

**Substantive Change Report**  
by the Agency for Quality Assurance through  
Accreditation of Study Programmes (AQAS)

Register Committee

Ref. RC17/C12

Ver. 1.0

Date 2016-06-15

Page 1 / 3

Decision of:	6 June 2016
Report received on:	3 March 2016
Agency registered since:	25.05.10
Last external review report:	February 2012
Registered until:	28/02/2017
Absented themselves from decision-making:	none
Attachments:	<ol style="list-style-type: none"> <li>1. <a href="#">Substantive Change Report</a></li> <li>2. <a href="#">Clarification Request of 19/04/16</a></li> <li>3. <a href="#">AQAS Response of 24/04/16</a></li> <li>4. <a href="#">AQAS Statement of 2/09/16</a></li> <li>5. <a href="#">EQAR Response of 17/10/16</a></li> </ol>

1. The Register Committee considered the Substantive Change Report of 1 March 2016. The Register Committee sought and received clarification from AQAS, as referred to below (see attached: request of 19/04/2016 and response of 26/04/2016).
2. The Register Committee already took note of the establishment of a separate complaints commission for AQAS's accreditation procedures, covered in the previous Substantive Change Report of 24/01/2014.
3. The Register Committee considered the information about the establishment of AQAS ARCH, as the "daughter organisation" with the purpose of, inter alia, providing consultancy activities for higher education institutions, evaluation and certification procedures "on their own behalf" and other projects abroad.
4. Based on the information provided by AQAS and presented on the websites<sup>1</sup> of the two organisations, the Register Committee noted that AQAS ARCH is fully owned by AQAS e.V. and managed by the same staff,

---

<sup>1</sup> <http://www.aqas.de/> and <https://www.aqas-arch.de>

while AQAS e.V. and AQAS ARCH present themselves as linked organisations.

## Register Committee

**Ref.** RC17/C12

**Ver.** 1.0

**Date** 2016-06-15

**Page** 2 / 3

5. The Register Committee requested clarification on the details of the consultancy activities offered by AQAS ARCH, in particular on whether there is a clear separation between its consultancy activities and the external quality assurance activities carried out by AQAS e.V. The clarification did, however, not elaborate on any policies or practices in place to prevent any conflicts of interest between consultancy and external quality assurance.
6. In its clarification letter, the agency explained that a division of tasks was established between AQAS e.V. and AQAS ARCH, so that AQAS e.V. continues to offer accreditation of programmes and systems, whereas AQAS ARCH is the “partner” for higher education institutions, offering evaluation, consultancy projects, trainings and specific workshops. AQAS further explained that while AQAS ARCH does not award the seal of the German Accreditation Council, it carried out evaluation and certification procedures “on their own behalf”.
7. The clarification referred to work carried out by AQAS ARCH at the University of Eastern Mediterranean, Bachelor of Interior Architecture. The Register Committee understood this to refer to the accreditation of that study programme, the report of which can be found in the list of programmes accredited by AQAS e.V.<sup>2</sup>
8. Based on the information at its disposal, the Register Committee therefore concluded that the activities of AQAS e.V. and AQAS ARCH can at present not effectively be separated, given that the organisations carry closely similar names, are managed by the same staff and present themselves as related entities.
9. The Register Committee expects that agencies implement a clear and transparent separation of consultancy and quality assurance activities (see ESG 3.6 and guidelines to ESG 3.1), including appropriate policies and practices to prevent any conflicts of interest between the two. It was not clear to the Committee which policies and practices AQAS e.V. and AQAS ARCH have in place to prevent conflicts of interest between consultancy and external quality assurance.
10. Some of the activities now carried out by AQAS ARCH, namely evaluation and certification procedures, fall within the scope of the ESG. The Register Committee considered that there is no clear separation

<sup>2</sup> See: [http://www.aqas.de/wp-content/plugins/aqas/uploads/56\\_378\\_IA.pdf](http://www.aqas.de/wp-content/plugins/aqas/uploads/56_378_IA.pdf)

between such activities by AQAS ARCH and the activities of AQAS e.V. at present.

## Register Committee

**Ref.** RC17/C12

**Ver.** 1.0

**Date** 2016-06-15

**Page** 3 / 3

11. In the interest of transparency and credibility, the Register Committee expects that registered agencies either include the subsidiary's activities (within the scope of the ESG) in the scope of their registration on EQAR, or ensure and demonstrate that the work of the subsidiary can effectively be distinguished from the registered agency. In the former case, it is expected that the subsidiary's activities comply with the ESG. In the latter case, it is expected that the agency ensures and is able to demonstrate that there is no risk of confusion whatsoever towards the outside world, for instance in that an evaluation or certification carried out by the subsidiary might be brought in connection with the parent organisation, its registration on EQAR or the ESG.
12. Based on the information at its disposal, the Register Committee was unable to determine whether AQAS made a clear choice for either option and implemented it accordingly. The Register Committee was therefore concerned whether the criteria for inclusion on the Register remain fulfilled.
13. The Register Committee concluded that it would not be practical to consider reducing the remaining validity of registration, according to §8.4c of the EQAR Procedures for Applications, and thereby request an earlier external review of the agency, since the regular periodic review of AQAS is already underway and due to be completed before expiry of AQAS' registration in February 2017.
14. The Register Committee underlined that the external review should address the issues addressed in paragraphs 8 to 11 above.

Von: herrmann@aqas.de form\_engine@fs22.formsite.com  
Betreff: Substantive Change Report: AQAS e.V.  
Datum: 03. März 2016 14:16  
An: substantive-changes@eqar.eu

H

Reference # 9271484

Status Complete

Agency #1 \* AQAS e.V.

Expiry date #1 \* 28/02/2017

Contact #1 \* Doris Herrmann

Phone #1 \* +49 221 99 50 06 21

Email #1 \* [herrmann@aqas.de](mailto:herrmann@aqas.de)

Other organisations? \* No

A. Has the organisational identity of the registered agency changed? \* Yes

Description \* AQAS e.V. established in 2002 - is an agency for quality assurance in the higher education area. The agency provides processes for the accreditation of programmes and quality assurance systems. AQAS is accredited by the German Accreditation Council and authorized to award its seal to German degree programmes and institutions. AQAS ARCH was founded as a "daughter organisation" of AQAS e.V. on January 1st in 2015, to provide consultancy activities for HEIs which exceed the level of accreditation procedures that come within the ambit of AQAS e.V.

B. Has the organisational structure changed? \* Yes

Description \* In May 2013 AQAS e.V. established a complaints commission to assess complaints submitted by universities referring to the decisions of one of the Commissions for Accreditation in an accreditation procedure, which could not be solved by a repeated consultation of the Commissions for Accreditation. In accordance to the statutes, it aims to find a final decision for the association.

C.i. Are there new types of activities? \* No

C.ii. Are there changes in existing activities? \* No

**C.iii. Have  
some or all  
existing  
activities been  
discontinued?**

No

\*

**Last Update**

2016-03-03 07:16:39

EQAR | Oudergemselaan/Av. d'Auderghem 36 | BE-1040 Brussels

Agency for Quality Assurance through Accreditation of Study  
Programmes (AQAS)

Ms Doris Herrmann

– by email –

Brussels, 19 April 2016

## Substantive Change Report – Clarification Request

Dear Doris,

We wish to thank you for the Substantive Change Report of 3 March 2016. Your report has been reviewed by two rapporteurs before being brought to the attention of the entire EQAR Register Committee.

In order to prepare consideration by the Committee, we would be obliged if you could clarify the following query.

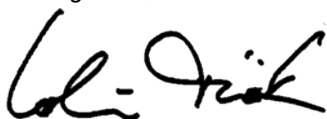
We note from the Substantive Change Report that AQAS established a "daughter organisation" - AQAS ARCH on 1 January 2015 to provide consultancy activities for higher education institutions.

As this is not addressed in the submitted documentation can you please clarify and provide further details on how are the consultation activities offered by AQAS ARCH separated from the external quality assurance activities carried out by AQAS e.V.?

In order to expedite proceedings we kindly ask you for a reply **by 29 April 2016**. Please inform us if any difficulties arise in meeting this deadline.

I shall be at your disposal if you have any further questions or inquiries.

Kind regards,

A handwritten signature in black ink, appearing to read "Colin Tück".

Colin Tück  
(Director)

European Quality Assurance  
Register for Higher Education  
(EQAR) aisbl

Avenue d'Auderghem/  
Oudergemselaan 36  
1040 Brussels – Belgium

Phone: +32 2 234 39 12

Fax: +32 2 230 33 47

[info@eqar.eu](mailto:info@eqar.eu)

[www.eqar.eu](http://www.eqar.eu)

VAT BE 0897.690.557

EQAR Founding Members:

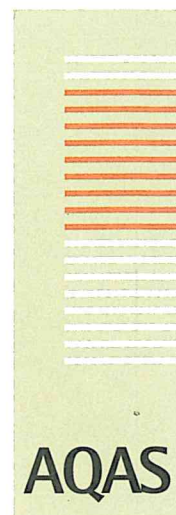


AQAS e. V. | Hohenstaufenring 30-32 | 50674 Köln

**Melinda Szabo**

European Quality Assurance Register for  
Higher Education (EQAR)  
Oudergemselaan 36 Avenue d'Auderghem  
1040 Brussels

BELGIUM



Agentur für Quali-  
tätssicherung durch  
Akkreditierung von  
Studiengängen

26.04.2016 /Loe

AQAS e. V.  
Hohenstaufenring 30-32  
50674 Köln

Fon +49 (0)221|99 5006-0  
Fax +49 (0)221|99 5006-9

info@aqas.de  
www.aqas.de

UST ID-Nr.:  
DE226639086

**Substantive Change Report: AQAS e.V., your letter from 19.04.2016**

Dear Melina Szabo,

AQAS ARCH (Accreditation, Reviews and Consulting) GmbH was founded in 2015 as a fully owned subsidiary of AQAS e. V. and offers consulting and services in addition to accreditation projects.

Within AQAS, a clear division of tasks was agreed: AQAS e.V. is further responsible for the accreditation of programmes and systems (with the awarding of the German Accreditation Council seal). AQAS ARCH is the partner for HEIs to undertake evaluation and consultancy projects, to carry out the certification of trainings and further education, and to offer specific workshops. With this division, more transparency of the activities is achieved.

AQAS ARCH is not part of the German accreditation system and is therefore not allowed to award the seal of the German Accreditation Council. However, AQAS ARCH is entitled to carry out evaluation and certification procedures on their own behalf.

The spin-off allows AQAS ARCH to carry out projects abroad. This helps German universities in their efforts to achieve further internationalisation. Often, these projects take place in the context of European projects such as TEMPUS or Twinning projects as well as consulting projects together with the German Academic Exchange Service or the German Rectors' Conference. In addition, foreign universities profit from the consulting services of AQAS ARCH.

AQAS ARCH was only founded in 2015. That is why only a few projects have been carried out by AQAS ARCH so far:

- Eastern Mediterranean University/Northern Cyprus: "Interior Architecture" ("Bachelor of Interior Architecture") (2015)
- University of Leipzig/Germany: Review of the evaluation regulations (2015)



- Workshop in Cologne/Germany: "How to organise successfully a programme accreditation" (2016)

We hope that we could clarify the task division between AQAS e.V. and AQAS ARCH with these explanations. If you have further questions, please do not hesitate to contact us.

Yours sincerely



Dr. Verena Kloeters  
– Managing Director –



AQAS e. V. | Hohenstaufenring 30-32 | 50674 Köln

Mr. Colin Tück  
Director  
European Quality Assurance Register for  
Higher Education (EQAR)  
Oudergemselaan 36 Avenue d'Auderghem  
1040 Brussels

BELGIUM

**AQAS**

Agentur für Quali-  
tätssicherung durch  
Akkreditierung von  
Studiengängen

02.09.2016/Hrm

AQAS e. V.  
Hohenstaufenring 30-32  
50674 Köln

Fon +49 (0)221|99 50 06-0  
Fax +49 (0)221|99 50 06-9

info@aqas.de  
www.aqas.de

UST ID-Nr.:  
DE226639086

## **Statement on Substantive Change Report: AQAS e.V., Conclusions of the Register Committee**

Dear Mr. Tück,

Please allow me to give a comment on the Substantive Change Report about AQAS which is published on the website of EQAR. I was surprised to read that the Register Committee was concerned whether the criteria for inclusion in the Register remain fulfilled and I can not understand the reason for this harsh reaction of your commission. AQAS is a notified accreditation body in Germany and has been part of the accreditation system for 14 years. AQAS has a high reputation in our country and abroad.

Therefore, I suppose that the decision of the Register Committee was based on a lack of information and assumptions which are not correct. Please let my clarify the background of the decision of AQAS to found our daughter organisation AQAS ARCH. While in Europe most of the accreditation bodies are financed by the state but are nevertheless seen as independent organisations the German system stipulates that all German accreditation agencies have to be fully self-financed non-profit organisations. Due to the German regulations the opportunities to offer consultation and workshops to Higher Education Institutions and to act as a partner in international projects are limited because of the separation between consultation and accreditation. That is the reason why ACQUIN ("ACQUINIUS University Services"), ASIIN ("ASIIN Consult GmbH") and FIBAA ("FIBAA Consult") founded separate organisations for this type of services whereas Evalag and ZEvA have separate units/tasks within their agency. AQAS was the last agency in Germany to implement a daughter organisation. AQAS ARCH GmbH was founded in 2015 as a fully owned subsidiary of AQAS e. V. Of course we decided to use the brand name of "AQAS" for the new organisation. All other agencies did the same in keeping their names for their consultancies.

The idea behind this was to separate the different activities which are carried out under the roof of AQAS in a transparent manner: AQAS e.V. is further responsible for the accreditation of programmes or institutions/QA-systems while AQAS ARCH is the partner for HEIs to undertake consultancy projects, to carry out the certification of trainings and further education, and to offer specific workshops. With this division, we are certain that more transparency of the activities will be achieved.

AQAS ARCH is a start-up which carried out a few projects so far such as the "Review of the evaluation regulations" at the University of Leipzig/Germany and two workshops. I suppose it is obvious that based on these activities AQAS ARCH can not employ staff or build up commissions yet. Therefore ARCH uses the resources of the mother organisation for the time being. Our practice of using experienced staff from the accreditation agency ("Personalüberlassung") does not differ from the practice of other German agencies and we manage this internal procedure in a transparent way.

As mentioned before the regulations of the German Accreditation Council (GAC) stipulate that an agency can not consult and accredit the same client. Of course this core principle is part of the philosophy and practice of AQAS. AQAS ARCH consulted the University of Leipzig and therefore AQAS e.V. did not take part in the tender for the system accreditation of this university.

AQAS ARCH carried out one programme accreditation at the Eastern Mediterranean University/Northern Cyprus for "Interior Architecture" in 2015. We decided to stop this practice because accreditation procedures will only be carried out by AQAS e.V. in the future. Therefore AQAS ARCH as an institution should not be part of the review carried out by the German Accreditation Council (GAC) and it is not planned to apply for registration in EQAR.

To avoid that the public gets a wrong impression of our agency because of the Change Report on the EQAR website I would kindly ask you to publish this statement too.

If you have further questions, please do not hesitate to contact our Managing Director Ms. Herrmann.

Yours sincerely



Prof. Dr. Eberhard Menzel

– President of the Board of AQAS –

AQAS

Eberhard Menzel

Hohenstaufenring 30-32

50674 Köln

Germany

Brussels, 17 October 2016

**Substantive Change Report by AQAS e.V.  
Your letter of 2/9/2016**

Dear Mr Menzel,

I would like to clarify some points in response to your comments on the Register Committee's decision of 6/6/2016.

1. Consultancy projects and the organisation of workshops are not activities within the scope of the ESG. These do, therefore, not need to be reviewed against ESG 2.1 – 2.7 in the ongoing external review of AQAS.

The Register Committee's concern was whether there is a clear separation between consultancy activities and external quality assurance activities, with adequate policies in place to prevent any conflicts of interest between them.

With regard thereto, your letter of 2/9/2016 clarified that AQAS has a policy of not offering accreditation to institutions that were consulted by AQAS ARCH. I thank you for this clarification, which was not obvious from previous communications.

2. The Register Committee's second concern was whether AQAS ARCH carries out any activities within the scope of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), such as review, audit, evaluation or accreditation of higher education institutions or programmes, concerning learning and teaching in higher education, including the learning environment and relevant links to research and innovation.

3. The Register Committee considered the same for the other agencies mentioned in your letter. It was either clear that the respective subsidiaries do not carry out activities within the scope of the ESG, or it was requested that the relevant activities be reviewed and assessed against the ESG.

European Quality Assurance  
Register for Higher Education  
(EQAR) aisbl

Avenue d'Auderghem/  
Oudergemselaan 36  
1040 Brussels – Belgium

Phone: +32 2 234 39 12

Fax: +32 2 230 33 47

[info@eqar.eu](mailto:info@eqar.eu)

[www.eqar.eu](http://www.eqar.eu)

VAT BE 0897.690.557



In all cases where either agencies or their subsidiaries carry out consultancy activities, the Register Committee did address the separation between external quality assurance and consultancy.

4. I thank you for clarifying that the programme accreditation carried out by AQAS ARCH was an exceptional case and that AQAS ARCH will no longer carry out accreditation procedures.

Your letter, however, mentions that AQAS ARCH carries out “certification of trainings and further education”. Likewise, AQAS' earlier clarification noted that AQAS ARCH carries out evaluation and certification procedures “on their own behalf”.

The Register Committee therefore expects (see our letter of 30 June 2016) that AQAS, within the ongoing external review by GAC, clarifies whether or not those activities are within the scope of the ESG, and that this is confirmed by the external review panel.

Should AQAS ARCH carry out any activities within the scope of the ESG, the Register Committee expects that those are either (a) implemented in compliance with the ESG and that this is demonstrated in the external review, or (b) that AQAS demonstrates that there is a clear separation between ESG-compliant activities of AQAS and non-compliant activities of AQAS ARCH, and that there is no risk of confusion whatsoever.

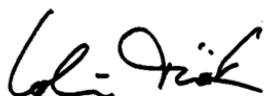
Should AQAS ARCH's activities be entirely outside the scope of the ESG, this should be confirmed by the external review panel.

5. After considering your report and additional clarification, the Register Committee took note of AQAS' Substantive Change Report and requested that the issues mentioned be addressed in the anyway ongoing external review of AQAS.

The Register Committee did not make any other conclusions and will get back to the matter once it has received the review panel's report.

In order to make this further exchange transparent, we will publish your letter as requested, along with our decision of 6 June 2016 and the present response. I remain at your disposal for any further questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Colin Tück".

Colin Tück  
(Director)