Stiftung zur Akkreditierung von Studiengängen in Deutschland

Akkreditierungsrat ∎

Printed Matter AR XX/2011

Experts' Report

on the application of the Accreditation Agency for Study Programmes of Engineering, Information Science, Natural Sciences and Mathematics (Reg. Assoc.) (ASIIN e.V.) of 26 May 2010 for Accreditation and Assessment of the Compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)

- submitted on 1 February 2011 -

1. Course of the procedure

With letter dated 26 May 2010, the Accreditation Agency for Study Programmes of Engineering, Information Science, Natural Sciences and Mathematics (Reg. Assoc.) (ASIIN e.V.) submitted its application for accreditation as an accreditation agency and for assessment of the compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) to the Accreditation Council.

On 5 October 2010 ASIIN submitted an explanatory statement for the application together with additional documents. At the request of the experts the Agency supplemented the explanatory statement for the application and submitted additional documentation on 30 November 2010. With electronic letters dated 13 December and 17 December and as requested by the experts during the on-site visit, the Agency handed over the resolutions adopted during the meeting of the Programme Accreditation Commission on 9 and 10 December 2010 that were relevant for the accreditation procedure.

The following experts were nominated by the Accreditation Council in its resolution of 21 June 2010:

Prof. Dr. Reinhold R. Grimm (Chairman), Universität Jena (em.); Chairman of Accreditation Council

Dr. Ingo Dahm, Deutsche Telekom AG (representative of professional practice)

Dr. Guy Haug, Austrian Accreditation Council (international representative)

Dr. Kurt Sohm, FH Council Austria (Österreichischer Fachhochschulrat) (international representative)

Inge Vogt, University of Cologne and Tecnológico de Monterrey (ITESM), Mexico (representative of the students)

By decision of the Chairman of the Accreditation Council, Prof. Dr. Grimm, Ms Vogt was replaced, owing to illness during the on-site visit, by **Johanna Thünker**, student at the University of Düsseldorf.

The expert group was supported by Ms Katrin Mayer-Lantermann on the part of the office of the Accreditation Council (Foundation for the Accreditation of Study Programmes in Germany).

On 5 October 2010, a preparatory meeting for the experts took place in Berlin during which the applicable criteria set by the Accreditation Council and the European Standards and Guidelines (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.

Between 8 and 9 December 2010 an on-site visit took place at the head office of ASIIN, prior to which the expert group met in a preliminary meeting on 7 December 2010. The expert group held discussions with the management of the Agency, members of the Accreditation Commissions for Degree Programmes and for Quality Management Systems, with personnel of the office, with experts and also with representatives of the higher education institutions that have already been involved in procedures carried out by the Agency (the schedule is provided in the annex).

The expert group presented the following report with unanimous opinion on 31 January 2011.

2. Abbreviations

Programme AC and System AC

Accreditation commissions of ASIIN for degree programmes and quality management systems

General Requirements for Programme Accreditation

"Information for Institutions of Higher Education - Requirements and Procedural Principles for the Accreditation and Re-accreditation of Bachelor's and Master's Study Programmes in Engineering, Architecture, Informatics, the Natural Sciences and Mathematics" in the version adopted on 28 March 2008 and the new version of this document entitled "General Criteria for the Accreditation of Study Programmes" in the version adopted on 9 December 2010.

General Requirements for System Accreditation

"Information for Institutions of Higher Education - Requirements and Procedural Principles for System Accreditation" in the version adopted on 4 October 2010.

SSC

Subject-specific Supplementary Criteria

Model agreement

Model agreement between the Foundation for the Accreditation of Study Programmes in Germany and the Accreditation Agencies in the version adopted on 8 December 2009.

KMK Guidelines

"Common Structural Guidelines of the Länder for the Accreditation of Bachelor's and Master's Study Programmes", resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder of 10 October 2003 in the version adopted on 4 February 2010.

Guidelines of the Accreditation Council

"Rules of the Accreditation Council for the Accreditation of Study Programmes and for System Accreditation" in the version adopted on 8 December 2009

3. The Accreditation Agency for Study Programmes of Engineering, Information Science, Natural Sciences and Mathematics (Reg. Assoc.) (ASIIN e.V.)

3.1 Incorporation and Purpose

The *Accreditation Agency for Study Programmes of Engineering, Information Science, Natural Sciences and Mathematics (Reg. Assoc.)* (ASIIN e.V.) was established on 19 February 2002 through the merger of two existing accreditation agencies that had been already accredited by the Accreditation Council: the Accreditation Agency for Degree Programmes in Engineering and Informatics (ASII) and the Accreditation Agency for Degree Programmes in Chemistry, Biochemistry and Chemical Engineering (ACBC) at universities and universities of applied sciences.

ASIIN e.V. carries out accreditation procedures for study programmes of engineering and natural sciences, information science, mathematics and architecture (programme accreditation) and will in the future carry out procedures for accreditation of quality management systems for teaching and learning (system accreditation). ASIIN is sustained by higher education institutions, trade associations, scientific speciality societies and professional associations as well as by the associations of the social partners.

3.2 Organisation

ASIIN is organised as a non-profit, registered association (e.V. - eingetragener Verein) and is registered in the register of associations under the name "Accreditation Agency for Study Programmes of Engineering, Information Science, Natural Sciences and Mathematics" (ASIIN). Pursuant to § 5 of the by-laws, the association is constituted by the following organs: the General Assembly, the Board, the Accreditation Commission for Study Programmes, the Accreditation Commission for Quality Management Systems, the Technical Committees, the Board of Complaints and ASIIN Headquarters.

3.3 Facilities

According to the Agency, in 2010 the income of ASIIN came to a total of 1,614,300.00 euro. The ASIIN head office is run by a full-time managing director (currently on leave) and a full-time deputy managing director. In addition to a secretary position, the Agency is currently offering a fixed-term post for an organisation assistant and an IT coordinator as well as two fixed-term and six permanent posts for academic collaborators. ASIIN rents 187 m² of office space as well as additional archive rooms.

3.4 Scope of Activity

The activities of ASIIN e.V. are regulated by the by-laws of the association.

According to its by-laws, taking into account any overriding provisions of the European Qualification Framework, the federal legislator, the Standing Conference of Ministers of Education and Cultural Affairs (KMK) and the German Accreditation Council, the Accreditation Agency establishes procedures and criteria for the evaluation of study programmes in engineering, information science, natural sciences and mathematics at German higher education institutions. In the case of study programmes at foreign universities, the Agency considers any relevant national overriding provisions in addition to the European Qualification Framework.

Furthermore, the Agency develops procedures and criteria for the evaluation of quality management systems at German higher education institutions. With regard to quality management systems at foreign universities, the Agency considers the relevant national overriding provisions besides the European Qualification Framework.

All activities of the Accreditation Agency serve to safeguard and further develop the standards and quality of education. To this end, ASIIN accredits study programmes and quality management systems and confers the seal of the Accreditation Council and other certificates upon successful completion of the procedure.

4. Assessment

The experts have gained the impression of ASIIN being a very professional agency. The responsibilities and competences of the organs are structured appropriately. The collaboration between the different organs and the documents for the harmonisation of procedures predominantly ensure the consistent application of the criteria set by the Accreditation Council. Differentiated mechanisms for appointment serve to ensure the competence of the panel members. The Agency has a sufficient number of well qualified staff members who hold mostly full-time positions. Furthermore, ASIIN presented a detailed and well-designed concept for voluntary and modular expert briefings that focuses not only on the criteria for programme and system accreditation but also conveys moderation techniques and competence orientation.

However, the experts are critical of some aspects regarding the Agency's understanding of quality. They query whether the higher education institutions' final responsibility for the outline and the quality of teaching and learning, required by criterion 2.1, is always considered as it should be in the Agency's panels. In this context, the experts consider the so-called Subject-specific Supplementary Criteria (SSC), which contain subject-related learning outcomes and to a large extent reference curricula, to be problematic.

Furthermore, the experts addressed the question of whether it is admissible that ASIIN awards its own seal in addition to the seal of the Accreditation Council when accrediting study programmes of state higher education institutions and higher education institutions recognised by the state in Germany. According to the experts, this poses the danger that the Agency – by awarding an additional ASIIN accreditation seal – may be able to impose standards that go beyond those set by the Accreditation Council. In particular, it is not clear how the seal of the Accreditation Council could be formally and practically differentiated from the ASIIN accreditation seal. Nevertheless, all study programmes certified by ASIIN are awarded with the seal of the Accreditation Council (apart from one very particular case). The expert group sees the danger of criteria becoming blurred because the formalised programme features subject to examination would not be sufficiently differentiated.

Furthermore, the experts also asserted that – contradictory to the intentions of ASIIN – students are not represented in all technical committees. They also note that documents relevant for conducting the accreditation procedure do not fully comply with the Guidelines of the Accreditation Council and the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in their current version.

The expert group recommends the Accreditation Council to re-accredit the *Accreditation Agency for Study Programmes of Engineering, Information Science, Natural Sciences and Mathematics (Reg. Assoc.)* (ASIIN e.V.) for both programme and system accreditation and to articulate the following conditions and recommendations:

Condition 1: The curricula listed in the *Subject-specific Supplementary Criteria* (SSC) or in their respective annexes shall be abated and the obligation of the higher education institutions to motivate derogations from learning outcomes set out therein and from other regulations shall be withdrawn. Furthermore, the SSC shall be revised in such a way that it clearly indicates that it is a guideline of non-binding character (criterion 2.1.1).

Condition 2: If the Accreditation Council should consider admissible that ASIIN awards its seal in addition to the seal of the Accreditation Council when accrediting study programmes of state higher education institutions and higher education institutions recognised by the state in Germany, it shall be clearly indicated in the documents addressed to the higher education institutions and to the experts that only the procedure for obtaining the seal of the Accreditation Council is binding for the higher education institutions (criterion 2.2.1).

Condition 3: The documents "General Criteria for the Accreditation of Study Programmes", "Information for Institutions of Higher Education - Requirements and Procedural Principles for System Accreditation", "General Terms and Conditions for the Implementation of Programme and System Accreditation Procedures in Germany" and the "General Terms and Conditions for International Procedures" as well as any other documents which might deviate from the Guidelines defined by the Accreditation Council and the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder shall be adjusted to their current version.

Condition 4: It shall be ensured that at least one student representative is involved in all internal panels of the agency (technical committees, accreditation commissions). In accordance with the commitment made during the on-site visit, ASIIN ensures that the remuneration of the student members participating in expert groups or panels shall be equivalent to the remuneration of the other groups involved (criterion 2.2.2).

Recommendation 1: The document "Information for Institutions of Higher Education - Requirements and Procedural Principles for System Accreditation" should provide for the involvement of one foreign expert for every system accreditation procedure (criterion 2.2.1).

Recommendation 2: ASIIN shall involve more student representatives in their Programme AC (criterion 2.2.2).

Recommendation 3: The Agency should examine which procedures are appropriate for enhancing diversity (with regard to previous experience, affiliation to a subject area, age, origin and sex) among the experts and members of the technical committees and other panels, but also among the Agency's own employees (criterion 2.2.2).

Recommendation 4: As announced in the application documents, it shall be binding also for the Accreditation Commission for Quality Management Systems that any members of the accreditation commission who have been involved in procedures in the role of experts shall not participate in deliberations concerning those procedures (criterion 2.3.3).

Recommendation 5: The subsequent assessment of the effectiveness of the internal quality management system shall include an evaluation of the relation between all single quality assurance measures and the consequences resulting from their outcomes (criterion 2.5).

Recommendation 6: It is recommended to jointly discuss the outcomes of an evaluation with the experts, technical committees and the employees of the Agency in order to initiate a quality management process (criterion 2.5).

4.1 Assessment based on the Criteria for the Accreditation of Accreditation Agencies

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

The Agency states that, in programme accreditation procedures, the quality of a study programme is qualified by the logic and effectiveness of the qualification process at the higher education institution and that those elements are evaluated by the Agency during the process of accreditation. The higher education institution, on the other hand, is responsible for setting the objectives (quality of programme content). Moreover, there are also "requirements set by the political, legal and the socio-economic environment" of the study programme. Furthermore, the quality of a study programme can also be measured on the basis of the success achieved by graduates on the labour market. The requirements and procedural principles for programme accreditation comply with the Guidelines of the Accreditation Council and the *European Standards and Guidelines*. These requirements are complemented by the Subject-specific Supplementary Criteria (SSC). There are SSC for 13 subject groups and for teaching degree courses. These criteria are developed by the technical committees whose accreditation procedure tasks also include evaluating the expert reports to ascertain if the experts have sufficiently taken into account the subject-specific requirements described by the SSC (for the tasks of the technical committees see § 10 of the by-laws). These SSC contain learning outcomes that are expected to be achieved in each subject. In addition, most annexes of the SSC also contain reference curricula. With the so-called curricular analysis the higher education institution should demonstrate to what extent their curriculum corresponds to the reference curricula or to the subject groups mentioned therein (cf. p. 47 in Annex 1). According to ASIIN the reference curricula serve only as a guide for the higher education institutions. Since the Agency is specialized in specific subject areas (engineering, information science, natural sciences and mathematics) its understanding of quality is determined by these subjects. This is reflected by the content of the Subject-specific Supplementary Criteria which contain subject-related quality expectations for the study programmes as well as "ideal, subject-related learning outcomes". The Agency's subject-focused understanding of quality is also reflected in its policy regarding the appointment of panel members and of experts, which requires them to have subject-specific expertise. ASIIN highlights both its

"process-oriented approach to evaluations" and its "learning outcome-orientation" with regard to the implementation of the accreditation concepts mentioned above. The former consists in the assessment of a) the definition of objectives, b) implementation and c) outcome evaluation/quality control. In this context, the learning outcomes which are formulated by the higher education institution and derived from educational objectives, form the "central reference framework for developing study programmes" in the higher education institution and for the external quality assessment through the accreditation process. The corresponding requirements set by ASIIN are aligned with the European Qualifications Framework for Lifelong Learning. The higher education institution shall clearly define the learning outcomes it is seeking and outline which measures can be taken for acquiring said competences in the study programme. With regard to the Subject-specific Supplementary Criteria the higher education institution is allowed to choose which catalogue they want to use and how they want to achieve their objectives.

According to the Agency, the understanding of quality in system accreditation complies with the statements regarding programme accreditation: The higher education institution is entitled to define autonomously the objectives of its study programmes and of its quality management in accordance with its institutional profile. In addition, there are requirements set by the political, legal and the socio-economic environment. With regard to the evaluation approach of ASIIN, this means that the Agency assesses the coherence of the quality management system implemented by the higher education institution. This assessment shall focus mainly on the learning processes. Not only shall the higher education institution describe and document its quality management system, but it shall also prove its effectiveness. The Agency would deliberately not impose the corresponding instruments and processes on the higher education institution, which should choose them according to their own quality objectives. The system accreditation activities of ASIIN are based upon the corresponding requirements and procedural principles which comply with the Guidelines of the Accreditation Council and the *European Standards and Guidelines*.

Assessment

ASIIN formulates both its understanding of quality in teaching and learning and – in its quality management manual – also its definition of quality in accreditation procedures. The Agency derives therefrom the subject and the structure of the procedure for accreditation. The Agency's perception of quality is publicly recorded in the above mentioned documents and on its website. A positive note with regard to the description of the system accreditation is that it is stressed that the system shall provide proof of its effectiveness and that ASIIN does not impose any particular quality management system.

However, the experts express difficulty and concern with regard to the Subject-specific

Supplementary Criteria (SSC) and in particular the reference curricula. According to the experts, those do not comply with criterion 2.1.1 that requires that it is the key responsibility of the higher education institutions to define educational goals and to develop corresponding concepts for study programmes. Even if – from the viewpoint of an accreditation agency that is specialised in specific subject areas – it may seem obvious that its understanding of quality is determined by these subjects, it is evident that the introductory passages of the SSC only allow for "reasonable deviations" from the learning outcomes defined therein. The very detailed reference curricula provided in the annexes of the large majority of the SSC are in fact designed as parameters for orientation and comparison "allowing for deviations". Also in this case, however, deviations should be motivated in order "to provide a structure for the discussion". According to the experts, these reference curricula are in particular contrary to criterion 2.1.1 due to their explicit input-orientated nature alone. On-site, the experts were able to see for themselves that neither all panel members nor all of the employees aimed at setting a corresponding standard, but rather that the SSC are considered first and foremost as guidance for the higher education institutions. Other panel members seemed to consider the application of these standards as the subject of the accreditation procedure. Therefore – according to the experts – this poses the danger that in practice higher education institutions might adapt to (alleged) standards and innovation could be hampered as a consequence. This apprehension was confirmed during the discussions with the representatives of the higher education institutions and with the experts which collaborated with the Agency.

Result

Criterion 2.1.1 is partially fulfilled.

Recommendation

The expert group recommends the Accreditation Council to prescribe a **condition**: The curricula listed in the *Subject-specific Supplementary Criteria* (SSC) or in their respective annexes shall be abated and the obligation of the higher education institutions to motivate derogations from learning outcomes set out therein and from other regulations shall be withdrawn. Furthermore, the SSC should be revised in such a way that it clearly indicates that it is a guideline of non-binding character.

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 Agency accredits the higher education institutions irrespective of their type. Its pro-

gramme accreditation activities focus on the following subjects:

- engineering

- information science

- natural sciences

- mathematics

- interdisciplinary areas which include one of the subject families mentioned above

- joint programmes which include one of the subject families mentioned above

- training of teachers for the mentioned disciplines.

The accreditation procedure will only be conducted if around 50% of the study programme falls into one of the subject categories covered by the ASIIN technical committee. In particular cases, the ASIIN cooperates with other accreditation agencies in order to comply with the subject-related requirements deriving from the study programmes which cannot be covered completely by the technical committees of the Agency.

Assessment

The Agency accredits across types of higher education institutions and also across disciplines.

Result

Criterion 2.1.2 is fulfilled.

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

The Agency's structures and procedures are made evident by the documents it uses for the accreditation procedures. The following documents should be mentioned in particular in this context:

a) The "General Criteria for the Accreditation of Study Programmes" (Annex 1 NEW) contain

- a general description of the ASIIN approach to evaluation

- requirements for study programmes for Bachelor's and Master's degrees

- procedural principles

- basic contractual provisions

- as well as an Annex containing a proposition for the structure of the self-assessment report, forms and a sample audit schedule for an on-site visit.

This document was adopted by the Programme AC on 9 December 2010. The Agency handed it over by electronic mail on 13 December 2010 following the corresponding request made by the experts during the on-site visit. The main item of the amended version consists in the "New Chart of General Requirements for Study Programmes to be adopted in the New Version of the General Requirements and Procedural Principles of ASIIN for Programme Accreditation - Revision 2010" that has also been subsequently handed over (Annex 2 NEW). The left-hand column contains the amended version of the requirements set by ASIIN for the accreditation of study programmes, the middle column shows the corresponding contents of the ESG and the right-hand column contains the corresponding criteria set by the Accreditation Council for study programme accreditation. The revised chart of requirements for study programmes now comprises eight assessment areas. On pp. 5f and 10f in the new version of the "General Criteria for the Accreditation of Study Programmes" an explanation is given as to how the requirements defined by ASIIN, the ESG and the criteria laid down by the Accreditation Council are related to one another and under which conditions the seal is awarded. During the on-site visit the Agency also explained to the experts that – with regard to the accreditation of study programmes in Germany – ASIIN usually awards its seal in addition to the seal of the Accreditation Council. It was also pointed out that the requirements set by ASIIN that need to be fulfilled in order to be awarded the Agency's seal are neither identical to nor in contrast with the requirements set by the Accreditation Council. According to the Agency, the requirements set by ASIIN operationalise the Council's requirements. In the future, the German higher education institutions will be able to decide whether to apply solely for the seal of the Accreditation Council or solely for the seal awarded by ASIIN or to apply for both seals. The Agency states that, for procedures conducted abroad, the requirements set by ASIIN may apply together with or alternatively to the corresponding national requirements.

b) In addition, the Subject-specific Supplementary Criteria (SSC) apply as already mentioned above (Annex 4).

c) The document "General Requirements and Procedural Principles for System Accreditation" (Annex 3) contains

- an introductory chapter (outline of system accreditation, definition of terms and

quality management systems in higher education institutions)

- the requirements set by ASIIN for the procedures for system accreditation

- procedural principles

- and an annex containing information about the documents to be submitted as well as sample schedules for on-site visits.

d) Furthermore, the General Terms and Conditions for Procedures in Germany (Annex 18) and for procedures abroad (Annex 45) are of relevance in this context;

e) as well as the by-laws (Annex 5).

f) The following documents are mentioned since they may demonstrate the consistency of the Agency's activities: the fundamental decisions of the Programme AC (Annex 24), the model for the accreditation report for programme accreditation (Annex 19), the audit check-list for experts for programme accreditation (Annex 23), the model letters drawn up by the head office for communication with the higher education institutions (Annexes 20 and 26), the manual for experts (Annex 21), the concept for the briefing of experts (Annex 31), the complaints procedure (Annex 27) as well as the annexes concerning quality management (Annex 28 to 30).

According to the explanatory statement for the application, the Guidelines of the Accreditation Council are "implemented and exploited" in the "General Requirements and Principles for Programme Accreditation". Accordingly, the Requirements and Principles for Programme Accreditation are regularly updated taking into account insights from internal quality management procedures and new decisions adopted by the Accreditation Council and the KMK. Furthermore, the Agency describes the revision of the "General Requirements for Programme Accreditation" that was concluded provisionally by the resolution adopted by the Programme AC on 9 December 2010. According to the Agency, the document was reviewed by a project group comprising members of the Accreditation Commission and with representatives of all interest groups involved. Furthermore, the Agency explained in which way external provision are applied that do not require extensive revision of the resolutions adopted by ASIIN (i.e. by notification in the Agency's panels and committees and in its newsletter) and, accordingly, in which way these provisions are applied during the period that precedes the next review process of the Agency's requirements and procedural principles (i.e. by fundamental decision of the competent panel or committee of the Agency). Moreover, the terms of the contracts with the higher education institutions ensure the application of those external provisions that are in force at the time when the contract is concluded.

Tasks, composition and election of the organs (the general assembly, the board, the accreditation commissions and the technical committees) are regulated in the by-laws.

Assessment

The experts are concerned about awarding the ASIIN accreditation seal in addition to the seal of the Accreditation Council if separate requirements set by the Agency are fulfilled, since in this way the Agency introduces additional standards "by the back door". These are standards that go beyond those set by the Council for the accreditation of study programmes and which are considered appropriate by the latter. The experts are asking the Accreditation Council to address the question of whether it is admissible for ASIIN to award its own seal in addition to the seal of the Accreditation Council when accrediting study programmes of state higher education institutions and higher education institutions recognised by the state in Germany. From the experts' point of view, if this is considered admissible, the conditions under which the different seals are awarded should be clearly recognisable for the higher education institutions and the experts involved. The Agency's efforts at providing transparency with the chart mentioned above and with the corresponding explanations should be acknowledged. According to the experts, however, it is still not sufficiently clear for higher education institutions and experts that only the seal of the Accreditation Council is mandatory for the accreditation of a study programme.

Moreover, according to the experts, the amended version of the General Requirements for Programme Accreditation takes the currently applicable Guidelines set by the Accreditation Council and the KMK only partially into account. Hence, the amended version of the Council's decision rules has not yet been fully considered. Examples of such deviations are:

> There is still a distinction between significant and insignificant defects (p. 18, Annex 1 NEW), although the Guidelines of the Accreditation Council under section 3.1 have instead introduced a distinction according to the probable term within which the defects could most likely be remedied. The modified content of section 3.6.3 of the Guidelines of the Accreditation Council – according to which a study programme has to be newly accredited only in the case of significant changes to its concept or profile which cause a decrease in quality – has likewise not been included into the document (see Annex 1 NEW, pp. 19ff). Finally, the obligation of the higher education institution to disclose whether an identical or similar application has already been submitted to other accreditation agencies (cf. p. 22) does not comply with the latest requirements set by the Accreditation Council. According to the Council's guidelines (§ 9 para. 7 of the Model agreement) the higher education institute is only required to state that the same application has so far not resulted in a negative decision or that is any other decision pending on it. In the experts' opinion, the requirement included in the "Specific Requirements for Re-Accreditation of Study Programmes", which requests that the higher education institution proves that the recommendations made for the initial accreditation have been implemented (cf. p. 26 of the document), does not comply with the Guidelines of the Accreditation Council according to which recommendations are not compulsory.

The General Requirements for System Accreditation – in accordance with the remarks made above concerning programme accreditation – have likewise not yet been adapted to the amended version of the Guidelines of the Accreditation Council. Furthermore, the statement on p. 29 of the ASIIN document, according to which extending the system accreditation may be considered if the procedure for re-accreditation is concluded within a year as expected, does not comply with the Guidelines of the Accreditation Council (6.3) since it is not mentioned therein that the procedure should be completed within a year. In accordance with the Guidelines of the Accreditation Council, the Agency should also provide that the participation of one expert from abroad is ensured for each system accreditation procedure. So far, involving a foreign member in the expert group was only optional.

The General Terms and Conditions for International Procedures are similarly not yet completely aligned with the latest versions of the resolutions adapted by the Accreditation Council and the KMK. In addition, the remarks contained in § 7 and § 17, according to which an accreditation decision may also be repealed if the rules of logical reasoning are infringed, do not comply with section 3.6.1 of the Guidelines of the Accreditation Council for programme and system accreditation – no matter how correct these observations may be.

According to the experts, the possibility described in the procedural documents to discuss the self-evaluation report with the competent staff member of the Agency prior to submittal for both programme and system accreditation procedures; this is due to the fact that, according to the explanations given by the persons-in-charge of ASIIN during the on-site visit, these discussions focus exclusively on formal aspects and do not include any advisory elements.

According to the verbal assurance given by the Agency, ASIIN takes the resolution "Standards for Structuring the Relationship between System Accreditation and Consultation Services" adopted by the Accreditation Council on 31 October 2008 into account. ASIIN Consult does not provide advisory or consultancy services in procedures for system accreditation conducted by ASIIN e.V.

Furthermore, the experts also discussed whether the criteria adopted by ASIIN for study programme accreditation, which have already been mentioned with regard to the awarding of the seal, deviate from the criteria set by the Accreditation Council. This is the case in several respects. For instance, section 1 of the chart states that there is at least the optional possibility to classify both Bachelor's and Master's study programmes as "more research-oriented" and "more practice-oriented", even though the currently applicable version of the KMK Guidelines allows application of this classification exclusively to Master's study programmes – and not for Bachelor's study programmes. The requirements con-

tained in section 3.2.7 of the ASIIN requirements ("As a general rule, the final thesis is accompanied by a colloquium") do not correspond to any similar requirements set by the Accreditation Council. Nevertheless, the experts concluded that those derogations do not pose a problem if it is made clear that in order to award the seal of the Accreditation Council it is not necessary to fulfil the requirements set by ASIIN (see remarks made above).

The review processes for the Agency's internal resolutions described in the explanatory statement for the application on pp. 11f, are comprehensible and appropriate. The procedures for ensuring the application of external provisions, when the review of the relevant requirements set by ASIIN are pending, are also appropriate. The consistent application of the Council's rules is also ensured by the documents listed below, which serve the purpose of harmonising the procedures and applying the criteria for accreditation in a systematic manner: The General Requirements for Programme and System Accreditation, the fundamental decisions of the Programme AC, and also the model for the accreditation report for programme accreditation, the audit check-list for experts for programme accreditation, the model letters drawn up by the head office for communication with the higher education institutions and the manual for the experts. In addition there are the instruments for the preparation and briefing of experts. The afore-mentioned structure of the Agency's organs, on the other hand, facilitates uniformity with regard to decisions. It is the task of both the technical committees (in programme accreditation) and the accreditation commissions to ensure uniformity in decisions taken by the Agency. Lastly, the Agency's complaints procedure and internal quality management system are additional opportunities for receiving feedback on and enhancing their processes.

With regard to the appropriate and legal regulation of the organs and their composition, the experts note that the tasks, composition and election of the Agency's general assembly and its board as well as the accreditation commissions and the technical committees are regulated in the by-laws. The responsibilities of the organs and their competences are regulated in the most appropriate manner: The general assembly is responsible for the usual regular tasks concerning management of the association. The board appoints, inter alia, the members of the accreditation commissions. The accreditation commissions are responsible for all decisions concerning the accreditation procedure. The technical committees advise the accreditation commissions and they give recommendations to the latter regarding the appointment of experts, the accreditation decisions and also the accreditation standards. Furthermore, they are responsible for debating fundamental subject-related questions connected with the accreditation process. The composition of the panels and committees provided for in the by-laws is also judged appropriate. The Programme

AC and the technical committees are respectively made up by one third of representatives from universities, universities of applied sciences and industry, whereas universities and industry are represented by an equal number of members in the general assembly and in the board. In view of the fact that academic representatives may be better able to evaluate comprehensively all aspects of a study programme than a representative of industry – who might focus solely on professional qualification – the experts consider the stronger representation of the universities within the Agency's panels and committees that prepare and take the decisions for accreditation, a wise solution.

Result

Criterion 2.2.1 is partially fulfilled.

Recommendations

1. The experts are asking the Accreditation Council to address the question of whether it is admissible for ASIIN to award its own seal in addition to the seal of the Accreditation Council when accrediting study programmes of state higher education institutions and higher education institutions recognised by the state in Germany.

2. If the Accreditation Council should consider admissible in the afore-mentioned cases that ASIIN awards its seal in addition to the seal of the Accreditation Council, the experts recommend prescribing the following **condition**: Documents addressed to higher education institutions and experts shall indicate clearly that solely the procedure for obtaining the seal of the Accreditation Council is binding for higher education institutions.

3. The expert group recommends prescribing the following **condition**: The documents "General Criteria for the Accreditation of Study Programmes", "Information for Institutions of Higher Education - Requirements and Procedural Principles for System Accreditation", "General Terms and Conditions for the Implementation of Programme and System Accreditation Procedures in Germany" and the "General Terms and Conditions for International Procedures" as well as any other documents which might deviate from the Guidelines defined by the Accreditation Council and the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder shall be adjusted to their current version.

4. Furthermore, the experts **recommend** to the Agency that the document "Information for Institutions of Higher Education - Requirements and Procedural Principles for System Accreditation" provides for the involvement of one foreign expert for every system accreditation procedure.

> **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

Universities (1st group), universities of applied sciences (2nd group), technical-scientific associations and professional organisations (3rd group) as well as trade associations and central federations of the social partners (4th group) are represented in the general assembly. Each of the afore-mentioned groups appoints three representatives for the board of the Agency. According to § 8 of the by-laws, the Programme AC shall be made up by one third respectively of representatives from universities, universities of applied sciences and industry. It shall also include one representative of the employees, one student member and one (international) consultant. At present, it is provided that there shall be 11 representatives respectively from the universities and from the universities of applied science as well as 8 industry representatives and representatives of the relevant associations in the Programme AC. In addition, there are currently two representatives from other disciplines as well as one representative of the employees and one student representative. At present, there are no international representatives. The System AC currently has three representatives respectively from the universities, from the universities of applied science and from industry as well as two students, one representative of the employees and five consultants or quality management experts. This complies with the Agency's statements regarding the composition and the content of § 9 of the by-laws. According to § 10 of the by-laws, the technical committees are made up by respectively one third of representatives from universities, universities of applied sciences and industry. According to § 10, at least one student member should also be present on each committee. Currently, on most of the technical committees one student member is present, in one committee there are two student representatives and in three other committees there are no students present (TC Chemistry, TC Physical Technologies, Materials and Processes and TC Informatics/Computer Science). The expert groups are composed of representatives from the higher education institutions and industry/professional practice and also students.

Assessment

According to the experts, the fact that there are no student members on some technical committees does not comply with criterion 2.2.2. They also hold the opinion that a stronger participation of students in the Programme AC would facilitate the committee's task of making a comprehensive assessment of study programmes. During the on-site visit the Agency explained that it is difficult to find a sufficient number of student representatives for the committees and for the expert groups. The experts assumed that the fact that the

student members of expert groups receive only half of the remuneration provided for the other status groups may be a possible reason for these difficulties. During the on-site visit, the Agency promised that they would ensure the equal treatment of students in the future. In general, the experts remark that the composition of panels and expert groups is homogeneous with regard to affiliation to a subject area, age and sex. Hence, they invite the Agency to encourage greater diversity.

Result

Criterion 2.2.2 is partially fulfilled.

Recommendation

1. The expert group recommends prescribing the following **condition**: It shall be ensured that there is at least one student representative present on all internal panels (technical committees, accreditation commissions). In accordance with the commitment made during the on-site visit, ASIIN ensures that the remuneration of the student members present in expert groups or committees shall be equivalent to the remuneration of the other groups involved.

2. The experts **recommend** that the Agency should examine which procedures are appropriate for enhancing diversity (with regard to previous experience, affiliation to a subject area, age, origin and sex) with regard to the experts as well as members of the technical committees and other panels, but also among the Agency's own employees.

3. The experts **recommend** the Agency to involve more student representatives in their Programme AC.

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 selection and briefing procedures for ensuring the competence of the panel members and the members of the expert groups are documented in the General Requirements for Programme Accreditation (Annex 1, p. 31f), the General Requirements for System Accreditation (Annex 3, p. 25f), in the by-laws (Annex 5), in the experts' manual for programme accreditation procedures (Annex 21), in the concept for the preparation of experts (Annex 31), in the presentation sheets of the panel members (Annex 33) and in the schedule of briefings for experts (Annex 38). Furthermore, they are described in the explanatory statement for the application in the explanatory notes regarding section 2.2.3. In

section 2.7 (Reporting) the Agency explains that the experts receive documents for preparation that have been specifically prepared for this purpose (the guidelines and the audit check-list that should facilitate their work with the application documents submitted by the higher education institution). In the progress report, (pp. 31f, explanatory statement for the application Part 1) the Agency describes that a briefing for experts about system accreditation has already been held.

Information about the competence of the employees (human resource development, further vocational training) can be found on p. 26 of the quality management manual and on p. 32 of the progress report. The vocational adjustment and training of new members takes place with mutual feedback discussions. Furthermore, experienced colleagues accompany the new employees during at least two procedures or on-site visits to higher education institutions before they may independently carry out accreditation procedures. In the case of important procedural documents the four-eye principle is applied. The employees have the opportunity to participate at relevant conventions and they are involved in cooperation projects with other accreditation agencies and with higher education institutions. In order to provide proof of the qualifications of its staff members ASIIN handed over at a later date an overview that lists the staff of the head office and which illustrates the functions and the professional experiences of all employees.

Assessment

The members of the panels and organs are nominated on the base of suggestions made by scientific speciality societies or by the respective superior organ. Applications from individuals are not accepted. Presentation sheets or CVs are provided for all members of the panels and organs. According to the regulations in § 8 para. 2 d) and § 10 para. 2 d) of the by-laws the exchange of human resources within the accreditation commission and within the technical committees should take place in a "rolling system". In the course of three years at least one third of the members are newly-appointed.

For the appointment of expert teams ASIIN has at its disposal a pool of experts for both programme and system accreditation. The criteria and the selection procedure for admission to the pool of experts described in the explanatory statement for the application are appropriate: the competent technical committee (for programme accreditation) or the accreditation commission for system accreditation makes its decision on the basis of the experts' presentation sheet. The competence of the experts is also ensured by the rules for the selection of the expert teams. These provide for the involvement of the technical committees and the appointing commission made up of the Programme AC in programme accreditation, whereas for system accreditation procedures the participation of a project group from the System AC and the presiding body of the System AC is required.

The Agency presents a detailed and well-designed concept for modular expert briefings that focuses not only on the criteria for programme and system accreditation but also conveys moderation techniques and competence orientation. Participation in this briefing programme is voluntary. Moreover, the documents handed over to the experts for preparation together with the principle applied by the Agency to combine newly appointed and experienced experts are adequate for ensuring the experts' competence.

Finally, the measures applied for the vocational adjustment of new staff members also serve to enhance the quality in accreditation procedures. According to the overview, which lists the staff of the head office, the majority of the employees hold university degrees. There are also several staff members with expertise in science and research management.

Result

Criterion 2.2.3 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

Cooperation with other organisations is documented in the General Requirements for Programme Accreditation on p. 64ff (Annex 1) and in the cooperation agreement between AHPGS, ASIIN and FIBAA (Annex 12) and it is described in the explanatory statement for the application. The Agency handed over the cooperation agreement with ASAP at a later stage.

The Agency states that in principle it assumes the sole responsibility for the conduct of the procedures. This applies also in those cases when the Agency is supported by other organisations, for instance with the provision of experts. These experts are appointed as ASIIN experts and comply with all applicable regulations of the Agency. During the on-site visit the Agency reaffirmed that the appointment procedure for the experts recommended by ASAP is identical to the procedure for experts who are recommended in other ways. Furthermore, if these experts do not fulfil the requirements applicable to all experts, they are not appointed.

According to the Agency, only procedures for teacher training programmes are carried out under the shared responsibility of ASIIN and other agencies (up to now ASIIN has collaborated only with AQAS). In this case a concerted procedure is carried out that allows a joint

assessment of systemic and structural elements of the qualification of teachers at a higher education institution. However, these concerted procedures result in separate accreditation decision adopted by the two agencies. In this context, ASIIN accredits the subject combinations which fall within the subjects the Agency focuses on while AQAS takes over the accreditation of the other combinations.

Assessment

No objection should be made to the cooperation agreement with ASAP, since ASIIN holds the final responsibility for the accreditation criteria and for the selection and appointment of the experts.

The cooperation with AQAS for the accreditation of teacher training programmes with separate assessment of the structural and of the subject-related elements (partial study programmes) and the subsequent accreditation decision for the whole study programme likewise complies with the rules of the Accreditation Council as well as the way in which both agencies cooperate during the procedure.

Result

Criterion 2.2.4 is fulfilled.

2.3 Independence

2.3.1 The agency has a separate legal entity.

Documentation

The relevant regulation in the by-laws (Annex 5) and the extract from the register of associations (Annex 6) the Agency demonstrate that ASIIN is a registered association.

Assessment

The Agency has a separate legal entity in accordance with criterion 2.3.1.

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

The Agency's charitable status is proven by the exemption certificate issued by the tax office (Annex 34) since exemption from corporate income tax and trade tax is exclusively issued to non-profit associations. Furthermore, the by-laws (Annex 5) determine the purposes of public utility of ASIIN. The Annexes also contain the Agency's budget and its annual financial report (Annex 35) as well as calculations for the cost of the procedures for programme and system accreditation (Annex 36 and 37). The Agency handed over expenditure statements for some of the single programme accreditation procedures and for some of the cluster accreditation procedures at a later stage.

Assessment

The Agency's charitable status determines that ASIIN does not work for profit. According to the information contained in the annual financial statement, the Agency has built up reserves. Nevertheless, according to § 58 no. 6 and 7 of the Fiscal Code, non-profit corporations are admitted to do this.

Furthermore, as ASIIN explains in the explanatory statement for the application (p. 18) that the accreditation procedures are carried out on a full cost basis and that all costs for the accreditation procedures, which have actually been incurred, are passed on to the higher education institutions. This principle is also provided for in § 4 para. 4 of the by-laws and is evident by a comparison of the submitted calculations for the cost of the procedures with the expenditure statements that are subsequently handed over. According to the Agency, the fees for the accreditation procedures are calculated as a lump sum. This solution makes it possible to avoid disadvantages caused by higher travel expenses due to the geographical position of a higher education institution or cost considerations which could jeopardise quality. Every year, the Agency examines whether its fees still covering the costs. If necessary, the fees are revised.

Result

Criterion 2.3.2 is fulfilled.

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

The independence and impartiality of the organs from directives and that of persons working for the agency is demonstrated in the following documents: the by-laws (Annex 5), the experts' impartiality and confidentiality declaration (Annex 22), the experts' manual for programme accreditation procedures (Annex 23), the rules of procedure of the technical

committees and the Programme Accreditation Commission (Annexes 13, 16, and 17). Furthermore, the Agency has illustrated that this criterion is fulfilled in its explanatory statement for the application (pp. 19ff).

Assessment

The structure of ASIIN ensures the independence of the organs of persons working for the agency from directives. Hence, it excludes the possibility of any of its member organisations exerting influence on on-going accreditation procedures. The independence of the members of the Programme and System Accreditation Commission from directives is determined by § 8 para. 2 a) and § 9 para. 2 a) of the by-laws, which state: "The members are independent with regard to their specialist field and not bound to instructions".

The possibility of being a member of panels and simultaneously a member of an expert group as illustrated in the explanatory statement for the application (pp. 20f) does not pose a problem with regard to the Programme AC and the technical committees despite the substantial difference between the roles assigned to the expert groups and to the committees since the independence of these committee or body members is ensured by the rules of procedure. These regulations determine that panel members who have been involved in procedures assuming the role of experts shall not participate in deliberations concerning those procedures. Up to now, there is no similar regulation for the System Accreditation Commission, but only a recommendation by a project group set up by the System AC which is similar to the regulations for the Programme AC and the technical committees. According to the application documents the System AC should have adopted a corresponding decision at its meeting in December 2010, but up to now the Agency has not submitted any proof of this.

The impartiality of the experts is ensured by requiring them to sign a declaration of impartiality and a non-disclosure agreement. Furthermore, the technical committees decide according to predetermined, published criteria (see the requirements for experts on pp. 31ff in the "General Requirements and Principles for Programme Accreditation" and the presentation sheets in Annex 33) whether to admit an expert to the pool of experts. The Agency also illustrates this in its explanatory notes with regard to criterion 2.2.3 on p. 15 of the explanatory statement for the application.

Result

Criterion 2.3.3 is fulfilled.

Recommendation

The experts **recommend** the Agency – as announced in the application documents – to define a regulation also for the Accreditation Commission for Quality Management Sys-

tems by which members of the accreditation commission who have been involved in procedures assuming the role of experts shall not participate in deliberations concerning those procedures.

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

The head office is governed by a full-time managing director and a full-time deputy managing director. In addition to a secretary position, the Agency is currently offering a fixed-term post for an organisation assistant and an IT coordinator as well as two fixed-term and six permanent posts for academic collaborators. Furthermore, it is planned to recruit a trainee as well as a further academic collaborator. At a later date, the Agency handed over an overview that lists the staff of the head office and which illustrates their functions, hours and expiry dates in the case of fixed-term posts.

ASIIN rents 187 m² of office space as well as additional archive rooms. All employees have a computer workstation connected to the internet and with access to standard peripheral office devices. All core processes of ASIIN are carried out electronically. Office spaces also include a meeting and conference room with appropriate technical equipment. In addition and as required, the Agency rents premises throughout Germany for the meetings of committees and bodies, workshops or training seminars.

Assessment

According to the overview, which lists the staff of the head office, the majority of the employees holds university degrees and works full-time. There are also several staff members with expertise in science and research management. During the on-site visit, the experts were able to see for themselves that the workload of the employees is appropriate, as well as the dimensions of the office.

Result

Criterion 2.4 is fulfilled.

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 feedback processes.**

Documentation

The quality management system implemented by ASIIN is documented by the quality management system (Annex 28a) and its annexes (Annex 28b) as well as on the Agency's website. The QM system is also published in parts in the form of process descriptions in the General Requirements for Programme and for System Accreditation, and is described in the explanatory statement for the application on pp. 23f. Customer satisfaction surveys are reported in Annex 29 and Annex 30 contains a report concerning the experts' satisfaction. Annex 19, 20, 25 and 26 contain models for expert reports, appointment confirmation letters for the higher education institutions, the accreditation certificate and a model letter that serves to communicate the accreditation decision to the higher education institution. On pp. 33ff of the progress report detailed information can be found about the quality assurance measures carried out. Furthermore, the three fundamental decisions reported in Annex 24 concern measures that should result from the customer survey.

The Agency's objective to enhance the self-management competency of the higher education institution and its commitment with regard to the principles of objectivity, validity, confidentiality and transparency are highlighted in the quality management manual. For all of its four fields of activity – auditors and panel members (field 1), accreditation requirements and procedural principles (field 2), conduction of the procedure (field 3) and recognition of the procedural and practice-related outcomes (field 4) – the Agency reports its "quality expectations". Each field of activity is related to measures and instruments which serve to fulfil the expectations concerning the results and at the same time to clearly illustrate whether they have been met. This section describes internal feedback mechanisms as well as external feedback processes. The right-hand column of the table on pp. 22ff of the quality management manual describes which conclusions may be drawn from the results produced by the feedback mechanisms.

Page 32 of the QM manual states that once a year a "QM group" carries out the assessment and adjustment of the internal quality management concept with the involvement of the head office and, if necessary, of the panels.

The annex of the QM manual contains descriptions of internal processes for programme accreditation. The corresponding processes for system accreditation as well as those for supporting processes – for instance "Development of Requirements and Procedural Principles" or "Data Security and Storage" – are not yet included.

The Customer Satisfaction Report for Programme Accreditation 2010 contains the results of the on-line surveys conducted among the higher education institutions. These surveys are conducted by ASIIN after completion of the respective accreditation procedure. This report also contains – like the attached expert satisfaction report for the same year – statements concerning the measures derived from the results of the survey.

According to the progress report, the panel meetings are used to discuss quality management issues. If necessary, separate project groups are set up. Project groups are charged with the task of reviewing the requirements and principles for the programme accreditation procedures and with the preparation of the experts for system accreditation. The enhancement of the briefing held before the beginning of the procedure and the role of the head office staff member in the system accreditation procedure are discussed. The Agency furthermore uses its experience gained through complaint and assessment procedures conducted by the Accreditation Council in order to adjust its procedural practice and to modify internal regulations.

Assessment

The illustration of the quality management system is comprehensive, intelligible and comprehensible. It suggests that all parties involved have a common understanding of the Agency's tasks and objectives because all panels as well as the experts and the head office are integrated into the illustrated system which refers to programme and system accreditation. The system includes both internal and external feedback processes as well as the resulting analysis of the Agency's own processes. The system has been adopted by the board and it is hence compulsory. The illustration provided by the Agency suggests that the quality management system is indeed continually applied. The QM system is published on the Agency's website and it is therefore publicly available.

Both the statements contained in the custom and expert surveys and the progress report allow insights to be gained as to how internal feedback mechanisms work and which consequences are to be drawn from their results. One of the afore-mentioned consequences is the amended version of the requirements and rules of procedure for programme accreditation, whilst another consequence consists in developing a "briefing module" for experts in system accreditation. In particular, the activities of the project group "Experts" are to be judged positively since the qualification of experts for system accreditation constitutes a particular challenge. In addition, according to the afore-mentioned three funda-

mental decisions adopted by the Programme AC in 2008 the panels and the head office were delegated by the AC to elaborate specific conclusions from the procedures.

Finally, a positive sign lies in the fact that the Agency took the Council's assessment procedure as an opportunity for modifying the assessment reports and deepening the level of detail of its rationale. This is – incidentally just like the Agency's practice to draw consequences from the complaints procedures described in the progress report – a sign of an efficient quality management system.

The quality management system is assessed once a year by the QM group. However, the experts noticed from the discussions with the Agency's employees that the awareness – that the objectives and measures of the Agency's internal quality management system should be subject to critical analysis from time to time – should be increased. The experts recognise that the Agency provides feedback mechanisms and that the results of the quality assurance measures are considered when reviewing the Agency's procedures and provisions. Nevertheless, according to the employees of the Agency the higher education institution and the experts are not formally notified about the results of the surveys carried out.

Result

Criterion 2.5 is fulfilled.

Recommendations

1. The experts **recommend** to the Agency that the subsequent assessment of the effectiveness of the internal quality management system should include an evaluation of the relationship between all the single quality assurance measures.

2. The experts **recommend** to the Agency to jointly discuss the outcomes of an evaluation with the experts, technical committees and the employees of the Agency in order to initiate a quality management process.

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 laid down in the by-laws (Annex 5). Furthermore, the rules of procedure of the board of complaints regulate the complaints procedure in detail (Annex

15). The relevant information for higher education institutions about the complaints procedure are reported in the General Requirements for Programme Accreditation (Annex 1) and on the ASIIN website under the section "Programme Accreditation", "Complaints": information is also provided about the current composition of the board of complaints. The experiences that have been gained with the complaints procedure are described in the progress report on pp. 35f.

The subject matter of the complaints procedure is defined in § 11 of the by-laws and in greater detail in § 3 of the rules of procedure. According to § 2 para. 2 of the rules of procedure of the board of complaints, members of the board of complaints are "independent with regard to their specialist field and not bound to instructions".

Assessment

The Agency has laid down an internal complaints procedure which is publicly accessible, defines the subject matter of the complaint and the members of the board of complaints are not bound to instructions.

Result

Criterion 2.6 is fulfilled.

2.7 Reporting

The agency describes its procedures and appraisal criteria adequately in detail and publishes them. It publishes the names of the experts, the expert reports[1] and the decisions of the accreditation procedures carried out by it.

Documentation

ASIIN states that the criteria and procedural principles applied in the accreditation procedures are mainly laid down in the "Information for Institutions of Higher Education - Requirements and Procedural Principles" (Annex 1 concerning the programme accreditation and Annex 3 concerning the system accreditation). This document, as well as the "Subject-specific Supplementary Criteria" and the additional explanatory notes concerning the types and outline of the procedures are published on the ASIIN website and in the Higher Education Compass. According to ASIIN, with regard to procedures initiated prior to 1 July 2010 the Agency publishes factual information about the study programme as well as its outline, a summary of the assessment, the conditions of the experts (if applicable), the du-

---

[1] The publication of the expert reports is mandatory in procedures, which will be initiated after 01.06.2010.

ration of the accreditation, the seal that has been awarded and the names of the experts. With regard to procedures initiated after 1 July 2010, the complete expert report is also published.

Assessment

ASIIN has laid down and also published the central criteria for the procedures as well as the procedural principles and outlines. The contents published with regard to the expert reports and to the names of the experts comply substantially with the Guidelines of the Accreditation Council. Nevertheless, these require the publication of the experts reports for procedures initiated after 1 June 2010, and not only those initiated after 1 July 2010. It is assumed that this is an editorial error in the documentation for application presented by the Agency. The problems posed by the lack of transparency with regard to the differences between the seals awarded by the Agency have already been dealt with under criterion 2.2.1.

Result

Criterion 2.7 is fulfilled.

4.2 Assessment based on European Standards and Guidelines (ESG)

3.1: Use of external quality assurance procedures for higher education

STANDARD:

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

GUIDELINES:

The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions. The standards for external quality assurance should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

Since standard 3.1 includes the fulfilment of Part II of the ESG, the following sections will firstly deal with standards 2.1 to 2.8 before making a statement concerning standard 3.1.

2.1 Use of internal quality assurance procedures

STANDARD:

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

GUIDELINES:

The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met. If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

Documentation

In Part 2 of the explanatory statement for the application the Agency illustrates that the equivalent of ESG standards 1.1 to 1.7 are found in the General Requirements for Programme Accreditation laid down by ASIIN. Hence, in all procedures for programme accreditation that should award the ASIIN accreditation seal the assessment is based upon the afore-mentioned standards contained in Part 1 of the ESG, irrespective of the country or Bundesland, in which the procedure takes place. The chart in Annex 2 illustrates that procedures that will award the ASIIN accreditation seal take into account the results of in-

ternal quality assurance processes of the higher education institution (cf. p. 12 of the chart, assessment area 6 of the ASIIN Requirements). In system accreditation procedures ASIIN evaluates the quality management of the respective higher education institution. Proof of the system's effectiveness is also required. As explained in section 1 of the supplement to the application for ENQA/eqar, all quality assurance activities and all procedures for certification carried out by ASIIN furthermore follow in principle the criteria set by the Agency for programme and system accreditation (Annexes 1 to 4). In the general statement mentioned above on pp. 5ff of the supplement to the application for ENQA/eqar it is explained that the Agency distinguishes between procedures for programme accreditation and procedures for system accreditation. In procedures for programme accreditation (see p. 6) the ASIIN accreditation seal and/or other seals (for instance the seal of the Accreditation Council) are awarded. In procedures for system accreditation the ASIIN accreditation seal and/or the seal of the Accreditation Council is awarded. Regardless of this, according to the Agency, the General Requirements for Programme and System Accreditation will also be applied at all times.

Assessment

According to the Agency's statements, the results of the internal quality assurance processes of the higher education institutions form part of the General Requirements of ASIIN for accrediting study programmes. The Agency applies these General Requirements in all quality assurance procedures carried out. It follows that the results of the internal quality assurance processes of the higher education institutions are assessed in all programme-related quality assurance procedures carried out by ASIIN. According to the Agency, the ASIIN system accreditation is based upon its requirements set for QM systems which assess the effectiveness of quality management systems.

Result

The Agency fully complies with standard 2.1.

> ## 2.2 Development of external quality assurance processes
>
> **STANDARD:**
>
> The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.
>
> **GUIDELINES:**
>
> In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used. As external quality assurance makes demands on the institutions involved a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

Documentation

ASIIN states that the Agency's aims and objectives of quality assurance processes are described in the by-laws and that they are operationalised by the General Requirements for Programme and System Accreditation. These documents are published – also on the Agency's website – and they are designed and developed through a process involving key stakeholders, including higher education institutions. According to the Agency, the involvement of all key stakeholders is a basic principle adopted by ASIIN. Their role and function are documented and transparent to third parties for both the determination of aims and objectives of the organisation and the definition of the requirements for programme and system accreditation in both national and international procedures. In addition, as explained in section 1 of the supplement to the application for ENQA/eqar, all quality assurance activities and all procedures for certification carried out by ASIIN follow in principle the criteria set by the Agency for programme and system accreditation (Annexes 1 to 4).

Assessment

The objectives of the Agency's quality assurance processes are laid down in the by-laws and published. The by-laws have been developed through a process involving key stakeholders, including higher education institutions. This applies also to the Agency's General Requirements for Programme and System Accreditation which describe the procedures that have to be applied.

Result

The Agency fully complies with standard 2.2.

> ### 2.3 Criteria for decisions
>
> **STANDARD:**
>
> Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.
>
> **GUIDELINES:**
>
> Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

Documentation

ASIIN states that the Agency's assessment criteria and rules of procedure for programme and system accreditation are clearly laid down and that they are consistently applied in all procedures. Hence, it is ensured that the procedures are comparable and that the criteria are applied in a uniform way. The procedural steps and the criteria are primarily illustrated in detail by the General Requirements for Programme and System Accreditation and published on the Agency's website. Decisions are adopted solely by the authorised accreditation commission. In addition, there is also a board of complaints. The higher education institutions are informed about the possibility to submit a complaint. According to ASIIN, the board of complaints has been called upon for 38 procedures since being established.

In its statement concerning standard 2.3 the Agency does not separately mention the by-laws (Annex 5), the model for the accreditation report for programme accreditation (Annex 19), the experts' manual (Annex 21), the audit check-list for experts for programme accreditation (Annex 23), the fundamental decisions of the Programme AC (Annex 24), the model letters drawn up for communication with the higher education institutions (Annexes 20 and 26), the illustration of the complaints procedure (Annex 27), the QM manual with its annex (Annexes 28 a and b) as well as the concept for the briefing of experts (Annex 31). However, they are listed in this section since these documents are relevant for the assessment of the consistency in the procedures carried out by ASIIN.

With regard to the procedures carried out abroad and to the procedures for awarding labels the Agency states that all quality assurance activities and all procedures for certification carried out by ASIIN follow in principle the criteria set by the Agency for programme and system accreditation (Annexes 1 to 4).

Assessment

The criteria according to which the Agency adopts its decisions in quality assurance procedures are explicitly laid down and published on the Agency's website. The consistency of the Agency's decisions is ensured by the documents that serve to harmonise the pro-

cedures and the systematic application of the criteria for accreditation. The following documents serve the afore-mentioned task: General Requirements for Programme and System Accreditation, the Fundamental Decisions of the Programme AC, the model for the accreditation report for programme accreditation, the audit check-list for experts for programme accreditation, the model letters drawn up by the head office for communication with the higher education institutions as well as the manual for the experts. These are complemented by the preparation procedures for experts and expert briefings. The structure laid down in the Agency's by-laws, on the other hand, helps to ensure the consistency of its decisions. It is the task of both the technical committees (in programme accreditation) and the accreditation commissions to ensure uniformity in decisions taken by the Agency. Finally, the Agency's complaints procedure and internal quality management system offer opportunities for receiving feedback and enhancing its processes.

Result

The Agency fully complies with standard 2.3.

2.4 Processes fit for purpose

STANDARD:

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

GUIDELINES:

Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes.

Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance. Amongst these elements the following are particularly noteworthy: insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task; the exercise of care in the selection of experts; the provision of appropriate briefing or training for experts; the use of international experts; participation of students; ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached; the use of the self-evaluation/site visit/draft report/published report/follow-up model of review; recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality.

Documentation

ASIIN explains that the assessment of the quality assurance procedures focuses strongly on whether the measures, instruments and resources are fit for achieving the aims and

objectives set by the higher education institution. Subsequently, the Agency illustrates the selection, appointment, composition and preparation of the expert groups as well as the outline of the procedures in programme and system accreditation stating that the ASIIN recognises the higher education institution's own quality assurance concepts and that the Agency's approach is to assess the achievement of the objectives the institution has defined.

In all quality assurance procedures, particular attention is paid, when appointing experts, that expertise of the respective system of higher educational institutions and the perspectives on the labour market is ensured by involving a local expert. According to the Agency, the afore-mentioned requirement is compulsory as per the relative provision for procedures that lead to an accreditation decision adopted by the Swiss Federal Department of Economic Affairs (see Annex 44). According to the statements in section 1 of the supplement to the application for ENQA/eqar, all quality assurance activities and all procedures for certification carried out by ASIIN follow the criteria set by the Agency for programme and system accreditation (Annex 1 to 4). According to the afore-mentioned section 1 of the application the outline of the procedures for accreditation carried out abroad and the procedures for awarding the *labels* corresponds to the procedure for programme and system accreditation.

Assessment

When appointing expert groups ASIIN has at its disposal a pool of experts for both programme and system accreditation. The criteria for admission to the expert pool indicated on pp. 31ff of the General Requirements for Programme Accreditation and on pp. 25ff of the General Requirements for System Accreditation are appropriate as well as the selection procedure described in the explanatory statement for the application (p. 15). The competent technical committee (for programme accreditation) and respectively the Accreditation Commission for System Accreditation adopt their decision based upon a presentation sheet. The competence of the experts is also ensured by the rules for the selection of the expert teams. These provide for programme accreditation to involve the technical committees and an appointment commission made up of the Programme AC, whereas for the system accreditation procedures the participation of a project group from the System AC and the presiding body of the System AC is required. ASIIN presents a detailed and well-designed concept for modular expert briefings that focuses not only on the criteria for programme and system accreditation but also conveys moderation techniques and competence orientation. Moreover, the documents handed over to the experts for preparation together with the principle applied by the Agency to combine newly appointed and experienced experts are adequate for ensuring the experts' competence.

Students are involved in the ASIIN expert groups for all quality assurance procedures carried out. At least in system accreditation procedures international experts may also be involved.

The described outline of the procedure, which is applied according to the Agency to all quality assurance procedures, results in justified conclusions. It contains common procedural elements (self-evaluation, on-site visit, drafting of reports, publishing of reports and follow-up).

The responsibility of the higher education institution for enhancing the quality of their activities is highlighted by the Agency. Nevertheless, in this respect the experts consider the so-called Subject-specific Supplementary Criteria (SSC) developed by the Agency (see Annex 4), which contain subject-related learning outcomes and reference curricula, as being of particular concern since the higher education institutions are obliged to motivate derogations and because the reference curricula are to be considered as input requirements. On-site, the experts were able to see for themselves that neither all panel members nor all of the employees aimed at setting a corresponding standard, but rather that the SSC are considered first and foremost as guidance for the higher education institutions.

Result

The Agency substantially complies with standard 2.4.

2.5 Reporting

STANDARD:

Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

GUIDELINES:

In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership. Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone. In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations. There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers. Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

Documentation

The Agency states that in programme accreditation care is taken to ensure that the reports are readily accessible. Any sections that contain recommendations are highlighted. The complete expert report of each accredited study programme for all procedures initiated after 1 July 2010 is published on the ASIIN website. Only sections that concern study programmes which have not yet been accredited, will be shown in black. For all procedures initiated prior to 1 July 2010, the Agency publishes information on its website about the study programme, the accreditation decision and any issued conditions, the duration of the accreditation, seals awarded as well as a summary of the assessment. The Agency has not yet carried out procedures for system accreditation, for which the afore-mentioned aspects concerning programme accreditation will apply. As explained in section 1 of the supplement to the application for ENQA/eqar, all quality assurance activities and all procedures for certification carried out by ASIIN furthermore follow in principle the criteria set by the Agency for programme and system accreditation (Annexes 1 to 4).

Assessment

The above statements of the Agency show that the expert reports are easy to comprehend and that the complete reports for all quality assurance procedures initiated after 1 July 2010 are published on the Agency's website.

Result

The Agency fully complies with standard 2.5.

2.6 Follow-up procedures

STANDARD:

Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

GUIDELINES:

Quality assurance is not principally about individual external scrutiny events: It should be about continuously trying to do a better job. External quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

Documentation

ASIIN claims that the procedures for programme accreditation contain follow-up procedures since both accreditations subject to certain conditions as well as the suspension of the procedure are possible. In the following section, the Agency describes procedures

subject to certain conditions and suspensions. Recommendations, which do not have a binding character, are to be considered separately. Nevertheless, re-accreditation procedures assess whether these recommendations have been implemented. If recommendations have not been implemented by the higher education institution, justification shall be given. The system accreditation contains a follow-up procedure in that suspension of procedure is allowed. The procedures for accreditation carried out abroad and the procedures for awarding the *labels* follow in principle the criteria set by ASIIN for programme and system accreditation. In order to enhance efficiency ASIIN applies an approach that is as uniform as possible when determining the consequences of decision and when establishing the time limits, irrespective of the quality seal applied for by the higher education institution. The Agency does, however, take into account specific national characteristics as well as specific requirements set by the owner of the seal, if necessary.

Assessment

The Agency carries out follow-up processes for all quality assurance procedures. A further follow-up procedure for system accreditation consists in the mandatory half-time random sample required by the Guidelines of the Accreditation Council. ASIIN has integrated this sample assessment into its system accreditation procedure as one of its procedural elements to be carried out after a positive decision on the system accreditation of a higher education institution (cf. Annex 3, p. 17). This sample assessment provides an intensive evaluation of some of the study programmes undertaken by the higher education institution.

Result

The Agency complies with standard 2.6

2.7 Periodic reviews

STANDARD:

External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

GUIDELINES:

Quality assurance is not a static but a dynamic process. It should be continuous and not »once in a lifetime«. It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

Documentation

The Agency illustrates that decisions in programme and system accreditation procedures are issued with time limitations and that the procedures are carried out on a regular basis. The award of the label is tied to the duration of the programme accreditation for the relevant study programme. Accreditations in Switzerland and in the Netherlands are also carried out on a regular basis.

Assessment

Assessments take place regularly.

Result

The Agency fully complies with standard 2.7.

2.8 System-wide analyses

STANDARD:

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments etc.

GUIDELINES:

All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work.

Documentation

The Agency states that the quality management instruments include surveys that have been carried out since 2006; their results are summarised in relative analyses. Furthermore, the Agency has elaborated a progress report for the procedure for re-accreditation by the German Accreditation Council, which also analyses how higher education institutions cope with the guidelines and approaches of the accreditation procedures. According to ASIIN, comprehensive reporting to the owners of the seal (when awarding labels) respectively to the national monitoring bodies in those countries, in which ASIIN is formally registered (Switzerland and the Netherlands), is also required.

Assessment

The progress report provides both a description and an analysis of the results of the programme accreditation. However, it has been elaborated only once and exclusively for the purposes of the procedure for re-accreditation. The experts acknowledge the Agency's ef-

forts to elaborate cross-procedural analyses, but they recognise that it is still necessary to encompass the potential for development to a greater extent.

Result

The Agency complies substantially with standard 2.8.

Total evaluation of Standard 3.1:

The assessment with regard to Part II of the ESG shows that the Agency complies with the standards 2.1 to 2.8.

Conclusion:

The Agency fully complies with standard 3.1.

3.2 Official status

STANDARD:

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

Documentation

The Agency explains that it is organised as a registered association. Since 2000, ASIIN has been entitled to award the seal of the Accreditation Council in addition to its own quality seal. Since 2008, the Agency has been entitled to award the afore-mentioned seals also in procedures for system accreditation. The procedures carried out by ASIIN are regularly reviewed by the German Accreditation Council; the latter is a member of ENQA. In addition, the Agency is officially approved in Switzerland and in the Netherlands and is subject to the supervision of the competent national authorities. Furthermore, the owners of the quality labels have also carried out an external quality assurance assessment of ASIIN (an audit carried out by external peers). This assessment was the pre-requisite for being authorised to award the labels.

Assessment

The Agency is recognised by the competent authorities and complies with any requirements of the legislative jurisdictions within which it operates. This is illustrated by the periodic re-accreditation by the Accreditation Council, which also checks whether the agency complies with the respective provisions.

Result

The Agency fully complies with standard 3.2.

3.3 Activities

STANDARD:

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

GUIDELINES:

These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

Documentation

The Agency illustrates that carrying out procedures for quality assurance constitutes the main task of its activities.

Assessment

The Agency regularly carries out external quality assurance procedures.

Result

The Agency fully complies with standard 3.3.

3.4 Resources

STANDARD:
Agencies should have adequate and proportional resources, both human and financial, to enable them to organize and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

Documentation

The head office is governed by a full-time managing director and a full-time deputy managing director. In addition to a secretary position, the Agency is currently offering a fixed-term post for an organisation assistant and an IT coordinator as well as two fixed-term and six permanent posts for academic collaborators. Furthermore, it is planned to recruit a trainee as well as a further academic collaborator. In order to provide proof of the personnel setup ASIIN handed over at a later date an overview that lists the staff of the head office and which illustrates the functions and the professional experiences of all employees.

ASIIN rents 187 m² of office space as well as additional archive rooms. All employees have a computer workstation connected to the internet and with access to standard peripheral office devices. All core processes of ASIIN are carried out electronically. Office spaces also include a meeting and conference room with appropriate technical equipment. In addition and as required, the Agency rents premises throughout Germany for the

meetings of committees and bodies, workshops or training seminars. When carrying out procedures abroad respectively when awarding the quality labels, the Agency calls upon the same panels and staff members.

Assessment

According to the overview, which lists the staff of the head office, the majority of the employees holds university degrees and works full-time. There are also several staff members with expertise in science and research management. During the on-site visit, the experts were able to see for themselves that the workload of the employees is appropriate, as well as the dimensions of the office. According to the experts, the ASIIN disposes of sufficient resources for the Agency's development.

Result

The Agency fully complies with standard 3.4.

3.5 Mission statement

STANDARD:

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement

GUIDELINES:

These statements should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

Documentation

According to ASIIN, the Agency's understanding of quality manifests itself in the by-laws, on the website, in the General Requirements for Programme Accreditation (see Annex 1), in the General Requirements for System Accreditation (see Annex 3) and in the quality management manual for the work of ASIIN (see Annex 28). These three documents are published on the Agency's website. ASIIN added in its explanatory statement for the application that all external quality assurance procedures of the Agency are subject to the same goals and principles and that the same panels are responsible for them.

Assessment

ASIIN formulates both its conception of quality in teaching and learning and its definition of quality in accreditation procedures. The Agency derives therefrom the subject and the structure of the procedure for accreditation. Its understanding of quality is publicly docu-

mented in the afore-mentioned documents and on the Agency's website. It is stated clearly in the quality management manual that the continuous enhancement of quality is considered to be the responsibility of the higher education institution and is ensured and promoted by the Agency. All quality assurance procedures carried out by the Agency are entirely focused on these objectives.

Result

The Agency fully complies with standard 3.5.

3.6 Independence

STANDARD:

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

GUIDELINES:

- An agency will need to demonstrate its independence through measures, such as

- its operational independence from higher education institutions and governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts)the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence;

- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Documentation

The Agency states that in principle it bears the sole responsibility for the conduct of the procedures and for defining the criteria for accreditation. This applies also in those cases when the Agency is supported by other organisations, for instance with the provision of experts. These experts are appointed as ASIIN experts and comply with all applicable regulations of the Agency. During the on-site visit the Agency reaffirmed that the appointment procedure for the experts recommended by ASAP is identical to the procedure which experts recommended in other ways. Furthermore, if these experts do not fulfil the requirements applicable to all experts, they are not appointed.

The independence and impartiality of the organs from directives and that of persons working for the agency is demonstrated in the following documents: the by-laws (Annex 5), the model for the experts' impartiality and confidentiality declaration (Annex 22), the experts' manual for programme accreditation procedures (Annex 23) and the rules of procedure of

the technical committees and the Programme Accreditation Commission (Annex 13, 16, and 17).

With regard to independence from governments ASIIN illustrates that the German accreditation system is decentralised and it is based upon the German Law on the Establishment of a Foundation, "Foundation for the Accreditation of Study Programmes in Germany". In accordance with said law, the Accreditation Council has been established as a foundation under public law. The main task of the foundation is the accreditation of accreditation agencies. Hence, there is no direct relation between ASIIN and the government or the competent ministries of the Länder or of the Federal Republic of Germany. Furthermore, the Agency is not financed through public funds but through the fees of the association members and by passing on the costs for accreditation procedure to the higher education institutions.

Assessment

No objection should be made to the currently applicable cooperation agreement with the accreditation network ASAP, since ASIIN holds the final responsibility for the accreditation criteria and for the selection and appointment of the experts.

Furthermore, the structure of ASIIN ensures the independence of the organs and of persons working for the agency from directives. In particular it prevents any of its member organisations from exerting influence on on-going accreditation procedures. The independence of the members of the Programme and System Accreditation Commission from directives is determined by § 8 para. 2 a) and § 9 para. 2 a), which states: "The members are independent with regard to their specialist field and not bound to instructions".

The impartiality of the experts is ensured by requiring them to sign a declaration of impartiality and a non-disclosure agreement. Furthermore, the technical committees decide according to predetermined, published criteria (see the requirements for experts on pp. 31ff in the "General Requirements and Principals for Programme Accreditation" and the presentation sheets in Annex 33) whether to admit an expert to the pool of experts .

Operational independence from governments and ministries is ensured by the decentralised structure of the accreditation system and by funding the Agency through subscription fees paid by the members and contributions made by the higher education institutions that apply for accreditation by ASIIN.

Result

The Agency complies with standard 3.6

3.7 External quality assurance criteria and processes used by the agencies

STANDARD:

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include

- a self-assessment or equivalent procedure by the subject of the quality assurance process;
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
- publication of a report, including any decisions, recommendations or other formal outcomes;
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

GUIDELINES:

Agencies may develop and use other processes and procedures for particular purposes. Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.

Agencies that make formal quality assurance decisions or conclusions which have formal consequences should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

Documentation

ASIIN illustrates on pp. 35ff of the supplement to Part 2 of the explanatory statement for the application that the Agency's procedures and assessment criteria for programme and system accreditation are clearly laid down, recorded in writing and published; ASIIN also states that said procedures and criteria are consistently applied in all procedures for all types of higher education institutions. Hence, it is ensured that the procedures are comparable and that the criteria are applied in a uniform way. The accreditation procedures carried out by ASIIN for both programme and system accreditation contain the following mandatory elements: the self-assessment of the higher education institution that serves to provide proof of compliance with the standards for obtainment of the accreditation seal; the assessment and at least one on-site visit at the higher education institution making the application, carried out by an external expert group with experts chosen from the ASIIN pool of experts comprising in general one student member, professors and also representatives of professional practice; the publication of the outcome of the accreditation procedure on the Agency's website according to the applicable requirements; accreditation issued generally with time limitations including subsequent follow-up procedures by re-accreditation. In addition for programme accreditation: verification that the conditions are fulfilled one year after issue and fulfilment of the recommendations issued during the pro-

cedure for re-accreditation.

The complaints procedure is laid down in the by-laws (Annex 5). Furthermore, the rules of procedure of the board of complaints regulate the complaints procedure in detail (Annex 15). The relevant information for higher education institutions about the complaints procedure are reported in the General Requirements for Programme Accreditation (Annex 1) and on the ASIIN website under the section "Programme Accreditation", "Complaints": information is also provided about the current composition of the board of complaints. The experiences that have been gained with the complaints procedure are described in the progress report on pp. 35f. The subject matter of the complaints procedure is defined in § 11 of the by-laws and in greater detail in § 3 of the rules of procedure. According to § 2 para. 2 of the rules of procedure of the board of complaints members of the board of complaints are "independent with regard to their specialist field and not bound to instructions".

With regard to accreditation procedures carried out abroad as well as procedures for awarding the *labels*, the Agency states that these are subject to the same requirements and procedural principles which apply for the other procedures and that they are carried out under the responsibility of the same panels.

Assessment

The processes, criteria and procedures used by agencies are pre-defined and publicly available. The procedure contains the following elements: self-evaluation report, assessment by experts including an on-site visit, publication of the expert report and follow-up measures. The complete reports are publicly accessible (see the assessment for ESG standard 2.5). The consistent application of the Agency's decisions is also ensured (see the assessment for ESG standard 2.3). Furthermore, the Agency disposes of a formalised complaints procedure.

Result

The Agency fully complies with standard 3.7.

3.8 Accountability procedures

STANDARD:

Agencies should have in place procedures for their own accountability.

GUIDELINES:

These procedures are expected to include the following:

1. A published policy for the assurance of the quality of the agency itself, made available on its website;

2. Documentation which demonstrates that:

   - the agency's processes and results reflect its mission and goals of quality assurance;

   - the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts;

   - the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are sub-contracted to other parties;

   - the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.

3. A mandatory cyclical external review of the agency's activities at least once every five years.

Documentation

The quality management system implemented by ASIIN is documented by the quality management manual (Annex 28 a) and its annexes (Annex 28 b) as well as on the Agency's website. The QM system is also published in parts in the form of process descriptions in the General Requirements for Programme and for System Accreditation, and is described in the explanatory statement for the application. Customer satisfaction surveys are reported in Annex 29 and Annex 30 contains a report concerning the experts' satisfaction. Annex 19, 20, 25 and 26 contain models for expert reports, appointment confirmation letters for the higher education institutions, the accreditation certificate and a model letter that serves to communicate the accreditation decision to the higher education institution. On pp. 33ff of the progress report detailed information can be found about the quality assurance measures carried out. Furthermore, the three fundamental decisions reported in Annex 24 concern measures that should result from the customer survey.

With regard to the measures taken to ensure the impartiality of the experts, the Agency explains that the experts appointed to carry out the procedure for accreditation are not

employed at ASIIN. Likewise, active members of the ASIIN panels work on an honorary basis. The existence of any conflict of interest of the panel members and experts working for ASIIN is excluded. For further information, please see the Agency's statements concerning ESG standard 3.6.

With regard to quality assurance, impartiality of experts and measures for ensuring the procedural quality in cooperation with third parties in accreditation procedures carried out abroad as well as procedures for awarding the *labels*, the Agency clearly states that these are subject to the same objectives and criteria which apply for the other procedures and that they are carried out under the responsibility of the same panels.

Assessment

The illustration of the quality management system is comprehensive, intelligible and comprehensible. It suggests that all parties involved have a common understanding of the Agency's tasks and objectives because all panels as well as the experts and the head office are integrated into the illustrated system. The system includes both internal and external feedback processes as well as the resulting analysis of the Agency's own processes. The system has been adopted by the board and it is hence compulsory. The illustration provided by the Agency suggests that the quality management system is indeed continually applied. The QM system is published on the Agency's website and it is therefore publicly available.

Both the statements contained in the custom and expert surveys and the progress report allow insights to be gained as to how internal feedback mechanisms work. One of the afore-mentioned consequences is the amended version of the requirements and rules of procedure for programme accreditation, whilst another consequence consists in developing a "briefing module" for experts in system accreditation. In particular, the activities of the project group "Experts" are to be judged positively since the qualification of experts for system accreditation constitutes a particular challenge. In addition, according to the afore-mentioned three fundamental decisions adopted by the Programme AC in 2008 the panels and the head office were delegated by the AC to elaborate specific conclusions from the procedures. Finally, a positive sign lies in the fact that the Agency took the Council's assessment procedure as an opportunity for modifying the assessment reports and deepening the level of detail of its rationale. This is – incidentally just like the Agency's practice to draw consequences from the complaints procedures described in the progress report – a sign of an efficient quality management system.

The system also includes an annual assessment by a QM group. However, the experts noticed from the discussions with the Agency's employees that the awareness – that the objectives and measures of the Agency's internal quality management system should be

subject to critical analysis from time to time – should be increased.

For the measures for ensuring the impartiality of the experts, see the Agency's assessment of ESG standard 3.6.

Result

The Agency fully complies with standard 3.8.

Bonn, 17 January 2011

Akkreditierungsrat ▪▪

Procedure for accreditation of the "Accreditation Agency for Study Programmes of Engineering, Information Science, Natural Sciences and Mathematics (Reg. Assoc.)" (ASIIN e.V.)

Schedule for the on-site visit of the expert group in Düsseldorf from 07.12. – 09.12.2010

Accommodation

Mercure Hotel Düsseldorf City Nord

Nördlicher Zubringer 7, Mörsenbroicher Ei, 40470 Düsseldorf

Meeting places:

- The preliminary meeting on 7 December 2010 took place at the Mercure Hotel Düsseldorf City Nord

- The on-site visit on 8 December 2010 started in the ASIIN head office, Robert-Stolz-Straße 5, 40470 Düsseldorf and continued from 10:00 a.m. at the Mercure Hotel Düsseldorf City Nord

- On-site visit on 7 December 2010 at the Mercure Hotel Düsseldorf City Nord

7 December 2010		
6:00 p.m.	Internal preliminary meeting at the hotel	Expert group AC and Ms Mayer-Lantermann
8:00 p.m.	Dinner at the hotel	Expert group AC and Ms Mayer-Lantermann
8 December 2010		
08:30 - 9:50 a.m. (ASIIN head office)	Discussion with the board members of the association and the deputy managing director	Prof. Dr. Jörg Steinbach (Vice-Chairman), **Prof. Dr.-Ing. Günter Schmidt-Gönner, Dr.-Ing. Sascha Hermann**, Birgit Hanny
09:50 - 10:15 a.m.	On-site visit of the ASIIN head office	
10:30 - 11:30 a.m.	Discussion with the members of the Accredita-	

(from this point forth at the Mercure Hotel)	tion Commission for System Accreditation	
11:30 - 11:45 a.m.	Break	
11:45 a.m. - 12:30 p.m.	Discussion with experts involved in procedures carried out by ASIIN	
12:30 - 1:30 p.m.	Light lunch, internal meeting	Expert group AC and Ms Mayer-Lantermann
1:30 - 2:30 p.m.	Discussion with representatives from study programme which have been accredited by ASIIN	
2:30 - 3:00 p.m.	Break	
3:00 - 4:00 p.m.	Discussion with the ASIIN staff members	with all available staff members of the ASIIN head office
4:00 - 5:00 p.m.	Discussion with the competent staff members about ASIIN's international fields of activity (for assessment of the ESG)	
5:00 - 6:30 p.m.	Internal final meeting of the first day	Expert group AC and Ms Mayer-Lantermann
7:30 p.m.	Internal working dinner	Expert group AC and Ms Mayer-Lantermann
9 December 2010		
09:00 - 10:00 a.m.	Discussion with the deputy managing director	Birgit Hanny
10:10 a.m. - 12:00 noon	Participation at the meeting of the Accreditation Commission for Programme Accreditation 11:00 a.m. - 12:00 noon - Discussion/Q&A session with the members - at the same time discussion/Q&A session with the chairpersons of the technical committees in connection with their participation at the meeting of the Accreditation Commission	
12:00 noon - 2:30 p.m.	Light lunch, internal final meeting with preparations for the expert report	Expert group AC
2:30 p.m.	Feedback discussion with the management of the Agency	Expert group AC, Birgit Hanny
2:45 p.m.	Departure	