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Expert Report

on the application of the Agency for Quality Assurance and Accreditation Austria (AQ Austria), dated 20 July 2012, for accreditation

- issued on 26 April 2013 -

1. Procedural basis

1.1 Statutory mandate

Pursuant to § 2 para. 1 no. 1 of the German Statute on the Establishment of a *Foundation for the Accreditation of Study Programmes in Germany*, the Foundation is assigned with the task of accrediting accreditation agencies. It grants, for a limited period of time, the right to accredit study programmes or internal quality assurance systems of higher education institutions by awarding the seal of the Foundation.

The decision of the Accreditation Council to award accreditation as well as the conduct of the procedure for accreditation of an accreditation agency are based on the resolution *Rules of the Accreditation Council for the Accreditation of Agencies* adopted on 8 December 2009.

In order to promote the international recognition of the decisions taken by the Accreditation Council and by the accreditation agency, the Accreditation Council adopted the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* in the approval of its accreditation criteria, as approved by the ministers responsible for higher education at the Bologna follow-up conference in Bergen in May 2005. By including the *ESG Standards*, the Accreditation Council emphasised the central role of accreditation in implementing the objectives set for the Bologna Process, making it clear that quality assurance in higher education - and particularly accreditation - can no longer be exclusively orientated toward national standards or particular characteristics. Other important sources for the formulation of the criteria set by the Accreditation Council are the *Code of Good Practice* laid down by the *European Consortium for Accreditation* on 3 December 2004 and the *Guidelines of Good Practice* elaborated by the *International Network for Quality Assurance Agencies in Higher Education* in April 2005.

1.2 The German accreditation system

In 1998, an accreditation procedure based upon the "peer review principle" was introduced for study programmes in the tiered graduation system. The group of reviewing peers includes scientists but also students, representatives of professional practice and international experts. The German Law on the Establishment of a *Foundation for the Accreditation of Study Programmes in Germany* adopted on 15 February 2005 provided a new legal foundation for accreditation. The objective of accreditation is to ensure content- and subject-related standards by assessing the conceptual outline of study programmes and the academic feasibility of the courses offered, including the assessment of quality in teaching as well as the scrutiny of the professional relevance and the promotion of gender mainstreaming. Generally, accreditation is a prerequisite for introducing and maintaining Bachelor's and Master's study programmes. In addition to programme accreditation, system accreditation was introduced in 2007. The object of system accreditation is the internal quality assurance system of a higher education institution. A positive system accreditation certifies that the quality assurance system of the higher education institution attains the qualification objectives in teaching and learning and ensures the high quality of the study programmes, and in so doing applies the *Standards and Guidelines for Quality Assurance*, the Guidelines of the Standing Conference of the Ministers of Education and Cultural Affairs of the *Länder*, and the criteria set by the Accreditation Council.

In Germany, decentralised agencies conduct the accreditation of study programmes (programme accreditation) and of quality assurance systems for teaching and learning (system accreditation). In its role as central accreditation body, the Accreditation Council accredits the accreditation agencies periodically and defines the basic requirements for accreditation procedures, which are to be carried out according to reliable and transparent standards. At the same time, the Accreditation Council takes care that the interests of the entire system, which are the responsibility of each *Land*, are taken into consideration during accreditation. The actual accreditation procedures are conducted independently from the state.

The *Foundation for the Accreditation of Study Programmes in Germany* also acts as a central documentation agency for the accreditation system and manages the database of study programmes accredited in Germany.

For private higher education institutions, a procedure of institutional accreditation was introduced by the Science Council, which monitors whether or not a higher education institution complies with the specifications for scientific teaching and research. Private higher education institutions must be accredited by the Science Council, preferably prior to starting operation, but at the latest prior to final state approval by the appropriate *Land*.

2. Course of the procedure

As of 1 March 2012, the Agency for Quality Assurance and Accreditation Austria (AQ Austria) was established with the adoption of the Act on Quality Assurance in Higher Education (HS-QSG)¹. From 1 September 2012, the responsibilities previously held by the Austrian Quality Assurance Agency (AQA) were taken over by AQ Austria. The agency works across all sectors of higher education in Austria.

With letter dated 12 March 2012 the newly created AQ Austria requested that the accreditation of the ceasing Austrian Quality Assurance Agency (AQA) be transferred to the AQ Austria. AQA was licensed for system accreditation procedures on 9 June 2009 and for programme accreditation procedures on 12 February 2010. This accreditation issued by the Accreditation Council expires on 31 March 2014.

The Accreditation Council, at its 71th meeting on 28 June 2012, decided that transferring the accreditation issued for AQA to AQ Austria is not permissible in law. AQ Austria was offered the possibility to apply for accreditation with an abridged procedure. With letter dated 20 July 2012 AQ Austria submitted its application for accreditation as an accreditation agency to the Accreditation Council. On 7 January 2013 AQ Austria submitted an explanatory statement for the application together with additional documents.

The following experts were nominated by the Accreditation Council in its resolution of 12 September 2012:

Dr. Mathias Stauffacher, former Secretary General of the Rectors' Conference of Swiss Universities (CRUS) and since January 2013 Secretary General of the association *swissuniversities* (spokesperson)

Prof.in Dr.-Ing. Aylâ Neusel, International Centre for Higher Education Research
Kassel

Rainer Schmidt-Rudloff, Infineon Technologies AG

Jacob Müller, student at the University of Potsdam

The expert group was supported by Ms Agnes Leinweber on the part of the office of the Foundation for the Accreditation of Study Programmes in Germany.

On 21 January 2013, a preparatory telephone conference for the experts took place dur-

¹ Federal Act on External Quality Assurance in Higher Education and on the Agency for Quality Assurance and Accreditation Austria of 30 July 2011 (Federal Law Gazette I No. 74/2011)

ing which the applicable criteria set by the Accreditation Council and the ESG were presented and explained. This occasion also served to develop the level of knowledge of the experts with regard to the procedural aspects and the understanding of their role, and to agree upon the agenda of the experts' meeting in Vienna.

On 21 February 2013, an on-site visit took place at the head office of the Agency in Vienna, prior to which the expert group got together for a preliminary meeting. The expert group held discussions with the management of the Agency and with the personnel of the office. (The agenda is annexed.)

The expert group presented the following report with unanimous opinion on 26 April 2013.

3. Agency for Quality Assurance and Accreditation Austria (AQ Austria)

3.2 Establishment as cross-sectoral agency

The external quality assurance and accreditation system for higher education institutions underwent a reorganisation in July 2011. As of 1 March 2012, the Agency for Quality Assurance and Accreditation Austria (AQ Austria) was established. From 1 September 2012, the tasks previously held by the Austrian Quality Assurance Agency (AQA), the Austrian FH Council (FHR) and the Austrian Accreditation Council for Private Universities (ÖAR) were transferred to AQ Austria. With the establishment of the AQ Austria, the activities which had been carried out until then by different stakeholders in all sectors of the Austrian higher education system were pooled together.

The Austrian FH Council (FHR) was established in 1993 on the basis of the University of Applied Sciences Studies Act (FHStG) as an independent and autonomous authority, being the first entity for external quality assurance for the Austrian higher education system². The council was primarily responsible for: accreditation of study programmes and evaluation of institutions; conferment of academic titles and nostrification of foreign degrees; observation of the study programmes in order to ensure the educational standards; promotion of quality in teaching and learning as well as innovations in the FH sector; observation of the developments in the education and employment system in the FH sector as well as advising the competent Federal Ministry in questions concerning the FH sector and the financing of study programmes; annual reporting to the competent Federal Ministry and the National Council about the development of study programmes and the collection and interpretation of statistical data concerning the FH sector.

² Federal Law Gazette I No. 340/1993 in the currently valid version

In 1999, the Federal Act on the Accreditation of Educational Institutions as Private Universities (UniAkkG 1999³) established the Austrian Accreditation Council for Private Universities (ÖAR). As an independent authority, the ÖAR was responsible for the accreditation of private universities and their study programmes, as well as the supervision of the accredited universities.

The Federal Act on the Organisation of Universities and their Studies (Universities Act 2002 - UG)⁴ requires public universities to implement quality management systems for quality and performance assurance. Federal Act on the University for Continuing Education Krems (DUK Law 2004) contains the same provision for the Danube University Krems.

In 2004, the Austrian Quality Assurance Agency (AQA) was founded as a provider of external reviews. Since then it has carried out quality audits of internal quality management systems, procedures for evaluations, certifications and accreditations of study programmes in different disciplines and institutions as well as system analyses and consulting projects, and has also published studies.

3.2 Organisation

The bodies of AQ Austria are established by law and include the Governing Committee, the Board, the Appeals Committee, and the General Meeting.

Pursuant to § 5, para. 1 HS-QSG, the five-member Governing Committee, which has a consultative role, submits opinions, among other things, on the regulations, standards and processes of the quality assurance procedure. Pursuant to § 12 para. 2 HS-QSG all three different sectors of higher education shall be represented within the Governing Committee. The members of the Governing Committee shall be elected by the General Meeting for a period of five years.

According to § 11 para. 1 HS-QSG, the General Meeting shall consist of 23 members:

- six representatives, nominated by the Advisory Council for Economic and Social Affairs;
- two representatives of the Austrian National Union of Students;
- one representative of the Association for the Establishment and Promotion of a Na-

³ Federal Law Gazette I No. 168/1999 in the version published in Federal Law Gazette I No. 54/2000

⁴ Federal Law Gazette I No. 120/2002 in the currently valid version

tional Students' Representation at Private Universities;

- six representatives of Universities Austria;
- four representatives of the Association of Universities of Applied Sciences;
- two representatives of the Austrian Private Universities' Conference;
- two representatives of the Federal Ministry of Science and Research.

Pursuant to § 12 para. 1 sentence 1 HS-QSG, the tasks of the General Meeting shall include substantially election of the Governing Committee; nominating the Board members (jointly with the competent Federal Minister of Science and Research); nomination and appointment of the members of the Appeals Committee, and acknowledgement of the financial plan and the financial statements.

Pursuant to § 6 para. 1 HS-QSG, the Board shall consist of 14 members and be responsible for key tasks concerning the quality assurance procedures of the agency. As per § 9 para. 1, the Board shall be responsible - among other things – for deciding on the accreditation of educational institutions and degree programmes or on the certification of quality management systems. Furthermore, the Board shall decide on regulations, standards and processes of the quality assurance procedure (see the statements concerning criterion 2.2.1).

The Appeals Committee consists, according to § 13 HS-QSG, of two Austrian members and one foreign member. The committee shall deal with and decide on appeals lodged by educational institutions against the procedure as such and against certification decisions (see the statements concerning criterion 1.6).

3.3 Resources

For the performance of its statutory tasks in Austria the Agency is granted subsidies of approx. [...] EUR per annum by the Federal Ministry of Science and Research. At present, the Agency employs 24 staff members (16.75 full time equivalents). The Agency plans to add 1,5 posts (FTE) in the first quarter of 2013.

AQ Austria rents 700 m² of office space in the city centre of Vienna. Up-to-date computer workstations and notebooks are made available to the staff.

3.4 Range of activities

According to § 3 para. 3 HS-QSG, the Agency has the following tasks:

1. Developing and carrying out external quality assurance procedures, as a minimum, audit and accreditation procedures, according to national and international standards;
2. accrediting higher education institutions and degree programmes (i.e. universities of applied science and their study programmes as well as private universities and their programmes);
3. reporting to the National Council by way of the competent Federal Minister;
4. publishing reports on the outcome of the quality assurance procedures;
5. continuously supervising accredited higher education institutions and degree programmes regarding accreditation requirements;
6. fulfilling the tasks according to the provisions of the University of Applied Sciences Studies Act (FHStG) and the Act on Private Universities (PUG);
7. issuing certificates for educational institutions following an audit (i.e. public universities and universities of applied science);
8. conducting studies and system analyses, performing evaluations, and carrying out projects;
9. providing information and advice in matters related to quality assurance and quality enhancement;
10. international cooperation in the area of quality assurance.

4. Assessment

Merging the quality assurance agencies that used to operate in the single sectors of higher education and pooling together the functions of the former teams poses a great challenge to the newly created AQ Austria. During their visit to the head office in Vienna that took place about six months after it had moved there, the expert group gained the impression that the Agency had already overcome the difficulties typically encountered during a start-up. The discussions with some of the Agency's employees showed that they cope in a very constructive manner with the given situation and that the prospects of the merger can be judged positively. According to the expert group, this may be put down mainly to

the new managing director's integrative approach and his leadership abilities. The current ENQA president who took over this position is a well-versed expert.

The Agency purposefully pursues a clear internationalisation strategy. In addition to its national tasks, AQ Austria aims at establishing a main area of business concerning colleges of arts and music; for this purpose it plans to cooperate with the European Music School Union. The expert group concurs that there is a certain demand in this sector and that it offers interesting prospects for development for both the HEIs concerned and the Agency. In the medium term, AQ Austria plans to become one of the leading agencies for external quality assurance on an international scale.

The expert group recognises that it is a realistic approach if the Agency focuses mainly on accreditation of sophisticated internal quality assurance systems of HEIs in order to gain important experience also with regard to procedures to be carried out in Austria. This strategy also offers opportunities for an adequate development of the human resources involved. Its solid financial basis allows AQ Austria to choose exactly which system accreditation procedures it wants to carry out.

The documents accompanying the application of AQ Austria for certification in Germany are very professional and informative. The experts note positively that the criteria of the Accreditation Council for programme and system accreditation are well operationalised since guiding questions can be found in the relevant guidance notes published by the Agency.

The issues concerning the transition from AQA to AQ Austria should be regulated even more clearly with regard to the procedures carried out in Germany. While the AQA's accreditation for Germany does not expire until 31 March 2014, AQ Austria would already be accredited as of June 2013, provided the Accreditation Council issues a positive decision. A currently on-going procedure for system accreditation carried out by AQA should be concluded before the end of the year. Transferring the relevant contract for the procedure to AQ Austria could benefit the higher education institution.

The expert group advises the Accreditation Council to accredit the Agency for Quality Assurance and Accreditation Austria (AQ Austria) for both programme and system accreditation procedures and to issue the following conditions and recommendations:

Condition 1: The Accreditation Council should obligate the Agency to involve more proven experts for the relevant discipline as members of the expert group of programme accreditation procedures (criterion 2.2.1).

Condition 2: The Accreditation Council should obligate the Agency to present a concept for separating the financial flows coming from Austrian state funding and other income

from accreditation procedures which have obtained the seal of the Accreditation Council (criterion 2.3.2).

Condition 3: The Accreditation Council should obligate the Agency to demonstrate how the accreditation procedures which have obtained the seal of the Accreditation Council are implemented - at least in the concept stage - within the quality assurance system run for the entire Agency and how they can be accessed by the public (criterion 2.5).

Condition 4: The Accreditation Council should obligate the Agency to establish a mechanism for complaints for accreditation procedures which have obtained the seal of the Accreditation Council and to publish the relevant rules of procedure (criterion 2.6).

Recommendation 1: In order to improve transparency, the website of the Agency should contain clearer descriptions regarding the transfer of procedures and activities from the former agencies to AQ Austria.

3.1 Assessment based on the criteria for the accreditation of accreditation agencies

Criterion 2.1: Self-image and understanding of the accreditation task

2.1.1. The agency has a publicly documented perception of quality, from which it derives the basis of its accreditation activity. Its activity is geared to the objective of enhancing quality and is based on the Higher Education Institutions' key responsibility for the profile and quality of teaching and learning.

Documentation

According to the statements on p. 7 of the application, AQ Austria is committed to contributing to the HEI's quality development. In doing so, the Agency places the emphasis on the constitutionally granted autonomy of higher education institutions which finds its expression in the freedom of research and teaching as well as in the right to decide freely how to structure the internal organisation of the HEI. AQ Austria respects the unique character of each higher education institution and its individual objectives. Therefore, the Agency considers it inappropriate to impose subject-specific quality standards on the HEI, since defining these academic standards should lie within the competence of the single HEI. AQ Austria considers its main mission to be that of assessing these definitions on the basis of a peer review with regard to their validity and plausibility and, in so doing, to support the HEIs in developing a culture of quality.

Hence, the promotion of quality development in autonomous higher education institutions is a central commitment of the Agency's work, also following international guidelines and,

in particular, the relevant European standards. The Agency states that it intends to carry on the strong international involvement that characterised the work of the three preceding organisations. These principles are set out in the Agency's mission statement which is also published on its website.⁵

Assessment

In its published mission statement, the Agency underlines that the primary responsibility for quality in all their areas and for quality assurance and development rests with higher education institutions. In particular, AQ Austria stresses the fact that the Agency aims at modelling standards and procedures with due regard to the differences in institutional profiles of higher education institutions. The expert group welcomes this approach not only in view of the cross-sectoral activities carried out in Austria but also as a basic principle for the procedures in Germany.

Result

Criterion 2.1.1 is fulfilled.

2.1.2 The agency accredits across types of Higher Education Institutions and also across disciplines in the case of admittance for programme accreditations.

Documentation

The statutory tasks of the AQ Austria include, according to § 3 para. 3 HS-QSG, the accreditation of higher education institutions (i.e. universities of applied science and private universities); the accreditation of study programmes (provided by universities of applied science and private universities), and audits, i.e. the certification of quality management systems of higher education institutions.

In accordance with this wide scope of activity and as a continuation of the accreditation activities carried out by AQA in Germany, the Agency does not restrict its accreditation procedures in Germany to particular types of HEIs or disciplines. The Agency's comprehensive scope of activity should be reflected in the relevant guidance notes etc., which will not contain any restriction with regard to types of HEIs or disciplines.

Assessment

Considering the statutory tasks of the newly established agency and the common practice of the AQA in the past, it is plausible that AQ Austria will work both with different types of HEIs and disciplines.

⁵ Annex 1 of the document "Supplementary Information" submitted in February 2013.

Result

Criterion 2.1.2 is fulfilled.

Criterion 2.2: Structures and procedures

2.2.1 For admittance to programme accreditation and/or for system accreditation, the agency proves binding internal structures and procedures, which ensure the correct and consistent application of the "Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation" in the current version. Responsibilities of the organs and their personnel are functional and legally regulated.

Documentation

Pursuant to § 6 para. 1 consists of 14 members: Eight members shall be experts in the area of higher education; they shall have academic qualifications and experience in quality assurance and shall represent different sectors of higher education. Two members shall be student representatives and four members shall be representatives of professional practice. They shall be familiar with the national or international higher education sector, have experience in professional fields relevant for higher education institutions, shall possess sound judgment in matters related to quality assurance, and shall be able to contribute to the fulfilment of the tasks of the Agency for Quality Assurance and Accreditation Austria because of their profound knowledge and experience. According to § 7 para. 2, two foreign members and two Austrian members among the members of the Board shall be nominated by the competent Federal Minister.

The Board currently comprises the following members:

Experts for Higher Education:

- Univ. Prof. Dr. Anke Hanft (University of Oldenburg), President of the Board;
- Univ. Prof. Dr. Wolfgang Mazal (University of Vienna), Vice-President of the Board;
- PhD Peter Findlay (Quality Assurance Agency for Higher Education);
- Univ. Prof. Dr. Ada Pellert (Berlin University for Professional Studies);
- Christina Rozsnyai, M.A., M.L.S. (Hungarian Accreditation Committee);
- Mag. Dr. Ferry Stocker (FH Wiener Neustadt);
- Univ. Prof. Dr. Hannelore Weck-Hannemann (University of Innsbruck);
- Univ. Prof. Dr. Hans Weder (University of Zurich);

Students

- Julian Hiller (Leibniz University, Hannover);

– Mag. (FH) Karin Schönhofer (VTB Bank, University of Vienna);

Representatives of professional practice

– Mag. Gudrun Feucht, M.A. (University of Applied Science Vienna);

– Dr. Valerie Höllinger, MBA, MBL (Berufsförderungsinstitut (bfi) Wien);

– Mag. Thomas Mayr (ibw Austria - Research & Development in VET);

– Mag. Peter Schlögl (Austrian Institute for Research on Vocational Training - öibf).

Pursuant to § 9 para. 1 HS-QSG, the Board decides on the accreditation of educational institutions and degree programmes or on the certification of the quality management system, and it decides on regulations, standards and processes of the quality assurance procedure.

The on-going tasks are carried out by the managing director and the head office. According to the statements on p. 15 of the application, their responsibilities include:

„ - *Generating and disseminating information with regard to quality assurance (by contacting HEIs; planning, carrying out and participating at events as well as by publications)*

- *modelling methods and procedures for external quality assurance*

- *providing research on existing methods and standards*

- *developing guidelines and standards for procedures*

- *searching for experts*

- *performing and coordinating procedures in quality assurance*

- *informing universities and universities of applied science with regard to self-documentation and self-evaluation (e.g. by feedback, interviews)*

- *preparing the experts with regard to methods and contents of the procedures*

- *coordinating and moderating follow-up procedures”.*

AQ Austria has outlined the routines and responsibilities in programme and system accreditation procedures in its application (p. 15-20). The annex includes separate guidance notes for programme and system accreditation procedures adopted by the Board. The decisions with regard to the procedures for both programme and system accreditation are taken by the Board. In particular, it decides on the appointment of experts, the accreditation of study programmes or internal quality assurance systems and on the compliance with imposed conditions. In system accreditation procedures, the Board also decides on admittance to the procedure (for the acquisition of experts see also criterion 2.2.3).

Assessment

Based on the HS-QSG, tasks and responsibilities of the AQ Austria bodies and their composition are laid down in the guidance notes for programme and system accreditation in a comprehensible and adequate way.

The guidance notes are procedural documents resolved with binding effect for the programme and system accreditation and they refer very clearly to the criteria and rules of procedure of the Accreditation Council. Both the criteria and the procedural steps of programme and system accreditation are based exclusively on the relevant regulations of the Accreditation Council. In order to provide guidance to the HEIs for the generation of the self-documentation, the Agency poses helpful questions concerning the single criteria analysed in programme and system accreditation. These guiding questions do not contain any distinct detailing which may exceed the level of detail provided by the criteria of the Accreditation Council. Roles and responsibilities of the parties involved in the procedures (HEI, experts and bodies/head office of the Agency) are likewise clearly described.

It is comprehensible that the key tasks concerning programme and system accreditation procedures are assigned to the Board, which appoints the experts and decides on accreditation. In the experts' view, the composition of the Board determined by § 6 para. 1 HS-QSG, according to which the Board shall include acknowledged experts in the area of higher education with academic qualifications and experience in quality assurance as well as student representatives and representatives of professional practice, offers a good basis to enable sound decisions with regard to system accreditation. According to the experts, the composition of the Board does not adequately reflect the range of discipline-related competences needed for decisions concerning programme accreditation. The expert group led a critical discussion on this issue, particularly in view of the fact that AQ Austria intends to focus on system accreditation in Germany. Furthermore, according to the recent resolutions of the Accreditation Council adopted on 20 February 2013, it is no longer mandatory for the Agency to hold a certification for programme accreditation in order to be allowed to carry out random samples in system accreditation procedures. The certification for programme accreditation remains compulsory on if random samples have to be carried out for state regulated study programmes such as teacher training programmes.

Broadening the range of the discipline-related expertise within the expert groups in programme accreditation procedures might be an alternative approach. In this regard, the expert group refers to the report and the accreditation decision adopted by OAQ in 2008 and the certification of AQA for programme accreditation in 2010. In both cases, a com-

mission with a narrow range of discipline-related competences was accepted in view of a broader-ranged commission appointed for procedures for programme accreditation that included at least three acknowledged experts with relevant academic qualifications. In both cases, the Accreditation Council assumed that the Agencies in question would focus on system accreditation procedures in Germany.

According to the statements of p. 22 of the guidelines for programme accreditation published by AQ Austria, expert groups for programme accreditation procedures shall only include a minimum of two experts with academic and disciplinary affinity from academia. In the event of programme accreditation procedures carried out by AQ Austria, the expert group recommends involving more proven experts for the relevant discipline as members of the expert group.

Result

Criterion 2.2.1 is partially fulfilled.

Recommendation

The expert group advises the Accreditation Council to issue the following condition:

1. The Accreditation Council should obligate the Agency to involve more proven experts for the relevant discipline as members of the expert group of programme accreditation procedures.

2.2.2 The agency involves representatives of interest groups (sciences, students and practitioners from the profession) relevant for the execution of the task.

Documentation

Pursuant to § 6 para. 1 HS-QSG, in addition to the experts in the area of higher education, the Board shall also include two student representatives and four representative of professional practice.

The composition of the expert groups for programme and system accreditation is bindingly laid down in the guidance notes (programme accreditation on p. 22, system accreditation on p. 12), and shall include representatives from academia and professional practice as well as student representatives.

With regard to the members of the appeals committee, § 13 para. 2 HS-QSG differentiates only between Austrian and foreign members.

Assessment

The involvement of representatives from academia and professional practice as well as

student representatives as members of the Board and expert groups is laid down in the relevant regulations of the HS-QSG and the pertinent procedural documents of AQ Austria. The Agency plans in this regard to start a cooperation with the Student Pool for Accreditation and the European Students' Union.

The systematic involvement of students and representatives of professional practice is not ensured only with regard to the appeals committee. Nevertheless, from the experts' point of view this is not considered to be a deficiency since the Accreditation Councils' requirements with regard to internal complaints procedures merely provide that they shall be formalised and publicly accessible (see criterion 3.6). Furthermore, there is no reason to expect that the handling of complaints might be a regular part in accreditation procedures carried out by AQ Austria.

Result

Criterion 2.2.2 is fulfilled.

2.2.3 The competence of those involved in the procedures, with regard to all areas relevant for the assessment procedures of programme accreditation or system accreditation, is ensured by appropriate selection procedures and briefing.

Documentation

The Agency explains in its application on p. 21 that the necessary competence profile and the size of the expert group shall be determined in accordance with the regulations set by the Accreditation Council during the preparation stage of an accreditation procedure. When searching for suitable experts for the procedures, the Agency uses its internal database with more than 400 qualified candidates (see application, p. 22). Student experts are proposed by the European Students' Union (ESU). Furthermore, the Agency also draws on candidates proposed by the German and the Swiss Student Pool.

The experts are appointed by the Board (p. 17 of the application).

AQ Austria plans to conclude individual agreements with the single experts in which their rights and obligations are set forth (annex 11).

Preparatory expert briefing consists essentially of the following measures (p. 22 of the application):

- AQ Austria plans to carry out workshops that shall prepare for experts' work in programme and system accreditation procedures. During these events, experts shall obtain information on accreditation in Germany, the role of experts within the procedures, rules of procedure and criteria (see annex 9 for a sample schedule).

- At the briefing stage, one or more virtual conferences are planned providing a first opportunity for exchanging ideas and discussing the outline of the procedures, the self-documentation of the HEI, details concerning the on-site visit as well as organisational issues.

- The preparatory meeting takes place several weeks prior to the on-site visit or immediately beforehand. The workshop takes about half a day. The workshop agenda includes the following objectives: Getting to know each other, clarification of outstanding issues and role allocation, preparation of a questionnaire and an agenda for the discussions with the HEIs, definition of the time and work schedule for the compilation of the report.

AQ Austria states in its application that it ensures the internal communication and further education of its staff members with different measures (p. 23): Participation at international and national expert meetings and conferences, continuous reference to relevant literature, conceptual work, close communication with the members of the Board. The Agency plans to support the internal work organisation, in addition to the internal team meetings, with a central data storage system and databases (p. 23). This includes an Intranet platform for the recording of single procedures as well as an expert data base and a bibliographic database with about 900 records. According to the statements on p. 23 of the application, the Agency is currently preparing a programme for personnel development. Continuous personnel training is funded with [...] Euro p.a.

Biographical information is provided on the members of the organs and on those members of the head office staff, who are involved in or responsible for accreditation procedures in Germany.

Assessment

The above mentioned measures adopted for expert briefing are reasonable and adequate for ensuring that accreditation procedures are carried out in compliance with the regulations of the Accreditation Council. The expert group welcomes the fact that in its general workshop AQ Austria also plans to address issues concerning the understanding of the experts' role within accreditation. During a conversation with the experts, the Agency clearly explained that - given the small number of procedures carried out in Germany - the preparatory briefing of experts will be geared in these cases to the specific procedural circumstances. In this regard it is planned to employ a range of events such as full-day workshops, meetings in the evening prior to the on-site visit or preparatory Skype conferences.

The biographical information provided on the members of the organs reveals broad competences ranging from academia, professional practice and quality assurance in higher

education. Similarly, the staff members of the head office possess relevant experience and skills - e.g. concerning the requirements which common and specific to both countries - in order to carry out accreditation procedures in Germany.

Programme and budgeting for internal work organisation and staff training are considered to be suitable for supporting the execution of the tasks carried out by the head office by providing the necessary information and skills or to allow to train the staff. The expert group approves the fact that procedural documents are elaborated by the Agency in project-specific work groups which see the transversal involvement of members of the previous head offices and with different responsibilities. This kind of exchange provides an important basis not only for professional development on a personal level but also for the process of growing together as the head office of a newly established agency.

Result

Criterion 2.2.2 is fulfilled.

2.2.4 If the agency engages other organisations for the implementation of parts of the procedures, the correct implementation must be ensured by reliable rules and procedures.

Documentation

According to its application, the Agency does not intend subcontracting other organisations (see p. 23 of the application).

Assessment

The criterion is not relevant.

Criterion 2.3: Independence

2.3.1 The agency has a separate legal entity.

Documentation

Pursuant to § 3 para. 2 HS-QSG, AQ Austria is a legal entity governed by public law (see p. 24 of the application).

Assessment

§ 3 para. 2 HS-QSG provides a legal definition of the Agency's legal identity.

Result

Criterion 2.3.1 is fulfilled.

2.3.2 It does not work on a profit-oriented basis and carries out the accreditation procedures on full cost basis.**Documentation**

Pursuant to § 15 para. 1 HS-QSG, the Agency is entitled to charge fees for the quality assurance procedures it carries out. According to p. 24 of the application, the fees for accreditation procedures in Germany cover the expenditures for the experts and the on-site visit as well as the personnel expenses with a flat-rate overhead. The flat administrative fee includes all actual costs incurred by the Agency and is based on empirical values. Samples for cost calculations for programme and system accreditation procedures are provided in annex 12.

Assessment

The calculations for programme and system accreditation procedures provided in the application are considered to be reasonable by the expert group. It is noticeable that the allowances for experts are set higher compared to other Agencies. During a conversation with the experts, AQ Austria explained their policy with the objective to ensure quality in their procedures by involving highly qualified experts. The fact that, by doing so, the costs for their procedures are also higher compared with those of other agencies is accepted by the Agency since they focus on higher education institutions with a sense of quality as future customers.

In order to ensure the separation of the financial flows coming from the Austrian Federal Government and other sources of income, and with regard to the accreditation procedures carried out in Germany on a full-cost basis, by the end of the year the Agency will establish a system of cost centres. This also complies with the legal requirements in Austria since pursuant to § 16 HS-QSG, the accounting group shall be separated according to the defined tasks.

Result

Criterion 2.3.2 is partially fulfilled.

Recommendation

The expert group advises the Accreditation Council to issue the following condition:

2. The Accreditation Council should obligate the Agency to present a concept for separating the financial flows coming from Austrian state funding and other income from accreditation procedures which have obtained the seal of the Accreditation Council.

2.3.3 The agency ensures the freedom from instructions of the organs in individual cases and the independence and impartiality of the persons working for it.**Documentation**

According to § 2 para. 2 HS-QSG, quality assurance procedures are formal processes carried out by independent and external experts. On p. 24 of its application, the Agency refers to the legal regulations concerning the impartiality of the members of the agency organs. Pursuant to § 6 para. 2 HS-QSG the following status groups are excluded from being appointed as Board members: members of the Federal Government or a provincial government, members of the National Council or the Federal Council or any other general representative body, or officials of a political party or of an institution represented in the General Meeting as well as persons who have been in such a position in the past four years. Employees working for Federal Ministries competent for higher education institutions shall also be excluded from board membership. In addition, § 25 para. 3 HS-QSG defines that the members of the Board shall be independent and not be bound by any instructions in the exercise of their office.

On p. 25 of its application, the Agency also states that the procedure for the nomination and appointment of the Board is to be considered an element ensuring the Board's autonomy. This procedure provides that ten members are nominated by the General Meeting with a two-third majority while four members are nominated by the Federal Minister. Following this, all nominated members are formally appointed by the latter. The autonomy of the Board is laid down in § 9 para. 2 HS-QSG and is again emphasised explicitly in § 25 para. 3 with regard to accreditation decisions. Furthermore, the members of the Appeals Committee are not allowed pursuant to § 13 para. 4 HS-QSG to be members of any other body of the AQ Austria.

According to the statements on p. 25 of the application, AQ Austria verifies the existence of possible conflicts of interest of the members of expert groups. In addition, the HEI is entitled to submit a statement concerning possible conflicts of interest and incompatibilities.

Subsequently, each expert is held to certify his or her impartiality with a declaration of commitment (annex 11), which has to be signed before the procedure starts.

The declaration of commitment contains the following grounds for partiality:

- lectureship or mandate at the reviewed higher education institution during the past three years,
- pending appeals procedure,
- possible involvement or collaboration with the providing organisation or with its bodies

during the past five years,

- intense joint research activities or cooperation with the HEI under review,
- having completed an examination/obtained a degree at the HEI during the past five years,
- other contractual relationships with the HEI,
- family relationship.

The rules of procedure (annex 6) contain the regulations establishing how to address possible cases of partiality in the Board: pursuant to § 9 para. 1 a biased member shall leave the meeting while the Board is discussing the topic in question. With regard to the criteria concerning possible partiality, the rules of procedure refer to § 7 AVG (General Administrative Procedure Act). It reads as follows:

“(1) In exercising their duties, administrative officers shall abstain from exercising their office and arrange for a substitute:

- 1. in matters in which they themselves, one of their relatives (§ 36a) or a person under their guardianship is involved;*
- 2. in matters in which they were or still are an appointed representative of a party;*
- 3. if there are any other important reasons resulting in doubts as to their full impartiality;*
- 4. in appeals proceedings if they had been involved in issuing the ruling appealed against or the preliminary decision on appeal (§ 64a).*

(2) In any case of imminent danger, if it is not possible to immediately appoint a substitute, also an administrative officer who is biased is entitled to perform the necessary official acts himself.”

Assessment

The relevant legal regulations contained in the HS-QSG adequately ensure the autonomy of the Board being the executing body in accreditation procedures. On the whole, there is no reason to conclude that the Agency bodies and committees are subject to mutual instructions or external dependencies with regard to their decisional activities.

The criteria concerning the possible partiality of experts are considered to be a reasonable basis for the exclusion of any cases of partiality. The regulation contained in § 6 of the Board's rules of procedure concerning possible partiality of its members is considered to be appropriate.

Result

Criterion 2.3.2 is fulfilled.

Criterion 2.4: Facilities

The agency is sustainably and adequately equipped for its function in all required functional areas in respect of personnel and material resources

Documentation

Pursuant to § 15 para. 1 HS-QSG, the Agency is funded by Austrian federal funds and by its own income. For the year 2013, the financial planning of the Agency indicates federal funds of [...] Euro. For the years 2014 and 2015, the plan allocates about [...] Euro p.a.

According to the statements on p. 26 of the application, the Agency for Quality Assurance and Accreditation Austria has 24 employees (16.75 full time equivalents); a further 1.5 full time equivalents will be added in the first quarter of 2013.

The head office disposes of 700 m² office space containing mainly single office rooms and two meeting rooms. The Agency possesses a security-protected data network with appropriate servers, 23 computer workstations, 3 additional computer workstations and 9 Notebooks. Two meeting rooms are available for meetings, workshops and training courses.

According to the statements on p. 26 of the application, the Agency has a central data storage system, which will be transferred gradually to a document management system, and a digital register of persons as well as a data and document platform with limited external access for facilitating the internal work organisation. The AQ Austria disposes of a library for internal use containing about 900 books.

Assessment

The structure of its financial envelope illustrated by AQ Austria is considered by the expert group to be reasonable with regard to functional adequateness and sustainability. The business plan submitted by the Agency demonstrates that a solid basic financial funding by Austrian federal funds is ensured up to and including 2015. Furthermore, federal funding is laid down by § 15 para. 1 HS-QSG. In addition, it is to be expected that the Agency will generate further income also through the national system. During talks with the experts, the Agency explained that AQ Austria is interested in carrying out accreditation procedures in Germany more for the sake of preserving its ability of acting on an international level and for the learning effects for the national system obtained by doing so than for economic interests.

During an on-site visit, the expert group was able to see for themselves that AQ Austria disposes of an excellent spatial and material setup to start its activities.

Result

Criterion 2.4 is fulfilled.

Criterion 2.5: Internal quality management

The agency continuously uses a formalised internal quality management system, which is suitable for assessing the effectiveness of the internal control processes and ensures the safeguarding and continuous improvement of the quality of the activity. It is publicly accessible and covers systematic internal and external feed-back processes.

Documentation

According to the statements on p. 27 of the application, AQ Austria is currently establishing an internal quality management system for the Agency. For the time being, the internal organisational structures and procedures previously adopted by the AQA will remain active; they were already assessed on the occasion of the accreditation issued in 2009/2010. In this regard, on p. 27 of its application, the Agency refers to the following elements:

- *“Regular internal team meetings (about every two or three weeks) of the entire team are held in order to inform all staff members about work progress of the different fields of activity; they also provide an occasion to discuss in detail certain work-related tasks, to provide information about general issues (ENQA work groups, initiatives of advocacy groups etc.) and to exchange ideas on internal work and office organisation issues as well as on the participation at relevant events. These meetings offer the staff members an opportunity to reflect and discuss methodological aspects related with the procedures. Topics and outcomes of these meetings are documented and the records are made accessible to the staff members for subsequent meetings.*
- *Regular internal meetings on single work-related tasks with the participation of the competent project coordinators and the managing directors. Topics and outcomes of these meetings are documented and the records are made accessible to the staff members for subsequent meetings.*
- *Strategic meetings taking place twice a year or for specific occasions during which staff members and members of the Board jointly debate relevant issues in order to prepare position papers and to discuss the strategic development of the Agency.*
- *Appraisal interview with staff members providing an occasion for reflection and feedback concerning the individual work organisation and personal professional development.*
- *After completion of a procedure, HEIs are asked to submit a written assessment regarding the Agency's project management. The Agency evaluates the feedback obtained from the HEIs and the results are discussed internally.*
- *After completion of the procedures, the experts are asked to submit a written assessment regarding the Agency's project management. The Agency evaluates the feedback*

obtained from the HEIs and the results are discussed internally.

- If new procedures need to be modulated or implemented or if it is planned to further develop existing procedures, the Agency organises joint workshops with the participation of HEIs and experts. These workshops focus on discussing and assessing procedural rules, criteria and routines.

- The Agency undergoes external reviewing on a regular basis.

- Training of new staff members is provided by a colleague who intensively supervises the new members at the beginning of their employment at the Agency. The new employees may refer to an internal guide describing the organisational processes of the Agency. Continuous training and the enhancement of the skills of staff members is ensured mainly by their participation in relevant professional events.”

Assessment

AQ Austria has clearly explained that, after the merge of the preceding agencies, the Agency's internal quality management is still in the process of being established and will be finalised during the second half of the year. In the meantime, the relevant internal quality assurance elements adopted by the AQA will remain in force for accreditation procedures in Germany. The QA measures formerly adopted by AQA offer suitable mechanisms for obtaining internal and external feedback. The process illustrated by the Agency according to which new procedural documents will be developed in teams consisting of staff members from different fields and cooperating in different sectors and responsibilities, is to be considered favourable for exchanging experiences and is a clear sign of embodied quality management. Nevertheless, the expert group sees the need to formalise the processes by appointing responsibilities. In so doing, the Agency should also explicitly include accreditation with the seal of the Accreditation Council. In addition, criterion 2.5 of the Accreditation Council imposes that internal quality assurance systems shall be publicly accessible.

Result

Criterion 2.5 is partially fulfilled.

Recommendation

The expert group advises the Accreditation Council to issue the following condition:

3. The Accreditation Council should obligate the Agency to demonstrate how the accreditation procedures which have obtained the seal of the Accreditation Council are implemented - at least in the concept stage - within the quality assurance system run for the entire Agency and how they can be accessed by the public.

Criterion 2.6: Internal complaints procedure

The agency has a publicly accessible, formalised internal procedure for reviewing accreditation decisions on application of a Higher Education Institution.

Documentation

The complaints procedure is regulated by § 13 HS-QSG and by the Appeals Committee's rules of procedure (annex 6) which refer to the relevant section of HS-QSG. Accordingly, an Appeals Committee with at least three members will be established, consisting of two Austrian members and one foreign member with expertise in the field of quality assurance in higher education and legal qualifications. Two substitute members shall also be appointed in order to act in place of biased members (see § 2 para. 2 of the rules of procedure set for the Appeals Committee). Pursuant to § 13 para. 4 HS-QSG, the members of the Appeals Committee may not be members of any other body of AQ Austria.

According to § 13 para. 10 HS-QSG, the Appeals Committee shall discuss appeals lodged by educational institutions proposing measures for solving the problem to the Board or to the complainant.

The process of a complaints procedure follows the provisions included under § 13 para. 10 HS-QSG. It is described on p. 28 of the application and reads as follows:

1. The HEIs are entitled to lodge an appeal against the manner in which a procedure is carried out at any time during the procedure; appeals against the reports or certification decisions shall be lodged within three months.
2. Appeals shall be lodged with the Management Office in writing (by post, telefax or e-mail). The Management Office shall forward the appeal without delay to the Appeals Committee for inspection and shall inform the Board accordingly.
3. The Appeals Committee will discuss the appeal either in writing or by inviting the complaining educational institution to discuss the appeal during a meeting. The Appeals Committee may also, in agreement with the higher education institution lodging the appeal, hold a hearing with third parties.
4. The Appeals Committee shall report the results of its investigations to the Board and to the complaining educational institution. If necessary, the Appeals Committee shall suggest appropriate measures to solve the problem (§ 11 of the rules of procedure set for the Appeals Committee).

Assessment

The complaints procedure on the grounds of § 13 HS-QSG and the adopted rules of procedure set for the Appeals Committee are considered to be reasonable and suitable. The

terms and procedures are clearly defined. The expert group criticises that the rules of procedure set for the Appeals Committee do not yet contain the manner and decisions of programme and system accreditation procedures as possible causes of complaint. In the course of the certification for accreditation in Germany, these issues shall be included into the rules of procedure; otherwise the Agency shall establish a different complaints procedure. In order to ensure transparency, this shall be made public on the Agency's website. The Agency assured to remedy this promptly.

Result

Criterion 2.6 is partially fulfilled.

Recommendation

The expert group advises the Accreditation Council to issue the following condition:

4. The Accreditation Council should obligate the Agency to establish a mechanism for complaints for accreditation procedures which have obtained the seal of the Accreditation Council and to publish the relevant rules of procedure.

Criterion 2.7: Accountability

The agency describes its procedures and appraisal criteria adequately in detail and publishes them. It publishes the names of the experts, the expert reports and the decisions of the accreditation procedures carried out by it.

Documentation

In its application, the Agency points out that, pursuant to § 21 HS-QSG, the results of the audit and the accreditation procedure shall be published by both the Agency and the applying educational institution; personal data shall not be made public. With respect to programme accreditation (p. 16 of the application) and system accreditation (p. 18) the procedure illustrated in the application provides for the publication of both the decision and the report.

At present, descriptions of procedural documents and assessment criteria for accreditation procedures are not yet published on the Agency's website.

Assessment

The expert group observes that in consequence of the extensive statutory commitments concerning Austria it can be expected that procedural documents, expert reports and decisions for programme and system accreditation will be also published. It is also comprehensible that AQ Austria has not yet published the assessment criteria and procedural documents for programme and system accreditations in Germany since the Agency is not

yet certified for these procedures. Furthermore, the Agency's website is still under construction.

In order to improve transparency, the expert group recommends that the website of the Agency should contain clearer descriptions regarding the transfer of procedures and activities from the ceasing agencies to AQ Austria.

Result

Criterion 2.7 is fulfilled

Recommendation

The expert group issues the following recommendation:

Recommendation 1: In order to improve transparency, the website of the Agency should contain clearer descriptions regarding the transfer of procedures and activities from the former agencies to AQ Austria.

Bonn, 26 April 2013

Accommodation:

BEST WESTERN PLUS Hotel Das Tigra

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Telephone: +43 (0)1/533 96 41-0 . Fax: +43 (0)1/533 96 45

E-mail: reservierung@hotel-tigra.at . www.hotel-tigra.at**Meeting place:**

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 1010 Vienna

20 February 2013		
20:00	Internal working dinner	Gastwirtschaft Stopfer Rudolfsplatz 4 1010 Vienna

21/02/2013		
08:30 - 09:45	Internal preliminary meeting	
09:45 - 10:00	Break	
10:00 - 11:30	Discussion with the management of the Agency	Prof. Dr. Anke Hanft, Prof. Dr. Wolfgang Mazal Dr. Achim Hopbach
11:30 - 12:30	Tour of the head office followed by internal lunch	
12:30 - 13:30	Discussions with the personnel of the office carrying out the programme and system accreditation procedures	Dr. Achim Hopbach, Mag. Alexander Kohler Mag. Elvira Mutschmann-Sanchez, Mag. Daniela Wanek
13:30 - 13:45	Queries to the management of the agency (if necessary)	Prof. Dr. Anke Hanft, Dr. Achim Hopbach
13:45 - 14:00	Break	
14:00 - 15:45	Internal final meeting of the expert group with preparations for the report	
15:45	Short feedback to the management of the agency, departure of the experts	Prof. Dr. Anke Hanft, Dr. Achim Hopbach