear weakness. The Agency may well have
developed a practice of consistent assessments based on further procedural guidelines that take their
departure in these criteria, but for reasons of accountability, the panel would have liked to see criteria
that address ESG requirements more directly. The process seems to be supportive and formalized but,
given that the agency aims to regulate and support HEIs, it was not sufficiently clear how are these
purposes considered in the decisions and how the agency manages to attain this specifically.

Panel Recommendation:
- The panel recommends that the agency develops more explicit criteria in the case of audits,
namely in what refers to the way they address ESG requirements more directly.

Panel conclusion: substantially compliant

ESG 2.6 REPORTING

<table>
<thead>
<tr>
<th>Standard:</th>
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<tbody>
<tr>
<td>Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.</td>
</tr>
</tbody>
</table>

2014 review recommendation
In the previous report by EQAR it was noted that “At the time of the external review AQ Austria was
yet to complete and publish the first reports of its external review. The Register Committee noted that
it is AQ Austria’s policy to publish the full reports of its external reviews and that a number of reports
have been made available (following its external review) on the website. AQ Austria is expected to
provide evidence of full implementation in the next review of the agency”.

Evidence
Providing the wider public with information about the quality of institutions and programmes is a very
important purpose of external quality assurance. AQ Austria publishes a report that contains its
decision, the full report of the experts and also the statements by the institutions (if the institution
agrees). The experts’ report contains a brief descriptive part about higher education and external
quality assurance in Austria, a short description of the process, the findings, conclusions, commendations and recommendations. As regards accreditation procedures and audits in Austria, the
publication of reports is also a legal obligation. In terms of publication, the same rules apply to all
processes conducted by AQ Austria. The final reports are made available on the website of AQ Austria
after the completion of the review process.

In order to support a consistent appearance of the reports and a consistent application of the elements of the reports AQ Austria uses templates with a given structure.

Most of AQ Austria’s procedures result in formal decisions and many are linked to approval of
institutions or programmes. In particular, in the latter the various potential addressees might have
very different interests. First and foremost, the reviewed institution wants to know that it met
expectations and standards and to what extent/how well. Moreover, the institution may want to learn
from a report at what point it might improve in order to (even) better meet the expectations. Others,
students, employers, authorities might also be interested in this kind of information but normally not
at the same level of detail. In order to do so AQ Austria uses templates for its reports that assure
comprehensiveness, fairness and readability of the information provided. The reports usually also
contain commendations and recommendations in order to make it easier for the institutions to make further use of the reports. In order to accommodate the information needs of other constituencies as well, AQ Austria publishes the report together with the decision and a short summary that might be interesting for the ‘quick reader’.

Since external quality assurance is first and foremost based on external experts and moreover institutions shall benefit from review reports as regards recommendations for further development, AQ Austria took the decision that the reports are written by the experts themselves. However, it’s the role of the coordinators to support the experts and to assure that the reports are complete, correct, fair and readable but the ultimate responsibility for the findings, the conclusions drawn from these findings and the final assessment, on whether a standard or criteria is met, lies with the external experts. The staff of the agency revises the reports and provides feedback to the evaluation teams, namely regarding issues of factual accuracy or clarification of judgements.

Analysis
The concerns expressed at the time of the previous review were mainly due to the recent establishment of the agency. Subsequently, AQ Austria has overcome these concerns and seems to follow clear reporting templates that are applied consistently. The reports are written by the experts, though supported by the agency coordinators, to ensure comprehensiveness, robustness, and fairness. The same rules apply to all processes and final reports are made available on the website of AQ Austria after the completion of the review process.

AQ Austria has made significant efforts to develop consistent, structured, and helpful reports of its quality assurance activities. The panel has analysed examples of those reports and has found that in general those were competently done and fulfilled those aims. The panel considers that the agency has been focusing not only on substantiating the assessment outcomes, but also on good practices and recommendations for improvement.

AQ Austria publishes a report that contains its decision, the full report of the experts and also the statements by the institutions, if the institution agrees. It also publicizes information about the fulfilment of accreditation criteria. In order to accommodate the information needs of other constituencies the agency publishes also a short summary for the ‘quick reader’.

As regards accreditations and audits in Austria the publication of reports is a legal obligation. Reports are also made public, though the Agency recognized that this has often a limited dissemination. This is a frequent matter of concern with agencies, especially since they are providing a role of behalf of the wider public and that is very relevant in informing different stakeholders about the outcomes of the agency’s activities. Thus, the agency has tried to develop more concise materials for the wider public, though in the interviews the team formed the opinion that this dissemination is still rather limited, especially among students and their families and among employers. One of the main factors for this is that it is not easy to access the reports on AQ Austria’s website, which clearly needs to be improved in terms of its accessibility and user-friendliness. Moreover, a database of reports and decisions could be developed to make it more straightforward for stakeholders less familiar with this type of procedures.

Suggestions for further development:
- The panel suggests to the agency to develop a database of reports and decisions to make more accessible for all stakeholders the results of its QA activities.
- The panel suggests to the agency to strengthen its efforts to disseminate the results of its QA activities with students and employers.
Panel conclusion: fully compliant

ESG 2.7 Complaints and Appeals

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

Evidence
Higher education institutions have the right to complain and appeal against the review process and the accreditation or certification decision. This committee consists of at least three members and two substitute members none of whom belong to any AQ Austria body. Substitute members replace other members in the case of bias. The process looks as follows:

1. A higher education institution may appeal or complain against the way a process is handled and in case of international accreditation against the accreditation or certification decision.
2. The objection is submitted to the secretariat in writing (post, fax or email). The secretariat immediately forwards the appeal or complain to the Appeals Committee and informs the Board.
3. The appeal is handled by the Appeals Committee, whereby the Appeals Committee deals with the appeal or complaint either by correspondence or in the form of a conversation with the higher education institution that submitted the complaint. The Appeals Committee may carry out, in agreement with the institution that submitted the appeal or complaint, a third party consultation.
4. The Appeals Committee must report the results of their investigations to both the complainant higher education institution and the Board. Where appropriate, the Appeals Committee shall propose appropriate measures to solve problems. Due to the legal framework, appeals against compulsory accreditation decisions at private universities and universities of applied sciences in Austria are not possible. In the case of private institutions and UAS they can appeal the procedure, but not the accreditation decision. According to the documentation provided, the applicant institution may appeal to the Appeals Committee of the AQ Austria against the procedure as such.

So far, the Appeals Committee had to handle five cases out of which one appeal was made by an Austrian private university while the others were filed by Austrian partners of foreign universities offering programmes in Austria. The appeal by the private university was not upheld, and two appeals by Austrian partners of foreign universities weren’t processed due to the repeal of the respective legal provision as explained above.

Analysis
The agency has developed a complaints’ and an appeals’ procedure which allows institutions to raise issues about both the process and the outcomes of quality assurance procedures. During panel interviews with the stakeholders it was highlighted that higher education institutions appreciated the existing procedures. They also referred to the open communication with the agency which allows them to resolve many issues without the need to revert to a formal complaints’ procedure.

The number of cases so far has been very small and mainly linked to foreign institutions (or their Austrian partners) offering degrees in Austria. According to the team the process seems to be clearly formalized and transparent and fully compliant with the ESG.

Panel conclusion: fully compliant
CONCLUSION

SUMMARY OF COMMENDATIONS
- The panel commends the agency for its efforts to develop an inter-sectoral dialogue among the different parts of the HE system and it encourages them to pursue that further through integrative approaches to QA across the all HE system, namely in its future strategic plan.
- The team commends the agency for the systematic presence of not only students, but also representatives of the labour market in the review panels for programme accreditation procedures.
- The team commend the agency for the systematic use of foreign experts in the review procedures, which has contributed to make the evaluations for robust and credible.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE - PANEL CONCLUSION: FULLY COMPLIANT

ESG 3.2 OFFICIAL STATUS - PANEL CONCLUSION: FULLY COMPLIANT

ESG 3.3 INDEPENDENCE - PANEL CONCLUSION: FULLY COMPLIANT

ESG 3.4 THEMATIC ANALYSIS - PANEL CONCLUSION: SUBSTANTIALLY COMPLIANT

Panel recommendations
- The panel recommends that the agency structurally embeds the practice of the publication of thematic analyses in its work programme, providing overview reports which bring together the results of its quality assurance processes, demonstrating their relevance for major quality issues in higher education in order to raise awareness among the HE sector and to better inform society.
- The panel recommends the agency to develop further its thematic analyses by focusing on QA in a broader sense such as in issues like internationalization, employability, active learning, and pedagogical innovation. This could be done by using specialized software and tools devoted to content and qualitative analysis.

ESG 3.5 RESOURCES - PANEL CONCLUSION: FULLY COMPLIANT

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT - PANEL CONCLUSION: SUBSTANTIALLY COMPLIANT

Panel recommendations
- The team considers that internal QA of the agency could be better linked to regular analytical work and that the feedback collected from different stakeholders should be analysed in a more systematic way.
- The team considers that the agency should reflect about the impact of external communication tools used by the agency, notably its website.

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES - PANEL CONCLUSION: FULLY COMPLIANT

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE - PANEL CONCLUSION: SUBSTANTIALLY COMPLIANT

Panel recommendations
- The team considers that the agency should address some of the standards that are not currently covered by some of the procedures, especially as regards audits and international programme accreditation. In particular, attention should be given to the coverage of standards 1.2 and 1.8 in some procedures, as it is recognized by the agency itself.
- Furthermore, it should reflect critically about its understanding of some of those standards and the way these are effectively covered by the existing procedures. In particular, the coverage of standard 1.3 seems incomplete, especially in international accreditations.

**ESG 2.2 Designing methodologies fit for purpose - Panel conclusion: fully compliant**

**ESG 2.3 Implementing processes - Panel conclusion: substantially compliant**

**Panel recommendation:**
- The panel recommends that AQ Austria takes a more proactive role in the dissemination and implementation of follow up of the public universities.

**ESG 2.4 Peer-review experts - Panel conclusion: fully compliant**

**ESG 2.5 Criteria for outcomes - Panel conclusion: substantially compliant**

**Panel Recommendation:**
- The panel recommends that the agency develops more explicit criteria in the case of audits, namely in what refers to the way they address ESG requirements more directly.

**ESG 2.6 Reporting - Panel conclusion: fully compliant**

**ESG 2.7 Complaints and appeals - Panel conclusion: fully compliant**

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

**Suggestions for further development**
- The panel suggests that the agency pursues further its reflection about the way to combine its regulatory and enhancement roles vis-à-vis certain parts of the HEsystem.
- The panel suggests that the agency develops its vision on its consultancy/support activities (e.g. through data collection or training), which could be distinguished more cautiously from the quality assurance activities which are provided by AQ Austria.
- The team considers that the agency could be more proactive in planning the audits and voluntary reviews by developing long term plans as proposals for different institutions.
- The panel suggests the agency to develop a database of reports and decisions to make more accessible for all stakeholders the results of its QA activities.
- The panel suggests the agency to strengthen its efforts to disseminate the results of its QA activities with students and employers.
## ANNEX 1: Programme of the site visit

### 27 February 2019

<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>14:30 – 17:00</td>
<td>Review panel’s kick-off meeting and preparations for day I</td>
<td>At disposal of the panel: Agency resource-person: Dr Maria Weber, Head of Accreditation Department, International Relations, employed since 2004 (predecessor Fachhochschul Council) (member of the working group for the revision of the procedures.)</td>
</tr>
<tr>
<td>17:00 – 17:45</td>
<td>Meeting with the CEO and the chair of the Board*</td>
<td>Professor Anke Hanft, Chair of the Board, member since 2004 (predecessor Austrian Quality Assurance Agency) (member of the working group for the revision of the procedures.)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Dr Achim Hopbach, Managing Director, employed since 2012 (member of the working group for the revision of the procedures.)</td>
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</tbody>
</table>

### 28 February 2019

<table>
<thead>
<tr>
<th>Timing</th>
<th>Topic</th>
<th>Persons for interview</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:15 – 8:45</td>
<td>Review panel’s private meeting</td>
<td>Professor Hans Weder, Member of the Board since 2012</td>
</tr>
<tr>
<td>8:45 – 9:30</td>
<td>Meeting with the team responsible for preparation of the self-assessment report*</td>
<td>Professor Peter Schlögl, Member of the Board since 2005 (predecessor Fachhochschul Council)</td>
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<tr>
<td></td>
<td></td>
<td>Melanie Gut M.A., Member of the Board since 2016</td>
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<td></td>
<td></td>
<td>Robert Neiser PhD, Secretariat, Accreditation Department, employed since 2013</td>
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<tr>
<td></td>
<td></td>
<td>Dr Michael Meznik, Secretariat, Audit and Consulting Department, employed since 2016</td>
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<tr>
<td></td>
<td></td>
<td>Stephanie Zweßler M.A., Secretariat, Analyses and Reports Department, employed since 2008 (predecessor Austrian Accreditation Council for Private Universities)</td>
</tr>
<tr>
<td>Time</td>
<td>Session</td>
<td>Participants</td>
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<td>----------------------------------------------</td>
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<tr>
<td>9:30 – 9:45</td>
<td>Review panel’s private discussion</td>
<td></td>
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</table>
| 9:45 – 10:30      | Meeting with representatives from the Senior | Anita Kruisz M.A. Deputy Managing Director, Head of Administration Department, employed since 2013  
|                   | Management Team*                            | Barbara Birke M.A., Head of Analyses and Reports Department, employed since 2004 (predecessor Austrian Quality Assurance Agency) (member of the working group for the revision of the procedures.)  
|                   |                                              | Dietlinde Kastelliz M.A. Head of Audit and Consulting Department, employed since 2010 (predecessor Austrian Quality Assurance Agency) (member of the working group for the revision of the procedures.)  
|                   |                                              | Dr Maria Weber, Head of Accreditation Department, International Relations, employed since 2004 (predecessor Fachhochschul Council) (member of the working group for the revision of the procedures.)  |
| 10:30 – 10:45     | Review panel’s private discussion            |                                                                              |
| 10:45 – 11:30     | Meeting with key staff of the agency/staff in | Anita Maria Freiberger, Accreditation Department, employed since 2015 (member of the working group for the revision of the procedures.)  
|                   | charge of evaluations*                       | Dr Elisabeth Froschauer-Neuhauser, Audit and Consulting Department, employed since 2014  
|                   |                                              | Frances Blüm, Audit and Consulting Department, employed since 2014  
|                   |                                              | Harriet Leischko, M.A., Accreditation Department, employed since 2009 (predecessor Fachhochschul Council) |
|                   |                                              | Barbara Schinwald M.A., Accreditation Department, employed since 2004 (predecessor Fachhochschul Council)  |
| 11:30 – 11:45     | Review panel’s private discussion            |                                                                              |
| 11:45 – 12:15     | Meeting with key staff of the agency/staff in | Reinhard Jakits M.A., employed since 2017  
|                   | charge of analyses and reports*              | Stephanie Zwießler M.A., employed since 2008 (predecessor Austrian Accreditation Council for Private Universities)  |
| 12:15 – 13:15     | Lunch                                        |                                                                              |
| 13:15 – 14:15     | Meeting with members of the Board*           | Professor Wolfgang Mazal, Vice-President, Professor at University of Vienna, member since 2012 (Member of the Board of the predecessor Fachhochschul Council 2003-2009)  
|                   |                                              | Christina Rozsnyai MA M.L.S., Hungarian Accreditation Commission, member since 2008 (predecessor Austrian Quality Assurance Agency) (member of the working group for the revision of the procedures.)  
<p>|                   |                                              | Professor Eva Schule-Stindl, Professor at University of Graz, member since 2015 |</p>
<table>
<thead>
<tr>
<th>14:15 – 14:30</th>
<th>Review panel’s private discussion</th>
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<tbody>
<tr>
<td>14:30 – 15:30</td>
<td>Meeting with members of the General Meeting</td>
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<tr>
<td>15:30 – 15:45</td>
<td>Review panel’s private discussion</td>
</tr>
<tr>
<td>15:45 – 16:30</td>
<td>Meeting with ministry representatives (where relevant)</td>
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<tr>
<td>16:30 – 16:45</td>
<td>Review panel’s private discussion</td>
</tr>
<tr>
<td>16:45 – 17:30</td>
<td>Meeting with heads of some reviewed HEIs/HEI representatives</td>
</tr>
</tbody>
</table>

**Dr Ferry Stocker** (academic), member since 2012 (member of the working group for the revision of the procedures.)

**Thomas Mayr M.A.**, Managing Director of ibw Austria - Research & Development in VET, member since 2012 (member of the working group for the revision of the procedures.)

**Melanie Gut** M.A. (Student) member since 2016

**Professor Anita Rieder**, Chair, Vice-chair of the Governing Committee, Vice-Rector of Medical University Vienna (representative of public universities)

**Elisabeth Fiorioli** M.A., Secretary General of Universities Austria (uniko) (representative of public universities)

**Professor Karl Wöber**, also member of the Governing Committee, Rector of MODUL Private University Vienna, President of Austrian Conference of Private Universities ÖPUK (representative of private universities)

**Dr Erich Brugger** M.A., Vice-chair, Chair of the Governing Committee, Managing Director of University of Applied Sciences Campus 02, Graz, (representative of universities of applied sciences)

**Dr Doris Walter**, Managing Director of University of Applied Sciences Salzburg (representative of universities of applied sciences)

**Gudrun Feucht** M.A., also member of the Governing Committee (representative of the Federation of Austrian Industries)

**Elmar Pichl** M.A., Director General

**Dr Wilhelm Brandstätter** MBA, Head of Department for universities of applied sciences, private universities, quality assurance, accreditation, Danube University Krems

**Edith Winkler** M.A., unit quality assurance and lifelong learning in higher education

**Professor Rudolf Feik**, Vice-Rector of University of Salzburg (At university of Salzburg AQ Austria conducted the quality audit (2013/2014; positive result with conditions), a voluntary evaluation of the unit “cooperative focus Science and Arts” by university of Salzburg and university Mozarteum (2017/2018), a voluntary accreditation of the „Geographical Information Science & Systems, UNIGIS MSc“, a voluntary accreditation (by using the European Approach) of the Joint Master-Programme European Political Science (Members of the Consortium: University of Salzburg, Austria; University of Pavia, Italy; University of Ljubljana, Slovenia; Ss. Cyril and Methodius University in Skopje, FYROM Former Yugoslav Republic of Macedonia; European University of Tirana, Albania; University of Tirana, Albania; FAMA College – Prishtina, Kosovo; University of Business...
and Technology – Pristina, Kosovo; University of Sarajevo, Bosnia und Herzegowina; Sarajevo School of Science Technology, Bosnia und Herzegovina) (2016/2017, positive result with conditions)

Professor Gernot Hanreich, Rector of University of Applied Sciences Burgenland (At UAS Burgenland AQ Austria conducted the quality audit (2013/2014; positive result with conditions); 11 programme accreditation procedures since 2012, 9 with positive results, 1 with negative results, 1 application withdrawn)

Professor Herbert Grüner, Rector of New Design Private University (At New Design Private University, since Professor Grüner took office, AQ Austria conducted one programme accreditation (2018/2019; negative recommendation by panel, decision by the Board on 13 February 2019)

Mag. Marcus Ratka, Rector of JamMusicLab Private University (At JamMusicLab Private University AQ Austria conducted the initial institutional accreditation (2017/2018 with positive result; before that the institution applied once without success.)

Professor Karl Ennsfellner, Managing Director of IMC University of Applied Sciences Krems (At UAS IMC Krems AQ Austria hasn’t conducted an Audit but conducted 8 programme accreditation procedures since 2012, 6 with positive results, 2 with negative results)

<table>
<thead>
<tr>
<th>As necessary</th>
<th>Wrap-up meeting among panel members and preparations for day II</th>
</tr>
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<tbody>
<tr>
<td><strong>1 MARCH 2019</strong></td>
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<tr>
<td><strong>TIMING</strong></td>
<td><strong>TOPIC</strong></td>
</tr>
</tbody>
</table>
| 8:30 – 9:00 | Review panel private meeting | Hofrat Dipl.-Ing. Dr. Gerald Gaberscik; Technical University Graz (At Technical University Graz AQ Austria conducted the quality audit (2017/2018; positive result), voluntary evaluations of Faculty of Architecture (2015/16); Faculty of Electrical and Information Engineering (2016/17); Faculty of Mechanical Engineering and Economic Sciences (2018/19); Faculty of Civil Engineering (ongoing))
| 30 minutes | 9:00 – 09:45 | Meeting with quality assurance officers of HEIs |
| 45 minutes | | Mrs. Susanna Boldrino, University of Applied Sciences Campus Vienna (At UAS Campus Vienna AQ Austria hasn’t conducted an Audit but conducted 11 programme accreditation procedures since 2012, 2 with positive results, 2 with negative results)
| | | Dr. Kurt Faninger, University of Applied Sciences Vienna of the Chamber of commerce Vienna (At UAS Vienna of the Chamber of commerce Vienna AQ Austria conducted the quality audit (2013/2014, positive result with conditions); 1 programme accreditation procedures since 2012 with positive results)
| | | Mrs. Karin Dlouhy M.Sc, Sigmund Freud Private University, Vienna (At Sigmund Freud Private University, Vienna AQ Austria conducted the initial institutional re-accreditation (2014/2015 positive result with conditions); 15 programme accreditation procedures since 2012, 8 with positive results, 1 with negative results, 6 applications withdrawn)
Mrs. Edina Hadiahmetovic, International University of Sarajewo (At IUS Sarajewo AQ Austria conducted 8 voluntary accreditation procedures (2016, positive result with conditions in 7 cases, negative result in 1 case)

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
<th>Participants</th>
</tr>
</thead>
<tbody>
<tr>
<td>09:45 – 10:00 15 minutes</td>
<td>Review panel’s private discussion</td>
<td></td>
</tr>
<tr>
<td>10:00 – 10:45 45 minutes</td>
<td>Meeting with students</td>
<td>Sebastian Höft, student at University of Arts Graz (public university) Marita Gasteiger, Austrian Students’ Union Anna Klampfer, Austrian Students’ Union, responsible for the student reviewers pool Noah Scheer, student at a private university</td>
</tr>
<tr>
<td>10:45 – 11:00 15 minutes</td>
<td>Review panel’s private discussion</td>
<td></td>
</tr>
<tr>
<td>11:00 – 11:45 45 minutes</td>
<td>Meeting with representatives from the reviewers’ pool</td>
<td>Christiane Gössinger, student at Sigmund Freud Private University, Vienna (Reviewer in institutional accreditation procedure of Private Medical University Vienna, 2018; institutional accreditation procedure of Berta v. Suttner Private University, 2018 (twice); institutional re-accreditation of Private University for Health Sciences, Medical Informatics and Technology; attended a training seminar) Professor Rony Flatscher, Vienna University of Economics and Business (Reviewer in accreditation procedure of „Wirtschaftsinformatik und Digitale Transformation“, BA, UAS Salzburg, 2018; attended a training seminar) Professor Margarethe Überwimmer, University of Applied Sciences Upper Austria (Reviewer in accreditation procedure of „International Management and Leadership“, MA in Business, UAS Vorarlberg, 2018; didn’t attend a training seminar) Professor Thomas Spitzley, Vice-Rector of University Duisburg Essen, Germany (Reviewer in institutional accreditation procedure of Berta von Suttner Private University, Krems; 2018; reviewer in evaluation procedure of Internationale Akademie für Philosophie, Liechtenstein, 2017; didn’t attend a training seminar) Via Skype: Dr. Robert Ginthör, CTO Big Data Lab Know-Center (Reviewer in accreditation procedure of “Data Science and Engineering”, UAS Upper Austria, 2017; accreditation procedure of Digital Business &amp; Software Engineering”, MA, MCI Salzburg, 2018)</td>
</tr>
<tr>
<td>11:45 – 12:15 30 minutes</td>
<td>Meeting with CEO to clarify any pending issues</td>
<td>Dr Achim Hopbach, Managing Director</td>
</tr>
<tr>
<td>12:45 – 13:30 45 minutes</td>
<td>Lunch (panel only)</td>
<td></td>
</tr>
<tr>
<td>13:30 – 14:15 45 minutes</td>
<td>Private meeting among panel members to agree on the main findings</td>
<td></td>
</tr>
<tr>
<td>14:15 – 15:00</td>
<td>45 minutes</td>
<td>Final de-briefing meeting with staff and Council/Board members of the agency to inform about preliminary findings*</td>
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<td></td>
<td><strong>Professor Wolfgang Mazal</strong>, Vice-President</td>
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<td></td>
<td><strong>Dr Achim Hopbach</strong>, Managing Director</td>
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<tr>
<td></td>
<td></td>
<td><strong>Anita Kruisz M.A.</strong> Deputy Managing Director, Head of Administration Department</td>
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<tr>
<td></td>
<td></td>
<td><strong>Barbara Birke M.A.</strong>, Head of Analyses and Reports Department</td>
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<tr>
<td></td>
<td></td>
<td><strong>Dietlinde Kastelliz M.A.</strong> Head of Audit and Consulting Department</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Dr Maria Weber</strong>, Head of Accreditation Department, International Relations</td>
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</tbody>
</table>
Annex I: TERMS OF REFERENCE
January 2018

1. Background and Context
The Agency for Quality Assurance and Accreditation Austria (AQ Austria) was founded in 2011 as part of the restructuring of the external quality assurance system in Austria. As an essential component of the restructuring, three former quality assurance organisations were merged and transformed into AQ Austria as a new sector-spanning and independent agency.

According to its legal mandate, AQ Austria is responsible for all post-secondary higher education institutions in Austria (public universities, universities of applied sciences, private universities (with the exception of university colleges of teacher education, the Institute of Science and Technology Austria (IST Austria) and the universities for philosophy and theology).

The agency’s remit comprises a large array of legally regulated functions in the field of external quality assurance, which encompasses the accreditation of higher education institutions and their programmes (private universities and universities of applied sciences), audits of the internal quality management systems (public universities and universities of applied sciences), consultancy and thematic analysis. Since 2014, the agency is also responsible for the notification of foreign study programmes offered in Austria.

In addition to its legal functions within Austria AQ Austria is also active abroad. It is recognized by the German Accreditation Council for conducting accreditation procedures in Germany, and also by the Kazakh ministry for conducting accreditation procedures in Kazakhstan. AQ Austria also collaborates with universities in other EHEA countries by way of offering programme accreditation and consultancy services.

The Agency for Quality Assurance and Accreditation Austria is incorporated under public law. Its bodies, their powers and composition are legally determined.

The Board of AQ Austria is the central independent decision-making body of the agency. This committee of experts is in particular responsible for all decisions regarding accreditation and certification, procedural guidelines and standards, supervision responsibilities vis-à-vis accredited educational institutions in Austria. Because of the various types of quality assurance processes, the Board possesses regulatory as well as non-regulatory competencies. The Board is made up of fourteen members, of that eight are academics (at least half of them must be foreign members), two are students (of the two one from abroad) and four members come from the professional practical field.

In addition to the Board, two bodies serve the main purpose of involving stakeholders, namely the General Meeting comprising 23 representatives of stakeholder organisations and the Governing Committee comprising 5 members from among the general Meeting.

The secretariat comprises 30 staff, and the annual budget is approx. 2.8 Million EURO.
AQ Austria has been an ENQA member since 2012 and is applying for renewal of its membership.

AQ Austria has been registered on EQAR since 2014 and is applying for renewal of registration.

2. Purpose and Scope of the Evaluation
This review, will evaluate the way in which and to what extent AQ Austria fulfils the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of AQ Austria should be reconfirmed and to EQAR to support AQ Austria application to the register.

The review panel is not expected, however, to make any judgements as regards granting membership.

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

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

- Quality Audits of internal quality management systems at Austrian public universities and at universities of applied sciences (compulsory) and in EHEA countries.
- Institutional and programme accreditation at Austrian private universities and universities of applied sciences (compulsory)
- Notification of foreign study programmes offered in Austria (compulsory)
- Voluntary accreditation of continuing education study programmes at Austrian higher education institutions
- System accreditation and programme accreditation in Germany (compulsory)
- International programme accreditation (voluntary); (AQ Austria does not conduct quality assurance procedures outside the EHEA).
- Institutional accreditation in Switzerland
- Voluntary Evaluation of programmes at HEIs (in Austria and abroad)

Furthermore, the self-assessment report and external review report should also address the agency’s recognition procedure of external QA activities of other agencies and how AQ Austria will ensure that the decisions taken on the basis of reviews carried out by other agencies are in line with the ESG, especially in case the agency is not registered on EQAR.

3. The Review Process
The process is designed in the light of the *Guidelines for ENQA Agency Reviews* and in line with the requirements of the *EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-assessment by AQ Austria including the preparation of a self-assessment report;
- A site visit by the review panel to AQ Austria;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
Follow-up of the panel’s and/or ENQA Board’s recommendations by the agency, including a voluntary follow-up visit.

3.1 Nomination and appointment of the review team members
The review panel consists of four members: one or two quality assurance experts, an academic employed by a higher education institution and student member. One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers.

In addition to the four members, the panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA expectations are met throughout the process. The ENQA staff member will not be the Secretary of the review and will not participate in the discussions during the site visit interviews.

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

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

3.2 Self-assessment by AQ Austria, including the preparation of a self-assessment report
AQ Austria is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency’s QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which AQ Austria fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat who has 4 weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the Guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within 4 weeks. In such cases, an additional fee of 1000 € will be charged to the agency.
- The report is submitted to the review panel a minimum of six weeks prior to the site visit.
3.3 A Site Visit by the Review Panel
AQ Austria will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel at least two months before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is 2.5 days. The approved schedule shall be given to AQ Austria at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by AQ Austria in arriving in Vienna, Austria.

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

3.4 Preparation and completion of the final evaluation report
On the basis of the review panel’s findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings with regards to each ESG. A draft will be first submitted to the ENQA review coordinator who will check the report for consistency, clarity and language and it will be then submitted to AQ Austria within 11 weeks of the site visit for comment on factual accuracy. If AQ Austria chooses to provide a statement in reference to the draft report it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter the review panel will take into account the statement by AQ Austria, finalise the document and submit it to ENQA.

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

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

AQ Austria is also requested to provide a letter addressed to the ENQA Board outlining its motivation applying for membership and the ways in which AQ Austria expects to contribute to the work and objectives of ENQA during its membership. This letter will be discussed along with the final evaluation report.

4. Follow-up Process and Publication of the Report
AQ Austria will consider the expert panel’s report and will publish it on its website once the ENQA Board has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. AQ Austria commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting a follow-up report to the ENQA Board. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board’s decision.

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

5. Use of the report
ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.
The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether AQ Austria has met the ESG and can be thus admitted/reconfirmed as a member of ENQA. The report will also be used for registration on EQAR, and is designed so as to serve these two purposes. However, the review report is to be considered final only after being approved by the ENQA Board. Once submitted to AQ Austria and ENQA and until it is approved by the Board the report may not be used or relied upon by AQ Austria, the panel and any third party and may not be disclosed without the prior written consent of ENQA. AQ Austria may use the report at its discretion only after the Board has approved of the report. The approval of the report is independent of the decision on membership.

The Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

6. Budget
AQ Austria shall pay the following review related fees:

| Fee of the Chair          | 4,500 EUR |
| Fee of the Secretary     | 4,500 EUR |
| Fee of the 2 other panel members | 4,000 EUR (2,000 EUR each) |
| Fee of 2 panel members for follow-up visit | 1,000 EUR (500 EUR each) |
| Administrative overhead for ENQA Secretariat | 7,000 EUR |
| Experts Training fund    | 1,400 EUR |
| Approximate travel and subsistence expenses | 6,000 EUR |
| Travel and subsistence expenses follow-up visit | 1,600 EUR |

This gives a total indicative cost of 30,000.00 EUR VAT excl. for a review team of 4 members. In the case that the allowance for travel and subsistence expenses is exceeded, AQ Austria will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and subsistence expenses in the limits of the planned budget, and will refund the difference to AQ Austria if the travel and subsistence expenses go under budget.

The fee of the follow-up visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it.

In the event of a second site visit required by the Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as travel and subsistence costs are recoverable from the agency.

7. Indicative Schedule of the Review

<table>
<thead>
<tr>
<th>Task</th>
<th>Date</th>
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<tbody>
<tr>
<td>Agreement on terms of reference</td>
<td>November/December 2017</td>
</tr>
<tr>
<td>Appointment of review panel members</td>
<td>September 2018</td>
</tr>
<tr>
<td>Self-assessment completed</td>
<td>By Mid-November 2018</td>
</tr>
<tr>
<td>Pre-screening of SAR by ENQA coordinator</td>
<td>November 2018</td>
</tr>
<tr>
<td>Preparation of site visit schedule and indicative timetable</td>
<td>December 2018</td>
</tr>
<tr>
<td>Briefing of review panel members</td>
<td>January 2018</td>
</tr>
<tr>
<td>Review panel site visit</td>
<td>February 2019</td>
</tr>
<tr>
<td>Draft of evaluation report and submitting it to ENQA coordinator for pre-screening</td>
<td>By April 2019</td>
</tr>
<tr>
<td>Draft of evaluation report to AQ Austria</td>
<td>April 2019</td>
</tr>
<tr>
<td>Statement of AQ Austria to review panel if necessary</td>
<td>Early May 2019</td>
</tr>
<tr>
<td>Submission of final report to ENQA</td>
<td>By mid-May 2019</td>
</tr>
<tr>
<td>Consideration of the report by ENQA Board and response of AQ Austria</td>
<td>June 2019</td>
</tr>
<tr>
<td>---------------------------------------------------------------</td>
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</tr>
<tr>
<td>Publication of the report</td>
<td>June 2019</td>
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</tbody>
</table>
### Annex 3: Glossary

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Definition</th>
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</thead>
<tbody>
<tr>
<td>ENQA</td>
<td>European Association for Quality Assurance in Higher Education</td>
</tr>
<tr>
<td>ESG</td>
<td>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</td>
</tr>
<tr>
<td>HE</td>
<td>higher education</td>
</tr>
<tr>
<td>HEI</td>
<td>higher education institution</td>
</tr>
<tr>
<td>QA</td>
<td>quality assurance</td>
</tr>
<tr>
<td>SAR</td>
<td>self-assessment report</td>
</tr>
</tbody>
</table>
ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY AQ AUSTRIA
1 HS-QSG
2 Rules of Procedure Board/General Meeting/Governing Committee
3 Rules of Procedure Secretariat
4 Rules of Procedure Appeals Committee
5 Mission Statement
6 Strategy
7 Internationalisation Strategy
8 Approval Swiss Accreditation Council
9 Approval German Accreditation Council
10 Staff List
11 Members of the Board
12 Members of the General Meeting
13 Members of the Governing Committee
14 Members of the Appeals Committee
15 Decree on Accreditation of Universities of Applied Sciences
16 Decree on Annual Reports of Universities of Applied Sciences
17 Decree on Accreditation of Private Universities
18 Decree on Annual Reports of Private Universities
19 Guideline for the Audit of Higher Education Institutions’ Quality Management Systems
20 Sample Schedule Workshop for External Experts
21 Sample Schedule Workshop for Applicant Institutions
22 Sample Code of Conduct
23 Involvement of Stakeholders in Revision of Regulations
24 Template for Reports
25 AQ Austria Guidelines for Institutional Accreditation in Switzerland
26 AQ Austria Guidelines for the Voluntary Accreditation of Courses of Continuing Higher Education
27 AQ Austria Guideline International Accreditation
29 Triennial Report 2015
30 Recognition of Non-formally and Informally Acquired Competences
31 Annual Report to the Minister of Health 2018
32 Analysis of External Reviews of University Colleges of Teacher Education
33 Analysis of Interpretation of Programme Accreditation Criteria
34 Systematic Analysis of the Annual Reports of Private Universities and Universities of Applied Sciences 2016/17
35 Annual Report 2017
36 Quality Report 2017
37 Analysis of External Feedback 2016/17
38 Evaluation of HS-QSG
39 Internal Quality Assurance
40 Finance Plan 2019
41 Plan Office Space: 3rd floor
42 Plan Office Space: 4th floor
43 AQ Austria Follow-up Report
44 Curricula Vitae of the Employees of the Secretariat
45 Curricula Vitae Members of the Board
THIS REPORT presents findings of the ENQA Agency Review of the Agency for Quality Assurance and Accreditation Austria (AQ Austria), undertaken in 2019.