Subject: Membership of AKKORK in ENQA

Dear Erika,

I am writing to inform you of the decision taken by the ENQA Board on 19 September 2019 regarding the membership of AKKORK in ENQA. After a thorough consideration and discussion on the review report, the ENQA Board concluded that the overall level of compliance with the ESG is not sufficient to renew the AKKORK membership at this stage.

The Board found a ‘non-compliance’ on two standards, ESG 2.5 Criteria for outcomes and ESG 2.6 Reporting. To be in line with the requirements of the ESG 2.5, the agency should base any outcomes or judgements that are made as the result of external quality assurance on explicit and published criteria. These criteria should be applied consistently, irrespective of whether the process leads to a formal decision.

In regard to ESG 2.6 Reporting, the Board notes that the agency should follow the requirements of the standard, i.e. to provide full reports on all evaluations and which are published, clear and accessible to the academic community, external partners and other interested individuals. For the activities where the agency takes formal decision based on the reports, the decision should be published together with the report.

As stated in the Guidelines for ENQA Agency Reviews, “a case of non-compliance would normally lead to a judgement that the agency is not substantially compliant with the ESG overall.” The evidence brought forward in the review report confirms that AKKORK is not substantially compliant with the ESG overall.

In addition, the Board urges the agency to give more attention to the standards where only partial compliance with the ESG is reached, i.e. ESG 3.1 Activities, policy and processes for quality assurance, ESG 3.4 Thematic analysis, ESG 3.6 Internal quality assurance and professional conduct, ESG 2.1 Consideration of internal quality assurance, ESG 2.2 Designing methodologies fit for purpose, and ESG 2.3 Implementing processes. In particular, the Board seconds the critical remarks of the panel on standard 3.1 Activities, policy and processes for quality assurance, where the panel recommends AKKORK to use the existing cooperation with
stakeholder organisations and develop a system of proposing candidates to the AKKORK bodies by the stakeholders themselves.

The Board expects AKKORK to closely follow the recommendations of the review panel.

The Board decided to designate AKKORK as “Member under review” for a period of two years from 19 September 2019. The Agency will need to undergo a new partial review process at the end of this period, or sooner, if it wishes. The partial review will focus in particular on ESG 2.5 Criteria for outcomes and ESG 2.6 Reporting and the standards that were found as partially compliant in this review (see above).

Should AKKORK object to the decision of the ENQA Board, it may file an appeal according to the procedures outlined in article 24 of ENQA’s Rules of Procedure.

If you have any further queries, please do not hesitate to contact the ENQA Secretariat.

Yours sincerely,

Christoph Grolimund
President

Annex: Areas for development
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As outlined by the review panel, AKKORK is recommended to take appropriate action, so far as it is empowered to do so, on the following issues:

ESG 3.1 Activities, policy and processes for quality assurance
AKKORK is recommended to align its mission statement and connected goals and objectives with its current activities and the strategy.

Moreover, AKKORK is recommended to develop a regular process of strategic planning that translates its mission into the comprehensive and targeted plans.

Finally, AKKORK is recommended to use the existing cooperation with stakeholder organisations to develop a system of proposing candidates to the AKKORK bodies by the stakeholders themselves.

ESG 3.3 Independence
AKKORK is recommended to clearly indicate in all its reports and other outcomes of the external QA procedures itself as the conducting agency.

Next, AKKORK is recommended to reflect in its statutes the actual structure of the agency, especially that the General Meeting does not elect any members of the Advisory Council or the International Accreditation Council.

ESG 3.4 Thematic analysis
AKKORK is recommended to clearly indicate the title, author, and date of publication in all published documents of thematic analysis.

Moreover, AKKORK is recommended to establish a clear process to address all of its activities in thematic analyses (e.g. the joint international accreditations) and to distribute the outcomes of such analyses to its stakeholders in a coherent way.

ESG 3.5 Resources
AKKORK is recommended to establish processes for its financial management and strategic planning to ensure the sustainability of the agency’s operations under the declining revenues (2014-2018), to achieve its mission, and seize opportunities that the agency sees for itself.

ESG 3.6 Internal quality assurance and professional conduct
AKKORK is recommended to consistently document and/or develop internal QA processes that are formal, explicit and close the loop. These processes should aim for the quality of the process outputs and for monitoring and critical reflection on the agency’s activities while avoiding bureaucratic burden.
ESG 2.1 Consideration of internal quality assurance
AKKORK is recommended to define coherent and independent sets of criteria for each of its procedures that are aligned carefully with Part 1 of the ESG.

Furthermore, AKKORK is recommended to reconsider the IQAS methodology to fully address the elements of ESG Part 1 based on a clear usage of the selected QM model(s).

Next, AKKORK is recommended to ensure that the entire ESG Part 1 are taken into account for professional-public accreditation.

ESG 2.2 Designing methodologies fit for purpose
AKKORK is recommended to clearly set the aims and objectives for all its procedures if it considers to continue offering all of them.

Moreover, AKKORK is recommended to establish processes for the involvement of external stakeholders (apart from the representatives in its bodies) in the design and continuous improvement of the offered procedures.

ESG 2.3 Implementing processes
AKKORK is recommended to consistently publish the detailed procedures of the external QA processes it offers.

Moreover, AKKORK is recommended to follow the European Approach for Cross-Border Quality Assurance, if it considers continuing to operate outside of the RF higher education system.

Next, AKKORK is recommended to ensure that there is a structured follow-up mechanism for each of its EQA activities, including those resulting in unconditional accreditation.

ESG 2.4 Peer-review experts
AKKORK is recommended to consistently compose all expert panels following the agency’s regulations.

Moreover, AKKORK is recommended to list all experts on any report that is an outcome of the panel’s work.

ESG 2.5 Criteria for outcomes
AKKORK is recommended to define explicitly and clearly for each of its activities the requirements on how to meet the criteria and how to reach different accreditation decisions
based on these criteria. This should be communicated to HEIs and experts in the same way, as well as published on the agency’s website.

Next, AKKORK is recommended to establish more effective processes to ensure consistency and transparency in the application of the criteria in the agency’s decision-making processes.

**ESG 2.6 Reporting**

AKKORK is recommended to publish all of its review reports on the agency website.

Furthermore, AKKORK is recommended to publish the decision together with the report for all cases, when the agency takes any formal decision based on the reports.

Next, AKKORK is recommended to publish all reports for professional-public accreditations in the state system for professional-public accreditation.

For all reports that are the outcome of the panel’s work, AKKORK is recommended to reference and approve these reports by the same panels. The reports should also always list all panel members.

**ESG 2.7 Complaints and appeals**

AKKORK is recommended to have a completely independent appeals committee, i.e. the body should not include members of any other body of AKKORK.