



Agency for  
Quality Assurance  
and Accreditation  
Austria

# ENQA coordinated external review of AQ Austria

## Self evaluation report

Vienna, 19<sup>th</sup> of December 2013

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## List of abbreviations

AQ Austria	Agency for Quality Assurance and Accreditation Austria
AQA	Austrian Quality Assurance Agency
BMWF	Federal Ministry for Science and Research
BWSF	Advisory Council for Economic and Social Affairs
DUK	Danube University Krems
ENQA	European Association for Quality Assurance in Higher Education
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
ESU	European Students' Union
EQAR	European Quality Assurance Register for Higher Education
FH-	Universities of Applied Sciences
FHK	Association of Austrian Universities of Applied Sciences
FHR	University of Applied Sciences Council
FHStG	Federal Act on University of Applied Sciences Degree Programmes (University of Applied Sciences Studies Act - FHStG)
HS-QSG	Federal Act on the External Quality Assurance in Higher Education and the Agency for Quality Assurance and Accreditation Austria (Act on Quality Assurance in Higher Education)
IST Austria	Institute of Science and Technology – Austria
ÖAR	Austrian Accreditation Council
ÖH	Austrian National Union of Students
ÖPUK	Austrian Private Universities' Conference
PUG	Federal Act on Private Universities (Private University Act)
QSRG	Quality Assurance Framework Law
UG	Federal Act on the Organisation of the Universities and their Studies (Universities Act 2002)
UniAkkG	Federal Act on the Accreditation of Educational Institutions as Private Universities (University Accreditation Act - UniAkkG)
UNIKO	Universities Austria
VSPU	Association for the Establishment and Promotion of a National Students' Representation of Private Universities

# 1 Foreword

The Agency for Quality Assurance and Accreditation Austria (AQ Austria) hereby presents its self-evaluation report for the external review carried out by the European Association for Quality Assurance in Higher Education (ENQA) with regard to the correct and the appropriate implementation and application of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Based on the outcome of this assessment, AQ Austria is seeking confirmation of full membership in ENQA. Furthermore, this also serves as basis for the request for inclusion in the European Quality Assurance Register for Higher Education (EQAR).

Recognition at the European level is an important goal for AQ Austria. In an evolving European Higher Education Area, quality assurance in higher education is inevitably conducted according to European standards. From the start, AQ Austria has given itself an international profile and deemed it very important at the European level to participate in the development of external quality assurance and to work together with other quality assurance agencies and stakeholders.

With this report, AQ Austria aims to demonstrate the ways in which it applies the ESG to its activities within Austria and at an international level. Additionally, the report makes an assessment of the agency's strengths and challenges.

This self-evaluation report has been drawn up during the start-up phase of the agency. Three former, internationally recognized Austrian organizations: the University of Applied Sciences Council (*Fachhochschulrat, FHR*), the Austrian Accreditation Council (*Österreichischer Akkreditierungsrat, ÖAR*), and the Austrian Quality Assurance Agency (*Österreichische Qualitätssicherungsagentur, AQA*), were incorporated and merged into the Agency for Quality Assurance and Accreditation Austria in the early summer of 2012.

Up until July 2013, AQ Austria carried out its external quality assurance processes on the basis of provisional procedural rules, while simultaneously revising all the regulations of the local Austrian accreditation and audit processes, developing the criteria and guidelines for accreditation processes outside of Austria, and merging the secretariats of the three aforementioned organisations.

AQ Austria gladly accepted this challenge, because it offered the possibility of ascribing a central importance to international perspectives during the start-up phase of the agency. This had already been the case with the external assessment by the German Accreditation Council, following the Winter 2012/13 proceedings, which certified AQ Austria – thus enabling it to conduct accreditation processes in Germany. At the same time, it is regrettable that AQ Austria has not been able to produce a significant level of documentation relating to already completed activities, and that it was not in a position to obtain the amount of feedback usually expected in such a process because of the low number of the already accomplished processes. However, the agency is happy to address its strengths and challenges in this report in a self-critical way and to use the external review in order to obtain recommendations and suggestions from international experts for the further development of the agency and its processes.

We would like to thank all parties involved in the self-evaluation process and the creation of this self-evaluation report. These individuals are members of our own agency bodies, employees of the agency, and other relevant external stakeholders, whose cooperation we especially appreciate.



Professor Dr. Anke Hanft

President of the Board



Dr. Achim Hopbach

Managing Director

## 2 Aims of the external assessment

On April 23, 2012 ENQA granted the Agency for Quality Assurance and Accreditation Austria (AQ Austria) full membership for a period of two years, a status that had been carried over from two of the three predecessor organizations: the University of Applied Sciences Council (FHR) and the Austrian Accreditation Council (ÖAR). <sup>1</sup> In order to receive confirmation of full membership, AQ Austria is required to submit an external evaluation within a two-year period. The purpose of this external evaluation is an assessment of the correct and appropriate implementation and application of parts 2 and 3 of the ESG, and based on these findings to be able to request full membership status from ENQA.

AQ Austria is a young agency, yet it has been able to establish itself based on the many years of experience inherited from its predecessor organisations. AQ Austria would like to use this external evaluation in order to measure the agency's progress since the merger and obtain advice for its further development.

AQ Austria therefore asks the panel experts to pay special attention to the questions posed in the annotations to Standard 2.4 and Standard 3.2, regarding the way in which the agency should see its double role: On the one hand it is a regulatory body carrying out accreditation processes, and on the other hand it is an agency that sees its purpose in supporting higher education institutions in improving quality. This especially holds true when considering the convergence of both of these roles in the sector of universities of applied sciences and in particular in the audits carried out in that sector.

This external evaluation also serves as the basis for the request for inclusion in the EQAR register.

## 3 The Self-Evaluation process

The creation of AQ Austria's self-evaluation report is based on a process of self-reflection both within the Board and within the secretariat, in which relevant external stakeholders have been involved. The Board used this self-reflection process in order to assess the young agency's strengths and challenges by looking at its state of development, and to implement initiatives that support the agency's continued development.

The Board began the process at a meeting on April 10, 2013 with a brainstorming session and created a working group consisting of the following people:

- Julian Hiller
- Christina Rozsnyai, M.A., M.L.S.
- Dr. Peter Schlögl
- Univ. Prof. Dr. Hannelore Weck-Hannemann

<sup>1</sup> AQ Austria's predecessors retained ENQA membership during the transitional period.

This working group was supplemented by working group within the secretariat which was made up of the following members,

- Dr. Achim Hopbach
- Mag. Daniela Wanek
- Dr. Maria E. Weber

The latter produced a rough draft of the self-evaluation report which was then completed with the participation of all colleagues. The AQ Austria Board first discussed the application and implementation of the ESG at its meeting on July 11, 2013. In its meeting on September 3, 2013, the Board discussed the first draft of the report. This report was discussed at a workshop on October 7, 2013 with some of the most important stakeholders (uniko, FHK, ÖPUK, ÖH, BMWF), and was adopted officially at the Board meeting on November 27, 2013, taking also the opinions of the Governing Committee into consideration. Throughout these discussions, the identification of strengths and challenges was the main focus.

## 4 AQ Austria in the national context

### 4.1 The Austrian Higher Education System

#### 4.1.1 Higher Education Institutions

The Austrian higher education system in summary<sup>2</sup>:

- 22 public universities  
Based on the 2002 University Act<sup>3</sup> these are automatically recognized (accredited) institutions. Academic research, the development and improvement of the arts, as well as research-led academic teaching constitute the strategic duties of public universities, which aim to create new academic knowledge and fields.
- 21 private universities sustained by private means with state accreditation. According to the University Accreditation Law of 1999<sup>4</sup> the private universities align their activities with the principle of freedom of scientific research, freedom of artistic creativity, the transfer of arts and its teaching, the connection between research and teaching, and the diversity of academic and artistic theories, methods and scientific doctrines.
- 11 universities of applied sciences, sustained by private and state subsidised providers or public providers, with state accreditation. The basis is the Federal Act on Universities of Applied Sciences Degree Programmes of 1993<sup>5</sup>. The main task of universities of applied sciences (FH) is to provide hands-on education at higher education level, which equips students with skills in respective field at an acceptable

<sup>2</sup> [http://www.bmwf.gv.at/fileadmin/user\\_upload/wissenschaft/naric/DS\\_punkt8.pdf](http://www.bmwf.gv.at/fileadmin/user_upload/wissenschaft/naric/DS_punkt8.pdf)

<sup>3</sup> Federal Act on the Organisation of the Universities and their Studies (Universities Act 2002), BGBl. I 2002/120.

<sup>4</sup> Federal Act on the Accreditation of Educational Institutions as Private Universities (University Accreditation Act - UniAkkG), BGBl. I 1999/168.

<sup>5</sup> Federal Act on University of Applied Sciences Degree Programmes (University of Applied Sciences Studies Act - FHStG), BGBl. I 1993/340.

academic level, to meet the necessary requirements of practical work, and to support the freedom to choose one's own education path and to support the occupational flexibility of graduates.

- the university colleges of teacher education, sustained by the state or through private means with state accreditation.
- the philosophy and theology universities, supported by the Catholic Church.

With the Danube University Krems (DUK), Austria has its own public university for postgraduate education, whose structure largely corresponds with that of public universities<sup>6</sup>. The Austrian university colleges of teacher education were the last to obtain university status<sup>7</sup>.

In 2006 the Institute of Science and Technology Austria (IST Austria)<sup>8</sup> was established, with its main task being the development of new fields of research and the post-graduate education in the form of PhD programmes and postdoctoral programmes.

Currently (as of the Winter Semester 2012) roughly 300,000 students are enrolled in public universities (including the Danube University Krems). Furthermore around 41,000 students are enrolled in universities of applied sciences and around 7,300 students are enrolled in private universities.<sup>9</sup>

#### 4.1.2 The Degree System

In Austria there are two parallel systems for regular degree programmes: the 'traditional' system is unrelated to the Bologna Process and the three-cycle-system with Bachelor, Master and Doctoral programmes<sup>10</sup>:

In the 'traditional' system, public and private universities as well as universities of applied sciences offer *Diplom* programmes (an older long-cycle type of higher education qualification), which, when passed, guarantees admission into a doctoral programme. The *Diplom* degree is usually granted from universities after completing studies consisting of 240 to 360 ECTS credits and from universities of applied sciences after completing 240 to 300 ECTS credits.

Since implementing the Bologna Process in Austria, all types of higher education institutions offer Bachelor programmes consisting of 180 ECTS credits. At the Master level, the credits amount to 120 ECTS at universities and 60 to 120 ECTS at universities of applied sciences.

"The Bearer of these *Diplom* qualifications or Master degrees (including those from the universities of applied sciences) are entitled to admission in a doctoral programme at a university. The doctoral qualification "Doctor in ..." or "Doctor of Philosophy" ("PhD") will be issued after at least three years of study<sup>11</sup>."

6 Bundesgesetz über die Universität für Weiterbildung Krems (DUK-Gesetz 2004), BGBl. I 2004/22.

7 Bundesgesetz über die Organisation der Pädagogischen Hochschulen und ihre Studien (Hochschulgesetz 2005), BGBl. I 2006/30.

8 Bundesgesetz über das Institute of Science and Technology - Austria, BGBl. I 2006/69.

9 [https://oravm13.noc-science.at/apex/f?p=103:6:0::NO::P6\\_OPEN:N](https://oravm13.noc-science.at/apex/f?p=103:6:0::NO::P6_OPEN:N)

10 [http://www.bmwf.gv.at/fileadmin/user\\_upload/wissenschaft/naric/DS\\_punkt8.pdf](http://www.bmwf.gv.at/fileadmin/user_upload/wissenschaft/naric/DS_punkt8.pdf)

11 [http://www.bmwf.gv.at/fileadmin/user\\_upload/wissenschaft/naric/DS\\_punkt8.pdf](http://www.bmwf.gv.at/fileadmin/user_upload/wissenschaft/naric/DS_punkt8.pdf)



In addition to the aforementioned internationally comparable qualifications, there are also Austrian-specific programmes, which at universities are called a 'university course' (Universitätslehrgang), or at universities of applied sciences a 'course for further education' (Lehrgang zur Weiterbildung), and a 'higher education programme' (Hochschullehrgang) at university colleges of teacher education. University colleges of teacher education don't offer Master programmes.

#### 4.1.3 External Quality Assurance

In July 2011, the Parliament of the Republic of Austria adopted the quality assurance framework law<sup>12</sup> (*Qualitätssicherungsrahmengesetz, QSRG*) for the reorganisation of external quality assurance and accreditation in Austria. The aim of this law is to create a cohesive frame of reference contributing to the strengthening of mutual trust and mutual recognition between the three higher education sectors. With the further development of the framework of external quality assurance, an improvement in the permeability between the three higher education sectors should also occur.

Until then, external quality assurance was characterized by a sector-specific configuration, both in institutional terms as well as procedurally. In 1993, as a result of the Federal Act on Universities of Applied Sciences Degree Programmes (FHStG) the Universities of Applied Sciences Council (FHR) was the first organisation for external quality assurance in Austria, established as an independent agency<sup>13</sup>. Its most important tasks were the accreditation of degree programmes and the evaluation of institutions, the awarding of academic degrees and the recognition of foreign academic qualifications, the safeguarding of educational standards by the monitoring of degree programmes, promoting the quality of teaching and learning as well as innovations in the universities of applied sciences sector, the monitoring and development of the universities of applied sciences sector in the educational and occupational system as well as advising the responsible federal ministries and the national parliament regarding questions relating to the universities of applied sciences, the drafting of the yearly report for the responsible federal ministries about the development of degree programmes, and the assessment and evaluation of statistical information regarding the universities of applied sciences sector. The Universities of Applied Sciences Council was a founding member of ENQA.

For private universities, the Austrian Accreditation Council (ÖAR) was founded in 1999 based on of the Federal Act on the Accreditation of Education Institutions as Private Universities (University Accreditation Act – UniAkkG 1999<sup>14</sup>). The ÖAR was an independent agency responsible for the accreditation of private universities and their degree programmes and the supervision of the accredited private universities. Just like the FHR, the ÖAR belonged to ENQA from the time it was founded.

Public universities were required to establish quality management systems for quality and performance assurance according to the Federal Act on the Organisation of Universities and their Studies (Universities Act 2002 – UG)<sup>15</sup>. The same also applies to the Danube University

<sup>12</sup> Act on Quality Assurance in Higher Education (HS-QSG) (Appendix 1); BGBl. I Nr. 74/2011

<sup>13</sup> BGBl. I Nr. 340/1993 in the version currently in force

<sup>14</sup> BGBl. I Nr. 168/1999, in the BGBl. version. I Nr. 54/2000

<sup>15</sup> BGBl. I Nr. 120/2002 in the version currently in force

Krems (DUK) according to the Federal Act on the Danube University Krems (DUK Act 2004)<sup>16</sup>. The Austrian Quality Assurance Agency (AQA) was founded in 2004 to conduct external evaluations. However, at that time, there was no obligation in terms of external quality assurance. The AQA carried out numerous processes in the fields of quality audits for internal university quality management systems, evaluation, certification, and accreditation of degree programmes across various study areas and institutions, as well as system analyses and consulting projects, and also published studies. The AQA was also a full member of the ENQA.

### External Quality Assurance at Higher Education Institutions according to HS-QSG

Sectors	Programme Accreditation		Institutional (Re-) Accreditation	Audit	Reporting System
	Degrees	Courses			
<b>Private Universities</b>					
<b>Universities of applied sciences</b>					
<b>Public Universities, Danube University Krems</b>					

Since the new HS-QSG came into force public universities must obtain certification of their internal quality management system through a quality audit process every seven years. The certification decisions are not linked to any direct legal or financial consequences. The universities can commission AQ Austria or another internationally recognised organisation (for example, an organisation recognized by EQAR) and/or independent agencies to carry out the audit.

Private universities have to be accredited institutionally by AQ Austria every six years. New degree programmes created in the interim period must also undergo accreditation; however, there is no programme re-accreditation because they are a part of the institutional reaccreditation.

The same rules are applied to universities of applied sciences as for private universities, except that institutional re-accreditation only occurs once and thereafter they enter the audit system. However the validity of the accreditation status depends on a positive certification from the audit process.

<sup>16</sup> BGBl. I Nr. 22/2004 in the version currently in force

## 4.2 AQ Austria - Overview

The Agency for Quality Assurance and Accreditation Austria was founded in 2011 as part of the restructuring of the external quality assurance system in Austria. As an essential component of the restructuring three former quality assurance organisations were merged and transformed into AQ Austria as a new sector-spanning and independent agency.<sup>17</sup>

According to its legal mandate, AQ Austria is responsible for all post-secondary higher education institutions in Austria (public universities, universities of applied sciences, private universities, with the exception of university colleges of teacher education, the Institute of Science and Technology Austria (IST Austria) and the universities for philosophy and theology)<sup>18</sup>. The agency's remit comprises a large array of legally regulated functions in the field of external quality assurance, which encompasses the accreditation of higher education institutions and their programmes (private universities and universities of applied sciences), audits of the internal quality management systems (public universities and universities of applied sciences) consultancy, studies and system wide analyses as well as carrying out audits at non-Austrian higher education institutions. However, the registration of programmes offered by non-local providers is not a function of AQ Austria but rather of the ministry.<sup>19</sup>

Along with AQ Austria, there are further actors involved in the field of quality assurance. In 2013 the Quality Assurance Council for Teacher Education, which is responsible for quality assurance at university colleges of teacher education and teacher education programmes, was established. Furthermore the Office of the Ombudsman, which is also regulated by HS-QSG, has existed since 2012 and is responsible for handling students' complaints. There are no mandatory external quality assurance processes for IST Austria or the Philosophy-Theology Universities.

AQ Austria has given itself an international profile and is active in continuing the international activities of its predecessor organisations, especially in Germany and the Balkans. As successor of the ÖAR and FHR, AQ Austria is a full member of the European Association for Quality Assurance in Higher Education (ENQA) and other international networks. Its area of operations encompasses Austria and other European countries.

### Organisational Structure

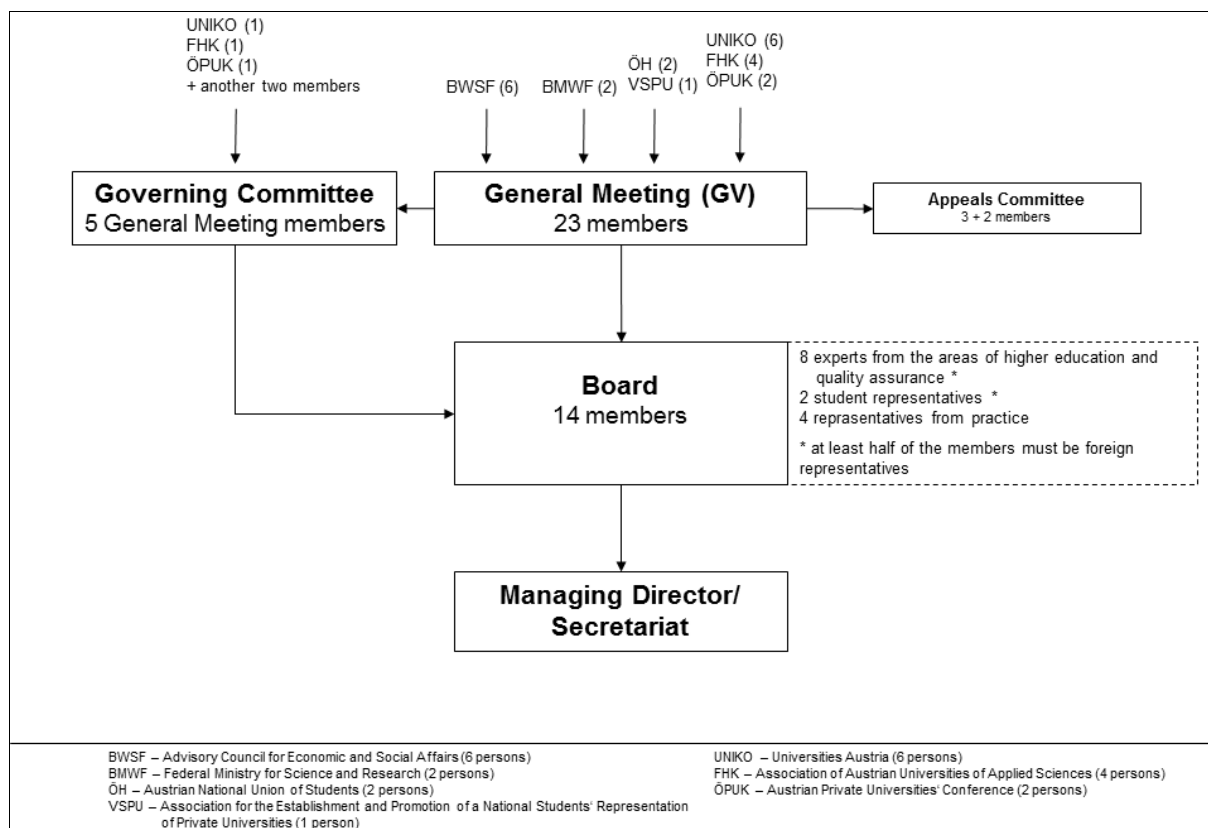
The Agency for Quality Assurance and Accreditation Austria is incorporated under public law<sup>20</sup>. Its bodies, their powers and composition are legally determined by the HS-QSG. The law is based upon the principle of bringing independent expertise and stakeholder participation together with a strong international component. This feature of AQ Austria can be clearly seen within its organisational structure.

17 HS-QSG

18 § 1 Abs. 1 HS-QSG

19 § 27 HS-QSG

20 § 3 Abs. 2 HS-QSG



The relevant interest groups are represented in the General Meeting, and one of its most important tasks is the nomination of ten of the fourteen members of the Board. In the five-person Governing Committee, which is also elected by the General Meeting, all three of the higher education sectors are represented<sup>21</sup> as well as other stakeholders. The Governing Committee has a primarily advisory function in terms of the design of quality assurance processes as well as the operative tasks of the agency. At least 45% of the members of all agency bodies must be women.

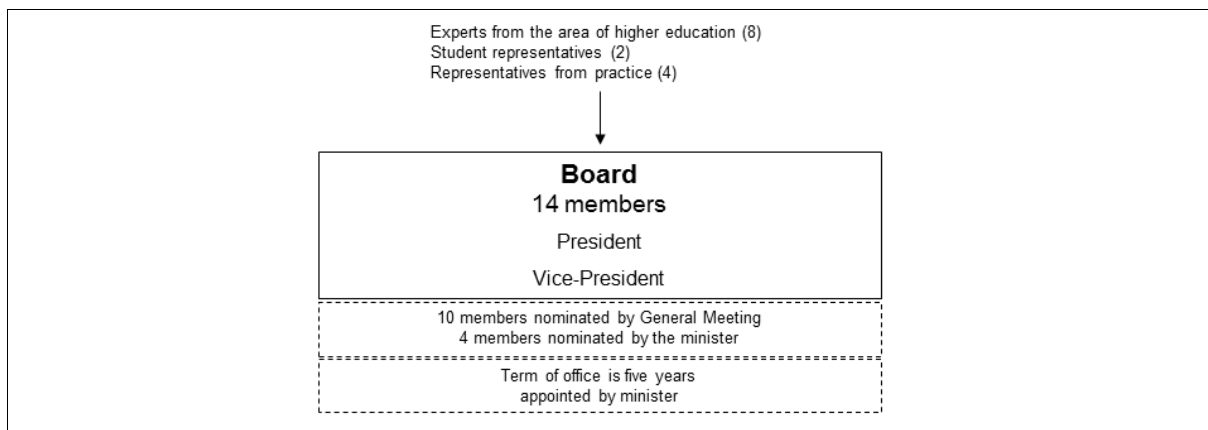
The implied powers, the appointment processes, and the composition of the bodies of AQ Austria will be described in the following section.

## Board

The Board is the central independent decision-making body of AQ Austria. This committee of experts is in particular responsible for all decisions regarding accreditation and certification, procedural guidelines and standards, supervision responsibilities vis-à-vis accredited educational institutions in Austria, and the publication of results of quality assurance processes, as well as for the organisation of the agency<sup>22</sup>. Because of the various types of quality assurance processes, the Board possesses regulatory as well as non-regulatory competencies.

<sup>21</sup> § 5 Abs. 1 HS-QSG

<sup>22</sup> § 9 paragraph 1 HS-QSG



As per paragraph 6 of the HS-QSG, the Board is made up of fourteen members, of that:

- eight members, who are experts from the field of higher education and who must possess academic qualification and experience in the field of quality assurance. The members must represent different sectors of higher education. At least half of them must be foreign members.
- two members should be student representatives; of the two one from abroad.
- four members from the professional practical field with expertise in national and international higher education, experience in university-related occupational areas and the ability to judge matters of quality assurance.

The term of office is five years with the possibility of one reappointment. The members of the Board elect a President and a Vice-President for a term of five years<sup>23</sup>. The President chairs the Board and the agency and also represents the agency in public<sup>24</sup>.

The Board must meet non-publically at least two times a year, and in reality meets about seven times a year, one to two of those meetings are two days long. For decision-making it is required that at least ten members are present, whereby at least eight members have to vote in favour of a proposal in order for it to be approved<sup>25</sup>. The voting weight for all members is equal.

Currently the Board is made up of the following people (term of office in parenthesis)<sup>26</sup>:

#### Experts from the field of higher education

- Univ. Prof. Dr. Anke Hanft, President of the Board (University of Oldenburg, Germany)
- Univ. Prof. Dr. Wolfgang Mazal, Vice-President of the Board (University of Vienna)
- PhD Peter Findlay, MA (QAA, UK)
- Univ. Prof. Dr. Ada Pellert (Berlin University for Professional Studies, Germany)

<sup>23</sup> § 7 HS-QSG

<sup>24</sup> Rules of procedure of the Board (Appendix 2.1); see also § 10 paragraph 1 HS-QSG

<sup>25</sup> § 8 HS-QSG

<sup>26</sup> Curriculum vitae of all members of the Board (Appendix 8.1)

- Christina Rozsnyai, M.A., M.L.S. (Hungarian Accreditation Commission, Hungary)
- Mag. Dr. Ferry Stocker (University of Applied Sciences Wiener Neustadt)
- Univ. Prof. Dr. Hannelore Weck-Hannemann (University of Innsbruck)
- Univ. Prof. Dr. Hans Weder (University of Zurich, Switzerland)

#### Students

- Julian Hiller (Leibniz Universität Hannover, Germany)
- Mag. (FH) Karin Schönhofer (University of Vienna)

#### Representatives from the professional field

- Mag. Gudrun Feucht, M.A. (Federation of Austrian Industries)
- Mag. Martha Eckl (Chamber of Labour)
- Mag. Thomas Mayr (Institute for Research on Qualifications and Training of the Austrian Economy)
- Dr. Peter Schlögl (Austrian Institute for Research on Vocational Training)

### **Governing Committee**

The Governing Committee is the strategic advisory body. It consists of five members who are elected from the General Meeting<sup>27</sup>. There is one member respectively representing the public university sector, the private university sector and the sector of the universities of applied sciences<sup>28</sup>, furthermore students and the professional field are also represented. The members serve a five-year term and reappointments are allowed. The Committee exercises its advisory function through communicating informed views<sup>29</sup>, especially with regard to the procedural guidelines and standards of the agency as well as regarding financial planning, progress reporting, job applications and the rules of operation. The structure ensures that stakeholders are systematically integrated in the continued development of quality assurance processes. In contrast to the Board, the members here function as representatives of the respective organisations from which they are sent. The Governing Committee meets at least two times a year. Annex 3 gives information regarding the individual members of the Governing Committee.

### **General Meeting**

In the General Meeting, which meets at least two times a year, the essential interest groups are represented. These interest groups include<sup>30</sup>:

- The Advisory Council for Economic and Social Affairs (six representatives),
- The Austrian National Union of Students (two representatives),
- The Association for the Establishment and Promotion of a Nationwide Students' Representation of Private Universities (one representative),
- The Universities Austria (six representatives),

27 § 5 paragraph 1 HS-QSG

28 § 12 paragraph 2 HS-QSG

29 § 5 paragraph 2 HS-QSG

30 § 11 paragraph 1 HS-QSG

- The Association of Austrian Universities of Applied Sciences (four representatives),
- The Austrian Private Universities' Conference (two representatives),
- The Federal Ministry for Science and Research (two representatives)

The representatives are appointed by the federal minister at the suggestion of the respective organisations for a period of five years and reappointments are allowed. The General Meeting elects a chairperson directly from the group.

Duties of the General Meeting are, in particular, the election of the Governing Committee, the nomination and appointment of the Appeals Committee, and the nomination of the members of the Board<sup>31</sup>, who need to be accepted by way of a two-thirds majority vote<sup>32</sup>. All other decisions are made by a simple majority vote, assuming that at least fifteen members are present<sup>33</sup>. Annex 4 lists the current membership of the General Meeting.

### **Appeals Committee**

The Appeals Committee is responsible for dealing with appeals from higher education institutions contesting the accreditation process and certification decisions<sup>34</sup>. The Appeals Committee consists of two Austrian and two foreign members coming from higher education institutions with expertise in the field of quality assurance and with legal qualifications, as well as, in the case of a conflict of interest, one Austrian and one foreign substitute member<sup>35</sup>. They are appointed for a period of three years by the General Meeting with the possibility of reappointment<sup>36</sup>. The members are not allowed to belong to any other body of the agency, and they must operate without instruction<sup>37</sup>. The Committee makes decisions based on a simple majority vote<sup>38</sup>. For a list of the members of the Appeals Committee, see Annex 3.4.

### **Secretariat**

The secretariat of AQ Austria<sup>39</sup> is led by the managing director, who handles the day-to-day business of the agency. The secretariat, based on the broad legal mandate of the agency is subdivided into four departments, each of which is led by a department manager. Currently 26 people (22,4 FTE) are employed.

The employees have qualifications and work experience in teaching, research, university management, university research and quality assurance.<sup>40</sup>

31 § 12 Abs. 1 HS-QSG

32 § 7 Abs 2 HS-QSG

33 § 12 Abs 2 HS-QSG

34 Rules of Procedure of the Appeals Committee (Appendix 2.2); see also § 13 HS-QSG

35 § 13 Abs 2 HS-QSG

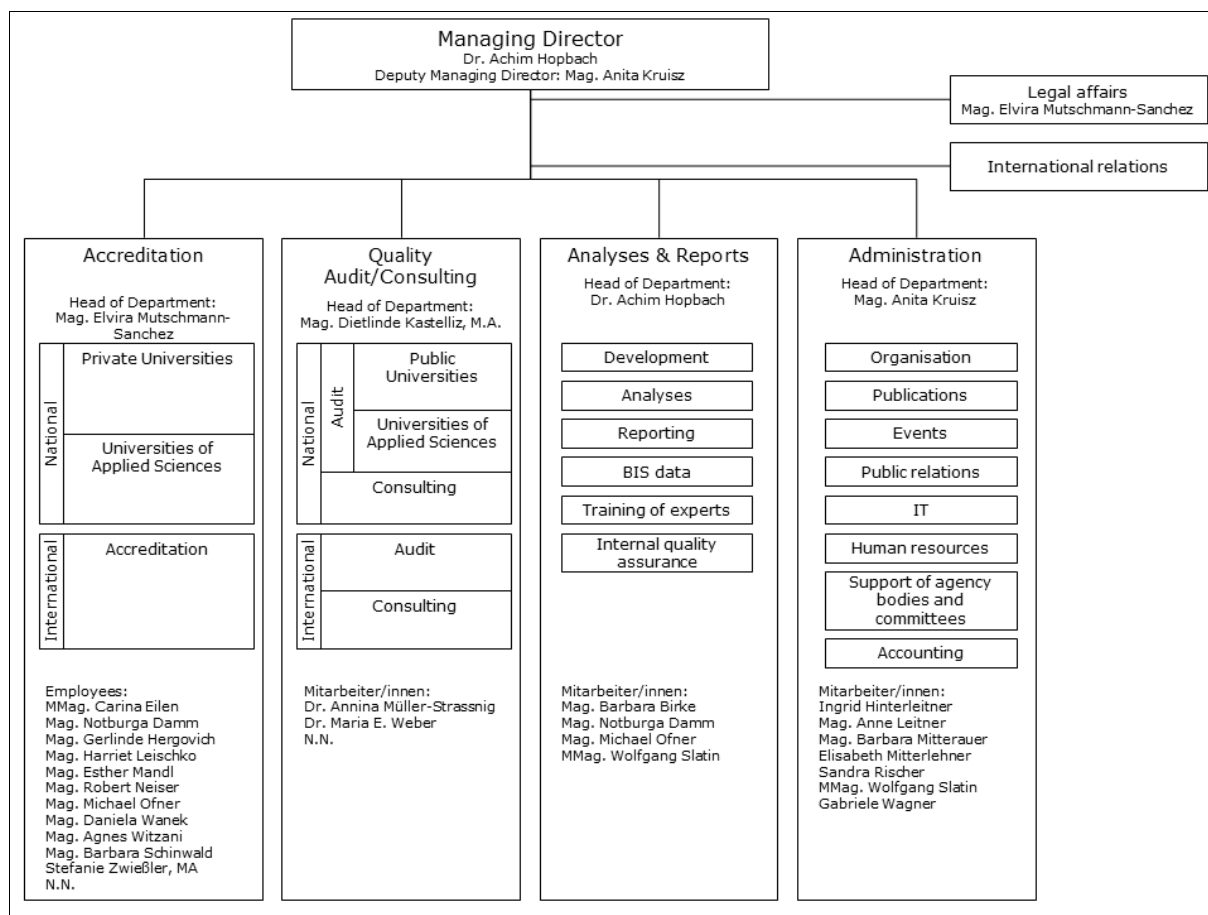
36 § 13 HS-QSG

37 § 13 Abs 4 HS-QSG

38 Rules of Procedure of the Secretariat (Appendix 2.3); see also §13 Abs 7 HS-QSG

39 Rules of Procedure of the Secretariat (Appendix 2.3))

40 Curriculum vitae of the employees of the Secretariat (Appendix 8.2)



The following tasks of the employees are weighted differently depending on the type of accreditation process at hand:

- The provision of information regarding questions of quality assurance (via communication with higher education institutions, participation in events, publications)
- The design and development of methods and processes of external quality assurance
- Research about existing methods and standards
- Development of procedural guidelines
- Coordination of quality assurance processes
- Provision of methodology and content to experts/advisors
- Coordination and moderation of follow-up processes

Employees are responsible for the individual processes of the agency. They are also the contact persons for the higher education institutions.



## 5 Evaluation against the ESG, part 2 and ESG, part 3

### Standard 2.1. Use of internal quality assurance processes

#### Standard:

External quality assurance processes 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 processes are carefully evaluated in the course of external processes, 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.

#### AQ Austria compliance

AQ Austria is committed to contributing to the quality development of higher education institutions (see AQ Austria Mission Statement<sup>41</sup>). By taking into account the internal quality management systems of higher education institutions, AQ Austria wants to ensure and document that these systems correspond with high national and international standards and that they improve the quality of higher education provision.

The effectiveness of internal quality assurance of a higher education institution inevitably plays a central role in the quality enhancement of the respective institution and therefore AQ Austria always takes this into consideration in all of its quality assurance processes, this appears in various ways depending on the type of process:

- **Audit:** The audit shows the effectiveness of the internal quality assurance of the institution that is being evaluated by having external experts assess the organisation and its implementation of the internal quality management system.<sup>42</sup>
- **Accreditation in Austria:** In institutional accreditation of universities of applied sciences and private universities as well as in programme accreditation the presence and the effective implementation of internal quality management in accordance with ESG 1.1 is a mandatory topic, as stipulated in paragraphs 14 (8) (assessment). The other elements of ESG Part 1 are also mandatory topics, as stipulated e.g. in § 17 (1) h (examination methods, in accordance with ESG 1.3); in § 14 k – n (recruitment procedure and further training of the staff, in accordance with ESG 1.4); in § 14 (8) c (use of information systems, in accordance with ESG 1.6); in § 14 (5) e – j, (6) i – m, § 17 (2) and (4) (resources, in accordance with ESG 1.5).<sup>43</sup>

41 Mission statement (Appendix 4.1)

42 Guideline for the Audit of Higher Education Institutions' Quality Management Systems (Appendix 5.1)

43 Decree on Accreditation of Private Universities and Decree on Accreditation of Universities of Applied Sciences (Appendix 5.2 and 5.3)

- Amendments to accreditation decisions of existing degree programmes have to be examined by AQ Austria, and the agency determines the appropriate process to be implemented<sup>44</sup>. For the decision about which procedural steps to follow, the effectiveness of internal quality assurance plays an important role.
- In international accreditation of Bachelor, Master and PhD programmes, the evaluation of internal quality assurance is established in Standard 3.<sup>45</sup>
- In program accreditation processes in Germany, quality assurance and development are integral components of the process, as outlined in criteria 9.<sup>46</sup>
- System accreditation: In system accreditation processes at German higher education institutions – similar to the audit – the quality assurance system as it relates to the area of learning and teaching (*Studium und Lehre*) is examined.<sup>47</sup>

Hence, measures of internal quality assurance are examined in the initial accreditation as well as in the re-accreditation of an institution. These measures play a decisive role in the accreditation of the institution and its degree programmes. Especially in re-accreditation processes, the actual effectiveness of the quality management system is in the focus. In the case of accreditation processes at universities of applied sciences, it becomes particularly clear what role the level of development and the effectiveness of internal institutional quality assurance plays in AQ Austria's accreditation processes. After one successful re-accreditation the institution is not required to undergo a further re-accreditation. Instead, and in recognition of the continued improvement of internal quality assurance, an audit procedure is carried out to determine whether comprehensive internal quality management systems are in place and are being effectively used.

AQ Austria possesses a substantial source of information about the internal quality assurance processes of the higher education institutions. This is due to its legally defined task in the field of analyses and reports, and especially because of the regular submission of quality assurance status reports to AQ Austria by Austrian higher education institutions. This information makes it possible to analyse the development and results of internal quality assurance and to use the results for the further development of the agency's process, as well as to allow for discussion in the professional public sphere. The yearly analysis of the annual reports of private universities and universities of applied sciences contributes to this.

In its work, AQ Austria benefits from the many years of experience gathered by its three predecessor institutions. As things now stand, thanks to the broad scope of the legal remit of AQ Austria, and through the wide-ranging experience gained from the respective processes it has implemented, the agency can grasp a great opportunity in moving forward with the design and development of its quality assurance processes.

44 § 12 Decree on Accreditation of Private Universities (Appendix 5.2) and § 12 Decree on Accreditation of Universities of Applied Sciences (Appendix 5.3)

45 Guideline International Accreditation of Bachelor, Master and PhD Programmes (Appendix 5.6)

46 Leitfaden Programmakkreditierung (Appendix 5.7)

47 Leitfaden Systemakkreditierung (Appendix 5.8)

## Standard 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 processes to be used.

### Guidelines:

In order to ensure clarity of purpose and transparency of processes, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The processes 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 processes to be used.

As external quality assurance makes demands on the institutions involved, a preliminary impact assessment should be undertaken to ensure that the processes to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

### AQ Austria compliance

The purposes of the quality assurance processes carried out by AQ Austria is defined by the agency based on the corresponding legal provisions<sup>48</sup>. (Also see the notes about Standard 2.1)

While these legally determined purposes were being translated into regulations, AQ Austria recognised that cooperation with the interest groups and especially the higher education institutions was going to be indispensable. AQ Austria invited all relevant actors participated in the development of the new quality assurance processes (audits, institutional accreditation and programme accreditation) in a comprehensive, multilevel process.

Concerning the participation of interest groups in shaping policy, the agency is able to confirm that the also composition of the Board provides a solid foundation that allows for a broad array of national and international perspectives. Just the fact alone that the Board membership is composed of a variety of experts, who offer experience in and views on quality in higher education from the context of their own specific background, makes it possible for the agency to do justice to the multidimensional character of quality at higher education institutions. The inclusion of very diverse informed experts in their personal capacity and not as representatives of the 'official' positions of any interest groups proved itself in the start-up phase of AQ Austria. This will lay the foundation for further policy development work of the agency.

However it goes without saying that the representation of a broad spectrum of expertise cannot and should not replace the institutionalized and formal participation of the relevant stakeholder, in particular as regards the design of the processes. Hence, as a first step,

<sup>48</sup> HS-QSG, PUG, FHStG, UG 2002

representatives from the three higher education sectors were invited to participate in an informal discussion. This took place during the preparation of the internal rough drafts for the new regulations by the committee made up of members from both the Board and the secretariat. The thinking here was to become familiar with the ideas of the academics as early as possible. As a second step, the sectors were invited to workshops, in which the first drafts of the new regulations were discussed. After further editing, the third step took place in the form of a broad, public consultation with stakeholders, which showed a pleasingly high level of participation and produced further valuable suggestions. Lastly, the Board approved the new regulations on June 14, 2013. The involvement of the stakeholders in the conceptual work was important in the start-up phase of the agency. Subsequently, guidelines for the higher education institutions and for the experts were developed according to the individual processes (these guidelines are currently being edited). The new regulations were presented in public workshops. Another purpose of this presentation was to recognize the higher education institutions' exact information needs.

<b>Timeline for the development of the process</b>		
18.09.2012	Board	Agreement regarding the agency's conception of itself and the purpose of the accreditation processes; basic consideration regarding the development of the processes  Formulation of the work assignments for internal audit and committees
22./23.10.2012	Committees/Board	Specification of work assignments and work processes
Informal consultation with the interest groups	Secretariat	Information about the fundamental positions of the interest groups regarding the to-be-developed processes, especially in relation to differences in processes of the former institutions
20.11.2012	Committees	The creation of the first drafts for the board meeting
14.12.2012	Board	Discussion of the first drafts and recommendations for the further development of the drafts
11./12.02.2013	Committees	The reworking of the board's recommendations for the drafts, version 1
04./05.03.2013	Workshops with the interest groups of the three sectors of higher education	Consultation with the interest groups about the drafts, version 1

21.03.2013	Committees	Reworking of the results of the workshop
10.04.2013	Board	Decision-making regarding the drafts, version 2
15.04. until 13.05.2013	Public consultation processes with participation of interest groups from the three sectors of higher education, the students, the social partners, and the state authorities	Statement regarding the drafts, version 2
23.05.2013	Board	Discussion of the statements
14.06.2013	Board	Decision-making regarding the new regulations and guidelines (drafts, version 3)
28.06.2013	Public presentation of the new procedural guidelines	Discussion about interpretations and design

AQ Austria assesses this process involving broad participation in its conceptual work as being very complex but also indispensable in order to be able to adjust the quality assurance processes according to the actual realities in the higher education institutions and in order to generate the higher education institutions' understanding about the specific process design.

During the time between the foundation of the agency and the approval of the new regulations, AQ Austria conducted its quality assurance processes based on the transitional regulations, which were passed in March 2012. They were the only rules valid until that point and were adapted only as far as it was necessary in accordance to the new law.

The other accreditation processes carried out by AQ Austria, like system accreditation in Germany and programme accreditation in Germany and international accreditation processes correspond to those processes in Austria and were developed at the same time. Whereby, for the processes in Germany, the standards of the German Accreditation Council<sup>49</sup> were also observed.

49 Accreditation Council: Rules for the accreditation of Study Programmes and for System Accreditation, Resolution of the Accreditation Council on 08.12.2009, last amended on 20.02.2013 Drs. AR 20/2013 ([http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/en/AR\\_Regeln\\_Studiengaenge\\_en\\_aktuell.pdf](http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/en/AR_Regeln_Studiengaenge_en_aktuell.pdf))

## Standard 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 consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

### AQ Austria compliance

Quality assurance processes of AQ Austria according to the HS-QSG are formal processes carried out by independent external experts, to determine the conformity of educational institutions and study programmes, or the quality management system of the educational institution to pre-defined and publicly available standards<sup>50</sup>. For this reason, it is imperative that the assessment criteria (and also all other regulations) are defined beforehand and publically known.

The Board of AQ Austria therefore enacted the following regulations, guidelines and manuals for the quality assurance processes it carries out:

- Decree on Accreditation of Universities of Applied Sciences (decided at the 14<sup>th</sup> meeting of the board on June 14, 2013)<sup>51</sup>
- Decree on Accreditation of Private Universities (decided at the 14<sup>th</sup> meeting of the board on June 14, 2013)<sup>52</sup>
- Guideline for the Audit of Higher Education Institutions' Quality Management Systems (decided at the 14<sup>th</sup> meeting of the board on June 14, 2013)<sup>53</sup>
- Guideline International Accreditation of Bachelor, Master and PhD Programmes (decided at the 15<sup>th</sup> meeting of the board on July 11, 2013)<sup>54</sup>
- Guidelines for the system accreditation process and guidelines for the programme accreditation in Germany according to the rules of the Accreditation Council (decided at the 16<sup>th</sup> meeting of the board on September 3, 2013)<sup>55</sup>

All of AQ Austria's rules, regulations and guidelines are published on the agency's website.

In order to ensure consistent application of the assessment criteria, AQ Austria has placed an important focus on adequately preparing its panel experts. On the one hand, in the

50 § 2 Paragraph 2 HS-QSG as well as the notes

51 Decree on Accreditation of Universities of Applied Sciences (Appendix 5.3)

52 Decree on Accreditation of Private Universities (Appendix 5.2)

53 Guideline for the Audit of Higher Education Institutions' Quality Management Systems (Appendix 5.1)

54 Guideline International Accreditation of Bachelor, Master and PhD Programmes (Appendix 5.6)

55 Leitfaden Programmakkreditierung (Appendix 5.7) and Leitfaden Systemakkreditierung (Appendix 5.8)

preliminary stages and at the beginning of the process they are familiarised with the procedural guidelines and criteria. (with regard to this, see Chapter 4, Standard 2.4). On the other hand, the secretariat plays an important role in the preparation and during the site visits, in the drafting of the experts' report and in the preparation of the Board decision. In particular the coordinators who are overseeing the process have the task of making sure the assessments are complete and also have to ensure that the criteria are being utilised properly. Concerning this, they intervene in the assessment in a moderating role and support the chairperson of the expert team, without taking any decisions themselves in the process. The coordinators are also subject to an extensive, internal training, in which the development of a common understanding of the regulations is especially encouraged. Here again, it is apparent how advantageous it is for AQ Austria to be able to resort to the experiences of the three former organisations, because in the course of the training activities, the positive elements from the former organisations can be incorporated into a common approach.

The board takes a central leading role in order to provide for consistent decision-making practice. Thereby it can, partly tie in with the decision-making practice of the former institutions. To support consistent decision-making practice the agency is currently working on the creation of an internal database of precedents. In spite of these measures, AQ Austria views it as a constant challenge for all persons involved (panel experts, employees, members of the board) to share common interpretations, and moreover, for these interpretations to be properly communicated to the higher education institutions and interest groups. Admittedly this is a typical challenge for new agencies and in the case of AQ Austria, there is also the distinct feature that there was a long-term assessment and decision-making practice in the three former organisations, which could not be adopted without some changes, because the assessment criteria had partially changed. Precisely where the differences are not so vast, it is a particular challenge for AQ Austria to make these changes transparent to the higher education institutions. The experience gained from the first review processes undertaken shows that the agency must continue with its efforts over the next few years, both in its internal decision-making process and in its public communication, so as to promote the development of fully consistent assessment practice and to convey this publically.

## Standard 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 processes 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 processes 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.

## AQ Austria compliance

### Processes

The detailed design of the various processes is oriented towards their specific purposes. All processes are carried out using the procedural steps conventional in the European Higher Education Area: self-evaluation, peer-review, site visits, report, publication of the results and reports, and follow-up. However, at the micro level they are differentiated from one another, with differences present between the accreditation processes and audits<sup>56</sup>, but also between institutional accreditation<sup>57</sup> and programme accreditation<sup>58</sup>. The difference between the design of accreditation processes on the one hand and audit standards on the other hand is self-explanatory in this context. While the accreditation criteria are designed in such a way as to make yes/no decisions possible, audit standards are designed with a view to the development-oriented focus of these processes. They also form the foundation for

<sup>56</sup> Decree on Accreditation of Private Universities (Appendix 5.2), Decree on Accreditation of Universities of Applied Sciences (Appendix 5.3), Guideline for the Audit of Higher Education Institutions' Quality Management Systems (Appendix 5.1)

<sup>57</sup> §§ 13f Decree on Accreditation of Private Universities (Appendix 5.2) and §§ 13f Decree on Accreditation of Universities of Applied Sciences (Appendix 5.3)

<sup>58</sup> §§ 16f Decree on Accreditation of Universities of Applied Sciences (Appendix 5.3) and §§ 16f Decree on Accreditation of Private Universities (Appendix 5.2)



certification, which can be granted with additional stipulations. The long-term experience of the previous organisations has been especially relevant, for example, in the audit processes where two site visits are carried out. The central focus of the first site visit is to examine the organization of the entire quality management system in the context of the goals and the strategies of the higher education institution. During the second site visit the actual implementation of the quality management system is evaluated in selected spheres of activity.

AQ Austria deviates from the typical procedural design of the assessment process in assessments of requests for amendments of accreditation decisions. For individual cases, the Board decides which procedural steps to take in order to be able to carry out the process appropriately and efficiently for its specific objective. Experts are only appointed and will only carry out site visits when an expert vote on an amendment is deemed necessary. If, for example, the given change is not of great significance or has no apparent effect on quality aspects, i.e., an increase in the capacity to accept only a few more students, the Board decides without engaging experts<sup>59</sup>.

AQ Austria views the configuration of its quality assurance processes as appropriately designed in order to reach the respective immediate objective. Nevertheless, it sees a particular challenge in the configuration or rather the implementation of the audit process in the university of applied science sector, because the law links the audit and the accreditation status together<sup>60</sup>. In line with the legal provisions, a university of applied sciences after a single successful institutional reaccreditation enters into the audit scheme. This means that the developmental dimension and the management capacity of universities of applied sciences become the focal point of external quality assurance and these will no longer be just a one-time snapshot of the quality of learning and teaching (*Studium und Lehre*). The legal specification for audits in the universities of applied sciences sector is, however, that the validity of the accreditation status is linked to the positive result of the audit. The link between these two different procedural objectives potentially exacerbates the fundamental differences in the configuration of both processes in terms of their practical implementation. The experiences of the agency, via their discussions with the universities of applied sciences, and the preparation for the first audit process in this sector made it clear that the trust of the universities of applied sciences must be won over, in order for the institution to be involved with the open and strong self-reflective culture of a development-oriented audit. This is, however, aggravated by the fact that in the case of negative results from the audit the accreditation status is put into question, which could lead to the closure of the institution. The consequence might be a greater level of compliance-oriented behaviour from the side of the university of applied sciences in the audit, which would mean that the objective of the audit has failed.

AQ Austria will pay special heed to the implementation of the first audit processes in the university of applied sciences sector so that the link between the audit and the institutional accreditation does not have negative effects in the implementation of the audit. Should there be, in this respect, the need to make slight modifications, AQ Austria will make these modifications after the analysis of the first process. If it is seen that the consequence of a negative audit are unsuitable in regards to the accreditation status of a university of applied science, AQ Austria will urge for an amendment to the legal regulations.

59 § 12 Decree on Accreditation of Private Universities (Appendix 5.2) and § 12 Decree on Accreditation of Universities of Applied Sciences (Appendix 5.3)

60 § 23 Paragraph 9 HS-QSG

A further legal limitation to procedures lies in the lack of possibility to give conditions in initial accreditation, whereas the law does permit this instrument for institutional re-accreditation.<sup>61</sup> Experiences from institutional re-accreditation and international experience show that the use of conditions in accreditation decisions strengthens the developmental aspect in accreditation processes, which is why AQ Austria will push for an amendment to the law in this case.

When AQ Austria is carrying out system accreditation or programme accreditation in Germany, the accreditation processes follow the criteria set forth by the German Accreditation Council<sup>62</sup>.

The safeguarding and the further development of quality in higher education institutions is a central requirement, which is implemented and conceptualised by AQ Austria according to national and international standards through their accreditation processes.

The criteria for the international accreditation processes for Bachelor, Master and PhD programmes carried out by AQ Austria are oriented towards the guidelines set forth by the Private University Accreditation Act and the FH (University of Applied Sciences) Accreditation Act but disregard specific Austrian requirements. The emphasis is on the correct and appropriate implementation of the Bologna-related instruments such as the Qualifications Framework for the European Higher Education Area, ECTS, the Diploma Supplement and the ESG.<sup>63</sup>

## **Selection of Experts**

In the course of preparation for accreditation and audit processes, the Agency for Quality Assurance and Accreditation Austria stipulates the respective competency profiles for the group of experts as well as its size. The Board makes these decisions on the basis of the respective procedural guidelines and defines the typological composition of the expert panel. The Board's decision is based on a proposal for membership of the panel submitted by the secretariat,<sup>64</sup> drawing on the agency's database of experts as well as other sources.

AQ Austria selects its experts on the basis of their competencies, especially those appropriate for a specific review process. For institutional processes, that means, for example, that the experts have proven experience in the management of higher education institutions and organisations as well as in quality management. Student experts, for example, are recommended from the student pool of the Austrian National Union of Students, which is currently in the start-up phase. Likewise the agency has resort to suggestions made by the European Students' Union (ESU) and the German and Swiss student bodies. What these student bodies have in common is that the participants are very well prepared for their roles as experts. AQ Austria finds professional practitioners through appropriate professional associations and alumni organisations.

61 § 23 Paragraph 8 and § 24 Paragraph 9 HS-QSG

62 Accreditation Council: Rules for the accreditation of Study Programmes and for System Accreditation, Resolution of the Accreditation Council on 08.12.2009, last amended on 20.02.2013 Drs. AR 20/2013 ([http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/en/AR\\_Regeln\\_Studiengaenge\\_en\\_aktuell.pdf](http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/en/AR_Regeln_Studiengaenge_en_aktuell.pdf))

63 Guideline International Accreditation of Bachelor, Master and PhD Programmes, Chapter 1 (Appendix 5.6)

64 Guideline for the Audit of Higher Education Institutions' Quality Management Systems, Chapter 5 (Appendix 5.1) and § 5 Decree on Accreditation of Private Universities (Appendix 5.2) and § 5 Decree on Accreditation of Universities of Applied Sciences (Appendix 5.3)

The panel of experts is internationally comprised, although the agency ensures that the group has sufficient knowledge of the Austrian higher education system and its different branches, since this is absolutely necessary for an assessment. AQ Austria has a database of experts, with roughly 400 people, which is constantly being updated. Luckily the agency can draw upon the contact information for the experts who have previously carried out reviews for the three former institutions.

### **Preparation and Training of the Experts**

The work of the experts is the core component of every quality assurance process. Therefore AQ Austria finds the preparation of the experts to be of utmost importance. The preparation/training of the experts takes place through the following steps:

- The Agency for Quality Assurance and Accreditation Austria will organise general workshops for the training of experts<sup>65</sup>. During these workshops, AQ Austria informs the experts in detail about their roles regarding the process, the procedural regulations and criteria. However, this measure is a financial challenge for the agency, because AQ Austria, as a national agency of a small country, works with experts from abroad, which usually leads to the accumulation of travel costs. Nevertheless the agency endeavours to continually increase the number of experts undergoing such training.
- Experts involved in a specific process initially receive extensive information about the application from the institution that has applied for a review. To that end, a manual with all relevant information about the process and the criteria of the process is provided. These manuals are currently being edited.
- The documentation that the institution prepares itself is provided to the experts at least one month before the preparatory meeting and the site visit.
- The agency produces a draft of the timeline for the site visit, which is adjusted to the preferences of the experts, including the timeframe, the content, and the discussion partners. In preparation for the next stage and also to foster the direct exchange between the experts, one or more virtual conferences are held, in which the procedural schedule, the documentation from the institution, the details about the site visit, and other organisational questions are discussed.
- A preparatory meeting takes place either several weeks before the site visit or immediately before the visit. The workshop lasts about half a day. The workshop's agenda consists of the following goals:
  - to become personally acquainted with one another
  - to clarify open questions and the distribution of roles
  - to create a questionnaire or agenda for the conversations
  - to establish a working plan and a timetable for the drafting of the report
- AQ Austria provides a template to all experts, which should ensure that all parts of the assessment are properly dealt with, supporting the transparency of and the ability to replicate the process.

AQ Austria has had, based on the experience of its predecessor organisations, positive experience with international groups of experts and recognises this as being a special

<sup>65</sup> Sample Schedule of a Workshop (Appendix 8.3)

attribute of the agency. This also brings with it increased time and effort required to ensure that experts are familiar with the specifics of the Austrian higher education system. This is especially noticeable in regards to the university of applied sciences sector. Although the German-speaking region provides a very large pool of experts from non-university higher education, a number of fundamental differences will always exist between the various university of applied sciences sectors. It is essential for these differences to be taken into consideration in the review process. Accordingly, AQ Austria pays special attention to the preparation of its experts in this area.

In addition, the Agency concludes agreements with its experts in which their duties and compensation are regulated and a document explaining possible bias (see also Standard 3.6) is included<sup>66</sup>.

## Standard 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.

## AQ Austria compliance

The Agency for Quality Assurance and Accreditation Austria is obliged to publish reports on quality assurance processes in accordance with § 3 paragraph 3 Z 4 HS-QSG. The results of the audits and accreditation processes must be published by both AQ Austria as well as the applicant institution<sup>67</sup>. AQ Austria publishes a report of findings for each review process that includes the complete report of the panel, the response of the higher education institution<sup>68</sup>,

<sup>66</sup> Declaration of Commitment (Appendix 8.4)

<sup>67</sup> § 21 HS-QSG

<sup>68</sup> The opinion of the university will only be released with its consent.

as well as the decision taken by AQ Austria's Board, including the reasons for the decision and a summary of it. This is a new publication practise, because the predecessor institutions did not publish the findings of review processes.

The Agency considers it important that the experts write the reports themselves. This on the one hand acts to strengthen the peer principle, but on the other hand it could lead to inconsistent approaches in the compilation of the expert opinion. AQ Austria provides the panel experts with a template to ensure that in each case the expert report contains the following elements:

- Information about the review process
- Basic information about the higher education institution that is being evaluated
- findings and assessments
- recommendations, where appropriate
- examination of all relevant criteria

In addition, the project coordinators support the compilation of the report by encouraging completeness, validity and compliance.

The final reports are made available on the website of AQ Austria after the completion of the review process: <https://www.aq.ac.at/de/aktuelles/aktuelle-entscheidungen.php>

In terms of publication, the same rules apply to all processes conducted by AQ Austria, be it system or programme accreditation processes in Germany, or the international accreditation of Bachelor's, Master's and PhD programmes.

Taking into account the principle that all quality assurance processes must serve to improve quality at higher education institutions, the agency has identified the institutions themselves as the most important target group in terms of reporting. This has the natural consequence that the writing in terms of content and style is by experts for experts. However, AQ Austria also recognises that the circle of people interested in the reports lies well beyond the evaluated institutions themselves. Therefore one of the process coordinators' duties is to make sure that the report is comprehensible. In addition to the reports, AQ Austria also publishes summaries of the main results of the reports. These summaries will take the form of a short overview, written in a style that allows both non-experts and experts to easily understand the content, purpose and outcome of the process.

## Standard 2.6. Follow-up processes

### Standard:

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

### AQ Austria compliance

In accordance with legal provisions, AQ Austria designs the follow-up processes individually. If AQ Austria finds problems during the course of the re-accreditation process, which are classified by the Board as being correctable within a specified time period, it issues an accreditation subject to conditions. In this case, the university has to submit a development plan and must be able to show within a period of nine months that the conditions have been fulfilled.

If AQ Austria determines in the course of the audit process that there are shortcomings in quality management that are deemed to be remediable within a specified period of time, it can grant conditional certification. In the case of conditional certification, the original shortcomings must be reappraised by AQ Austria no more than two years after the initial certification by means of an appropriate follow-up process.

A specification and strength of AQ Austria is that its broad statutory mandate provides another instrument which forms as a kind of follow up also in case of initial accreditations without conditions, which in particular supports the further development of higher education by focussing on the implementation of recommendations: Private universities and universities of applied sciences have to submit an annual report on major internal developments to the Agency.<sup>69</sup> These reports provide AQ Austria with an important source of information as well as acting as a monitoring tool. They enable AQ Austria to monitor the implementation of requirements or recommendations and other relevant developments and where appropriate, allow it to give advice. In addition, the annual reports are an important source of information in a re-accreditation process, because the development of the higher education institution and especially the implementation of AQ Austria's recommendations are documented through these reports. In addition reports play an important role for preparation of system-wide analyses and reports.

<sup>69</sup> Decree on Annual Reports of Private Universities (Appendix 5.4) and Decree on Annual Reports of Universities of Applied Sciences (Appendix 5.5)

When AQ Austria runs an accreditation process at non-Austrian higher education institutions, it is also possible, in terms of initial accreditation, to award conditional accreditation: If AQ Austria finds shortcomings in the course of an international accreditation process of Bachelor's, Master's and PhD programmes which is expected can be remedied within nine months, it issues conditional accreditation<sup>70</sup>.

If AQ Austria finds shortcomings in the course of a system accreditation process in Germany, which can be remedied within nine months, it issues conditional accreditation. In addition, the higher education institution is obliged under the so-called "interim evaluation" to submit AQ Austria a self-evaluation report after the first half of the accreditation period, which essentially includes an overview of quality assurance processes carried out in the accreditation period up until that date<sup>71</sup>.

If AQ Austria finds shortcomings in the course of a programme accreditation process in Germany, which can be remedied within nine months, it issues conditional accreditation<sup>72</sup>.

Overall, AQ Austria considers it to be a strength, to have by way of annual reporting a follow-up tool that allows continuous monitoring of higher education institutions. A weakness lies in the fact that initial accreditation cannot be subject to conditions. As mentioned in Chap. 4 (Standard 2.4) above, AQ Austria is pushing for a change to be made in this legislation.

## Standard 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 processes 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 process. 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.

## AQ Austria compliance

The validity period of accreditations and audit decisions is stipulated in the regulations and guidelines according to the following statutory rules:

- Audit decisions at public universities and universities of applied sciences are limited to seven years.<sup>73</sup>

<sup>70</sup> Guideline International Accreditation of Bachelor, Master and PhD Programmes (Appendix 5.6)

<sup>71</sup> Leitfaden Systemakkreditierung (Appendix 5.8)

<sup>72</sup> Leitfaden Programmakkreditierung (Appendix 5.7)

- Institutional accreditation of universities of applied sciences are provided for a period of six years, with re-accreditation awarded for a further six years, subsequent accreditation is coupled to successful certification.<sup>74</sup>
- Programme accreditation of universities of applied sciences study programmes are only performed once, the duration is then bound to the institutional accreditation.<sup>75</sup>
- The institutional accreditation of private universities is awarded for a period of six years, re-accreditation is awarded for another six years, and subsequent re-accreditation can be awarded for a period of up to twelve years.<sup>76</sup>
- Programme accreditations are generally tied to the institutional accreditation of private universities, whereby initial accreditation takes place at the level of programme accreditation.<sup>77</sup>

The validity period of accreditation carried out by AQ Austria at non-Austrian higher education institutions, is orientated either on the regulations of the country in which the process is being performed (for example, the Accreditation Council for processes in Germany), or on the national regulations for accreditation processes in Austria:

- System accreditations in Germany are awarded for a period of six years, whereby a so-called interim evaluation must be carried out after the first half of the accreditation period has expired. System re-accreditation is awarded for eight further years.<sup>78</sup>
- Programme accreditation in Germany is awarded for a period of five years; re-accreditation is awarded for a further seven years.<sup>79</sup>
- International accreditation of Bachelor's, Master's and PhD study programmes are awarded for a period of six years.<sup>80</sup>

## Standard 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.

73 Guideline for the Audit of Higher Education Institutions' Quality Management Systems (Appendix 5.1), see also § 22 Para 4 HS-QSG

74 Decree on Accreditation of Universities of Applied Sciences (Appendix 5.3), see also § 23 Para 9 HS-QSG

75 Decree on Accreditation of Private Universities (Appendix 5.2), see also § 24 Para 9 HS-QSG

76 Decree on Accreditation of Private Universities (Appendix 5.2), see also § 24 Para 10 HS-QSG

77 Decree on Accreditation of Private Universities (Appendix 5.2), see also § 24 Para 10 HS-QSG

78 Leitfaden Systemakkreditierung (Appendix 5.8)

79 Leitfaden Programmakkreditierung (Appendix 5.7)

80 Guideline International Accreditation of Bachelor, Master and PhD Programmes (Appendix 5.6)



## AQ Austria compliance

The Agency for Quality Assurance and Accreditation Austria has the statutory mandate to conduct studies and system analysis on thematic priorities and crosscutting issues<sup>81</sup>. The practical experiences and results of the external quality assurance processes are an essential part of the studies and analysis. They are, on the one hand, made available to universities and on the other hand used to further develop the review process. Since AQ Austria can decide for itself which data and information the universities of applied sciences and private universities need to provide, it can ensure that it only receives the information it needs for its activities and thus that no unnecessary reports are written.

Every three years the agency prepares and publishes a report on the development of quality assurance in the Austrian higher-education institutions. The report is based on the annual reports of the universities of applied sciences and private universities as well as the reporting of public universities. AQ Austria sees this report as a great opportunity to be able to provide guidance for the higher education institutions in terms of the continued development of internal quality assurance. Therefore, the report is of high priority and will include external consultation with international experts.

AQ Austria sees it as a strength, that this analysis and reporting task has been enshrined in law. Consequently, a separate but small department has been established, which is responsible for this area in the AQ Austria secretariat. It is of central importance for the structure of AQ Austria, that the work in the area of analysis and reporting is not separated from the activities carried out in quality assurance in the strict sense. In addition to two persons (one and a half full-time equivalents) who work exclusively in this department, three other employees are also partially assigned to analysis and reporting. In addition, the work is organized in projects so that almost all employees can be involved. Self-critically, however, the agency found that during the set-up phase and due to numerous vacancies, the department for analysis and reporting could only begin with broader work on the first three-year report in the summer of 2013. However, since its inception, this department of the agency has evaluated a support programme of the BMWF and put together a series of publications from workshops of the predecessor institutions. A series of workshops is already being planned in 2014, through which this area of activity of AQ Austria will be expanded.

81 § 3 Para 3 Z 8 HS-QSG

### Standard 3.1. Use of external quality assurance processes 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.

#### AQ Austria Compliance

See the above explanation (Standard 2.1 to Standard 2.8).

### Standard 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.

#### AQ Austria compliance

The Agency for Quality Assurance and Accreditation Austria is a legal entity under public law with the HS-QSG as a legal basis.<sup>82</sup> Its bodies' responsibilities and composition are fixed by law in the HS-QSG<sup>83</sup>. It is responsible for all higher educational institutions (public universities, universities of applied sciences, private universities, with the exception of teacher training colleges, the IST Austria and Philosophical-Theological higher education institutions) in Austria<sup>84</sup>. AQ Austria is also mandated to undertake international review processes. The registration of cross-border studies on the other hand is not a responsibility of AQ Austria but is instead undertaken by the Ministry<sup>85</sup>.

<sup>82</sup> § 3 Para 2 HS-QSG

<sup>83</sup> HS-QSG

<sup>84</sup> § 1 Para 1 HS-QSG

<sup>85</sup> § 27 HS-QSG

AQ Austria is not only a very young agency, it is also one of the first national quality assurance agencies in the European Higher Education Area that has been established in a (partial) competitively aligned national quality assurance system. However, it is specified that the agency only partially competes with other agencies. Only public universities and universities of applied sciences can choose internationally recognized agencies instead of AQ Austria for the carrying out of audits. In the accreditation process, neither private universities nor universities of applied sciences enjoy the right to choose, because they are bound to the exclusively competent AQ Austria. How exactly this specific Austrian construction will affect the young agency is not yet known. As a result of this, some incongruity may be seen in the case of the universities of applied sciences. Through the accreditation process, these institutions are bound to AQ Austria, and the agency also exercises a kind of supervisory function, by examining, with the help of annual reports, the compliance with accreditation requirements. Different from this the explicitly development-oriented audit processes should not be perceived as being a means of control. They should rather be used by the universities of applied sciences for an open and self-critical reflection on their own development. AQ Austria has clearly set-up and defined its processes, so that the Audit does not contain any compliance oriented dimension. However for the universities of applied sciences adapting to this approach is undoubtedly a process that will require a period of adjustment.

There is also a fundamental question here: What consequences does this have for AQ Austria, in particular for its position in the Austrian higher education system and its position in the 'market' when it as the national quality assurance agency feels obliged to achieve the goals of the HS-QSG, and when its activities contribute to common cross-sectorial higher education quality standards, while foreign agencies understandably do not have such an obligation, for example when they carry out review processes in only one of the three higher education sectors? The results thus far are too few to be able to provide an answer to this question, or to be able to recognize the impact that the specific Austrian submarket in quality assurance will have on the role AQ Austria plays as a national quality assurance agency.

Regarding the official status it's noteworthy that, in addition to the legal basis in Austria, AQ Austria has also been approved by the German Accreditation Council as an accreditation agency in Germany<sup>86</sup> and by the Kazakh Ministry of Education as an accreditation agency operating in Kazakhstan<sup>87</sup>.

Its secure and broad legal basis is a strength that AQ Austria recognizes. Nevertheless, it cannot be said with certainty whether or not the specific Austrian situation of partial competition with foreign quality assurance agencies will count as a weakness.

86 Expert report on the application for accreditation (Accreditation Council) (Appendix 6)

87 Regulation of the Kazakh Ministry of Education (Appendix 8.5)

### Standard 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.

#### AQ Austria compliance

According to the legal mandate, the Agency for Quality Assurance and Accreditation Austria is responsible for all higher educational institutions (public universities, universities of applied sciences, private universities, with the exception of teacher training colleges, the IST Austria and Philosophical-Theological higher education institutions) in Austria<sup>88</sup> and has a legally regulated wide range of tasks in the field of external quality assurance<sup>89</sup>:

1. Development and implementation of external quality assurance processes, at least audit and accreditation processes, according to national and international standards;
2. Accreditation of higher education institutions and programmes (i.e., universities of applied sciences and their study programmes as well as private universities and their programmes);
3. Reports to the national parliament by way of the competent Federal Minister;
4. Continuous supervision of accredited higher education institutions and their programmes regarding accreditation requirements;
5. Tasks in accordance with the provisions of the University of Applied Sciences Studies Act (FHStG) and the Private University Act (PUG);
6. Certification of higher education institutions based on an audit (i.e., public universities and universities of applied sciences);
7. Conducting studies and system analysis, evaluations and projects;
8. Information and advice on issues of quality assurance and quality development;
9. International cooperation in the field of quality assurance.

The Agency for Quality Assurance and Accreditation Austria is thus characterized by a range of tasks, which includes the state accreditation of universities and their programmes (private universities, universities of applied sciences), the certification of university internal quality management systems (public universities, universities of applied sciences), consulting services and studies and system analysis as well as the carrying out of quality assurance processes at non-Austrian universities. Regularity in the implementation of the accreditation procedure results from the time limited accreditations and certifications (see Standard 2.7).

AQ Austria has performed 26 accreditation processes in the university of applied sciences sector since its foundation in March 2012, as well as 13 accreditation processes in the private university sector, and one process outside of Austria (system accreditation), as well as

<sup>88</sup> § 1 Para 1 HS-QSG

<sup>89</sup> § 3 para 3 HS-QSG

carrying out audit processes, while at the time of the completion of this report some processes were not yet completed. Additionally, 16 accreditation processes abroad should be taken into account.

### Standard 3.4. Resources

#### Standard:

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

AQ Austria compliance

#### **Infrastructure and Financing**

The Agency for Quality Assurance and Accreditation Austria employs 26 employees (22.4 full-time equivalents). The office premises<sup>90</sup> extend to approximately 700 sqm and are equipped with a modern office infrastructure. Apart from a few two- or three-person-offices, individual offices are available for the majority of employees. The Agency has a private, security-protected data network with appropriate servers, 26 PC workstations, 2 extra workstations and 9 laptops. A meeting room is available for meetings, workshops and training courses.

The work of the secretariat and the bodies of the Agency for Quality Assurance and Accreditation Austria are supported by a central data storage system (that is being gradually developed into a document management system), and a document platform with restrictable external access.

A library of about 1,850 titles is available to the staff of the Agency for Quality Assurance and Accreditation Austria.

The financing of the Agency for Quality Assurance and Accreditation Austria is regulated by law and is mostly funded by annually allocated federal funds, based on a financial plan<sup>91</sup>. In addition, the Agency charges fees for the carrying out of quality assurance processes, which includes the actual costs of the evaluation as well as a flat charge for the process<sup>92</sup>. The Agency may decide freely how it spends its funds. For the financial year 2014, funds to the tune of 2.17 million euros are anticipated as being required, explicitly this also includes funds for staff training measures in addition to specialized trainings through participation in conferences, projects, etc.

The agency sees its current situation as a strength. The first few months of 2013 were marked by a tight personnel situation due to a number of job vacancies, but for 2014 it can be assumed that there are sufficient financial and human resources.

<sup>90</sup> Plan Office space (Appendix 8.7)

<sup>91</sup> Finance Plan (Appendix 7)

<sup>92</sup> § 20 para 1 HS-QSG

## Selection and preparation of employees

The employees in the secretariat, using their expertise and professional experience, handle a substantial part of the policy development and operational work. They lay the foundation for the development of processes and standards, develop guidelines and coordinate the review processes. At its inception, AQ Austria found itself in the fortunate situation that the secretariats of all three predecessor organisations were merged and a guarantee of employment existed. Thus, the agency has for the most part employees at its disposal who have many years of experience in higher education quality assurance. Restructuring processes often unfortunately result in staff changes, which in this case could be limited, and have now been compensated for again. The competencies of the employees are further developed through participation in national and international conferences, through their continuous involvement in the production of relevant literature and policy work and through close communication with members of the board. Within the team there is a continuous information exchange regarding the achievements and the problems of the various review processes. Similarly, a dissemination of knowledge gained takes place at attended further training sessions.

Internal communication is supported through regular staff meetings, at department level and cross-departmental. In addition, once a month, as a training mans, a voluntary Jour fixe takes place, when a staff member presents a topic of general interest. Twice a year, a strategy workshop is held together with the presidency. The internal organization of work is supported by common document filing systems and databases. These include an intranet platform for the documentation of individual review processes, an expert database (400 entries) and a library database (1850 entries). Employees participate in professional conferences - both nationally and internationally, often as speakers.

For new staff, there is an introductory training programme that not only passes on knowledge but also includes components of mentoring, the accompaniment of review processes as well as getting to know all relevant stakeholders. 14,000 EURO is currently being made available for the further training of all employees. Apart from training measures by way of internal training sessions and invited involvement in the review processes of other agencies, individual annual training needs are determined at annual meetings.

## Standard 3.5. Mission statement

### Standard:

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

### Guidelines:

This statement should describe the goals and objectives of members' 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 its work. The statement should make clear that the external quality assurance process is a major activity of the member and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statement is translated into a clear policy and management plan.

## AQ Austria compliance

The Agency for Quality Assurance and Accreditation Austria sees that its main task is to contribute to the development of quality in higher education and to ensure that this quality is transparent. It sees itself as an centre expertise and advice for issues of quality assurance and quality enhancement and as a catalyst for the further development of quality assurance. Consequently, the agency also recognises the need to provide public policy suggestions in the field of higher education.

AQ Austria has summarized its principles in a mission statement, which provides the strategic direction of the Agency and the focus for its day-to day operation. In its activities, AQ Austria adheres to the following principles:

- Universities carry the primary responsibility for quality assurance and quality enhancement in their performance areas.
- AQ Austria sees its processes as an adjunct to internal university quality assurance and aligns them with the self-defined quality goals of the university. AQ Austria is independent from instruction in its activities. Decisions in quality assurance processes are made solely on aspects of quality.
- The implementation of quality assurance processes is based on international standards of good practice, particularly adhering to the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).
- The basis for the development of processes and standards or criteria is collaboration with universities and other stakeholders.<sup>93</sup>

By taking into account the internal quality management systems of higher education institutions, AQ Austria wants to ensure and document that these systems correspond with high national and international standards and that they improve the quality of higher education provision. Accordingly, the promotion of quality enhancement in higher education is a central part of the review processes, which have been designed and implemented by the Agency for Quality Assurance and Accreditation Austria according to national and international standards. This requirement also derives from the legally prescribed tasks of the Agency<sup>94</sup>.

As places for the generation of knowledge, universities need a high degree of autonomy. This is based on the fundamental chartered legal right of freedom in teaching and research as well as autonomy in decision-making, such as in the organisational design of higher education institutions. The Agency for Quality Assurance and Accreditation Austria takes into account and respects the uniqueness of each individual higher education institution and their individual goals. Accordingly, it considers it inappropriate to impose specific academic standards on the higher education institutions, since their definition should come from the academic sector and indeed from within each institution itself. The Agency for Quality Assurance and Accreditation Austria sees that its main task is to appraise, by way of peer review, the validity and plausibility of such provisions.

AQ Austria regards it as crucial for the acceptance of the agency, to guarantee the independence and academic professionalism of its processes and thus to ensure its contribution to the development of a quality culture in higher education institutions.

<sup>93</sup> Mission statement (Appendix 4.1)

<sup>94</sup> § 3 Para. 3 HS-QSG

The creation of a common European Higher Education Area requires mutual trust in terms of the quality of institutions. Therefore, quality assurance takes place not only in a national context, but is based on common European standards. Quality assurance processes must be internationally recognized and must allow for an exchange of international expertise. In this respect, the Agency for Quality Assurance and Accreditation Austria recognizes the necessity of continuing the intense international engagement of its three predecessor organisations.

AQ Austria strives for international commitment, which is put into practice at different levels and through various measures. The organizational structure of AQ Austria, the involvement of international expertise in the Board and the international experience of predecessor institutions support this claim. AQ Austria laid down the objectives and foci of its international commitment in its internationalisation strategy, which supplements and specifies the Mission Statement in terms of international activities:

- AQ Austria supports the recognition of Austrian universities, universities of applied sciences and private universities in the European Higher Education Area.
- As a national agency AQ Austria offers Austrian universities, universities of applied sciences and private universities quality assurance processes in accordance with high international standards.
- The expertise of AQ Austria contributes to the development of quality assurance processes and standards at an international level. At the same time, AQ Austria draws upon the experience of other agencies for its own operation.

AQ Austria draws on rich experience in cooperation with various countries and regions. Cooperation with higher education institutions and quality assurance agencies are to be developed and expanded in accordance with the objectives of AQ Austria. Priority countries and regions are Austria's German speaking neighbouring countries and Central and Eastern Europe. Cooperation with Asian countries are in the pipeline.<sup>95</sup>

The mission statement is implemented in the daily work of AQ Austria, insofar as it carries out legally determined accreditation processes - which currently comprise the majority of its activities. In regard to the other areas, AQ Austria will develop a medium-term work plan in the spring of 2014. This will not only include strategic aims but also concrete measures for achieving and evaluating those aims.

AQ Austria's international activity is based on its internationalisation strategy. It is worth mentioning that at this early stage in its work the agency has already succeeded in being chosen to carry out a TWINNING project, through which the Bosnian-Herzegovinian Quality Assurance Agency will be supported.

<sup>95</sup> Internationalisation strategy (Appendix 4.2)



## Standard 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 processes 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.

### AQ Austria compliance

The independence of the Agency for Quality Assurance and Accreditation Austria and its review process is legally secured at different levels.

#### **Exclusion of representatives of interest groups from the Board**

The Board as the central decision-making body includes experts from the field of higher education, students working professionals: To ensure the independence of the Board and ensure that all relevant decisions are based solely on the existing expertise and not on political or other inappropriate considerations, all stakeholders in the strict sense are excluded from it: This is especially true for members of the Federal Government or a provincial government, for members of the Parliament, the Federal Council or any other general representative body. This also applies to all the functionaries and officials of a political party, functionaries and officials represented in the General Meeting, as well as for people who have exercised such a function in the last four years. Also excluded are employees in active duty in the management of higher education institutions and in relevant ministries: Employees of the agency may also not belong to any body of the agency including the Board.<sup>96</sup>

The process of nomination and appointment also ensures the independence of Board members. Ten members are nominated by the General Meeting by a two-thirds majority, and following this four members are formally appointed by the Minister<sup>97</sup>.

<sup>96</sup> § 6 Para. 2, § 10 Para. 4 HS-QSG

<sup>97</sup> § 7 HS-QSG

## **Independent decision-making by the board**

Accreditation and certification are decided by the Board on the basis of expert advice. Neither the General Meeting nor the Governing Committee as bodies of stakeholders are involved in any way in accreditation and certification decisions.

The independence of the Board in decision-making is enshrined in § 9 para 2 HS-QSG and explicitly highlighted again with respect to accreditation decisions in § 25 para 3.

These strict rules allow the agency to effectively combine together the principles of independence and participation of the relevant stakeholders in the higher education sector. The stakeholders have the opportunity and the mandate to be involved in the further development of the agency and its review processes by way of the General Meeting, without being able to exercise influence on decision-making. All relevant decisions are left to the Board, which is composed of independent experts. The Board members' varied professional and national backgrounds guarantee the expertise-led activities of the Agency, which take into account the relevant dimensions of higher education.

## **Independence and impartiality of the experts**

AQ Austria ensures the independence and impartiality of its experts in the course of the selection process in several steps.<sup>98</sup>

First, potential conflicts of interest are checked during the search for experts. Following their appointment, AQ Austria asks the respective university to examine possible conflicts of interest and incompatibilities.

Subsequently, each expert confirms his or her impartiality in a declaration of commitment. This declaration must be signed before the commencement of the review process.

The following reasons apply for possible bias:

- teaching or work contacts with the university to be evaluated, in the last three years,
- an on-going appeal process,
- as applicable, involvement or participation in the organization or its bodies in the past five years,
- intensive joint research collaboration or cooperation with the university to be evaluated
- completion of an examination / degree completion at the University within the last five years,
- other contractual relationship with the University,
- family relationships

Drawing on initial experience, AQ Austria is of the opinion that the structure of the agency is very well suited to being able to preserve the autonomy of the agency in the design, implementation and decision-making in regard to the review processes on the one hand and being able to maintain the indispensable involvement of stakeholders on the other hand.

<sup>98</sup> § 2 Z2 HS-QSG

One statutory provision still exists in the HS-QSG that was criticized as possibly interfering with the independence of AQ Austria's predecessor organisation Austrian Accreditation Council. Namely, that accreditation decisions must be approved by the responsible Minister. It should be emphasized, first, that the Minister is not able to change the accreditation decisions of the Agency. The Minister is also not able to refer a decision back to the agency for review. The Minister can only deny approval of an accreditation. However, it is important to note the possible reasons for such a decision: reasons can only be of political nature. The responsible Minister is not allowed to assert qualitative reasons; the quality assessment is the sole responsibility of the Agency. In practice, this would mean that the Minister could only give other non-substantive reasons to a private university, even though it may have met the legal and quality requirements, for not providing the authorization to commence its activities. AQ Austria considers that its independence is not being compromised here, because the Minister has no possibility of influencing the exclusive competence of the Agency. In addition, it should be noted that no Minister has exercised such discretion since the establishment of the accreditation system in 1993.

AQ Austria sees its independence, which is enshrined in national law by the relevant ministry and other stakeholders, as a strength. This also applies to the implementation of independence in the design of quality assurance processes, in the implementation of the processes and the final accreditation decisions, especially in securing the independence of experts.

### Standard 3.7. External quality assurance criteria and processes used by the members

#### Standard:

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

- a self-assessment or equivalent process 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 process 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 processes 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 process. The nature and form of the appeals process should be determined in the light of the constitution of each agency.

## AQ Austria compliance

All methods, processes, criteria and standards of quality assurance processes carried out by the Agency for Quality Assurance and Accreditation Austria must be approved in advance by the Board of the agency. As an advisory body, the Governing Committee may present their position. A public review process is a prerequisite for the adoption of regulations, from which the accreditation and audit processes are to be designed. Regulations, directives and guidelines are posted on the agency's website.<sup>99</sup>

As already explained in the notes to the ESG Part 2, the regular steps of quality assurance procedures are similarly applied to the various processes conducted by AQ Austria, although they may be applied in different variations. To avoid unnecessary repetition, they are presented here in summary form.

The peer principle (HS-QSG § 2) is predetermined by law as a procedural basis, and the quality assurance processes are described as being carried out by independent and external experts. The refinement and implementation of the review processes, also with regard to the composition of experts and expert groups is subsequently the role of the Agency.

The results of audit and accreditation processes shall be published by both the agency and the higher education institution in accordance with § 21 HS-QSG<sup>100</sup>.

The law regulates the possible range of decisions related to certification and accreditation processes. No conditions are allowed for initial accreditations, while re-accreditations and certifications may be made subject to conditions being met. In line with this framework, the follow-up measures for each review process are designed.

Higher education institutions are able to appeal against the review process and the accreditation or certification decision.<sup>101</sup> This appeal is handled by an appeals committee<sup>102</sup>. This committee consists of at least three people and two substitute members none of whom belong to another body of the Agency for Quality Assurance and Accreditation Austria (see Chapter 2). Substitute members replace other members in the case of bias. The process is as follows<sup>103</sup>:

1. A higher education institution may appeal against the way a process is handled and against the accreditation or certification decision.
2. The objection is submitted to the secretariat in writing (post, fax or email). The secretariat immediately forwards the appeal to the Appeals Committee and informs the Board
3. The appeal is handled by the Appeals Committee, whereby the Appeals Committee deals with the complaint either by correspondence or in the form of a conversation with the higher education institution that submitted the complaint. The Appeals

99 <https://www.aq.ac.at/en/index.php>

100 Guideline for the Audit of Higher Education Institutions' Quality Management Systems, Chapter. 5 (Appendix 5.1) and § 10 Decree on Accreditation of Private Universities (Appendix 5.2) and § 10 Decree on Accreditation of Universities of Applied Sciences (Appendix 5.2) and Leitfaden Systemakkreditierung, Kapitel 3 (Appendix 5.8) and Leitfaden Programmakkreditierung, Kapitel 2.3 (Appendix 5.7) and Guideline International Accreditation of Bachelor, Master und PhD Programmes, Chapter. 3.6 (Appendix 5.6)

101 § 13 HS-QSG

102 Rules of Procedure of the Appeals Committee (Appendix 2.2)

103 Rules of Procedure of the Appeals Committee (Appendix 2.2), see also § 13 Para. 10 HS-QSG

Committee may carry out, in agreement with the institution that submitted the complaint, a third party consultation.

4. The Appeals Committee must report the results of their investigations to both the complainant higher education institution and to the Board. Where appropriate, the Appeals Committee shall propose appropriate measures to solve problems.

So far, the Appeals Committee has had to handle only one case.

### Standard 3.8. Accountability processes

**Standard:**

Agencies should have in place processes for their own accountability.

**Guidelines:**

These processes 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, Committee/Council/Board and staff members;
  - 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 process are subcontracted to other parties;
  - the agency has in place internal quality assurance processes 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 which includes a report on its conformity with the membership criteria of ENQA.

### AQ Austria compliance

The Agency for Quality Assurance and Accreditation Austria is subject to various accountability regulations, both at a national and European level. Apart from the standard financial reporting requirements of the Ministry of Finance, the Agency is required to prepare an annual activity report and an auditor's report, both of which are submitted to the national parliament via the Federal Minister and are published<sup>104</sup>. Every three years, the Agency publishes a report on the development of quality assurance at Austrian higher education institutions.

<sup>104</sup> § 28 Para 1 HS-QSG

The agency has the duty to report to the Minister with regard to its compliance with laws and regulations and the performance of its duties. The agency is also subject to review by the Austrian Court of Audit and the Ombudsman's Office<sup>105</sup>.

There is also accountability to the German Accreditation Council for the accreditation processes carried out in Germany.

In addition, AQ Austria "takes its own medicine" – which is already established by way of a legal principal: The Agency is obliged by law to regularly undergo an external evaluation according to international standards<sup>106</sup>.

The agency is currently building a comprehensive system of internal quality assurance, based on the foundations of the three predecessor institutions. Indeed, it has already begun to be implemented in regard to the review processes. This system is based on the following quality objectives of AQ Austria:

- "The process rules and criteria are appropriate, comply in a suitable manner with the legal requirements and those set by the ESG (Standards and Guidelines for Quality Assurance in the European Higher Education Area) and are easily understood and applied by all involved.
- The specified (according to HS-QSG § 25 para 6 Z 2) deadline for a decision of nine months is observed.
- All participating persons and parties are informed about schedules, process fundamentals and tasks. "

Quality assurance measures are related in part to the persons with active responsibilities:

- Thus, Board members, when taking office are fully informed of the legal basis, and it goes without saying that AQ Austria informs them about procedural rules and thereafter keeps them up to date. Instruments to support the Board members in their decisions are templates for draft resolutions as well as a list of precedents.
- Agency staff exchanges questions and information on all relevant issues at department and interdepartmental staff meetings. At least once per year, each member of staff has a staff appraisal session led by the director pertaining to feedback about the job, the review of job scope and the identification of training needs. Newly hired employees go through an introductory training programme.
- Prospective experts have the opportunity to participate in a seminar, which focuses on the work of the expert panel.  
Experts are prepared for each actual review process. This includes being provided information on the principles of the process, the actual process in detail and the information exchange in the review application in two steps.

Quality assurance measures are of central importance for the rules of process:

The comprehensibility and applicability of the rules of the review process and criteria for decision are evaluated in feedback questionnaires. After the completion of each review process, feedback is obtained from the experts and from the higher education institutions that

<sup>105</sup> § 30 Para 1 HS-QSG

<sup>106</sup> § 3 Para 4 HS-QSG

have been evaluated. The coordinator of the review process analyses the feedback and reports, when appropriate, directly to the head of department or at the next team meeting. In urgent cases the head of department informs the Managing Director of a need for change and drafts a resolution for the board to decide upon. In general, rules of process and criteria for accreditation and audit standards are changed only every two years. For this, the feedback questionnaires (experts, higher education institutions, Board members, reports of the review coordinators) are analysed. The results are discussed in team meetings. The proposed amendments will be processed within the department, when deemed necessary. These are then discussed in workshops with stakeholders that take place every second year and, where appropriate, are presented to the board for a decision. The results are published every second year in quality reports, which will be discussed in a staff meeting and by the board. If necessary, further measures will be taken.

About the quality assurance of the review process:

After the completion of each review process, feedback is obtained from the experts and the assessed higher education institutions. The review coordinator analyses the feedback and reports where appropriate, directly to the Head of Department at the next department meeting. Additionally, annual feedback will be obtained from the Board members. This analysis is included in the quality report, which will be discussed in both a staff meeting and at a Board meeting. When deemed necessary, measures will be taken.

The agency carried out its review processes on the basis of old procedural rules and transitional rules until the fall of 2013, and therefore the feedback mechanisms of the three predecessor institutions were used. The new internal quality assurance system has been used in the review processes that began in the fall of 2013, so results are not yet available.

## 6 Evaluation against ENQA membership criterion 8

ENQA Criterion 8 Consistency of judgements, appeals system and contribution to ENQA aims

Standard:

1. The agency pays careful attention to its declared principles at all times, and ensures both that its requirements and processes are managed professionally and that its judgements and decisions are reached in a consistent manner, even if the judgements are formed by different groups
2. If the agency makes formal quality assurance decisions, or conclusions which have formal consequences, it should have an appeals process. The nature and form of the appeals process should be determined in the light of the constitution of the agency.
3. The agency is willing to contribute actively to the aims of ENQA.

AQ Austria compliance

For a consistent application of rules and the decision, see the commentary on ESG 2.3

For complaint handling processes, see the commentary on ESG 3.7.

AQ Austria builds on and continues the dedicated international activities of its three predecessor institutions, all of which were full members of ENQA. ENQA plays a central role as it represents the interests of quality assurance agencies in the European Higher Education area and offers an important platform for the exchange and development of quality assurance processes. So far, AQ Austria has been represented at ENQA by its director, who until October 2013 held the post of ENQA-President, and the Agency has actively participated in the working groups 'Staff Development', 'Impact of QA', 'Quality Assurance in life-long learning', and 'stakeholder involvement in QA practises'.

## 7 Strengths of and challenges for AQ Austria

Through the process of self-evaluation, AQ Austria has gained valuable information about its self-perception, structure and activities. Especially, as a young agency whose structure is not yet complete, there is a chance to use these findings as well as the results of an external peer review for further development. In summary, on the basis of this self-evaluation AQ Austria has been able to recognise its strengths and weaknesses as follows:

### Strengths

#### 1) Wide range of tasks

The broad remit of AQ Austria, especially the responsibilities of consulting, system analysis and reporting complement the 'classic' scope of duties of such an agency (i.e. the implementation of quality assurance processes) and strengthens the importance of AQ Austria in the Austrian higher education system. It must also be noted that the agency is still at the beginning of its development in this area. This strength includes the instrument of annual reporting, that the Agency uses for information beyond that relating simply to quality assurance processes, providing insight into internal developments in the higher education institutions, and allowing AQ Austria to provide comprehensive advice in the further development of quality assurance at Austrian higher education institutions.

This wide remit is also a strength with regard to the design of the review processes. Because the HS-QSG explicitly defines different purposes of the review processes, the AQ can orientate itself closely in terms of design to these different purposes. It therefore sees itself as not being exposed to the problem that many quality assurance agencies face, i.e.: how to serve contradictory purposes with a single process design.

#### 2) Structure of the Agency

Another strength of the agency is in the design of its internal structure, especially in the combination of independent expertise and stakeholder participation with a strong international component. The broad participation of stakeholders in the design of external quality assurance processes on the one hand side, the guarantee of independent decision making on the results drawn from the accreditation procedure on the other hand side is a strength. This is supported on the one hand, through the acceptance of the agency by all stakeholders in the Austrian higher education system and guarantees on the other hand, credibility and professionalism. The strong international component, in terms of the proportion of one-third of board members being non-Austrian nationals, is also seen to be a beneficial factor.



### 3) International Profile

AQ Austria has a further strength in terms of its international networking and activities outside the borders of Austria. Here in particular, it benefits from the vast experience of its three predecessor institutions. The strength lies in the strategic focus of international engagement, which is aimed at cooperation and does not follow economic interests.

### 4) Cultural Diversity

Through the merger of its three predecessor organisations, the Agency is characterized by cultural diversity in the approaches to quality assurance, which is a strength. The process of convergence shows that this diversity leads to fruitful dialogue on objectives, principles and processes of quality assurance, which enriches the work of all those involved.

## Challenges

### 1) Incomplete integration of quality assurance at the system level

A challenge has been recognised by AQ Austria in the non-consideration of teacher-training programmes and the registration of cross-border studies in the newly created (by the HS-QSG) unified quality assurance system. AQ Austria has been assigned a role of responsibility for quality assurance in Austrian higher education sector by the law, and therefore accepts that this configuration at the system level is a gap in its own activities.

### 2) No conditions in initial accreditation

The lack of ability to subject initial accreditation to conditions is a weakness. This is because this offends against the principle that all quality assurance processes serve to improve quality, because it is exactly this instrument (conditional accreditation) that can directly stimulate quality improvement processes at higher education institutions.

### 3) Tension between accreditation and audit in the University of Applied Sciences sector

A challenge has been recognized by AQ Austria in the connection between audit and accreditation status in universities of applied sciences. This link creates tension that may have a negative impact on the audit process, because the more open nature of the audit can imply a greater control dimension to the audit process. AQ Austria takes this on as a challenge to clarify its own role in the tension between control-oriented accreditation and more development-oriented audit and consulting activities, with the goal of gaining equal acceptance in both working areas.