

To the
Managing Director of the German Accreditation Council (GAC)
Dr. Olaf Bartz
Geschäftsstelle der Stiftung zur Akkreditierung
von Studiengängen in Deutschland
Adenauerallee 73
53113 Bonn

Response by AQAS: GAC report for the re-accreditation of AQAS e.V.

Dear Dr. Bartz,

we hereby give thanks to the expert panel and the GAC for their report and the manner in which the procedure was carried out so far which we felt was extremely fair. We were very pleased by the panel's positive appreciation of our work which was communicated to us verbally after the visit. During the meetings we received initial advice on how to develop our work further; we immediately picked up these suggestions and have, in parts, already implemented them. Unfortunately, the tone of the GAC report is rather matter-of-fact and does not reflect the good atmosphere of the procedure and the appreciation expressed by the expert panel.

The report follows the logic of the GAC rules for the accreditation of agencies of 23.09.2016. The report clarifies that the decision by GAC is based on the set of rules of 08.12.2009 in the version of 10.12.2010. In its letter of 13.07.2016 initialising the re-accreditation procedure the GAC assured AQAS that the procedure would be based on this set of rules. Nothing to the contrary was agreed between the GAC and AQAS.

AQAS' international business activity is still at the development stage despite first orders from international universities and our participation in EU projects. In 2015 we reviewed and systematised - on the basis of the new ESG (2015) - our documents that we use in programme and institutional accreditations. Due to the "Substantive Change Report" by EQAR of 06.06.2016 and the "Confirmation of Eligibility: Application for Renewal of Registration Application" we suspect that issues raised by the Register were given a higher profile during the accreditation procedure than it seemed justified, given the size of our international business operation in comparison to the volume of national accreditation procedures.

We would like to expressly thank the GAC expert panel for their willingness to openly discuss the critical points raised by EQAR with the AQAS representatives and to engage with our arguments. At the same time we are keen to stress that we can't comprehend the allegation made by EQAR that our agency mixes the business areas of consultancy and 2 accreditation. There was never any proof for this allegation, nor a complaint made against

The logo for AQAS, consisting of the letters 'AQAS' in a bold, black, sans-serif font. Above the letters is a vertical bar with horizontal stripes in shades of green and orange.

Agentur für Quali-
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Studiengängen

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us; nor were we ever guilty of any misconduct. These allegations, however, run through the whole accreditation procedure and are also reflected in the report. On the other hand, the outstandingly positive feedback that we have received to date from

international universities and experts regarding the professionalism and efficiency of our accreditation procedures were not taken into consideration in the evaluation by the GAC panel.

Please find below our detailed response regarding the separation between AQAS e.V. and AQAS ARCH GmbH.

In the following response to the GAC report we separated factual corrections from content-related comments. Editorial comments have been included as an Appendix.

I. Factual corrections

III.2 Organisation

Paragraph 7:

*“From the second half of 2016 the AQAS **Head Office** has been divided into three main business areas: system accreditation, programme accreditation and an international operation. Each of these three areas is headed up by a member of staff (f/m). The two Managing Directors have responsibility for all business areas and manage, in addition, system accreditation and international activities in which they also act in an operational capacity.”*

The newly created business area “quality assurance” was added in the second half of 2016, functioning as a cross-sectional area beyond the three business fields described above.

IV Assessment of the European Standards and Guidelines (ESG)

▪ ESG 3.1, Assessment, Paragraph 3

“So far, AQAS has not submitted a written policy on the separation between quality assurance and consultancy”.

This statement is not correct. In the subsequent delivery of 11.11.2016 AQAS submitted a detailed paper explaining the relationship between AQAS e.V. and AQAS ARCH GmbH.

The Board as well as the General Assembly discussed the separation of consultancy and accreditation at its decision to set up the daughter company (GmbH) in 2014. In its founding decision the Board states as follows:

“Through the separation of the areas of classical accreditation (with the award of the seal by GAC) in the e.V. and additional projects in the daughter company (GmbH) a stronger internal and external transparency should be achieved.

The aim is to set up a separate company not involved in the German accreditation system and which therefore has a greater potential to attract new business, offering universities and

other education providers additional services. The non-profit company (AQAS e.V.) would therefore only serve the company's main aim (accreditation of QA systems in universities and study programmes)."

As explained in our SER we are perfectly clear that AQAS e.V. cannot accredit the same organisation that received consultancy services through AQAS ARCH GmbH. We always interpreted the GAC decision "Standards for the design of the relationship between system accreditation and consultancy services" of 31.10.2008 as a fundamental requirement that we fully subscribe to in our programme accreditation procedures and in our international activities. AQAS shares the GAC position that an unbiased assessment and decision are key requirements for accreditation procedures to be

trustworthy and impartial, along with agencies' professionalism and the highest levels of transparency. The ESG and the "Code of Good Practice for the Members of the European Consortium for Accreditation in Higher Education" provide us with direction and guidance in our work. We agree with GAC that the work of an accreditation agency in a particular procedure, be it programme or institutional accreditation, is incompatible with a preceding (or current) consultancy at the same university. This incompatibility naturally includes organisations which are connected operationally with the agency.

In our consultancy project with the [...] we clearly showed that we understood and implemented the guidelines and code of practice outlined above. AQAS ARCH carried out an assessment of the university's evaluation statutes, however, when AQAS e.V. was invited to bid for tender for a system accreditation at [...], we declined to participate (compare SER, p. 16.). We also made our reasoning transparent to GAC.

▪ **ESG 3.4, Documentation, Paragraph 1**

"The agency states that it undertakes thematic analyses with the instrument "reporting back". AQAS thereby collects the results and experiences accumulated throughout the course of different projects and accreditation procedures. These results and experiences are presented at events, conferences, trainings, workshops as well as discussions and also published in bespoke newsletters and publications. This allowed AQAS to feed key findings back into the accreditation system (see Appendix V.4)."

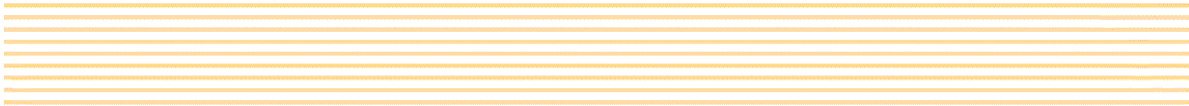
The activities of AQAS in the framework of the "reporting back" process go beyond merely "collecting" data. The aim is to present or publish theme-based summaries of our results and experiences that we made over the course of various accreditation procedures and projects. Our aim it to relay key findings into the system. Thus, AQAS wishes to actively contribute to the discourse of stakeholders engaged in the accreditation system (see SER, p. 22).

The relevant summary of our extensive activities to date has been included as an Appendix with our response.

▪ **ESG 3.4, Documentation, Paragraph 2**

"Within the framework of the previous re-accreditation procedure of AQAS it was stated that AQAS would put together an end-of-year report, summarising the results and experiences the agency had made during the year. This report would be presented to the Board and to members of staff. In the current SER no reference is made to a report."

Due to capacity issues, AQAS decided to no longer publish these internal reports.



▪ **ESG 2.2, Documentation, Paragraph 4**

“Research and governance are not explicitly assessed during the institutional on-site visit, however, these areas find their way into the different interfaces between studying and teaching.”

We were surprised by the explicit reference to research and governance as the ESG does not pick up on these areas. Nevertheless, experts intensively discussed research aspects in [...] procedure. These discussions were also reflected in the expert report which was also made available to the GAC review group.

▪ **ESG 2.2, Assessment, Paragraph 3**

“As far as the institutional accreditation in [...] was concerned common issues in Europe such as gender equality or the Lisbon convention were met with difficulties”.

This statement is not correct. AQAS has never, at any stage of the re-accreditation procedure, made such a statement.

Even if the ESG don't include the theme of Gender Mainstreaming the international expert panel explicitly discussed the theme of gender equality with the representatives (f/m) of the [...] University: Female and male students are taught at the university in the same courses and the percentage of women is very high. There are numerous female professors who made it clear that they were neither restricted in teaching nor in research. Since the experts could not identify any problems, the [...] report did not perceive gender equality as a problem. On the contrary, the experts reached the following assessment:

“The QA system [...] supports scientific integrity; forms of discrimination were not detected. The college shows a highly developed level of awareness of discrimination.” (p. 18).

It is correct, however, that international projects always require a culturally specific interpretation of the ESG. Against this background there was also a discussion around “recognition” as shown in the report:

“Recognition procedures are regulated. The regulations regarding re-sits, disability compensation, illness and other circumstances are written down in the Postgraduate/Undergraduate Academic Regulations Handbook and transparent to all stakeholders.” (p. 31)

In this respect, the statement made above in the report for the re-accreditation of AQAS is wholly without foundation.

More correct would be the following description:

“During the [...] accreditation procedure [...] a number of common topics in Europe such as gender equality and the Lisbon Convention were also discussed. No fundamental problems came to light”.

In addition we would like to point out that we consider it inappropriate to include content-related statements in the AQAS re-accreditation report which refer to a concrete project.

We also consider such statements highly questionable in terms of safeguarding the university in question.



- **ESG 2.3, Assessment, Paragraph 3**

“The expert group shares this assessment, encouraging AQAS to explain in detail how the agency understands its function and role in international projects. This self-definition should be clearly defined for all stakeholders if this hasn’t already happened.”

In the context of a TEMPUS project AQAS informed university and ministry representatives on aspects of external quality assurance, among them the ESG and the criteria development as well as the process for external evaluation. The TEMPUS project resulted, amongst others, in setting up a national accreditation agency in [...]. AQAS did not, subsequently, carry out consultancy services for universities but undertook accreditation procedures for different study programmes in [...]. AQAS fully understands that consultancy services have to be separated from accreditation procedures in international projects. It goes without saying that this understanding also informs AQAS’ practice in Germany. There are neither consultancy elements nor is there an “international bonus” for applicants involved in international accreditation procedures co-ordinated by AQAS. There was, however, a specific problem in [...] that we described in our report submitted to the Ministry of Education and which we have made available to the GAC expert panel (see Appendix of the additional delivery).

Many study programmes in [...] were good in terms of their quality but failed to reflect the level of subject-specific and academic discussions in western European countries. The experts (m/f) found the programmes to be sound but old-fashioned. The AQAS expert group attempted to provide, in a sense, “developmental support”, offering recommendations on how to further develop the university’s study programmes. This “support” was offered in two areas, namely for the subject-specific content of study programmes and their competence orientation. From our point of view (and that of our experts!) our “support” complies with the Quality Enhancement approach which has long been demanded (by QA stakeholders) in Europe.

II. Explanatory notes to the assessment

III. **Assessment of the European Standards and Guidelines**

Standard 3.1. Use of external quality assurance procedures for higher education

- **Assessment, Paragraph 3:**

“The experts, however, hold the view that a fundamental decision has to be taken regarding the relationship between the parent company and its subsidiary once the business volume of AQAS ARCH increases significantly.”

*“**Recommendation 1:** AQAS should formulate guidelines in the form of a basic decision defining the separation between accreditation and consultancy, between ESG and non-ESG activities as well as between AQAS and AQAS ARCH.”*

We understand very well the experts’ assessment that a basic decision governing the relationship between parent company and subsidiary is recommended if the business volume increases. However, we don’t understand why the long-term perspective of the experts’ recommendation (“once the business volume of AQAS ARCH increases”) was not included in the wording of recommendation 1. This omission suggests that there are

difficulties separating the two business areas for which action should be taken. From our point of view this omission picks up the allegation made by EQAR which is reflected in recommendation 1.

We've already been able to prove in the procedure that there is no problem; this was also stated by the expert panel in their report: *"In conversations with the Managing Directors and staff members it became apparent to the expert panel that the separation between quality assurance and consultancy is ensured."*

Standard 3.4. Thematic Analysis

Recommendation 2: *AQAS should develop a concept for future thematic analyses and should soon publish a first contribution on its homepage.*

Even if we've long followed the "reporting back" principle (as described above) it is correct that we had no central location where we published relevant contributions. In the meantime, we have set up a section on our homepage where we put our first contributions online. Next to older publications one can find new articles that we wrote - as suggested by the expert panel - on the basis of our reflective texts from the SER. In addition there are references to publications which we published elsewhere (for legal reasons).

AQAS seeks to publish, at least annually, a "thematic analysis" on a current topic.

We therefore consider this recommendation to have been implemented.

<http://www.aqas.de/ueber-aqas/thematische-analysen/>

Standard 3.6 Internal quality assurance and professional conduct

▪ **Assessment, Paragraph 5:**

"The Quality Management concept of the agency admittedly remains incomplete because quality control loops have not been closed. In order to ensure the representation and improvement of each single process and to comply with the PDCA-principle (plan-to-check-act), the Share Point Server should be supplemented by incorporating quality assurance mechanisms such as the ZEM analyses and by defining robust feedback loops."

Recommendation 3: *"AQAS should expand its existing Share Point Server so that processes of the quality management system are mapped onto the requirements of the PDCA cycle."*

In the preceding accreditation procedure we presented in detail the different instruments and measures that AQAS draws upon for its international quality assurance. From our point of view the quality control loop has hereby been closed. The Share Point Server fulfills the function of a Quality Management Handbook and supports AQAS in terms of a document management system through illustrating processes and providing a steer through them. We are prepared to submit another summary (for instance as an image) to show that we have implemented a closed control loop system and to incorporate the relevant documentation on our Share Point Server.



Standard 2.1 Consideration of internal quality assurance

▪ Assessment, Paragraph 1:

“With regards to programme and institutional accreditation with the seal of the GAC it is not necessary to assess the added synopses as these procedures comply with the “Rules for the Accreditation of Study Programmes and for Institutional Accreditation “ of GAC which are aligned with the 2005 ESG version.”

This statement in the report by GAC took us by surprise: we prepared these synopses specifically for this procedure in order to show that we had, to a large extent, already implemented the ESG 2015 in our guidance notes and checking criteria (and the accompanying criteria), whilst applying the current criteria of the GAC for programme and institutional accreditation.

▪ Assessment, Paragraph 2:

“In addition, AQAS developed bespoke guidelines for programme and institutional accreditation procedures outside Germany. Even if the agency did not submit synopses for these guidelines the listed criteria clearly show – with reference to the relevant ESG standards – that the standards comply with the ESG.

From our point of view it is not necessary to have a synopsis in place matching up international programme accreditation criteria with the ESG as these are nearly, worded identically with the ESG.

Standard 2.5 Criteria for outcomes

“Recommendation 4: The criteria for international institutional accreditation should be published.”

We would like to express our thanks for suggesting that the criteria for international institutional accreditation should be published on the AQAS homepage.

In the meantime we immediately corrected this oversight and assume that we have hereby implemented this recommendation.

<http://www.aqas.eu/services/institutional-accreditation-audit/>

Standard 2.6 Reporting

“Recommendation 5: AQAS should improve the search facilities on its website for reports from international procedures.”

All reports from international accreditation procedures have been inputted into the database by AQAS. However, it was fed back to us that it was difficult to find the international reports in the database. Based on the feedback by the expert group we put together a summary of our international accreditation procedures and have already uploaded it on our international homepage.

We assume that this recommendation has now been implemented.

<http://www.aqas.eu/services/accredited-study-programmes/>

▪ **Assessment, Paragraph 2:**

“The publication and processing of all database records for AQAS, which have a relatively high market share compared to other agencies’ records, is a very time consuming and onerous activity. AQAS should consider whether existing personnel capacity is sufficient”.

Existing personnel capacity is sufficient! The ongoing technical database problems have nothing to do with human resource issues at AQAS.

*“**Recommendation 6:** AQAS should look for solutions, jointly with GAC and those responsible for the database, on how these data record entry problems in the main database could be solved. The disputed issues around functionality and loss of data should be put down in writing.”*

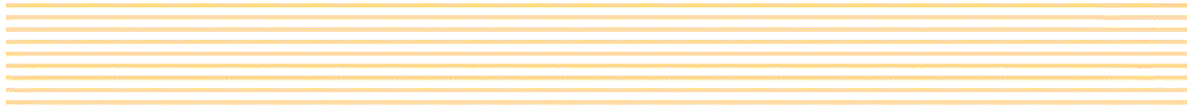
Together with the other agencies AQAS has been, for years, in contact with GAC about these database problems: the minutes of the GAC Round Table with the other agencies of 03.05.2013 (Appendix) show that we had, at the time, flagged up that the database was “not state-of-the-art”. The email correspondence with the Head Office of GAC from 2015 (also included as an Appendix) proves that we have repeatedly pointed out the recurring problems with the database (esp. the “loss” of data). Other agencies corroborated these problems.

Since late 2016 we’ve been again in an extensive email contact with the GAC and those responsible for the database (this can be viewed from the enclosed email correspondence which has also been included as an Appendix). We are happy to work constructively towards improving the database, however, do not consider the proposed conditions to be appropriate:

- The timescale allotted to agencies in which they have to meet a condition and provide evidence to GAC is normally six months. However, the scale of the problem is thus that it will certainly take considerably longer (for all parties concerned) to come up with the required solution.
- AQAS cannot take sole responsibility for the problem referred to in the condition, nor can AQAS fulfil the condition on its own. It is only by working together with the GAC and those responsible for the database that a solution can be found.
- With the introduction of a traffic light system, presented during our re-accreditation procedure, we have already established a quality assurance process. The traffic light system ensures that any problems faced by us when entering data on the database will be documented and monitored.

V. Assessment on the basis of the GAC criteria

- The rendition of the **recommendation 2** (self-reflexive reports) does not correspond to the wording in the text for standard 3.4. The resulting **condition 2** does not comply with the criteria of GAC for the accreditation of agencies in the version of 10.12.2010 upon which the procedure is based (see above).
- The proposed **condition 4** does not comply with the criteria of GAC for the accreditation of agencies in the version of 10.12.2010 upon which the procedure is based (see above).



V.1 In reference to the fulfilment of the GAC criteria

- The description refers to the GAC criteria in the version of 23.09.2016 (see above). According to the statements made above full reference should have been made to the **criteria in the version of 10.12.2010**.
- The assessment of the **criterion 3.1**. seems inappropriately short.
- Assessments for criteria **3.4, 3.10** and **3.11**. are altogether missing.
- The assessment for **criterion 3.7** comes as a surprise as the adequate composition of the AQAS expert panels was nowhere called into question during the procedure. The resulting **condition 2** furthermore does not comply with the criteria of GAC for the accreditation of agencies in the version of 10.12.2010 upon which the procedure is based (see above).

AQAS sought to be as transparent as possible in the procedure towards GAC and its expert panel; we openly disclosed business figures and data. We expect that all relevant information in the application documents and the assessment report will be blackened prior to publication.

If you have any questions, please don't hesitate to contact us.

Yours sincerely

Prof. Dr. Eberhard Menzel
Chair of the Board

Doris Herrmann
Managing Director for Strategy, Process and International

Dr. Verena Kloeters
Managing Director

Appendices

- Summary of activities "reporting back"
- Excerpt protocol of GAC for the Round Table of 03.05.2013
- Excerpts of email correspondence AQAS/GAC/HRK relating to the database
- Editorial comments