

ENQA AGENCY REVIEW

**AGENCY FOR
QUALITY
ASSURANCE
AND
ACCREDITATION
AUSTRIA
(AQ Austria)**

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European Association for
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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 from October 2023 to May 2024, including a site visit conducted in Vienna from 20th to 23rd of February 2024. The review was performed according to the methodology described in the Guidelines for ENQA Targeted Reviews. This report should be read together with the [external review report](#) of the agency's last full review against the ESG in 2019.

This review report will be used for the renewal of AQ Austria's ENQA membership as well as the renewal of AQ Austria's registration in EQAR. This is the third review of AQ Austria against the ESG, after 2019 and 2014; its three predecessor agencies had been successfully reviewed against the ESG in 2007.

Established in 2012 through a merger of three specialised agencies, AQ Austria is the Austrian public quality assurance agency. It also operates internationally. In the Austrian higher education sector its tasks include accreditations and re-accreditations of universities of applied sciences (UAS) and private higher education institutions (HEIs), accreditations of the private HEIs' and UAS' programmes, and audits of public universities. Internationally, it has worked within EHEA, including in Germany and Switzerland. AQ Austria also conducts consultations and evaluations and performs a number of expert and administrative tasks. Its work is based on the public responsibility for quality in higher education, securing academic freedom, autonomy of higher education institutions and scientific integrity.

According to the Terms of Reference (ToR), this targeted review has evaluated to what extent AQ Austria continues to fulfil the requirements of the ESG. AQ Austria did not receive any judgements of partial compliance in the last review, but the panel took into consideration the notes from EQAR in relation to the most recent substantive changes in the agency with regard to standards 3.1, 2.2, 2.3 and 2.5, and the changes in the German QA system with regard to standards 2.3, 2.5 and 2.6, as follows:

- ESG 3.1 – considering how the agency clearly separates between its activities that are within and outside the scope of the ESG, especially newly introduced procedures i.e. 'review procedures for programmes for continuing education' as well as the agency's other tailored evaluation activities concerned with teaching and learning in higher education,
- 2.1 has been addressed for all AQ Austria's activities within the scope of ESG.
- 2.2, 2.3 and 2.5 have been considered for the new activity, namely institutional accreditation of international HEIs.
- 2.3, 2.5 and 2.6 have been considered for accreditations in Germany, to take into account the changes in the German system which took place since the last review.
- Finally, the agency's self-selected enhancement area ESG 3.6 (Internal QA and Professional Conduct) has been addressed.

The panel judged the agency compliant with the ESG, as listed in the table below.

During the site visit, the panel appreciated the open discussions with all stakeholders, and especially the AQ Austria staff, as well as the proactive approach of AQ Austria to working on the enhancement area.

Summary of agency's compliance with the ESG (Parts 2 and 3)

ESG	Compliance according to the targeted review ¹	Compliance transferred from the last full review ²
2.1	Compliant	N/A
2.2	Compliant	N/A
2.3	Compliant	N/A
2.4	N/A	Substantially compliant → Compliant
2.5	Compliant	N/A
2.6	Compliant	N/A
2.7	N/A	Fully compliant → Compliant
3.1	Compliant	N/A
3.2	N/A	Fully compliant → Compliant
3.3	N/A	Fully compliant → Compliant
3.4	N/A	Substantially compliant → Compliant
3.5	N/A	Fully compliant → Compliant
3.6	N/A	Fully compliant → Compliant
3.7	N/A	Fully compliant → Compliant

¹ Compliance refers to the focus areas that were evaluated in depth and are part of the Terms of Reference, i.e., standards that were only partially compliant with the ESG during the last full review, ESG Part 2 for newly introduced or changed QA activities of the agency, ESG 2.1 for all QA activities and any standard affected by substantive changes since the last full review. If any of the standards of Part 2 of the ESG are covered due to the newly introduced or changed QA activities, a remark "for new or changed QA activities only" is added in brackets to the compliance assessment.

² Compliance refers to the last EQAR Register Committee decision for renewal of inclusion on the Register, or in case when an agency is not renewing its registration in EQAR, compliance refers to the last ENQA Agency Review report and should its judgement differ from that of the panel, the judgement of the ENQA Board, as stipulated in the membership decision letter by the ENQA Board. Compliance refers to the QA activities of the agency that were reviewed during the previous full review.

INTRODUCTION

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 in 2023/24, from October 2023 to May 2024 and should be read together with [the external review report of the agency's last full review against the ESG](#) conducted in 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 compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

Registration on EQAR is the official instrument established by the European Higher Education Area (EHEA) for demonstrating an agency's ESG compliance. An external review is a prerequisite for registration.

As AQ Austria has undergone two successful reviews against the ESG Parts 2 and 3, it is eligible and has opted for a targeted review. The purpose of a targeted review is to ensure the agency's compliance with the ESG by covering standards that may have been found partially compliant during the agency's last renewal of registration in EQAR and on standards that could have been affected by substantive changes³ during the past five years while at the same time further strengthening the enhancement part of the review.

SCOPE OF THE REVIEW

AQ Austria is carrying out the following activities within the scope of the ESG (activities marked with * are discussed in the last Substantive Change Report Decision of AQ Austria):

- Accreditation of private higher education institutions in Austria
- Accreditation of programmes at private higher education institutions in Austria
- Accreditation of universities of applied sciences
- Accreditation of programmes at universities of applied sciences in Austria
- Audit of internal quality management systems at Austrian public universities, universities of applied sciences and university colleges of teacher education
- European Approach for QA of Joint Programmes
- International Accreditation of Higher Education Institutions*
- International Programme Accreditation*
- Programme accreditation in Germany
- System accreditation in Germany

³ e.g. organisational changes, the launch of new external QA activities.

- Institutional accreditation in Switzerland
- Joint programme accreditation

The following activities of the applicant are outside the scope of the ESG (all of which are discussed in the last Substantive Change Report Decision of AQ Austria):

- Notification of foreign degree programmes in Austria
- Developing and carrying out review procedures for programmes for continuing education
- Providing information and advice in matters related to the recognition of formal, non-formal and informal competences
- NQF Service Point
- Consultancy and other evaluation activities

This review evaluates the extent to which AQ Austria continues to fulfil the requirements of the ESG. The targeted review aims to place more focus on those parts that require attention and provide sufficient information to support AQ Austria's application to EQAR. The review will be further used as part of the agency's renewal of membership in ENQA.

The **focus areas** of the review are listed in the ToR of the review as follows.

C) Standards affected by other types of substantive changes:

a. System accreditation and programme accreditation in Germany

- ESG 2.3: considering the interaction between the German Accreditation Council (GAC) and AQ Austria, and their respective roles in the follow-up processes;
- ESG 2.5: addressing whether the new arrangements had any impact on the consistency of applying the accreditation criteria.
- ESG 2.6: analysing how AQ Austria ensures that its final reports are also published if the institution does not forward the report to GAC.

b. International accreditation of higher education institutions and degree programmes

- ESG 2.2: reflecting upon the implemented changes in procedural rules and assessment criteria for the institutional level;
- ESG 2.3: considering how does the agency ensures the implementation of the accreditation procedure in case of a combined institutional and programme level accreditation and how does the agency ensure a consistent follow-up, verifying the implementation of any conditions imposed with or attached to its decisions;
- ESG 2.5: considering the consistency of applying the accreditation decision at the level of higher education institutions.

c. Other changes

- ESG 3.1: considering how the agency clearly separates between its activities that are within and outside the scope of the ESG, in particular considering the agency's newly introduced procedures i.e. 'review procedures for programmes for continuing education' as well as the agency's other tailored evaluation activities concerned with teaching and learning in higher

education (please see further Annex 2 of EQAR's Policy on the Use and Interpretation of the ESG).

D) ESG 2.1 Consideration of internal quality assurance;

E) Selected enhancement area: ESG 3.6 Internal quality assurance and professional conduct

F) Other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any).

MAIN FINDINGS OF THE 2019 REVIEW

In the 2019 ENQA review, AQ Austria was found fully compliant with the ESG standards 3.1, 3.2, 3.3, 3.5, 3.7, 2.2, 2.4, 2.6 and 2.7. Additionally, while the panel found AQ Austria to be substantially compliant with the ESG 3.6, the ENQA Board considered that there was sufficient evidence to assess it as fully compliant. AQ Austria was deemed substantially compliant with the remaining standards (3.4, 2.1, 2.3 and 2.5). The EQAR Committee assessed AQ Austria as compliant with all ESG standards.

The panel commended AQ Austria for the following:

- ESG 3.1: for the 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 whole HE system, namely in its future strategic plan.
- ESG 2.4: for the systematic presence of not only students, but also representatives of the labour market in the review panels for programme accreditation procedures, and the systematic use of foreign experts in the review procedures, which has contributed to make the evaluations for robust and credible.

The panel made the following recommendations:

- ESG 3.4 (underlined by the EQAR Committee): 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.
- ESG 3.4 (underlined by the EQAR Committee): 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 3.6: 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.
- ESG 3.6: The team considers that the agency should reflect about the impact of external communication tools used by the agency, notably its website.
- ESG 2.1: 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.

- ESG 2.1: 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 2.3: The panel recommends that AQ Austria takes a more proactive role in the dissemination and implementation of follow up of the public universities.
- ESG 2.5: 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.

Finally, the panel gave the following suggestions for further development:

- ESG 3.1: 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.
- ESG 3.1: 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.
- ESG 3.5: 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 2.6 (underlined by the EQAR Committee): 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.
- ESG 2.6 (underlined by the EQAR Committee): The panel suggests the agency to strengthen its efforts to disseminate the results of its QA activities with students and employers.

REVIEW PROCESS

The 2023/24 external targeted review of AQ Austria was conducted in line with the process described in the *Guidelines for ENQA Targeted Reviews*, the EQAR Procedures for Applications, and in accordance with the timeline set out in the Terms of Reference. The panel for the targeted review of AQ Austria was appointed by ENQA and composed of the following members:

- Heli Mattisen, Director, Estonian Quality Agency for Education, Estonia, Chair (ENQA nominee)
- Đurđica Dragojević, Senior Advisor, Croatian Ministry of Science and Education, Croatia, Secretary (ENQA nominee)
- Tim McIntyre-Bhatty, Governor, University for the Creative Arts, Former Deputy Vice-Chancellor, Bournemouth University, UK (EUA nominee)
- Adrian Korzeniowski, Bachelor studies in Electronics and Telecommunication, Lodz University of Technology, Poland, panel member, student (ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool)

Fiona Crozier, ENQA's representative, acted as the review coordinator.

AQ Austria produced a self-assessment report (SAR) that provided the basis for the review panel's work. Panel members received the SAR on November 25th 2023 and immediately began to evaluate its contents according to the provisions of the ToR. The panel's introductory meeting with ENQA coordinator and EQAR's representative (who joined in only at the beginning of the meeting) took place online, on January 10th, 2023, with the panel's work continuing via email. The panel met again

online on February 1st, 2023, followed by the clarification meeting with the agency's resource person, to clarify the overall HE and QA context of the agency and prepare for the common work on the self-selected ESG standard for enhancement.

The site visit took place in Vienna, with a panel pre-meeting on February 20th, 2024. The panel met with the agency staff, management, members of its board and other committees, experts, and representatives of HEIs, government, student and other organisations, during the next three days, from February 21st to 23rd, 2024. The meetings included a workshop with the AQ Austria staff on the enhancement topic.

After the site visit, the review panel produced this final report based on the SAR, additional information and documents and the site visit. As part of the report writing process, the panel provided an opportunity for AQ Austria to comment on the factual accuracy of the draft report.

The review panel is very grateful to AQ Austria and its management and staff for the supportive and open attitude throughout the review, which contributed significantly to the work of the panel.

Self-assessment report

In the SAR, AQ Austria explained that the self-evaluation process had begun at the end of 2022 in parallel with the revision of the mission statement and the strategy. In January 2023, the Board decided on a targeted review, selected ESG 3.6 as the enhancement topic, and appointed a three-member core team of AQ Austria senior staff for the development of the SAR. The team established milestones and used the strategy workshops to develop the SWOT analysis with the Board and the staff and worked with the General Meeting to collect general stakeholder feedback on the agency's work. The SAR then went through a number of feedback rounds with the Board and the staff, to be approved by the Board in October 2023.

As many of the changes relevant for the review were done before 2021, the SAR was able to build on the 2021 Follow-up Report to ENQA, adding information and data as required by the subsequent changes, as reported to EQAR, and the review TOR.

The panel found the SAR to be clear and informative, with a good selection of appendices, so that only few additional documents were requested. There was some confusion with the tables mapping the criteria of AQ Austria's procedures which use external standards (German, Swiss, European Approach to QA of Joint Programmes) to the ESG part I, and this was discussed and explained on site.

Site visit

The site visit took place in the AQ Austria premises in Vienna, from February 21st to February 23rd, 2024, with a panel pre-meeting the day before, on February 20th. The panel met with almost all of the AQ Austria staff, members of its Board and General Meeting representing all relevant external stakeholders, some of the AQ Austria reviewers, and representatives from all types of HEIs in the diverse Austrian system. The frankness of communication was exceptional, with people freely expressing their opinions and engaging in discussion in a relaxed atmosphere. While this was true of all groups, the panel would particularly like to emphasise the quality of discussions with the AQ Austria staff, as well as the quality of the contributions of the students participating in the meetings.

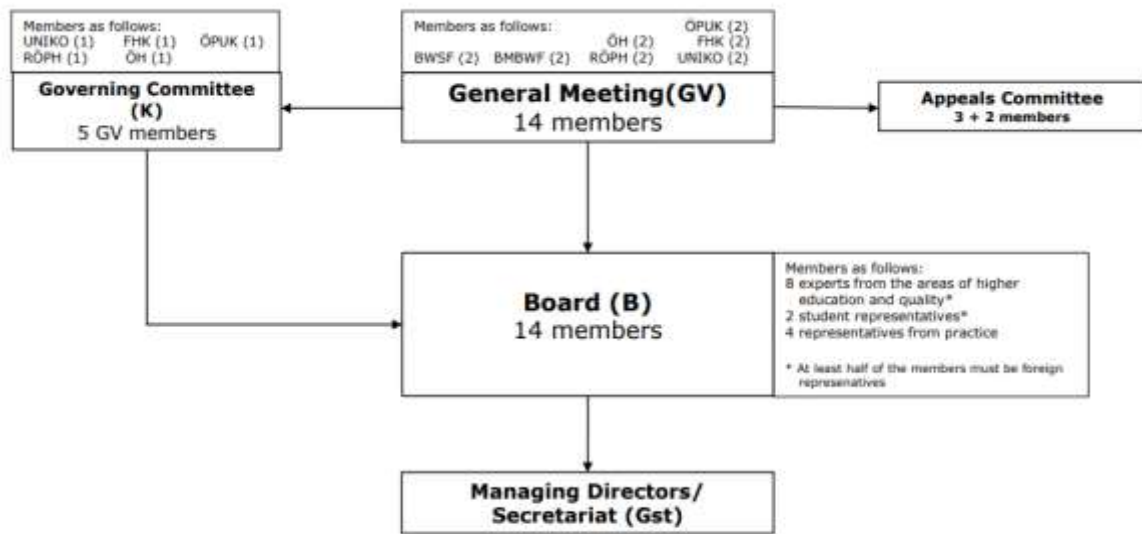
CHANGES WITHIN THE AGENCY

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM

According to the SAR, the Audit Guidelines and the Guidelines for International Accreditation of HEIs and Degree Programmes as well as the new Accreditation Decrees for private universities and universities of applied sciences (UAS) were thoroughly revised in 2018, and then again changed in 2020 to take account of the legal changes. The changes, as listed in the SAR, were the following:

- For UAS as well as private HEIs, it became possible to grant accreditation with conditions for new programmes of existing HEIs.
- The Private Universities Act was replaced by the Private Higher Education Act to enable a conceptual redefinition of the sector as "private higher education" and a future differentiation between private higher education colleges and private universities, the latter being defined by the delivery of at least one doctoral programme. The extension of institutional accreditation can be granted for a period of 6 to 12 years (previously 6 or 12 years).
- It should be noted here that, somewhat confusing, a university is considered private in Austria if it was not established by the federal state, and thus a number of private universities are actually publicly-owned and funded.
- The above legal change was reflected in the number of private HEIs: there are now 19 of them (out of which 17 are private universities), while there were 13 private universities in 2019. The number of HEIs otherwise remained unchanged (21 UAS, 13 Colleges of Teacher Education, and 22 public universities).
- Colleges of Teacher Education were integrated in the external quality assurance system, with AQ Austria tasked with implementing the 1st cycle of audits; these were designed to include two site visits, as was the case also with the 1st cycle for UAS and public universities.
- Audits for all three types of HEIs now include the possibility of selecting an in-depth focus area to strengthen the enhancement aspect of an institution, and added focus on "internationalisation and societal objectives" which according to the SAR enables AQ Austria to take "into consideration international experiences and examples of good practice from different external quality assurance systems for HEIs in the EHEA."
- The requirements for annual reports were redefined. As explained by the SAR, p. 12, "Whereas the UAS and private higher education institutions were previously required to describe "developments in the review areas of accreditation", they are now expected to provide a more broadly conceived "presentation of the achievements and activities" of the HEIs."

AQ AUSTRIA'S ORGANISATION/STRUCTURE



BWSF – Advisory Council for Economic and Social affairs (2 members)
 BMBWF – Federal Ministry of Education, Science and Research (2 members)
 ÖH – Austrian National Union of Students (2 members)
 RÖPH – Rectors' Conference of the Austrian University Colleges of Teacher Education (2 members)
 UNIKO – Universities Austria (2 members)
 FHK – Association of Austrian Universities of Applied Sciences (2 members)
 ÖPUK – Austrian Private Universities' Conference (2 members)

Image: structure of AQ Austria bodies (source: AQ Austria [website](#))

While the structure of the AQ Austria bodies – with the General Meeting serving as the advisory body which elects the Governing Committee from among its members, and which appoints the Board as the main body of the agency – remains unchanged, there was a change in the composition of the General Meeting. In 2021, the number of members was reduced from 23 to 14 in accordance with the Act on Quality Assurance in Higher Education and adjusted to include representatives of the Rectors' Conference of the Austrian University Colleges of Teacher Education.

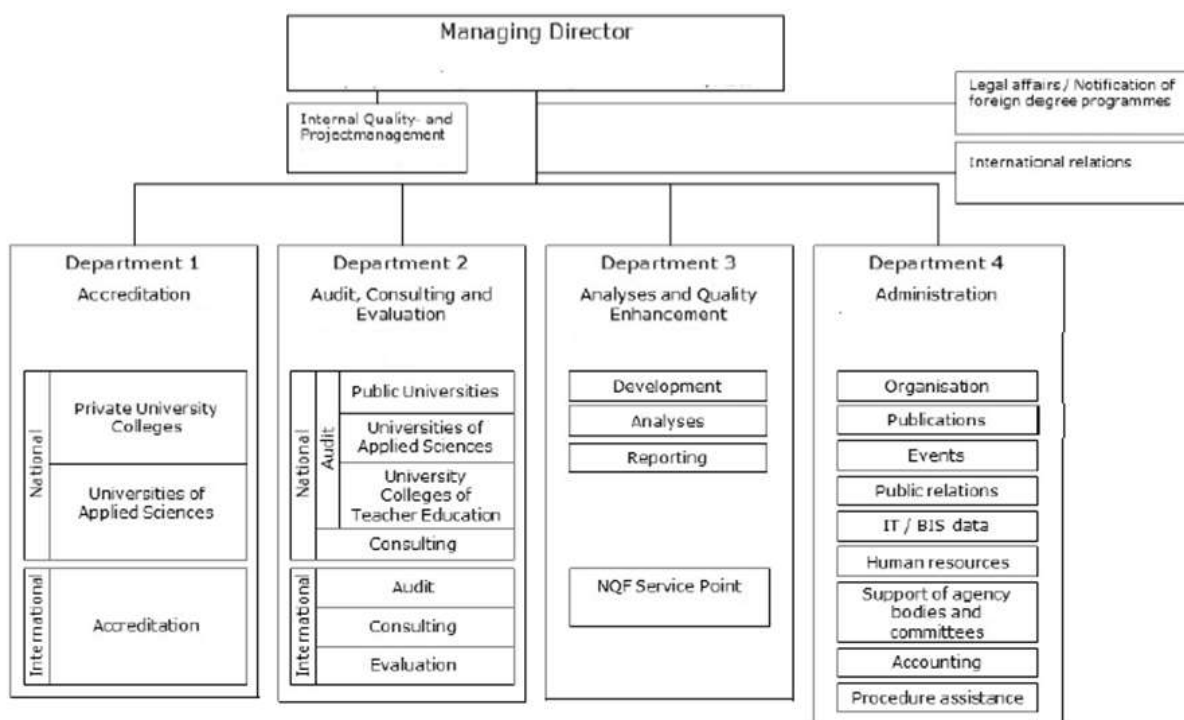


Image: structure of AQ Austria's secretariat (adapted from the AQ Austria 2023 Internal Quality Management Implementation Report)

Regarding changes to the Secretariat, in January 2023, internal quality management was transferred from the Analyses and Enhancement department to the Management. As of September 2023, 33 persons were employed in the Secretariat, amounting to 28.6 full-time equivalents (FTEs). This represented a reduction of 3 individuals when compared to the previous year, but no change when compared to 2019.

The agency was affected by the Covid pandemic in that it developed IT-infrastructure for remote work and online meetings, both of which it continues to use.

AQ AUSTRIA'S FUNDING

There have been no major changes in the AQ Austria's funding, except that overall, it has decreased slightly from 3 million euros in 2018, to around 2 million annually by the federal government plus around 700,000 euros from AQ Austria's own revenue. AQ Austria's expenses, however, have largely stayed the same at between 2.5 and 3 million euros annually, with the difference made up from the agency's reserves. While federal funding is generally stable, AQ Austria's own revenue depends on the number of applications by HEIs. Accreditations outside Austria are one potential source of revenue which has not been prioritised due to the scope of tasks within Austria. Currently the agency is planning to increase its activities in Switzerland, which could increase the revenue base and thus decrease the pressure on the reserves.

AQ AUSTRIA'S FUNCTIONS, ACTIVITIES, PROCEDURES

Substantive changes within the agency were reported to EQAR in February and March of 2023, and accepted by the EQAR Committee in May 2023. These refer to the following.

- While previously only programme accreditation had been performed internationally, the procedure of international institutional accreditation, modelled after those performed in Austria, was developed in 2019, and thus included in the ToR for this review.
- In line with the German regulations, AQ Austria discontinued the programme and system accreditation in Germany according to the pre-2018 rules.
- AQ Austria discontinued the voluntary accreditation of continuing education programmes at higher education institutions in 2021, due to legal changes which introduced as a new activity a review procedure for programmes for continuing education for which concerns exist. As was explained to the panel during the pre-visit meeting, HE programmes for continuing education are very varied in Austria and can be delivered as equivalent bachelor or master programmes. They are considered the responsibility of the HEI and part of the IQA. This procedure puts AQ Austria in a supervisory role, enabling it to assess the programme for which substantial complaints were submitted to the competent ministry and not accounted for by the HEI; the outcome can be a recommendation to the HEI to improve or close the programme. As was the case also with the voluntary accreditation, the procedure was never implemented in practice. The EQAR Committee was satisfied that it was outside the scope of the ESG.
- Following a change in the Act on Quality Assurance in Higher Education the 'notification of foreign degree programmes in Austria' procedure was extended to institutions from non-EU or non-EEA countries. The EQAR Committee took note that the notification procedures by AQ Austria are desk-based, considering the standards of the country of origin or domicile. If the notification has been approved, the educational institution may start the operation of the degree programmes in Austria. The degree programmes and academic degrees are considered to be those of the educational institution's country of origin. The procedure does not provide any equivalence with the Austrian degree programmes. As the activity is not a peer assessment but a limited desk documentation activity, the Register Committee concurred with AQ Austria that this activity was outside the scope of the ESG. The panel discussed this further at the pre-meeting after learning from AQ Austria's documents that procedure can in fact include a peer assessment and a site visit in the case of non-EU/non-EEA providers. However, the panel was satisfied with the information that while this was indeed the case, the aim of the procedure is merely to confirm that the programme follows the legal standards of its country of origin; teaching and learning are not assessed, and the outcome of the procedure is not an accreditation or an evaluation.
- The Committee further noted that AQ Austria has expanded its evaluation activities and has recently carried out a number of DeGEval type evaluations on behalf of the research association of the Northern Rhine-Westphalia, one of the German federal states. The differentiation between the evaluations and other consulting activities, and those in line with the ESG as part of the ESG standard 3.1 was added to the ToR for this review.
- AQ Austria had been involved with the recognition of prior learning (recognition of formal, non-formal and informal competences; RPL) for several years within various national and international projects, and "information and counselling on questions of recognition of non-formally and informally acquired competences" was added to its statutory tasks in 2021. This is an activity outside the ESG which has, as noted by AQ Austria, brought additional funding and improved their public perception.
- While there have been no changes in the implementation of the European Approach for Quality Assurance of Joint Programmes, this has become an important activity for AQ Austria,

especially with the increasing number of European Universities and thus joint programmes in Austria.

FINDINGS: COMPLIANCE OF AQ AUSTRIA WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG) WITHIN THE SCOPE OF THE REVIEW

ESG PART 3: QUALITY ASSURANCE AGENCIES

In the part 3 of the ESG, the ToR refers to 3.1: considering how the agency clearly separates between its activities that are within and outside the scope of the ESG, in particular considering the agency's newly introduced procedures i.e. 'review procedures for programmes for continuing education' as well as the agency's other tailored evaluation activities concerned with teaching and learning in higher education.

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.

2019 review recommendation

While this standard was assessed as Fully Compliant in 2019 and thus not connected with a recommendation, the suggestion for further development were given which remain relevant for this current report:

- 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 more clearly distinguished from the quality assurance activities which are provided by AQ Austria.

Evidence

Several activities conducted by AQ Austria are outside the scope of the ESG, as discussed in detail in the last Substantive Change Report of AQ Austria and described in SAR pp 5-6.

A recent activity tasked to AQ Austria by the legal framework involves *Developing and carrying out review procedures for continuing education programmes* (§ 26a HS-QSG). Within the framework of audits of public universities and universities of applied sciences, AQ Austria assesses the way in which HEIs ensure the quality of programmes (both degree as well as non-degree programs) and learning and teaching processes. In the case of private universities, the AQ Austria website states that if programmes lead to academic degrees, they have to undergo programme accreditation. However, programmes of continuing education that do not lead to degrees are not directly assessed in accreditation or reaccreditation procedures. The programmes of continuing education in Austria are varied, from short courses to programmes leading to academic degrees, and AQ Austria staff note that they are an aspect of the Austrian system often difficult to explain to outsiders, although well understood within the country. AQ Austria used to offer voluntary evaluation of programmes of

continuing education, but legislation was changed to allow AQ Austria to evaluate such programmes as described by the SAR, “only in cases where substantial deficits have become evident: In cases of reasonable doubts with regard to the quality of conduct and contents of the programme, HEIs need to undergo an external programme-related supervisory process.” If such a procedure were to be invoked and AQ Austria did not find issues with the quality of the offering, the procedure would have no outcome; if issues were to be identified, AQ Austria can require improvements or order the HEI to terminate the programme. Although AQ Austria did develop the procedure in a specific decree, none have taken place in practice, and the activity is considered to be outside the scope of the ESG.

Another example of AQ Austria’s duties outside the scope of the ESG is the notification of foreign programmes delivered in Austria, a registration procedure which requires foreign HEIs to prove that they are accredited in their home countries and, in case of non-EU and non-EEA HEIs, operate in line with the legislation of their home country. Again, while this procedure can be modelled after the regular reviews, especially in the case of non-EU and non-EEA HEIs, and the procedure can even include the appointment of expert panels, AQ Austria staff emphasise that it is paper-based, that the focus is not on QA of programmes or institutions, and the outcome is not an accreditation, as AQ Austria can either issue recommendations for improvement or require that the programme is not be offered in Austria (negative decision). As discussed with AQ Austria on site, while some of these programmes are very successful, some of them have shown to be problematic and/or unaccredited in their home countries. Additionally, some HEIs have used the fact that they have registered with AQ Austria to falsely market themselves as accredited in Austria. AQ Austria staff note that in those cases they have an unfortunate role of acting as a watchdog, monitoring HEIs and preventing them from misleading the public. While the ‘easy’ solution for these issues for AQ Austria, mentioned by the panel, would be to stop the procedure altogether, it is the opinion of AQ Austria staff that the agency needs to protect the potential students as far as it is able to. AQ Austria staff expect that the legislation will change in a way that will allow them to also ask for evidence that the programmes themselves have been accredited in the respective home countries. The agency also offers information to the public, including a database of the registered programmes on their website (which clearly states that these programmes are registered, but not accredited in Austria).

The stakeholders at the site visit were aware of the existence of these procedures and viewed them as part of the AQ Austria’s role as a supervisory and an administrative body, and thus different from the core AQ Austria’s tasks which focus on quality reviews and quality enhancement.

While the above two activities are clearly defined by law, AQ Austria also has the remit to provide evaluation and consultation services and has the authority to decide on these and design them. AQ Austria staff confirmed during discussions that they were aware of the potential confusion that could arise if quality assessment processes were not clearly distinguished from consultations and other supportive activities. The SAR explains that AQ Austria offers services to HEIs in Austria and abroad on issues related to the establishment, further development or implementation of their quality management system or individual measures. Furthermore, HEIs can contract the services of AQ Austria when preparing for external quality assurance procedures conducted by other agencies. AQ Austria also offers tailor-made evaluations which are carried out as peer review procedures looking at compliance with standards for research quality and other types of standards other than the ESG, but also as services in preparation of an evaluation to HEIs in Austria and abroad. The SAR provides examples of both activities, and AQ Austria submitted to the panel a complete list of evaluation and consultation projects. This information is publicly available in AQ Austria’s annual reports.

The SAR states that “a strict and transparent distinction between quality assurance procedures based on the ESG and other activities is crucial, which is ensured by a clear, distinctive presentation of AQ Austria’s activities, including the AQ Austria website, the relevant decrees or documents, and publications. This separation is particularly emphasised with regard to evaluation and consulting

services, to avoid infringement with other QA-activities.” The panel discussed this at a number of meetings on-site. The representatives of HEIs the panel met during the site visit mentioned that the existence of consulting services opened up the potential for conflicts of interest – primarily that AQ Austria could use information learned during consulting projects to inform a subsequent review of an HEI (which could be considered to be potentially prejudicial); but also that a third party (or an HEI) may perceive that an inappropriate advantage is conferred to an HEI that has undertaken a consulting project with AQ Austria. These issues were identified in the 2019 report as the reason why UAS and private HEIs would hesitate to commission AQ Austria for services. During the site visit the panel met representatives of UAS and HEIs that have either commissioned AQ Austria for services, or were considering doing so. Along with other stakeholders, they were unanimous in the view that while such risks theoretically existed, they did not present an actual threat, as they all described AQ Austria as professional and trustworthy. As additional safeguards, they mentioned the fact that different departments and different people often work on these activities, and significantly that consultancies and evaluations consider aspects of HEI work that differ from those checked by AQ Austria reviews, with both issues and peers selected in cooperation with the HEI. AQ Austria staff further explained that the agency is specifically prohibited by the QA Act to audit institutions for which it provided consultation services on the design of their internal quality management (IQM) systems in the next audit cycle. However, AQ Austria is still able to provide consultation for such HEIs on other issues - in practice, this has happened once since 2019, when they helped select peers for an evaluation of a department of a university they later audited (the peers selected then were not involved in the audit).

The agency can also provide consultation services to UAS and private HEIs in spite of the fact that they accredit both them and their programmes. AQ Austria staff explained that in these cases, the focus is always defined in the contract and relates to specific issues chosen by the HEI, rather than the fulfilment of any of the accreditation standards, or the design of the IQM. They also mentioned that in practice, this has never required explaining, as HEIs clearly understand that AQ Austria’s roles cannot overlap. This was also independently noted by the HEI stakeholder group and hence the statement was triangulated. However, this group also noted that, for the sake of clarity for third parties, this could be better explained in various AQ Austria documents and on its website.

Additionally, part of AQ Austria’s mission is supporting quality enhancement at HEIs, which includes activities related to the recognition of prior learning, acting as an NQF service point for non-formal HE qualifications, general support to HEIs regarding QA matters and procedures, and various workshops and conferences. At the site visit, a number of stakeholder groups spoke highly of the expert services AQ Austria provides, especially regarding the recognition of prior learning. A recent conference on lifelong learning was also mentioned as a success by both the stakeholders and AQ Austria staff. Finally, an example was given of how AQ Austria staff were available for meetings and discussions to explain everything needed to apply for reviews in line with the Austrian legislation to those institutions that need such support.

Analysis

In line with the ESG, programmes of continuing education are considered part of the HEI’s IQM systems and are thus taken into account by all of AQ Austria’s procedures. However, whilst AQ Austria’s audit procedure has the legal basis to take into account any learning and teaching taking place at the HEI, institutional accreditations and re-accreditations of UAS and private HEI-s can only assess degree programmes. In effect, considering that private HEIs only undergo accreditations and re-accreditations, their non-degree programmes are only implicitly checked through the general assessment of IQM. This is not considered problematic or confusing in the Austrian context, where these programmes are understood as different from other HEI programmes that lead to a degree. They are specifically evaluated by AQ Austria only in the case of complaints, in a procedure which closely follows the model of the ESG-related procedures, meeting the requirements of the ESG part

2, apart from being cyclical. It is clear that the procedure is not within the scope of the ESG in its nature, as it does not lead to awarding any kind of certificate, label or mark. The panel did not identify any room for confusion between this activity and those within the scope of the ESG.

The procedure of the notification of foreign programmes is, again, not within the scope of the ESG in its nature. However, while this is clear to the AQ Austria stakeholders and the panel, and well explained at the AQ Austria website, the agency reports that in this case there is a risk of misrepresentation by foreign HEIs. The agency is not only well aware of the risk but is actively working on monitoring, identifying and rectifying any such misrepresentation. This task will probably become easier if AQ Austria is successful in lobbying for a change to legislation so that the procedure also seeks evidence of programme accreditation in the home country of the HEI.

The evaluations and consultations are clearly differentiated from the ESG-related procedures on the AQ Austria website as well as in their documents. In discussions with stakeholders at the site visit, it was confirmed that there was no potential for confusion between AQ Austria's QA activities, and consultations and evaluations. However, as discussed above, the panel established that there was potential for confusion regarding the mechanisms for avoiding conflicts of interest and ensuring that no confidential information is shared between these two types of activities. Namely, while these mechanisms are clearly present and well-known to the stakeholders, they cannot be found on the AQ Austria website nor specifically mentioned in the consultation and evaluation contracts.

Finally, regarding the AQ Austria's work aimed at supporting quality enhancement, which includes its work on the recognition of prior learning that was positively referenced by a number of stakeholder groups at the panel visit, the panel identified no confusion with the ESG-related QA activities, or confusion among stakeholders between AQ Austria's "support" and "assessor" roles. The agency staff are available for explanations and support to HEIs regarding the procedures they conduct. The agency is also acting as a centre of expertise, supporting HEI development regarding topics such as the recognition of prior learning and lifelong learning. The stakeholder views supported the belief of AQ Austria that this type of work was well recognized and appreciated and serves to improve the AQ Austria's public image.

Panel commendations

- I. The panel wishes to commend the agency for its work on supporting quality enhancement within HEIs, which is well recognised and appreciated by the stakeholders.

Panel recommendations

- I. The panel recommends that AQ Austria adds an explanation on avoiding conflicts of interest between consultations and evaluations and their regular QA activities on their website (e.g. explaining cases in which they cannot offer such services to an HEI, ensuring confidentiality in consultations and evaluations) and adapts the templates for contracts as required.

Panel conclusion: compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

In the ESG Part 2, the ToR required the panel to look at ESG 2.1 for all AQ Austria procedures within the ESG; ESG 2.2 only regarding the new institutional accreditation procedure for international HEIs; ESG 2.3 only regarding follow-up in German and international accreditation, and the implementation of the international accreditation procedure in case of a combined institutional and programme level accreditation; ESG 2.5 regarding consistency in the case of the new

institutional accreditation procedure for international HEIs, and regarding the German system; and 2.6 regarding the publication of reports in the German system.

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

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

2019 review recommendation

Under 2.1, the 2019 panel made the following 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.

Additionally, under the standard 2.5 but relevant here, the 2019 panel recommended “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.”

Evidence

The 2022 AQ Austria’s Follow-up Report for ENQA states that guidelines for international programme accreditation were revised in 2019 to take into account the recommendations made by the review panel in 2019. The report states that 1.8 is not applicable to procedures in Germany and explains that even though the full application of ESG Part I is not intended by law for public university audits in Austria, since “audits should be regarded as complementary to other QA procedures”, nonetheless the 2021 audit guidelines do include standards referring to studying and teaching, as they were revised to take into account the panel’s recommendation. The 2023 SAR repeats much of this, adding that while 1.8 is not covered by the audit procedure, public universities are obliged by law to publish relevant information. However, the table provided in the SAR also lists standards focusing on ESG 1.8 for the German procedures, as is the case in the analysis of the standards provided by the German Accreditation Council (GAC) in its ENQA review. For all types of procedures, the panel checked the standards against the ESG, and the tables provided, and then looked at a sample report randomly chosen from the AQ Austria website, to confirm that all of these are assessed in practice.

Here it is also relevant to mention that audit guidelines were not only revised in 2021, but also separated into three different documents for the three different types of HEIs that can be audited – public universities, UAS and university colleges of teacher education (UCoTE). However, the three documents differ only slightly in terminology and wording and numbering of the standards.

In the compliance mapping table in SAR all EQA procedures of AQ Austria in the scope of ESG were analysed, including the European Approach to QA of Joint Programmes and accreditations in Germany and Switzerland. The analysis of the mentioned three EQA activities in the table was unexpected in the sense that AQ Austria highlighted several aspects where, in their opinion, compliance with the first part of ESG is rather insufficient, even though all these EQA procedures have already been assessed multiple times as compliant with ESG. However, as AQ Austria is not responsible for these

standards and has no possibility to change them, the panel decided not to include the analysis of the European Approach to QA of Joint Programmes and accreditations in Germany and Switzerland in the compliance mapping table of the review report and focused only on the analysis of the sample of AQ Austria's reports based on these standards. For other procedures, both the content of standards as well as the implementation of the standards in sample reports were analysed.

Table: AQ Austria's procedures and ESG - Mapping table (adapted from the SAR)

	Audit	Institutional Accreditation	Programme Accreditation	International Accreditation		
				Institutional	BA and MA programmes	PhD programmes
ESG I.1	Standards 1, 2	§15 (4), (12)	§17 (1)	Criterion 10.1	Criteria 1, 10.1	Criterion 10.1
ESG I.2	Standard 3 (and 4 at UCoTE)	§15 (5)	§17 (1), (2)	Criterion 3	Criteria 2.5, 2.7	Criteria 3.2, 3.4
ESG I.3	Standard 3 (and 4 at UCoTE)	§15 (5), (6)	§17 (1), (2)	Criteria 4.1, 4.2	Criteria 2.5, 8.2	Criteria 3.3, 4.3, 4.5
ESG I.4	Standard 3 (and 4 at UCoTE)	§15 (5)	§17 (2), (7)	Criterion 9	Criteria 2.8-2.10, 9.2	Criteria 4.6-4.8
ESG I.5	Standards 3, 5 (3, 4, 7 at UCoTE)	§15 (8)	§17 (4)	Criteria 5.4, 6.1-6.6	Criteria 3.1-3.6, 6.1, 6.2	Criteria 5.1-5.5
ESG I.6	Standard 3 (and 4 at UCoTE)	§15 (6), (9), (10)	§17 (5), (6)	Criteria 4.1, 7, 8	Criteria 4, 5, 8.1	Criterion 6
ESG I.7	Standard 2	§15 (2), §16 (2),	§17 (2)	Criterion 10.2	Criterion 10.2	Criterion 10.2
ESG I.8	n/a (regulated by sectoral HE acts)	§15 (12)	/	Criterion 11	Criterion 11	Criterion 11
ESG I.9	Standard 3 (and 4 at UCoTE)	§15 (4)	§17 (1)	Criteria 1.2, 10.3	Criteria 1.2, 10.3	Criteria 1.2, 10.3
ESG I.10	n/a (regulated by law)	§9 (2), (4)	§9 (2)	Criterion 10.3	Criterion 7	Criterion 7

During the site visit, in addition to checking specific gaps identified in the analysis with the AQ Austria staff and reviewers, the panel asked most groups of stakeholders about their interpretation of the ESG I.3. The AQ Austria staff noted that they saw students as central to all of their activities, and that any

issues regarding HEI quality should be interpreted from the perspective of relevance for students. HEIs commented that AQ Austria's ex-ante procedures were especially valuable for providing a student perspective before any students are enrolled at the HEI or on a programme. Finally, the students reported on their active involvement in programme design and evaluation. Alignment of teaching methods, content and assessment was mentioned as another important aspect in all AQ Austria's procedures, either assessed directly in programme accreditations or as included in the IQM systems in institutional-level procedures.

Analysis

The analysis of compliance with the Part I of the ESG is done separately for audits (where the standards for public universities, UAS and UCoTE are almost the same, with minor differences in wording and numbering), accreditations in Austria (because criteria for institutional and programme accreditation are complementary, and almost the same for private HEIs and UAS), international institutional and programme accreditation, accreditation in Germany, accreditation in Switzerland, and accreditation of joint programmes according to the European Approach.

Audit at public universities, universities of applied sciences and university colleges of teacher education

ESG 1.1: As is noted in table above, audit Standard 1 requires and defines a quality management strategy and involvement of internal stakeholders, while Standard 2 focuses on quality procedures and requires involvement of external stakeholders where appropriate. It is not explicitly stated in either that the strategy needs to be public; however, it is visible from the sample reports that the quality policies and strategies are published.

ESG 1.2: The table above lists Standard 3, which (in the Note – basically a guideline for the Standard) does mention the development of study programmes and student competences. It does not refer to student qualifications; however, these are defined in detail by the University Law. While for UAS and public universities there is a single standard for all types of programmes, for colleges of teacher education there is a separate Standard 4 for programmes of continuing education, as an important part of their role.

ESG 1.3: Standard 3, listed in the table above, does mention in the Note that the university's IQMS should include “the further enhancement of teaching and learning processes”, “supporting and counselling services for students in all phases of their studies” and “support for students in the learning process”. This standard does not mention the active role of students, however, in the Standard 1 students are listed among the internal stakeholders who take part in defining the concept of quality and are responsible for ensuring it. All the sample reports that the panel checked covered student involvement, how active they are and if their feedback is taken into account, and all stakeholders on site confirmed this to be an important aspect of audits.

ESG 1.4: The Note for Standard 3 lists “the review and assessment of students' competences and performance in all phases of their studies (including access to higher education and possible admission procedures).” The importance of this aspect, as noted, was emphasised by stakeholders on site. Additionally, AQ Austria supports the development of recognition of non-formal and informal learning at Austrian HEIs, providing workshops and guidelines, with HEI representatives all mentioning its expertise.

ESG 1.5: The table lists Standard 3 (with the Note specifying “support for teachers in the teaching process”) and Standard 5 (Standard 7 for university colleges of teacher education), which specifically refers to the management of human resources, with the Note referring to selection, appointment and development of teaching staff. The fairness and transparency of the procedures are not mentioned in the standard but are assessed in practice as is clear from the sample reports.

ESG 1.6: The table lists Standard 3, which, as noted, refers to support to students and achieving the objectives of study programmes, but does not specifically mention learning resources or funding. The sample reports show that the panels look at the procedures connected to all types of resources along with satisfaction surveys among internal stakeholders and various performance indicators relevant for particular HEIs, such as success in applying to external funding, student employment etc.

ESG 1.7: The table lists Standard 2, the Note of which specifically requires the university to collect information on all of its activities and use the results of its analysis for quality enhancement and management.

ESG 1.8: As noted, this standard is listed as not applicable. However, the SAR correctly notes that the respective sectoral laws cover publicity of information in detail, with regulations such as the date until which changed curriculum needs to be published to take effect in the following semester.

ESG 1.9: Standard 3 listed in the table does require that “university implements quality management measures along the targeted objectives in the fields of studying and teaching and the societal goals” while its Note lists “the development of new study programmes and the further development of existing study programmes” as one of the aspects covered. The sample reports show that the communication of the results of quality enhancement activities is assessed on site.

ESG 1.10: The Table lists § 18 para. 1 of the Quality Assurance Law, which requires universities to undergo audits every 7 years.

Institutional and programme accreditation of universities of applied sciences and private higher education institutions

ESG 1.1: In initial institutional accreditation, the HEI must have a quality assurance system embedded in its strategic management. The extension accreditation assesses the functioning of the system in detail. Programme accreditation assesses if the programme introduction and delivery are part of the QA system.

As seen in the sample reports, the newly established universities are required to have a development plan which contains clear objectives and design of the QA system; a published quality policy and information on the institution and the courses; and statutes with a list of pre-defined matters to cover, such as ethics and including the student voice. In all types of reviews considered here, student involvement in the system was discussed by the panel.

ESG 1.2, ESG 1.3, and ESG 1.4: While the standards for initial institutional accreditation of UAS and private HEIs differ somewhat in wording, they both clearly cover all aspects of the ESG standards. The same standards are again assessed in the programme accreditation procedures. As found in the sample reports, for newly established institutions, the panels assess the procedures for programme establishment, and if they are appropriate for the institutional profile. Student support is assessed as well as the degree to which the institution is ‘student-centred’. The learning outcomes and the progression regulations are assessed for each study programme separately. In programme reviews all three standards are assessed in detail, and active participation of students is part of the standards.

ESG 1.5: While the UAS standards focus in detail on the minimal number and competences of teachers per course, those for private HEIs prescribe that at least 50% of teaching must be done by permanently employed staff, while defining their competences more generally and looking at the research environment. The same standards exist in all the procedures considered here. Statutes of institutions are required by the standards to cover issues related to staff employment and development, gender equality etc.

ESG 1.6: All the procedures assess if the funding and the infrastructure necessary to deliver programmes, graduate all admitted students and ensure student support are available.

ESG 1.7: Both initial and extension accreditation require HEIs to submit a development plan, with a pre-defined list of types of information that need to be collected and analysed as a basis for quality assurance and management.

ESG 1.8: The publicity of information, including curricula, is assessed in the institutional accreditation procedure. The programme accreditation procedure does not have a comparable standard, however, sample reports show that the panels assess the availability of information on the curricula to current and prospective students.

ESG 1.9: The initial accreditation assesses if HEIs have established processes to evaluate and enhance study programmes and that ensure that they will pass the accreditation procedure; the extension accreditation assesses the effectiveness of these processes, and the programme accreditation assesses if the programme was subject to them.

ESG 1.10: The accreditation decrees stipulate that six years after the initial accreditation, HEI must undergo re-accreditation (extension accreditation), which is valid for between six and twelve years. After that, according to the QA Law, UAS must undergo audits valid for seven years, while private universities continue undergoing accreditation extensions every 12 years. Programmes only undergo initial accreditation. However, because the decision on programme accreditation has the formal status of an administrative decision, any changes to the programme duration, name, content etc. have to be reported to AQ Austria. AQ Austria then completes a procedure to formally change the decision, which involves the Board and can involve appointment of an expert panel in case of significant changes. Both UAS and private HEIs submit annual reports to AQ Austria. The format of these reports has been changed by AQ Austria and some HEIs at the site visit found that it was now more useful and focused on the effectiveness of the IQA, while others still consider it to be a potentially unnecessary legal formality.

International accreditation

ESG 1.1: The institutional accreditation criteria assess if the institution has a quality assurance system, and the programme accreditation assesses if the programme is part of it. As above, one aspect of the standard not assessed is the publicity of the quality assurance policy; it can be assumed following the above examples that this would be assessed in practice, however there is no way to confirm that as there have been no reports since 2019.

ESG 1.2: Institutional accreditation only generally assesses if the institutions have processes for development of study programmes which involve stakeholders. The BA and MA programme criteria explicitly assess all other aspects of this standard, while for PhD programmes the workload of the taught part is assessed. This means that if only one of the procedures is applied, only a part of the standard will be covered.

ESG 1.3: Institutional accreditation assesses if students receive support and counselling and if they can submit complaints. The BA and MA programme accreditation procedure assesses whether there is assurance that the learning outcomes are reached, if students play an active role in the process, and if they are able to file complaints. The procedure for PhD programmes assesses if students receive counselling, and if achievement of learning outcomes is ensured and adequately assessed.

ESG 1.4: Institutional accreditation does not explicitly look at the regulation of the student life cycle. The programme accreditation explicitly looks at regulation of student admission, achievement of learning outcomes, recognition and mobility.

ESG 1.5: Institutional accreditation assesses if at least 50% of teaching is done by the permanently employed staff, if they are involved in research and have opportunities to develop. In addition to that, the BA and MA programme accreditation procedure assesses the balance between teaching and research, and PhD programme accreditation also looks into their specific relevant experience. As above, employment procedures are not assessed.

ESG 1.6: Both institutional and BA and MA programme accreditation assess if there is adequate student support, infrastructure and funding. The PhD programme accreditation assesses if there is sufficient funding.

ESG 1.7: Only the institutional accreditation procedure assesses if the institution collects relevant information.

ESG 1.8: Institutional accreditation assesses if the “HEI publishes easily accessible and up-to-date information on its activities on its website, including, as a minimum, the curricula and study regulations as well as examination regulations, and an outline of the quality management system.”

ESG 1.9: Institutional accreditation assesses generally if teaching and research are part of the QAS, but does not go into specifics as defined by the ESG standard.

ESG 1.10: The criteria require that the institution and the programme implement quality assurance, but not explicitly that they undergo external QA procedures. However, the procedure allows only accredited HEIs to apply, and programmes can be considered only if they are accredited and have already graduated at least one generation of students. On site, AQ Austria staff explained that failure to meet these preconditions is often the basis for refusing a request for international accreditation.

To summarise, the panel’s analysis has identified some potential gaps in the ESG compliance: not all aspects of 1.1., 1.5 and 1.10 are explicitly covered by the standards; 1.2, 1.3, 1.4, and then 1.7, 1.8 and 1.9 are fully covered only if both institutional and programme accreditation are implemented. At the same time, the Guidelines for International Accreditation start by explicitly mentioning that the standards are based on the ESG and look at their implementation, and the panel has seen in other AQ Austria reviews that all aspects of the ESG standards were covered even when this was not explicitly required by the procedure standards. It is also clear from the discussions with the AQ Austria staff that while developing the standards they wanted to keep them brief and flexible, with the understanding that the reference points would be clarified, and detail added during the contracting with the institution. Thus, while the standards for international accreditation could be made more explicit in some respects, the panel believes that they would enable full coverage of the ESG Part I when specified in each particular case in the contract concluded with the higher education institution, taking also into account the local context. Unfortunately, the panel was unable to assess any specific contract or report, as AQ Austria had not conducted any international accreditations during the previous period.

European Approach for Quality Assurance of Joint Programmes

Regarding the quality assurance of joint programmes according to the European Approach, the SAR table does not indicate coverage of all ESG standards, indicating that 1.5, 1.7, 1.9 and 1.10 are not covered. However, in the panel’s analysis, standard 7.1 of the European Approach explicitly covers programme staff, and 1.7, 1.9 and 1.10 are implicit in standard 9 which refers to quality assurance. Examination by the panel of a sample report showed that all were appropriately discussed by the AQ Austria’s panel, with the key recommendations referring precisely to the faculty and the QA

arrangements. At the site visit, AQ Austria staff explained that while the ESGs are indeed covered by the standards, in the table they have highlighted those that they feel could benefit from improved wording or mapping within the standards. They also noted that there still are additional legal conditions that have to be assessed for Austrian institutions even when conducting the reviews according to the European Approach.

Institutional accreditation in Switzerland

According to the Swiss legislation, HEIs are accredited based on the criteria listed in the law (e.g. high quality of staff, teaching and research etc.) and against the international criteria – the ESG. It thus makes little sense to assess if standards do indeed cover the ESG, and there have been no such reviews by AQ Austria in the relevant period, and thus no reports to check if these are applied in practice. AQ Austria is closely cooperating with the relevant Swiss authorities and does plan to implement more of these reviews in the future, thus meaning that this is something that will be looked at in more detail by future reviews of AQ Austria.

Accreditation in Germany

This is done according to the standards from the Specimen Decree, as adapted into the legislation of the specific federal state. The panel discussed the analysis provided by AQ Austria, finding that it matches the one provided by GAC in its ENQA review. It should only be added that while the table 6 from the SAR correctly notes that §18 of the Decree requires HEIs to publish information on programme accreditation, other types of information required under ESG 1.8 are required by state laws, rather than the Decree. AQ Austria has carried out only one system accreditation in Germany; the report is very thorough in its ESG coverage. Specifically, the various types of information under ESG 1.8 have been assessed under a number of standards. It should also be noted that the Specimen Decree standards have been analysed against the ESG in the ENQA review of GAC, also confirmed by EQAR, and that GAC has accepted the AQ Austria's report as in line with the standards, without asking for any additional changes and clarifications.

Panel commendations

2. Even if the standards are sometimes general, the panel wishes to commend the agency for the reports which are very informative and thorough in their coverage of the Part I of the ESG.

Panel suggestions for further improvement

2. While the panel understands that much of this would be covered by the contract with the institution, it would still be beneficial to make the standards for international accreditation more explicit, clarify their reference points as provided by the ESG, and ensure that all aspects are covered by both programme and institutional accreditations if they are to be implemented separately. The panel understands that this is not a priority activity for the AQ Austria, and thus the timing of the implementation can be dependent on the timing on any future applications to international calls for accreditation offers.

Panel conclusion: 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.

This standard is considered only for the new AQ Austria's activity – international institutional accreditation.

Evidence

The SAR explains that in 2019 AQ Austria introduced PhD programme accreditation as well as institutional accreditations to its international accreditation guidelines to implement the legal changes in Austria as well as to adapt to the developments in the EHEA which put more focus on these two types of accreditations. The international procedures are based on those implemented in Austria, which were developed according to stakeholder feedback in a process of public consultation.

AQ Austria does not conduct initial accreditations internationally - the Guideline for International Accreditations states that it is applicable only to accredited institutions, and degree programmes which have already been completed by a student cohort (p. 4). Since 2019 AQ Austria has refused several requests due to institutions or programmes not meeting the necessary preconditions. While the standards are defined by the Guideline, the details of the procedure and the legal framework are determined in a contract with the institution which is obliged to provide information on the local context and requirements. As reference points, according to the Guideline, the procedure takes relevant EHEA documents and the institution's own objectives. The Guideline does not mention communication with local authorities or knowledge of the local language, regulations and practices as a relevant aspect of the procedure, e.g., when defining experts' competences, only general international experience is required.

AQ Austria staff explained at the site visit that a lot of work is done during contracting to make sure that it covers all the relevant legal provisions in the country. AQ Austria staff also noted that in agreement with the Board, they have decided not to prioritise international accreditations, and pursue them only if they offer added value in terms of improving staff competences. Since 2019 AQ Austria has not carried any international accreditations.

Analysis

The panel finds that the changes to the international accreditation procedure clearly build on the parallel procedures in Austria and are in line with the ESG. While there were no stakeholders to consult, the procedures do follow those in Austria which are based on stakeholder consultations, and clearly refer to the relevant EHEA documents, most importantly the ESG. The objectives of the procedure are to be fully defined in the contract with the institution, along with interpretation of standards, which is to provide re-accreditation or additional quality label, rather than providing ex-ante accreditation or accreditation against the Austrian standards. The panel holds that the fact that only accredited institutions and programmes are taken into account does ensure that they are in line with the regulations in their local jurisdictions. It is also clear that the AQ Austria staff invest much effort into ensuring that this is indeed the case before contracting a HEI; the Guidelines however mention this only as a condition, without any further details.

Panel suggestions for further improvement

- I. We believe that Guidelines for International Accreditation would be improved by describing more thoroughly what evidence is required from an HEI to prove that it is accredited in its jurisdiction and works in line with the relevant regulations, as well as providing more information on the contracting process and what the contract would need to include.

Panel conclusion: 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

This standard is considered for:

- the new AQ Austria activity – international institutional accreditation - considering how the agency ensures the implementation of the accreditation procedure in case of a combined institutional and programme level accreditation, and
- accreditation in Germany, when considering the respective roles in the follow-up by GAC and AQ Austria, as highlighted by the last ENQA review of GAC - how does the agency ensure a consistent follow-up, verifying the implementation of any conditions imposed with or attached to its decisions.

Evidence

The Guidelines for International Accreditation have a common chapter with procedural rules, and then specific chapters with criteria for each type of accreditation – institutional, BA/MA, or PhD. The procedural rules remain unchanged regardless of the number of the procedures applied. The procedural rules require that there is always an institutional SAR, a site visit with peers which includes a tour of the facilities and the infrastructure, meetings with all relevant stakeholders, review report and a Board decision that can be appealed. The details of the procedure are to be set in the contract with the institution. The Guidelines clearly specify that fulfilment of any conditions is to be assessed within nine months by peers, which will be additionally included in the costs, and that HEIs failing to prove fulfilment of conditions lose accreditation. HEIs are also obliged to report any changes in the 6-year accreditation period. The Guideline mentions no other forms of follow-up. However, AQ Austria notes in the SAR that a follow-up workshop might be offered. The agency does have a practice of offering voluntary follow-up in audits, however this would incur additional costs and has never been taken up by an institution.

Accreditation in Germany is regulated by the Specimen Decree, which explicitly states (§ 27 and § 28) that in case of conditions, their fulfilment is reported to the German Accreditation Council, and the same is true of any changes to the accredited programmes or the institution. In the one procedure implemented since 2019, while the AQ Austria panel did not consider it necessary to impose conditions, GAC did turn one of their recommendations into a condition to ensure consistency. The AQ Austria website provides links to the GAC decision, from where it is visible that GAC did assess the fulfilment of the conditions and that the institution was successful. The communication in the German system takes place between GAC and the HEI, and the AQ Austria panel member that the panel met at the site visit explained that, as the review took place in the early days of the new German system, there was a lot of fruitful communication between the panel and GAC. There was no formal involvement of AQ Austria. AQ Austria does not offer any other types of follow-up procedures to the German institutions, even though this would be possible. This is currently only a theoretical possibility because AQ considers its pricing to be non-competitive within Germany and therefore does not plan to apply to carry out further accreditations there; the agency noted that the accreditation

that it did carry out was by special request of the HEI which wished to have a similar panel and agency as in its last review, in order to be able to compare the two review systems better.

Analysis

Both in international accreditation and accreditation in Germany, follow-up is clearly ensured by the regulations in the case of conditions, and it did indeed take place in the case of the one German accreditation implemented. In international accreditation, the HEI is obliged to report changes, and in the German system this reporting is done to GAC. In both cases, the panel believes that AQ Austria could do more to promote other opportunities for follow-up.

The other aspect of this standard - how the agency ensures the implementation of the accreditation procedure in case of a combined institutional and programme level accreditation – can be assessed only theoretically as this has never occurred in practice. The procedural rules clearly cover all aspects required by the ESG and remain unchanged for combined as well as individual procedures. The duration of the site visit, number of peers etc. are to be defined during contracting, which ensures the necessary flexibility and is appropriate. It should also be noted that AQ Austria has experience with combining institutional and programme accreditations, as system accreditation in Germany includes assessment of a sample of programmes, and the combination is also a possibility in the accreditations of UAS and private universities.

Panel suggestions for further improvement

3. AQ Austria could include the possibility of follow-up either in the form of reporting, a (online) workshop or other forms of follow up, in the Guidelines for International Accreditation, as well explicitly including them in any potential bids for accreditations in Germany.

Panel conclusion: 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.

This standard is considered only regarding:

- the new AQ Austria's activity – international institutional accreditation – regarding the consistency of applying the accreditation decision at the level of higher education institutions
- German accreditations, which are done according to the GAC criteria – addressing whether the new arrangements had any impact on the consistency of applying the accreditation criteria.

2019 review recommendation

The 2019 recommendation refers to the audit procedure, and is relevant for ESG 2.1, which is why it is quoted under that standard.

Evidence

Regarding the international accreditations, the SAR notes that “consistency in the decisions made by the Board of AQ Austria is ensured by encompassing stringent preparation of experts and in-depth knowledge of rules and criteria, still taking the diversity of (national) higher education contexts into account. With the terms of reference, both the HEI and the agency have a document that ensures compliance with the rules, as the procedural regulations and practices are contractually defined.” It should also be added that the AQ Austria’s Board traditionally includes several international experts, as well as Austrian experts with significant international expertise. As noted, the accreditation status of the HEI and the programmes is thoroughly checked before contracting, safeguarding AQ Austria from making decisions which would be inconsistent with any similar decisions by local actors.

Regarding accreditations in Germany, the SAR states that “overall consistency has considerably increased under the new regulations and the GAC as the sole decision-making accreditation body.” At the site visit it was explained that, while no analyses were done, the introduction of a single decision-making body has clearly improved the consistency of decision-making. It was also clear in the one review that was carried out, that the GAC took into account reviews of other HEIs which came up with similar conclusions and recommendations, and on this basis decided to turn one of the recommendations into a condition.

During the site visit the stakeholders all commended AQ Austria for doing its work competently, professionally and with integrity. The panel discussed with agency staff the recent phenomenon of several HEIs appealing AQ Austria’s decisions at administrative courts and how this has put additional emphasis on the need to make consistent, substantiated and well elaborated decisions. Following this experience of participating in administrative court proceedings, the AQ Austria staff carefully consider any potential issues from the very start of any procedure.

Analysis

AQ Austria has implemented all existing processes and safeguards for the new procedure of international institutional accreditation, ensuring that all such procedures are consistently implemented. As noted under ESG 2.1, the panel did find certain gaps in the wording of the criteria and believes that they could be more explicit in several aspects. However, the explicit reference to the ESG in the Guidelines for International Accreditation and AQ Austria’s performance in other procedures both serve as evidence that the standards would be consistently implemented across institutions and programmes. Similarly, while under ESG 2.2 the panel notes that the Guidelines would be improved by being more explicit about the contracting procedure, the current provisions are sufficient to ensure that the accreditation criteria are known in advance.

Regarding accreditations in Germany, the limited AQ Austria experience does not allow for comparison of consistency over several accreditations, but does show that the GAC, as the body tasked with consistency of decisions in the German system, was satisfied with the manner in which the AQ Austria’s experts interpreted and implemented the accreditation criteria.

Panel conclusion: compliant

ESG 2.6 REPORTING

Standard:

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

In this review, only the publication of reports from the German accreditation procedures is assessed - analysing how AQ Austria ensures that its final reports are also published if the institution does not forward the report to GAC.

Evidence

Since 2019, AQ Austria has conducted only one review in Germany, and the report is published on the GAC website, with AQ providing the link. At the site visit, AQ Austria representatives noted that indeed it is a theoretical possibility that an HEI would not submit its report to the GAC, as in the German system the application for accreditation is submitted to GAC only when the report is complete. Thus, in the case of a negative report, an HEI could decide to postpone the application and reapply to another agency to acquire another report – however, an AQ Austria representative noted that this would be very unlikely due to timing and costs. AQ Austria is aware that if this would happen, they would be obliged by the ESG to publish the report themselves, however, this provision has not been specifically included in the institutional contracts.

Analysis

The panel finds that the AQ Austria website is, overall, easy to navigate, with procedures clearly defined and separated, and the reports easy to find and well structured. However, the website is not adapted to mobile devices and would require an update in this regard, as discussed further under ESG 3.6. Regarding the potential for not publishing reports in the German system, AQ Austria is well aware of the risk and has a clear plan on how to approach it; in the view of the panel, this might usefully be included in the contract. As AQ Austria does not currently plan to bid for German accreditations, this is a theoretical possibility.

Panel suggestions for further improvement

4. In the case of German accreditations, AQ Austria could include a clause in the contract template on publishing the report in case the HEI does not forward it to the GAC.

Panel conclusion: compliant

ENHANCEMENT AREA

ESG 3.6

Introduction

The ESG standard 3.6 (Internal quality assurance and professional conduct) selected by AQ Austria essentially covers the entire functioning of the agency, as internal quality management encompasses the agency's strategic management, principles of external quality assurance, staff management, and internal and external communication. The 2019 review recommended 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.” It also recommended “that the agency should reflect about the impact of external communication tools used by the agency, notably its website.” According to the SAR, from autumn 2021 onwards, a range of initiatives concerning the overall organisational development of AQ Austria have been taken, which included workshops with external consultants and changes to the internal communication schemes. In 2022, the Board and Secretariat initiated a review of AQ Austria's mission statement, with the result that the existing mission statement continues to prove viable; this was followed by the development of a mid-term strategy, which was successfully concluded with the AQ Austria Strategy 2023/2027. In the SAR, the agency highlighted topics it wished to discuss in more detail with the panel during the visit. These were as follows:

- Integration: Setting the framework for the implementation of an integrative and fit-for-purpose QM system, considering the broad(ening) range of legally determined responsibilities and separate departmental structures.
- Development: Discussion on how to further develop an already implemented QM system to increase flexibility, adaptability and openness in a changing environment (considering legal regulations, new tasks, societal demands, etc.).
- Implementation: Dialogue about how to transform an existing internal quality management system into a valuable framework that supports both short-term processes and mid-term strategic developments.
- Support: Exchange of experiences (best practices) regarding the use and implementation of technical/digital tools for the optimisation of internal QA processes. What should be considered when introducing an integrative, yet adaptable QM system and what to avoid?

The agency suggested a workshop would be the best method to tackle these topics, and the panel accepted the idea, scheduling an hour and a half long workshop on the second day of the site visit. On the agency's suggestion, all staff members who participated in the panel discussions also participated in the workshop. The panel also included a meeting with senior staff on the first day of the site visit to clarify any open questions regarding the enhancement area.

The workshop

Based on the thorough preparation by AQ Austria, review of several documents – most importantly the AQ Austria Strategy - and interviews during the site visit, the panel proposed to focus on the complexity of the activities offered by AQ Austria and to discuss with the agency its internal capacity for addressing challenges, including that of unpredictability. This focus is also connected to AQ Austria's Strategic goal 3.4 - Organisation & Culture (“As an organisation with a clear profile, a value-based working culture and creative freedom, AQ Austria is a valued employer. On the basis of shared values and goals, while at the same time attaining diversity, a careful use of resources is enabled.”) Shaping a value-based organisational culture fosters a sense of unity and purpose among staff members and enhances the engagement, performance and satisfaction of staff members. It was the impression of the panel that although there have been several discussions about values within the agency, these have not yet been defined. The mission statement mentions values of public responsibility for quality in higher education, securing academic freedom, autonomy of higher education institutions and scientific integrity. However, in the view of the panel these describe more the agency's

general approach to the objectives of external quality assurance in higher education than the values that underpin the internal organizational culture. This is why the panel started the workshop with asking the AQ Austria staff to name 3 values that they follow most in their everyday work. As a result, the following word cloud was formed:



A word cloud of AQ Austria's values, created at the workshop with AQ Austria staff

The values mentioned three times or more were “expertise”, “professionalism, professional work” and “transparency”; these were also mentioned by the stakeholders the panel met at the site visit. Then, “participation, participative approach, dialogue” and “unbiased, integrity, accuracy” were mentioned more than once.

After this, the participants were asked to identify up to three challenges that the agency is currently struggling with the most. The following challenges were mentioned more than three times:

- complexity of processes, increasing workload
- lack of resources including funding
- the need to adopt digital solutions to increase the efficiency of work processes and reduce the need for human intervention
- organisational development, the need to reconsider and prioritise the strategic goals and enhance the decision making processes

The chair of the panel followed with a presentation, using examples to discuss the values and challenges mentioned by the AQ Austria staff. Discussing the chart on quality culture, below, all agreed that the agency does have a living quality culture that can be built on and operationalised. However, the bridge between the structural-formal elements (IQM manual) and organisational-psychological elements needs strengthening.



Image: elements of quality culture (source: European University Association⁴)

Agile methodologies were then discussed, as applied to the agency work, and the organisation of the Estonian Quality Agency for Education (HAKA) was discussed as an example of agile organisation without strict internal structure. Finally, there was a discussion of balanced dependence of the agency, as the way of achieving independence. All the participants then separated into groups to agree on three things that should be done differently or not at all within the agency to cope with the most important challenges.

Below we provide the summary of the discussions in the workshop, along with panel's suggestions for further steps, as conclusions.

Conclusions

The review panel observed several key areas where AQ Austria demonstrates a commitment to improvement and development, marked by a thoughtful and steady approach. The following points summarize the findings of the panel:

- Dedicated staff and bottom-up approach: the team at AQ Austria forms the core of its operations. The organization's emphasis on a collaborative, bottom-up approach is commendable.
- Joint effort for continuous improvement: AQ Austria's collective dedication to ongoing improvement is evident.
- Recognition for expertise, transparency and trust: the external acknowledgment of AQ Austria as a trusted and transparent body of expertise is evident. This recognition underlines the trust and credibility it has established amongst stakeholders.

⁴ European University Association (2006). Quality Culture in European Universities: A Bottom-Up Approach. Report on the Three Rounds of the Quality Culture Project 2002 – 2006.

- Digital transformation in progress: the steps taken by AQ Austria towards digitalization, including the initiation of a working group and the implementation of the Confluence document management system, indicate a solid foundation for operational efficiency.
- Strategic communication efforts: The acknowledgment of the need for a robust communication strategy and the organization's focus on clearly defining its target groups illustrate a strategic approach to enhancing outreach.

The possibilities for further development the panel identified can be grouped around three main points. Under each, there is potential to introduce further good practice that could serve as an example to other agencies.

AQ Austria's Strategy and complexity of activities

- A certain tension exists between the AQ Austria's mission and strategic objectives and its day-to-day work. In fulfilling the tasks mandated by law, the agency operates extensively with monitoring and supervision. However, in the agency's mission statement, the focus is clearly on quality enhancement, not quality control. Similarly, the strategy places significant emphasis on the agency's activities at the international level, but their share in daily activities is minimal, and the cross-border quality assessments are not a priority for the agency. These examples provide an opportunity for further reflection on both the mission and the strategy.
- A budget deficit exists, which is currently not a problem since the agency has surpluses from previous periods and stable federal funding, but which could become a problem in the longer term and should thus be accounted for in the strategy and negotiations with respect to federal funding.
- Due to tensions in activities, noted above, prioritisation is a key issue for AQ Austria and further such consideration may be useful in the context of setting future strategy.
- AQ Austria discusses its strategy with the wide range of stakeholders represented in its bodies; this is an advantage for the agency and may help with prioritisation. However, ad-hoc activities required by external factors may precipitate a revision of the strategic plans, thus making the strategy (or its appendices) a living document.
- An idea that might deserve further consideration is to better align the strategy and the annual report so that the structure and content of the annual report follow the agency's strategic goals and metrics.

People and IQM

- There seems to be a good understanding of what the core values are, as demonstrated in the workshop, and there is always a need to reinforce such discussion so that the meaning of core values for the everyday work of all staff members is as fully embedded as possible in every aspect of the agency's operations, including hiring practices, performance evaluations, and decision-making processes.
- Building on the common definition of values, investment in sub-divisional staff development and team sessions may help to ensure that definitions and processes for assurance and enhancement – the IQM system- are fully explored. More regular reflections on different activities could be conducted, with PDCA cycle implemented in everyday life and closing the feedback loop of “smaller steps”. The IQM system could be based on formalising the regularity of such meetings and ways in which their outcomes are used to achieve and/or modify strategic objectives.

- Agility was much discussed at the workshop, as not just reacting quickly to external influences, but being proactive and agile. This includes what was mentioned above - dividing processes into smaller steps with smaller objectives, not being afraid of making mistakes, and applying the Deming cycle by planning improvements and reporting back to the groups that suggested them.
- In this aspect, developing agility further may also mean delegating decision-making to where the best competence lies so that teams can be more confident in their ability to complete tasks and make the necessary decisions.
- Knowledge transfer inside the agency may be enhanced through discussions within and among teams, peer learning and other types of knowledge transfer inside AQ Austria, using cross-department meetings for discussions, sharing knowledge, building further common understanding, and reflecting on goals and values.
- One of the strategic goals is to have AQ Austria become an increasingly attractive employer. The panel discussed with AQ Austria how it might measure the achievement of this goal and various suggestions were mentioned, such as analysis of the number of qualified applicants to recruitment calls announced by AQ Austria; employee turnover; and salary and other benefits offered, in addition to surveys among staff.
- Another strategic objective expects AQ Austria to define competences, responsibilities and tasks of leadership and staff within the framework of an organisational development process as well as evaluate, revise and implement the concept of "specialist expertise" of staff. Both are ongoing processes, relevant for AQ Austria's work in several ways, including staff satisfaction and the external perception of AQ Austria (indeed, AQ Austria was often praised during the site visit as an expert organisation.) The panel emphasises both as processes under development that could be examples of good practice for other agencies.
- Other ideas for improving staff development, some of which are already implemented, include annual interviews, establishing an inventory of personal skills goals, staff exchange between agencies and discovering good practices of other agencies.

Digitalization and communication

- Strategic focus 3.3. "expertise and dialogue" includes the strategic measure 4: Developing a target group-oriented communication strategy that covers all fields of activity of AQ Austria and takes into account different platforms and communication channels (website, media relations, etc.). Currently the communication strategy is being developed with external support. Defining the target groups of external communication, and ensuring student/applicant interests are fully served seems important in this regard. Social networks could be looked into - for example, LinkedIn. AI could be used to e.g. produce summary reports for different target groups.
- AQ Austria may also want to update the website to enhance user-friendliness, target audience appropriateness, visuals, and possibilities to use it from mobile devices.
- As is the case with internal feedback, discussed above, an important aspect of IQM is external feedback, analysed and discussed regularly (after each review, event, etc.), with any potential improvements suggested immediately to be implemented when possible, with results reported publicly (e.g. on the website, in newsletters or in the annual reports.)
- Digitalization of EQA procedures: the opportunities technology offers are starting to be leveraged so that neither the agency nor HEIs waste their valuable time on tasks that a simple

digital application or even artificial intelligence (AI) can do in a fraction of the time. Developing digital solutions and the targeted and relevant use of AI possibilities in the agency's daily work and quality assessments initially requires significant investments, for which funds must be found. However, already the use of a document management system (Confluence) has eased the submission of documents to stakeholders, and there is room for development by using such existing and thus affordable solutions.

Finally, it bears repeating that the panel much appreciated the agency's experienced, knowledgeable and dedicated staff, and their culture of dialogue and openness. A firm basis for a flexible and effective IQM system clearly already exists.

CONCLUSION

SUMMARY OF COMMENDATIONS

ESG 3.1 Activities, policy, and processes for quality assurance

1. The panel wishes to commend the agency for its work on supporting quality enhancement within HEIs, which is well recognized and appreciated by the stakeholders.

ESG 2.1 Consideration of internal quality assurance

2. Even if the standards are sometimes general, the panel wishes to commend the agency for the reports which are very informative and thorough in their coverage of the Part I of the ESG.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

ESG 3.1 Activities, policy, and processes for quality assurance

1. The panel recommends that AQ Austria adds an explanation on avoiding conflicts of interest between consultations and evaluations and their regular QA activities on their website (e.g. explaining cases in which they cannot offer such services to an HEI, ensuring confidentiality in consultations and evaluations) and adapts the templates for contracts as required.

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 IMPROVEMENT

ESG 2.1 Consideration of internal quality assurance

1. While the panel understands that much of this would be covered by the contract with the institution, it would still be beneficial to make the standards for international accreditation more explicit, clarify their reference points as provided by the ESG, and ensure that all aspects are covered by both programme and institutional accreditations if they are to be implemented separately. The panel understands that this is not a priority activity for the AQ Austria, and thus the timing of the implementation can be dependent on the timing on any future applications to international calls for accreditation offers.

ESG 2.2 Designing methodologies fit for purpose

2. We believe that Guidelines for International Accreditation would be improved by describing more thoroughly what evidence is required from an HEI to prove that it is accredited in its jurisdiction and works in line with the relevant regulations, as well as providing more information on the contracting process and what the contract would need to include.

ESG 2.3 Implementing processes

3. AQ Austria could include the possibility of follow-up either in the form of reporting, a (online) workshop or other forms of follow up, in the Guidelines for International Accreditation, as well explicitly including them in any potential bids for accreditations in Germany.

ESG 2.6 Reporting

4. In the case of German accreditations, AQ Austria could include a clause in the contract template on publishing the report in case the HEI does not forward it to the GAC.

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
	15:00-17:00	Review panel's kick-off meeting and preparations for site visit	<i>(include name and title)</i>
0	17:00-18:00	An online clarifications meeting with the agency's resource person to clarify the agency's changes since the last full review against the ESG and to understand the background and motive of the agency's choice of the self-selected ESG standard for enhancement (next to the overall HE and QA context of the agency)	<ul style="list-style-type: none"> • Managing Director • Head of Accreditation / International Affairs • Internal quality- and project management
	17:00-19:00	Review panel's pre-visit meeting and preparations for day 1	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
	08:45-09:15	Review panel's private meeting	
1	09:15-10:00	Meeting with the Managing Director and the President of the Board	<ul style="list-style-type: none"> • Managing Director • Deputy Managing Director / Head of Internal Administration • President of the Board <i>online</i> • Vice president of the Board
	10:00-10:15	Review panel's private discussion	
2	10:15-11:15	Meeting with representatives from the Senior Management Team and Internal Quality Management	<ul style="list-style-type: none"> • Head of Accreditation / International Affairs • Head of Audit, Consulting and Evaluation • Head of Analyses and Quality Enhancement • Internal quality- and project management

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
	11:15-11:30	Review panel's private discussion	
3	11:30-12:30	Meeting with Departments: 1 – Accreditation 2 – Audit, Consulting and Evaluation 3 – Analyses and Quality Enhancement Legal affairs / Notification of foreign degree programmes (staff unit)	Accreditation Department (3 people), Audit, Consulting and Evaluation (2 people), Analyses and Quality Enhancement (1 person) and Legal affairs / Notification of foreign degree programmes (1 person)
	12:30-13:30	Lunch (panel only)	
4	13:30-14:15	Meeting with members of the Board	<ul style="list-style-type: none"> • HEI expert <i>online</i> • Representative from practice • HEI expert <i>online</i> • Student • Representative from practice
	14:15-14:30	Review panel's private discussion	
5	14:30-15:15	Meeting with members of the General Meeting	<ul style="list-style-type: none"> • Representative of the Ministry • Deputy Chair, Representative of Universities Austria • Representative of the Austrian National Union of Students • Representative of the Ministry, Director General BMBWF • Representative of the Austrian Private Universities Conference
	15:15-15:30	Review panel's private discussion	
6	15:30-16:15	Meeting to clarify any remaining questions regarding the enhancement area – ESG 3.6	<ul style="list-style-type: none"> • Managing Director • Internal quality- and project management

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
	16:15-17:15	Wrap-up meeting among panel members and preparations for day 2	
	09:00-10:00	Review panel's private meeting	
7	10:00-10:45	Meeting with representatives from the reviewers' pool	<ul style="list-style-type: none"> • Vice Rector, University College of Teacher Education, Vienna, <i>Audit at Univ. Coll. of Teacher Edu.</i> • Management UAS Salzburg, also Representative of UAS in the General Meeting, <i>Audit at UAS</i> • Rector and Managing Director, New Design University – Private University, <i>Inst. Accr.</i> • Vice President AQ Austria, <i>Accr. in Germany: UAS Kiel</i> • Student, <i>UAS procedures</i>
	10:45-11:30	Review panel's private discussion	
8	11:30-12:15	Meeting with heads of some reviewed HEIs/ HEI representatives	<ul style="list-style-type: none"> • Vice Rector, University College of Teacher Education Styria • Rector, University for Continuing Education Krems • Rector, FH Technikum Wien • CEO, FH St. Pölten • President, Anton Bruckner Private University, Linz • Rector, University of Natural Resources and Life Sciences, Vienna (BOKU)
	12:15-13:15	Lunch (panel only)	
9	13:15-14:00	Meeting with quality assurance officers of HEIs	<ul style="list-style-type: none"> • Quality Management and Accreditation Unit, UMIT Tirol • Head of Quality Assurance, FH Technikum Wien • Accreditation Officer, Central European University, Vienna • Head of Quality Management, Paris Lodron University Salzburg • Vice Rector, University College for Agricultural and Environmental Education

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
	14:00-14:15	Review panel's private discussion	
10	14:15-15:45	A workshop on the enhancement area – ESG 3.6	<ul style="list-style-type: none"> • Managing Director • Deputy Managing Director / Head of Internal Administration • Head of Accreditation / International Affairs • Accreditation Department – 2 people • Head of Audit, Consulting and Evaluation • Audit, Consulting and Evaluation – 1 person • Head of Analyses and Quality Enhancement • Analyses and Quality Enhancement - 1 person • Internal Administration – 1 person • Internal Administration / IT – 1 person • Legal affairs / Notification of foreign degree programmes) • Internal quality- and project management
	15:45-17:30	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions	
	08:30-09:30	Meeting among panel members to agree on final issues to clarify	
11	09:30-10:30	Meeting with the Managing Director to clarify any pending issues	<ul style="list-style-type: none"> • Managing Director
	10:30-12:00	Private meeting between panel members to agree on the main findings	
	12:00-13:00	Lunch (panel only)	
12	13:00-13:30	Final de-briefing meeting with staff and Board members of the agency to inform about preliminary findings	<ul style="list-style-type: none"> • Managing Director • Deputy Managing Director / Head of Internal Administration • Vice president of the Board • Head of Accreditation / International Affairs

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			<ul style="list-style-type: none">• Head of Audit, Consulting and Evaluation• Internal quality- and project management

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

Targeted review of Agency for Quality Assurance and Accreditation Austria (AQ Austria) against the ESG

Annex I: TERMS OF REFERENCE

The present Terms of Reference were agreed between AQ Austria (applicant), ENQA (coordinator) and EQAR.

1. Background

Agency for Quality Assurance and Accreditation Austria-AQ Austria has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2014-05-01 and is applying for renewal of EQAR registration based on a targeted external review against *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* coordinated by The European Association for Quality Assurance in Higher Education (ENQA).

Agency for Quality Assurance and Accreditation Austria - AQ Austria has been a member of ENQA since 2012 and is applying for renewal of ENQA membership.

AQ Austria is carrying out the following activities within the scope of the ESG (activities marked with * are discussed in the last Substantive Change Report Decision of AQ Austria):

- Accreditation of private higher education institutions in Austria
- Accreditation of programmes at private higher education institutions in Austria
- Accreditation of universities of applied sciences
- Accreditation of programmes at universities of applied sciences in Austria
- Audit of internal quality management systems at Austrian public universities, universities of applied sciences and university colleges of teacher education
- European Approach for QA of Joint Programmes
- International Accreditation of Higher Education Institutions*
- International Programme Accreditation*
- Programme accreditation in Germany
- System accreditation in Germany
- Institutional accreditation in Switzerland
- Joint programme accreditation

All these activities will be included on the agency's profile on the EQAR website and linked to DEQAR database. NB: The agency may not upload reports from other activities to DEQAR.

The following activities of the applicant are outside the scope of the ESG (activities marked with * are discussed in the last Substantive Change Report Decision of AQ Austria):

- Notification of foreign degree programmes in Austria*
- Developing and carrying out review procedures for programmes for continuing education*
- Providing information and advice in matters related to the recognition of formal, non-formal and informal competences*
- NQF Service Point*
- Consultancy and other evaluation activities*

2. Purpose and scope of the targeted review

This review will evaluate the extent to which AQ Austria continues to fulfil the requirements of the ESG. The targeted review aims to place more focus on those parts that require attention and provide sufficient information to support AQ Austria's application to EQAR.

The review will be further used as part of the agency's renewal of membership in ENQA.

2.1 Focus areas

A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision:

a. Not applicable

B) Standards 2.1 to 2.7 for the following activities: not applicable.

C) Standards affected by other types of substantive changes:

a. System accreditation and programme accreditation in Germany

- ESG 2.3: considering the interaction between GAC and AQ Austria, and their respective roles in the follow-up processes;
- ESG 2.5: addressing whether the new arrangements had any impact on the consistency of applying the accreditation criteria.
- ESG 2.6: analysing how AQ Austria ensures that its final reports are also published if the institution does not forward the report to GAC.

b. International accreditation of higher education institutions and degree programmes

- ESG 2.2: reflecting upon the implemented changes in procedural rules and assessment criteria for the institutional level;
- ESG 2.3: considering how does the agency ensures the implementation of the accreditation procedure in case of a combined institutional and programme level accreditation and how does the agency ensure a consistent follow-up, verifying the implementation of any conditions imposed with or attached to its decisions;
- ESG 2.5: consider the consistency of applying the accreditation decision at the level of higher education institutions.

c. Other changes

- ESG 3.1: considering how the agency clearly separates between its activities that are within and outside the scope of the ESG, in particular considering the agency's newly introduced procedures i.e. 'review procedures for programmes for continuing education' as well as the agency's [other tailored evaluation activities](#) concerned with teaching and learning in higher education (please see further Annex 2 of EQAR's Policy on the Use and Interpretation of the ESG).⁵

D) ESG 2.1 Consideration of internal quality assurance;

E) Selected enhancement area: ESG 3.6 Internal quality assurance and professional conduct

F) Other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any).

These issues should be investigated by the review panel as far as possible, providing an analysis and conclusion on the ESG standard(s) concerned.

3. The review process

The review will be conducted in line with the requirements of *the EQAR Procedures for Applications* and *the Policy on Targeted Reviews*, and following the methodology described in the *Guidelines for ENQA Targeted Reviews*.

The evaluation procedure consists of the following steps:

- Agreement on the Terms of Reference between EQAR, AQ Austria and ENQA;

⁵ See further Annex 2 of EQAR's Policy on the Use and Interpretation of the ESG
https://www.eqar.eu/assets/uploads/2020/09/RC_12_1_UseAndInterpretationOfTheESG_v3_0.pdf

- Nomination and appointment of the review panel by ENQA;
- Self-assessment by AQ Austria including the preparation and publication of a self-assessment report;
- A site visit by the review panel to AQ Austria;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Analysis of the final review report and decision-making by the EQAR Register Committee;
- Decision on ENQA membership by the ENQA Board;
- Attendance to the online follow-up seminar.

3.1 Independence of the review coordinator

The coordinator has not provided remunerated (e.g. consultancy) or unremunerated services to AQ Austria during the past 5 years, and conversely AQ Austria has not provided any remunerated or unremunerated services to the coordinator.

3.2 Nomination and appointment of the review team members

The review panel consists of four members including an academic employed by a higher education institution, a student member and one other expert. At least two members are from another country.

At least one panel member should be a quality assurance professional that is currently employed by a QA agency and has been engaged in quality assurance within the past five years. When requested by the agency under review or when considered particularly pertinent, other stakeholders (for example, a representative of the labour market) may be included. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

One of the members serves as the chair of the review panel, and one as the review secretary. At least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. At least two panel members come from outside the national system of the agency under review (if relevant).

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The Review Coordinator will not be

the secretary of the review and will not participate in the discussions during the site visit interviews.

ENQA will provide the agency with the proposed panel composition and the curricula vitarum of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

Once appointed, the coordinator will inform EQAR about the appointed panel members.

3.3 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 includes all relevant internal and external stakeholders;

The self-assessment report is expected to contain:

- a description of the self-assessment process and the production of the SAR;
- a description of changes occurred within the agency since the last full review, including any eventual changes in the higher education system and quality assurance system in which the agency predominantly operates, the agency's structure, funding, its list of external quality assurance activities within the scope of the ESG, as well as the changes in the agency's quality assurance activities abroad (where relevant);
- a section that addresses the focus areas of the review, including standards that were considered to be partially compliant with the ESG in the last full review as well as ESG 2.1 and one self-selected ESG standard for enhancement (see **2.1 Focus areas**);
- a SWOT analysis of the agency as a whole;
- for each of the individual standards enlisted above (see section 2) a consideration of how the agency has addressed the recommendations as noted in the previous EQAR Register Committee decision of inclusion/renewal (if applicable).

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 continues to meet the ESG and thus the requirements for EQAR registration.

The self-assessment report is submitted to the review coordinator, which has two weeks to carry out a screening. The purpose of a screening is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The coordinator will not judge the content of information itself but rather whether or

not the necessary information, as outlined in the *Guidelines for ENQA Targeted Reviews*, is present. If 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 ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

3.4 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule considering the aspects included under the focus area (as defined under point 2.1 of the Terms of Reference).

The schedule will include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit. 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 site visit should enable the review panel to explore how the agency has addressed the standards where it has been found to be partially compliant (if the case), aspects of substantive change, consideration of internal quality assurance (ESG 2.1) and the self-selected ESG standard(s) for enhancement. The panel will include extra time during the site-visit to address any other arising issues (if the case) that might have an impact on the agency's compliance with the ESG.

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

Prior to the physical site visit, the panel attends a joint briefing call between the panel, ENQA and EQAR to clarify the review expectations and address any possible arising matters.

In advance of the site visit (at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

3.5 Preparation and completion of the final review report

The review report will be drafted in consultation with all review panel members and correspond to the purpose and scope of the review as defined under articles 2 and 2.1. In particular, it will provide a clear rationale for its findings concerning each ESG. When preparing the report, the review panel should bear in mind the *EQAR Policy*

on the Use and Interpretation of the ESG to ensure that the report will contain sufficient information for the Register Committee for application to EQAR⁶.

The external report will present the facts and analysis reflecting the reality at the time of review. This will form the main basis for the Register Committee's decision making.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language. After panel has considered coordinator's feedback, the report will go to the agency for comment on factual accuracy. If AQ Austria chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report.

Thereafter, the review panel will take into account the statement by AQ Austria and submit the document for scrutiny to ENQA's Agency Review Committee and then to EQAR along with the remaining application documents (self-evaluation report, Declaration of Honour, statement to review report-if applicable). The report is to be finalised normally within 2-4 months of the site visit and will normally not exceed 30 pages in length. All panel will sign off on the final version of the external review report. The Coordinator will provide to AQ Austria the [Declaration of Honour](#) together with the final report.

4. Publication and use of the report

AQ Austria will receive the expert panel's report and publish it on its website once the ENQA Agency Review Committee has validated the report. Prior to the final validation of the report, the ENQA Agency Review Committee may request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome. The report will also be published on the EQAR website together with the decision on registration, regardless of the outcome.

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA.

5. Decision-making on EQAR registration and ENQA membership

The agency will submit the review report via email to EQAR before expiry of the agency's registration on EQAR. The agency will also include its self-assessment

⁶ See here: <https://www.eqar.eu/assets/uploads/2018/04/UseAndInterpretationOfTheESGv2.0-2015.pdf>

report (in a PDF format), the Declaration of Honour and any other relevant documents to the application to EQAR (i.e. annexes, statement to the review report).

EQAR is expected to consider the review report and the agency's application at its Register Committee meeting in June/July 2024. The Register Committee's final judgement on the agency's compliance with the ESG as a whole can either be substantially compliant (approval of the application) or not substantially compliant (rejection of the application). In case of a positive decision (substantially compliant with the ESG), the registration is renewed for a further five years (from the date of the review report).

The decision on ENQA membership by the ENQA Board will take place after EQAR Register Committee decision.

To apply for ENQA membership, the agency is requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

6. Indicative schedule of the review

Agreement on Terms of Reference	June 2023
Appointment of review panel members	June 2023
Self-assessment report (SAR) completed by AQ Austria	September 2023
Screening of SAR by ENQA Review Coordinator	Early October 2023
Preparation of site visit schedule and indicative timetable	October 2023
Briefing of review panel members	December 2023
Review panel site visit	February 2024
Submission of the draft review report to ENQA Review Coordinator	March/early April 2024
Factual check of the review report by the AQ Austria	April 2024
Statement of AQ Austria to review panel (if applicable)	April 2024
Submission of review report to ENQA	May 2024
Validation of the review report by the Agency Review Committee	June 2024

EQAR Register Committee meeting and decision on the application by AQ Austria	June-July 2024
Decision on ENQA membership by the ENQA Board	September 2024

ANNEX 3: GLOSSARY

AI	artificial intelligence
AQ Austria	Agency for Quality Assurance and Accreditation Austria
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
GAC	German Accreditation Council
HE	higher education
HEI	higher education institution
IQM	internal quality management
IQMS	internal quality management system
QA	quality assurance
RPL	recognition of prior learning
SAR	self-assessment report
TOR	terms of reference
UAS	university of applied sciences
UCoTE	university colleges of teacher education

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY AQ AUSTRIA

- Budget Overview 2019-23
- Information on Appeal Proceedings
- Overview of Evaluations, Consultations and Reviews 2019-23
- 2023 Policy Paper with Suggestions for Amending the Legal Framework (in German)

ENQA TARGETED REVIEW 2024

THIS REPORT presents findings of the ENQA Targeted Review of the Agency for Quality Assurance and Accreditation Austria (AQ Austria), undertaken in 2024.

enqa.

European Association for
Quality Assurance in Higher Education