Agency for Quality Assurance and Accreditation Austria

The Agency for Quality Assurance and Accreditation Austria

Self-Assessment Report for the external review by ENQA

Vienna, 14th of November 2018

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
T +43 1 532 02 20-0, F-99, office@aq.ac.at, www.aq.ac.at, DVR Nr.: 093 31 63

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
T +43 1 532 02 20-0, F-99, office@aq.ac.at, www.aq.ac.at, DVR Nr.: 093 31 63

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List of Abbreviations

AQ Austria	Agency for Quality Assurance and Accreditation Austria
BMBWF	Federal Ministry of Education, Science and Research
BWSF	Advisory Council for Economic and Social Affairs
CEENQA	Central and Eastern European Network of Quality Assurance Agencies in Higher Education
DUK	Danube University Krems
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
ESU	European Students´ Union
EUA	European University Association
EURASHE	European Association of Institutions in Higher Education
FH	Universities of Applied Sciences
FHK	Association of Austrian Universities of Applied Sciences
FTE	Full time equivalent
HEI	Higher Education Institution
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)
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
IST Austria	Institute of Science and Technology – Austria
ÖH	Austrian Students´ Union
ÖPUK	Austrian Private Universities´ Conference

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
T +43 1 532 02 20-0, F-99, office@aq.ac.at, www.aq.ac.at, DVR Nr.: 093 31 63

SAR	Self-Assessment Report
UNIKO	Universities Austria

Foreword

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

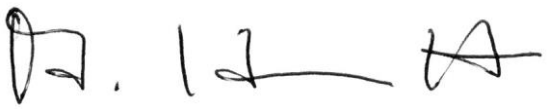
Recognition at the European level is important to AQ Austria. In an evolving European Higher Education Area, quality assurance in higher education is inevitably conducted according to European standards and good practice. From the start, AQ Austria has given itself an international profile and deemed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

With this report, AQ Austria aims to present how it applies the ESG to its activities within Austria and at an international level. Additionally, the report contains an assessment of the agency's strengths and challenges.

AQ Austria is undergoing its second review by ENQA. Whereas the first evaluation took place only shortly after AQ Austria was established by way of merging three predecessor agencies and thus was still in the developmental stage, the current review provides an opportunity to evaluate the agency as fully operational.

External review is challenging for every institution. AQ Austria gladly accepted this challenge because by tasting its own medicine the agency took the opportunity to review its operations with view to European good practice. The self-assessment was just one component of comprehensive analyses that took place between 2016 and 2018. In 2016 AQ Austria started an evaluation of the HS-QSG with the purpose to assess whether the legal provisions are appropriate for the agency to perform its role defined by the law. This process was accompanied by a revision of AQ Austria's mission statement. Also, AQ Austria decided that five years after starting operations it was time to revise all its quality assurance processes which started in early 2017. The combination of the three major analyses provided a good opportunity to take stock of the developments of the agency and its activities since becoming operational and since the last ENQA review. AQ Austria was inspired by the results of these analyses and is convinced that also the external review will make a contribution on which the Agency can build on and enhance its work in future years. Hence AQ Austria is looking forward to discussing all questions relevant for the evaluation of the current state of development of the agency and future directions with the panel.

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



Professor Dr Anke Hanft

President of the Board

Dr Achim Hopbach

Managing Director

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
T +43 1 532 02 20-0, F-99, office@aq.ac.at, www.aq.ac.at, DVR Nr.: 093 31 63

1 Introduction

On 18th June 2014 the Board of the European Association for Quality Assurance in Higher Education (ENQA) granted the Agency for Quality Assurance and Accreditation Austria (AQ Austria) full membership for a period of five years.

In accordance with Art. 6 of the Statutes of ENQA and with Art. 8 (2) of the Rules of Procedure of ENQA AQ Austria, by letter of 14th November 2017 requested an external review by ENQA in order to apply for re-confirmation of its membership status. AQ Austria herewith submits its self-assessment report for the external review 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).

Furthermore, the review serves as basis for the request for continuing AQ Austria's inclusion in the European Quality Assurance Register for Higher Education (EQAR).

2 Development of the self-assessment report

The creation of AQ Austria's self-assessment 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 agency used this self-reflection process in order to review its state of development, to assess the agency's strengths and challenges, and to implement initiatives that support the agency's continued development.

The Board began the process at a meeting on 13th December 2017 by setting up a working group in charge of organizing the self-assessment and drafting the self-assessment report. The group consisted of:

Melanie Gut, MSc, Member of the Board
Professor Wolfgang Mazal, Vice-President of the Board
Professor Peter Schlögl, Member of the Board
Professor Hans Weder, Member of the Board
Dr Achim Hopbach, Managing Director
Dr Michael Meznik, Secretariat (department for audit and consultancy)
Robert Neiser, PhD, Secretariat (department for accreditation)
Stephanie Zwießler, M.A., Secretariat (department for development and analyses)

The Board kicked-off the process with a discussion on strengths and weaknesses at its meeting on 13th February 2018 as did the secretariat on 28th February. Following up on this the working group started the self-assessment by taking into account the recommendations of the last review, collecting and assessing relevant information such as the outcomes of the discussions during the revision of the mission, and the results of the evaluation of the HS-QSG (see **annex 38**) and of the internal quality management through the biennial quality reports. The self-assessment benefited also from the parallel project of revising all quality assurance procedures. In addition the following analyses were conducted internally: (Informal) complaints against external experts, activities of the appeals committee, duration of accreditation procedures. The working group reported on the progress of the self-assessment to the Board at its meetings on 15/16th May 2018, 11th September 2018 and to the secretariat at the regular staff meetings and at specific staff meetings on 28th February 2018, 12th September 2018 and 11th October 2018.

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
T +43 1 532 02 20-0, F-99, office@aq.ac.at, www.aq.ac.at, DVR Nr.: 093 31 63

The working group collected feedback from stakeholders by analysing feedback to reviews conducted between 2013 and 2015, analysing statements to the evaluation of the *Act on Quality Assurance in Higher Education* (Hochschul-Qualitätssicherungsgesetz, HS-QSG)[1] and by collecting feedback at a meeting with stakeholders, namely uniko, FHK, ÖPUK, and ÖH on 19th September 2018. In addition a draft report was presented to and discussed by the General Meeting on 28th October 2018.

The Board adopted the report at its meeting on 14th November 2018.

3 Higher education and quality assurance of higher education in Austria

3.1 The Austrian Higher Education System

Higher Education Institutions:

The Austrian higher education system[2] consists of 69 institutions, notably:

- 22 public universities, including the Danube University Krems (DUK) which is a public university for continuing education
- 13 private universities
- 21 universities of applied sciences
- 9 Public University Colleges of Teacher Education
- 4 Private University Colleges of Teacher Education

In 2006 also the Institute of Science and Technology Austria (IST Austria)[3] was established, with its main task being the development of new fields of research and the post-graduate education by offering PhD programmes and postdoctoral programmes.

Degree System:

In Austria two parallel systems for regular degree programmes co-exist: On the one side and predominantly programmes within the 'Bologna-degree-structure', namely Bachelor programmes consisting of 180-240 ECTS credits, Master programmes that amount to 120 ECTS at universities and 60 to 120 ECTS at universities of applied sciences. Doctoral qualifications can only be issued by public and private universities based on doctoral programmes of at least three years of study.

On the other side the 'traditional' degree structure with the *Diplom* granted upon completion of 'long cycle' programmes of 240 to 360 ECTS credits still exist, mainly in the fields of law, medicine, arts and music.

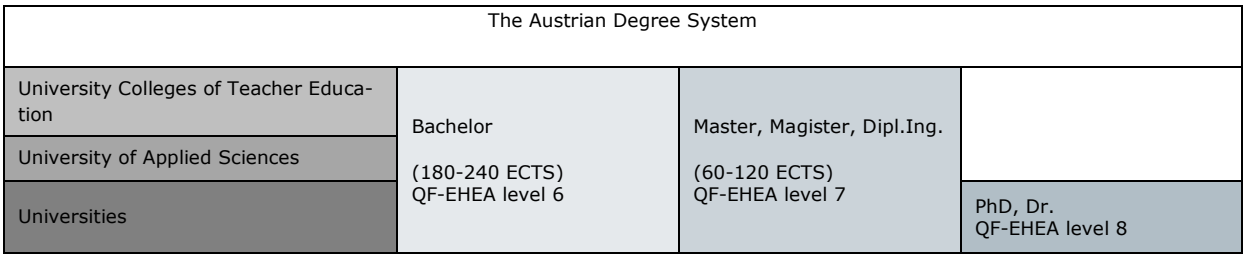
1 Act on Quality Assurance in Higher Education (HS-QSG) BGBl. I Nr. 74/2011; (see **annex 1**)

2 **https://bmbwf.gv.at/fileadmin/user_upload/Kasparovsky/HsSystem_201602_E_BF.pdf**

3 Bundesgesetz über das Institute of Science and Technology - Austria, **BGBl. I 2006/69 (German version only)**

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
T +43 1 532 02 20-0, F-99, office@aq.ac.at, www.aq.ac.at, DVR Nr.: 093 31 63

Figure 1: The Austrian Degree System



In addition to the aforementioned qualifications, Austrian higher education institutions offer continuing education programmes which are called 'university course' (Universitätslehrgang) at public and private universities, 'continuing education course' (Lehrgang zur Weiterbildung) at universities of applied sciences and 'higher education programme' (Hochschullehrgang) at university colleges of teacher education. Some of them lead to Master degrees, which are, however, not equivalent to Master degrees of the 'regular' degree programmes. These programmes are non-equivalent since students may enroll without prior Bachelor's degree. Furthermore, graduates of these programmes are not per se eligible for admission to PhD programmes.

Enrolment Numbers:

Currently roughly 278,000 students are enrolled in public universities (including the Danube University Krems). Furthermore approx. 13,000 students are enrolled in private universities, approx. 52,000 students are enrolled in universities of applied sciences, and approx. 13.000 students are enrolled in university colleges of teacher education[4]. Enrolment numbers in continuing education programmes amount to approximately 40.000.

Outside the Austrian higher education system but inside Austria another system evolved during the last couple of years, namely the provision of foreign degree programmes. Precondition for foreign higher education institutions to be entitled to offer degree programmes is the inclusion on a list that is regulated by AQ Austria. Currently 341 programmes are provided by 52 higher education institutions from 22 countries. Data on enrolment numbers are not available.

3.2 Internal Quality Assurance

The various laws on public universities, private universities, universities of applied sciences and on university colleges of teacher education contain stipulations for internal quality management. Two legal provisions apply to all sectors: HEIs are required to set up quality management systems and they have to implement course-evaluation by students. The laws do not regulate in detail the design of the internal quality management systems; nor do the agency's regulations prescribe the design of the internal quality management systems.

Some features of internal quality management are identified in the triennial report on the state of development of quality assurance at Austrian HEIs which was published already in 2016 but is still valid as far as general features are concerned:

[4] **https://www.bmbwf.gv.at/wissenschaft-hochschulen/** (Data: winter semester 2017/18)

- The policy documents and reports of the HEIs clearly demonstrate that the original focus on quality assurance is increasingly being extended to the perspective of quality enhancement, and the HEIs are endeavoring to establish a quality culture.
- The responsibility for quality management at the HEIs is generally located at the management level.
- Operational quality management tasks are defined and assigned to one or more staff positions or administrative units. The implementation is adapted to the respective framework conditions and the range of tasks depends on the size of the HEI.
- The internal structures required by law have been established at all universities of applied sciences, and many private universities have carried out structural reforms since 2012. The new audit procedures for public universities and universities of applied sciences support the further development of higher education institutions and promote the professionalism of QA processes and their documentation.
- The internal quality assurance procedures cover the entire spectrum of activities of the HEIs. They refer to organizational units, persons and the range of activities of the HEIs. Most of the procedures are subsumed under the term "evaluations".
- Regular revision of study programmes is clearly one focus of HEIs' internal quality assurance and enhancement activities. In general, the decision-making in revising programmes is separated from the operational level. The revision processes include participation of internal and external expertise.
- The quality assurance activities in research are comprehensive. Many quality assurance tasks are located in the research support service, since external quality assurance of third-party-funded research projects plays a central role. The state of development of internal quality management measures at HEIs correlates with the extent and sophistication of research activities.
- In addition to the compulsory external procedures, many HEIs carry out voluntary external quality assurance procedures; they are part of the internal quality assurance and development portfolio. This primarily includes program accreditation and certification by common QM models. (see **annex 29 „Triennial Report 2015"**)

3.3 External Quality Assurance

Since 1st March 2012, external quality assurance is based on the HS-QSG. This act introduced a major reform of external quality assurance in the Austrian higher education system aimed at strengthening mutual trust between the three higher education sectors of public universities including the Danube University Krems, private universities and universities of applied sciences, and at fostering mutual recognition in order to support mobility between the sectors through

- common (minimum) standards for higher education;
- abolition of the fragmentation of bodies and procedures in external quality assurance and thus ensuring better integration and coordination of the different higher education sectors;
- establishment of a cross-sectoral external quality assurance and accreditation agency;
- cross-sectoral regulation of framework conditions for quality assurance procedures;
- establishment of common assessment areas for quality assurance procedures that apply across sectors.
- legal regulation for the notification of foreign degree programmes.

Based on a major legal reform in 2011, the current system of external quality assurance and accreditation in Austria is, for the first time based on common cross-sectoral standards for higher education and for external quality assurance procedures.

The university colleges of teacher education, however, were not covered by this act.

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
T +43 1 532 02 20-0, F-99, office@aq.ac.at, www.aq.ac.at, DVR Nr.: 093 31 63

In organisational terms the three previously existing quality assurance agencies were merged into just one body that is AQ Austria. Before 2012, external quality assurance was characterized by a sector-specific configuration, both in terms of purpose and procedure as well as in organisational terms. Public universities were not subject to compulsory external quality assurance. Private universities and universities of applied sciences had to undergo accreditation at institutional level and at programme level. Accreditation equalled the licence of operation. Three quality assurance agencies existed, the Austrian Accreditation Council for Private Universities and the University of Applied Sciences Council for the university of applied sciences, both performing the tasks of statutory bodies. In addition, as a third agency the Austrian Quality Assurance Agency AQA operated in all sectors but not with any statutory function.

Based on HS-QSG various external quality assurance procedures are applied in the Austrian higher education system:

- Public Universities have to obtain certification of their internal quality management system through a quality audit every seven years. The certification decisions are not linked to any legal or financial consequences. The universities can commission AQ Austria or another internationally recognised independent agency, for example an agency listed on EQAR.
- Private universities have to obtain institutional accreditation (equals licence for operation) by AQ Austria every six or twelve years. New degree programmes must also undergo accreditation; however, re-accreditation of degree programmes is part of the institutional re-accreditation.
- Universities of Applied Sciences have to obtain institutional accreditation (equals licence for operation) by AQ Austria. New degree programmes must also undergo accreditation; however, re-accreditation of degree programmes is part of the institutional re-accreditation. In this case institutional re-accreditation is applied only once after six years and thereafter the audit scheme applies. However, legal consequences apply because the validity of the institutional accreditation status depends on a positive certification of the internal quality management system.
- In 2014 the HS-QSG was amended by way of introducing compulsory programme accreditation was implemented for the newly established PhD-programmes at DUK.
- In addition new regulations for the notification of degree programmes offered in Austria by foreign higher education institutions.

Figure 2: External Quality Assurance at Higher Education Institutions according to HS-QSG

	Quality Audit	**Institutional Accreditation**	**Programme Accreditation**	**Annual Reports**
Public Universities				
Danube University Krems			Only PhD-Programmes	
Private Universities				
Universities of applied sciences				

In conclusion, all procedures with statutory functions i.e. accreditation of private universities and universities of applied sciences and their programmes and also accreditation of the doctoral programmes at DUK have to be carried out by AQ Austria. As far as the non-statutory

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quality audits are concerned public universities and universities of applied sciences can choose either AQ Austria or other agencies for conducting the audits.

In conclusion, despite the fact that the implementation of HS-QSG introduced a common framework for quality assurance in Austrian higher education significant differences between the three higher education sectors covered by HS-QSG persist in terms of purpose, legal consequences, procedure and actor.

It is noteworthy that quality assurance of the university colleges of teacher education is not covered by HS-QSG and thus outside the remit of AQ Austria. The institutions have to organize evaluations at institutional level by external experts every seven years. However it is not necessary to commission a quality assurance agency with the review. Also, there are no mandatory external quality assurance processes for IST Austria or the Philosophical-Theological Universities.

3.4 History, profile and activities of AQ Austria

History

Based on the *Act on Quality Assurance in Higher Education* (HS-QSG) AQ Austria was established on 1st March 2012 as the national quality assurance agency for higher education (§ 3 Abs. 2 HS-QSG).

AQ Austria became operational in July 2012. In terms of core activities the agency started conducting its accreditation and audit procedures based on provisional regulations. The three subsequent years were characterized by typical activities and challenges for establishing a new organization. In parallel AQ Austria designed new accreditation-ordinances and audit-guidelines which were approved by the Board in June 2013. In 2015 after the adoption of the ESG2015, AQ Austria had to introduce only minor changes. The agency could take advantage of the fact that the 2013 regulations were designed in parallel with the process of revising of the ESG and consequently the new developments at European level could be taken into account immediately.

AQ Austria is the first cross-sectoral quality assurance and accreditation agency in Austria with a broad range of responsibilities in quality assurance, accreditation, thematic analyses and consultancy and forms an essential component of the legal reforms in 2012 by replacing three former quality assurance agencies.

The years 2013 and 2014 were characterized by two external reviews of AQ Austria by the German Accreditation Council and by ENQA. Although the self-assessment for the ENQA review took place right in the phase of implementing the new agency AQ Austria considered it a good opportunity to analyse its establishment and initial activities. The certification by the German Accreditation Council and the re-confirmation of full membership by ENQA and consequently the inclusion on EQAR formed a milestone in the development of the agency and for the international recognition.

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
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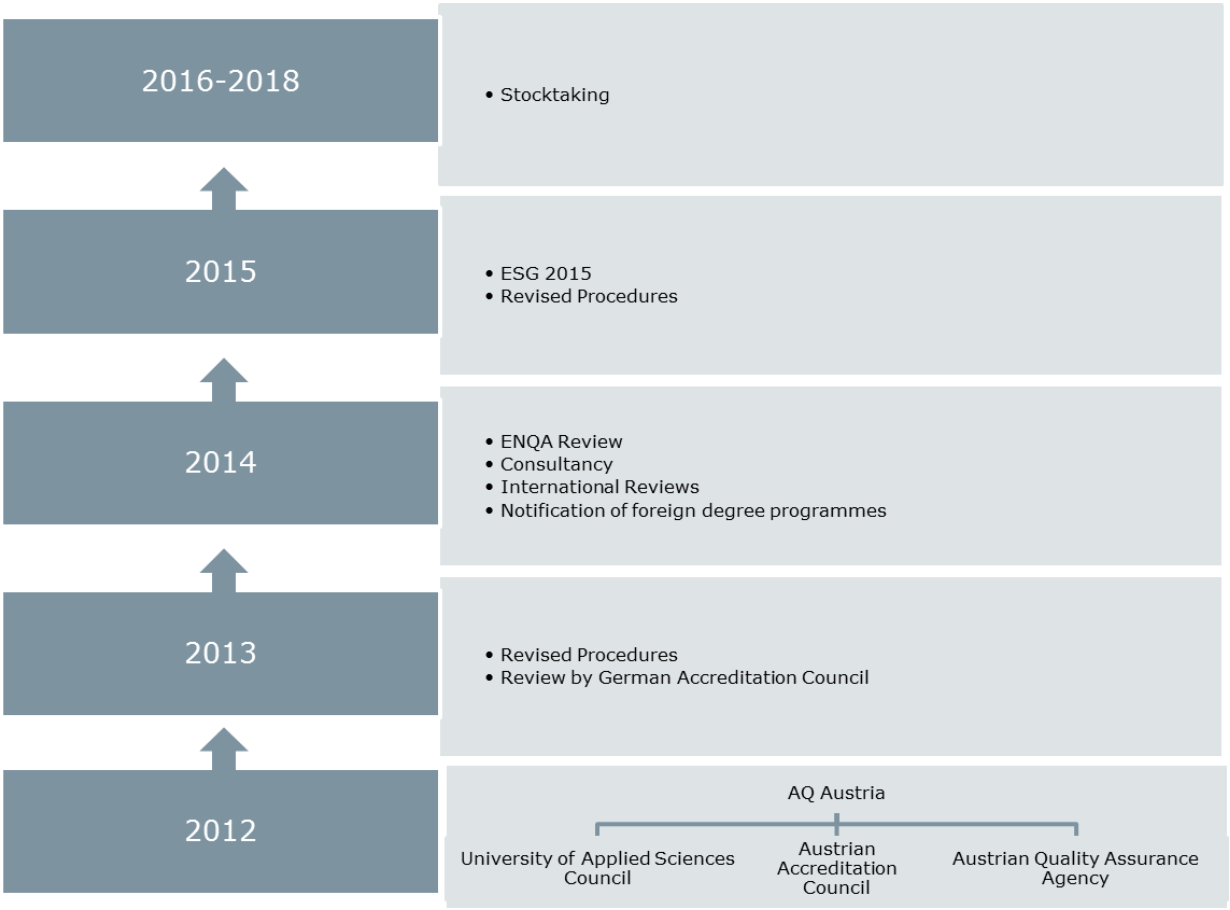
Figure 3: AQ Austria: 2012 - 2018



After implementing its compulsory external quality assurance procedures at national level in 2013, AQ Austria started its activities in the fields of thematic analyses, voluntary external quality assurance procedures and consultancy, both in Austria and abroad.

In 2014 AQ Austria assumed a new function by taking over from the ministry the responsibility for the notification of foreign degree programmes offered in Austria. In 2018 the relevant legal regulation was repealed by the Constitutional Court and AQ Austria terminates its activities by the end of the year. A new legal regulation shall come into force in 2019 of which details are not known yet.[5]

The board of AQ Austria decided to conduct three analyses or revisions respectively: Firstly, the Board reviewed its strategy and revised it slightly by taking into account first experiences. Secondly the Board conducted an evaluation of

Whereas the first four years since its inception were characterized by establishing the agency and implementing its activities and assuming new responsibilities the year 2016 marked the beginning of a comprehensive stock-taking exercise.

[5] Whereas the notification procedure as such was no quality assurance procedure and thus not governed by the principles of ESG AQ Austria applied ESG in specific cases: When the foreign HEI collaborated with an Austrian educational institution in providing the programme AQ Austria had to evaluate activities of the Austrian partner. By the end of 2015 the first round of reviews of Austrian partners was accomplished. Since this activity has been interrupted and new regulations are not in place yet it was agreed with ENQA and EQAR that the activities related to the notification of foreign degree programmes should not be covered by this external review of AQ Austria.

the HS-QSG notably whether its regulations form a suitable legal basis for AQ Austria to perform its tasks. Thirdly, the Board started the revision of all its quality assurance procedures. This was deemed appropriate five years after becoming operational.

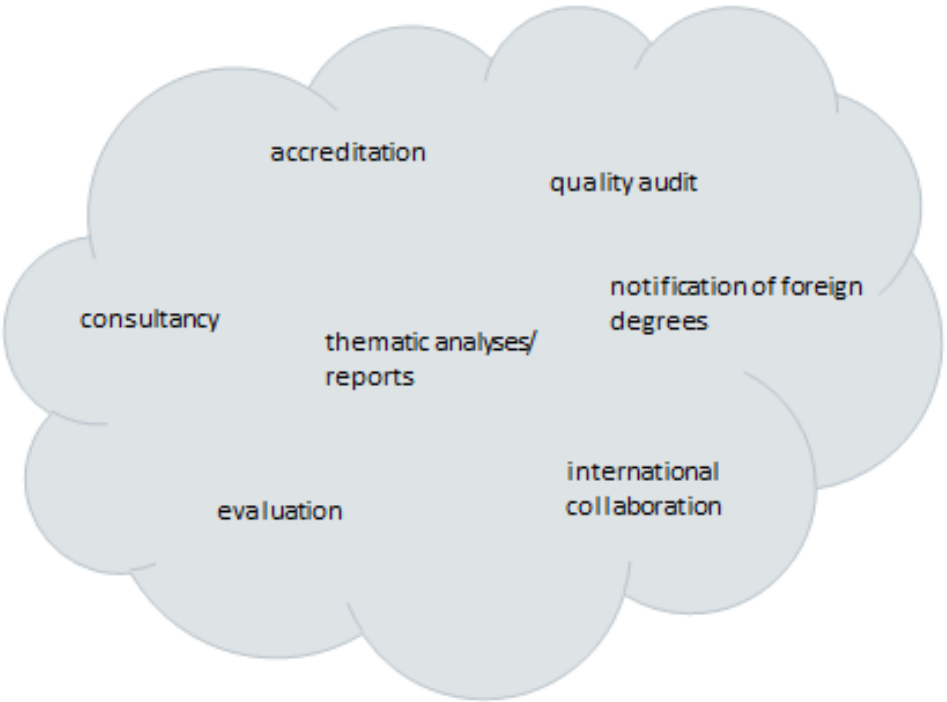
The three projects were completed between autumn 2016 and summer 2018 and informed the self-assessment for the ENQA-review which started in December 2017.

The new regulations for Quality Audits and the Austrian accreditation procedures come into force in December 2018 and February 2019 respectively.

Profile

AQ Austria is not only the successor of the three former quality assurance agencies, it also, to a greater or lesser extent, inherited their tasks. According to its legal mandate, AQ Austria is responsible for all higher education institutions in Austria (§ 1 Abs. 1 HS-QSG). 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), supervision of accredited institutions, notification of foreign degree programmes, consultancy, and thematic analyses as well as international collaboration (§ 3 HS-QSG).

Figure 4: AQ Austria: Activities



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Vis-à-vis private universities and universities of applied sciences AQ Austria acts as public authority as regards accreditation and supervision. As regards audits at public universities and universities of applied sciences, and also as regards voluntary evaluation activities and advice to higher education institutions AQ Austria acts as one service provider among others.

It's noteworthy that, unlike many other agencies in the EHEA, AQ Austria holds both statutory functions and non-statutory functions at the same time.

In its mission AQ Austria states:

"AQ Austria is a quality assurance agency that is recognized in Austria and internationally and operates in several countries. It is based on the values public responsibility for quality in higher education, Securing academic freedom, autonomy of higher education institutions and scientific integrity. It supports the higher education institutions in continuous quality enhancement and, thanks to their expertise, provides impulses for the further development of the higher education system. It also contributes to providing transparent information about the quality of higher education institutions in their service areas. The following principles apply to the activities of AQ Austria:

- AQ Austria is independent in its activities and free of instructions. Decisions in quality assurance procedures are made solely on quality grounds.

- The quality assurance procedures are based on international standards of good practice, in particular the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

- The quality standards of AQ Austria are suitable for covering different university profiles.

- Universities bear the primary responsibility for quality in all their areas of work, quality assurance and development.

- AQ Austria understands its quality assurance procedures as a supplement to internal quality assurance and development.

- The work of the Agency in general, the procedural rules and standards or criteria in particular, will be further developed in an experiential, continuous internal learning process in collaboration with universities and other stakeholders." (see **annex 05 "Mission Statement"**)

AQ Austria considers its broad remit and particularly its role as regards thematic analyses and consultancy as an important component of its role as national quality assurance and accreditation agency which is not to be separated from conducting reviews.

Another core feature of AQ Austria is its international orientation, which is put into practice at different levels and through various measures. Not only for HEIs but also for quality assurance agencies internationalization starts at home. An important feature of AQ Austria is the international composition of its Board; almost 50% of its members are foreign. Furthermore AQ Austria benefits from the fact that the secretariat comprises staff from four countries. Also the design of the quality assurance procedures follows international good practice. Based on this foundation AQ Austria is also active abroad and at international level which is explained in detail in **chapter 9**. AQ Austria is an active full member of the European Association for Quality Assurance in Higher Education (ENQA) and other international networks such as CEENQA, INQAAHE, EUA and EURASHE. The international orientation of AQ Austria is based on its internationalization strategy which complements the mission. (see **chapter 7**)

In general a quality assurance agency should be more than just the organizer of external reviews but should also contribute to the development of the national higher education system as a whole, not just to individual institutions. Consequently a broad remit is paramount.

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
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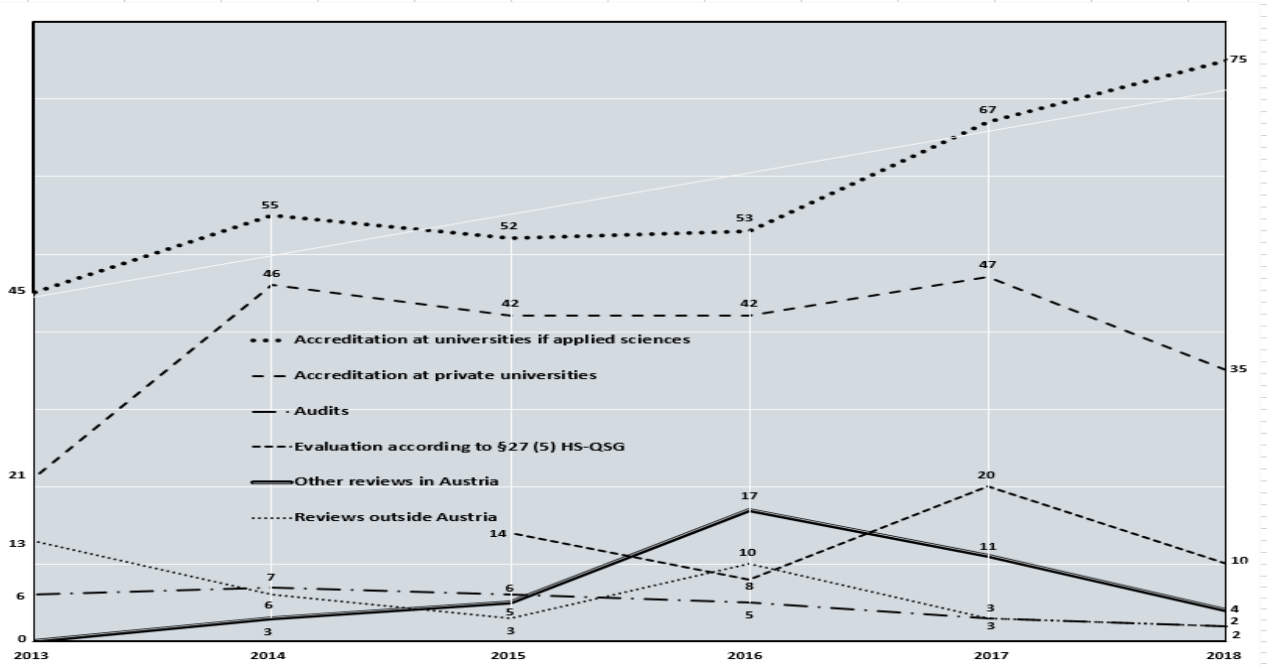
Activities

Conducting external quality assurance procedures at higher education institutions forms the largest part of the agency's activities. Between 2013 and 2018 AQ Austria conducted over 700 quality assurance procedures (see **chapters 4 and 5**).

Figure 5: Quality Assurance Procedures 2013-2018[6]



In addition to implementing the compulsory quality assurance procedures AQ Austria started in 2014 to implement its broad remit by engaging in other activities as well. Firstly, in 2014 AQ Austria, on request of public universities started voluntary external quality assurance procedures. These might be programme evaluations with view to revise the programmes or voluntary accreditation procedures applying the European Approach for Quality Assurance of Joint Programmes which AQ Austria is actively promoting. Currently the agency conducts the second review of this kind. Secondly, in line with AQ Austria's mission to offer services on request of HEIs the agency, in collaboration with a university developed a scheme for the voluntary accreditation of continuing education programmes. After the pilot-review no further reviews of this kind have been conducted so far, though.

AQ Austria conducts consultancy projects for universities that want to revise strategies at departmental level as regards internationalization. Another service offered was the evaluation of individual qualification agreements at public universities.

AQ Austria also supports HEIs in the preparation of quality audits conducted by other agencies.

As one part of AQ Austria's broad mandate the agency has the statutory mandate to conduct thematic analyses (§ 3 (3) No 8 HS-QSG) and to publish regularly certain reports. Therefore the agency introduced a dedicated department for reports and analyses in the secretariat.

[6] Numbers for 2018 are provisional

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
T +43 1 532 02 20-0, F-99, office@aq.ac.at, www.aq.ac.at, DVR Nr.: 093 31 63

This part of AQ Austria's activities is directed either to specific groups of HEI, specific higher education sectors or the whole higher education system. They form a significant part of the basis for the agency's development as centre of competence as regards questions related to quality of higher education. Two groups of thematic analyses and reports can be distinguished:

Thematic analyses in the wider sense:

In this field, AQ Austria deals with thematic focuses and cross-cutting issues, which may relate to several higher education institutions, parts of (individual higher education sectors) or even the entire higher education system. A key feature of these activities is that they involve the relevant actors and institutions (the higher education institutions and their stakeholder organisations, the Ministry of Science and other relevant organisations, such as e.g. the Austrian Exchange Service) in the development and implementation of analyses.

The issues selected for the analyses are based on current educational matters and challenges as well as on developments in the European Higher Education Area (EHEA). The concrete identification of issues (e.g. quality assurance of appointment procedures, quality assurance of continuing education etc.) is usually initiated by the higher education institutions or results from the exchange with stakeholders from higher education, a proposal of the Ministry, from the agency's own interests or anonymised findings from quality assurance procedures, or it is based on an official mandate (e.g. the "Bericht zur Entwicklung der Qualitätssicherung an Hochschulen in Österreich" – Report on the Development of Quality Assurance at Higher Education Institutions in Austria),

As a rule, the analyses are conducted as cooperative projects between several higher education institutions, which are coordinated by AQ Austria, ensuring that the higher education institutions' experiences are included first hand and that they can identify themselves with the results. Most of the activities are organised as workshops with a view to exchange experience between the higher education institutions, to which also external (national as well as international) experts are invited.

The outcome is often a publication, which also includes an analytical part, as well as recommendations of the different project groups. The reports are published on the responsibility of AQ Austria, thus ensuring an open and critical dialogue between and within the project groups. The reports are made available to all higher education institutions free of charge. The intensive dissemination of the reports shall furthermore guarantee that the results also find their way into expert conferences and national working groups.

Examples:

- Triennial Report on the state of development of quality assurance at Austrian higher education institutions: Every third year the agency prepares and publishes a report on the development of quality assurance in the Austrian higher-education institutions. The first Triennial Report (as it is called in short) 2015 was mainly based on the annual reports of the universities of applied sciences and private universities as well as the various public reports of public universities, as stipulated in the law; the second report, to be published in winter 2018/19 is based on an extended list of sources by particularly using the review reports in order to make better use of the broad experience and knowledge. In addition the second issue of the Triennial Report puts specific emphasis on "implementation of study programmes". In the future AQ Austria will always focus on one specific aspect of internal quality management in order to make these reports as little repetitive as possible and in order to enhance their relevance (**annex 29**)
- Recognition of non-formally and informally acquired competencies. Recommendations for recognition and crediting procedures (2016) (**annex 30**)
- Recognition of non-formal and informal learning, follow-up (ongoing)

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- Continuing education programmes at Austrian higher education institutions (ongoing)
- Evaluation of HS-QSG (2017) (**annex 38**)

Thematic analyses in the narrow sense:

The quality assurance procedures at higher education institutions conducted by AQ Austria form the basis of analyses with different areas of focus. On the one hand, the results obtained from the analyses of the review procedures that have been carried out, serve as a means to gain an understanding of the current problem areas and developments at higher education institutions. On the other hand, the findings and any recommendations resulting from the analyses are presented in a transparent way and published to make them available for other parties in the higher education field or other stakeholder groups. In order to ensure that no data or information of individual higher education institutions or outcomes of accreditation and audit procedures are exchanged, only aggregated results are published.

In this context, it should be underlined that the quality of the final reports, the representativity of the underlying data material as well as the anonymity of the higher education institutions involved are basic principles of AQ Austria's analytical work.

The findings of the thematic analyses furthermore serve as a means to critically reflect on the own work in the review procedure and, if necessary, optimize the proceedings. An analysis of external review procedures often involves several AQ Austria employees from different departments.

Examples:

- Analysis of interpretation of Programme-Accreditation Criteria by private universities and universities of applied sciences (2017) (**annex 33**)
- Analysis of external reviews of university colleges of teacher education (2018) (**annex 32)**
- Analysis of first round of Quality Audits (ongoing)
    - Analysis of part-time study programmes (ongoing)
    - Systematic Analysis of the annual reports of private universities and universities of applied sciences (**annex 34**). So far, this report is not to be considered a thematic analysis in the narrow sense because it is mainly based on data and a certain amount of information provided on relevant aspects. However, AQ Austria amended the regulations for submitting annual reports in order to gain more analytical information which will be used in the future to analyse developments in the two sectors. Differently from now this will provide an opportunity to publish these reports.
    - Annual Report to the Minister of Health on current developments in the health programmes at universities of applied sciences. The report is mainly based on the analysis of the applications for accreditation, the review reports and also statistical data collected in a database that AQ Austria administers on behalf of the ministry. (**annex 31**)

In addition to these reports AQ Austria has to submit an Annual Activity Report to the parliament which is also published. (**annex 35**)

Closely linked to these activities AQ Austria provided HEIs and stakeholders with opportunities to discuss current topics related to quality of HEI and higher education and to collaborate in developing recommendations for good practice etc. In this regard AQ Austria’s annual conferences shall be mentioned which provide a forum for approximately 200 participants to exchange experience and discuss topics such as Framework-conditions for high quality research (2018), horizontal mobility in higher education (2017); or Quality Culture (2016). Also as

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regards some of the above mentioned analyses AQ Austria organized workshops in order to foster discussions among HEIs and to work on recommendations, namely the workshop series about **study programmes designed specifically for working students** which is an important feature of many study programmes at the universities of applied sciences; and the workshop series about **recognition of informal and non-formal** learning.
Important in this regard are also the **Platform for co-operative education** in Austria with institutions providing co-operative study programmes, AQ Austria, stakeholders and the ministry as members. The platform, initiated by AQ Austria designed **principles for co-operative study programmes**. Another example is the *Informal platform Quality Assurance of study programmes in the health care sector*.
In addition AQ Austria engages in activities such as the Evaluation of the project "**Sparkling Science**" which was funded by the ministry and supports collaborations between universities and secondary schools; and the monitoring of "**proMoAustria+**" which is a scheme to support the implementation of Bologna instruments and policies, funded by the European Commission and run by the Austrian Academic Exchange Service.

Naturally AQ Austria is actively involved in advisory bodies and working groups such as the National Bologna Follow-up Group, the Erasmus+ Advisory Board to the Austrian Academic Exchange Service, Network Recognition, Advisory Body for education statistics of Statistics Austria, etc.

During 2016 and 2017 AQ Austria accepted an interesting new challenge. The public colleges of teacher education were for the first time required to undergo an external evaluation. Although AQ Austria has no legal responsibilities for this sector almost all institutions commissioned AQ Austria to conduct the external reviews. This was an interesting challenge in so far as the whole sector underwent and still undergoes significant changes which will transform the institutions into more typical higher education institutions. Furthermore, AQ Austria didn't only have the opportunity to evaluate almost an entire sector but could contribute substantially to the development of this particular sector towards an equally respected higher education sector in Austria.

In conclusion AQ Austria is a well-established quality assurance agency that successfully accomplished the merger of the three predecessor-agencies in legal terms, organisational terms and not the least in cultural terms. Whereas the first three years were characterized by typical challenges of a new organisation created by a merger, the agency, during the last three years managed to assume new responsibilities, establish its activities in reporting, thematic analyses and consulting, and finally conducted various processes of analyzing its role and activities, the latter culminating in the external review by ENQA. The last two years provided a very good opportunity to test the effectiveness and impact of the agency's work over this period. With the new regulations for Quality Audits and the Austrian accreditation procedures coming into force in December 2018 and February 2019 respectively, early 2019 marks a significant step for AQ Austria. During 2019 and 2020 AQ Austria will use the opportunity to take the lessons learnt during the last two years and decide upon any new directions of its future development.

Organisational Structure

AQ Austria's organisational structure is legally determined by the HS-QSG and consists of the Board, the General Meeting, the Governing Committee, and the Appeals Committee. The bodies are supported by a secretariat.

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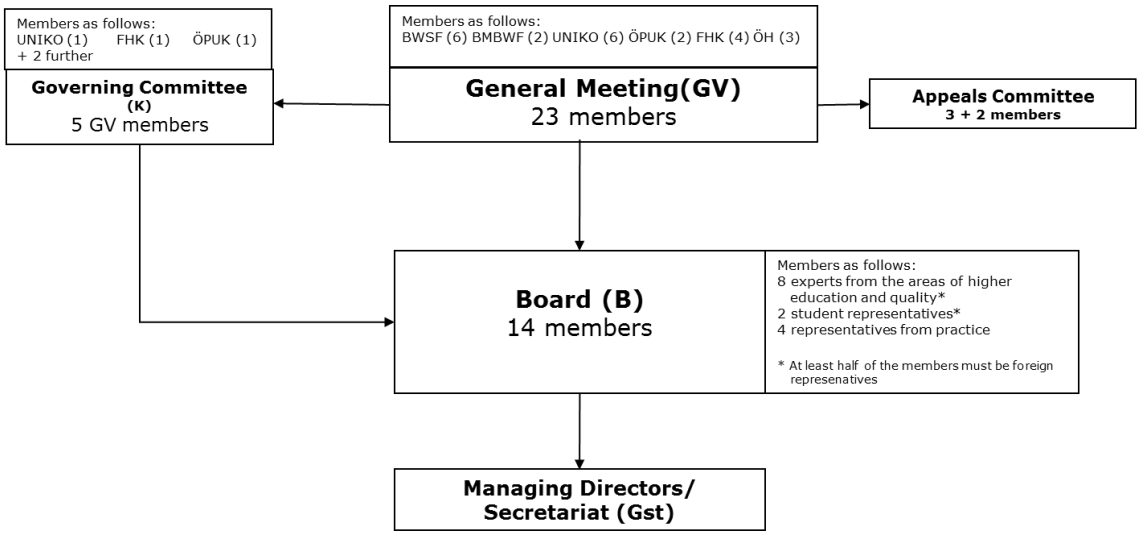
Figure 6: Organisational Structure of AQ Austria



BWSF – Advisory Council for Economic and Social affairs (6 members)
BMBWF – Federal Ministry of Education, Science and Research (2 members)
ÖH – Austrian Students´ Union (3 members)
UNIKO – Universities Austria (6 members)
FHK – Association of Austrian Universities of Applied Sciences (4 members)
ÖPUK – Austrian Private Universities´Conference (2 members)

Board

The Board is the main decision-making body of AQ Austria. It is in responsible for designing the agency's methodologies, for taking all formal decisions in accreditation and audit procedures, and for executing the supervision of accredited institutions. Furthermore the Board decides upon the strategy, the annual budget, the annual report and the organisational structure of the secretariat (§ 9 (1) HS-QSG).

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

- eight members are experts from academia, who must have 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 from among the students; one has to be from abroad.
- four members from the field of professional practice with expertise in national and international higher education, experience in university-related occupational areas and the ability to judge matters of quality assurance.

Members of the Board act in their personal capacity and must operate without instruction by any stakeholder groups which underlines the independent decision-making.

The term of office is five years with the possibility of one reappointment. From among its members the Board elects a President and a Vice-President for a term of five years (§ 7 HS-QSG). The President chairs the Board and the agency and also represents the agency in public.[7]

The Board has to meet non-publically at least two times a year, and in reality meets about seven times a year. 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 ap-

7 Rules of procedure of the Board (**annex 02**); see also § 10 paragraph 1 HS-QSG

proved (§ 8 HS-QSG). The voting weight for all members is equal. **Annex 11** gives information regarding the current membership of the Board.

General Meeting

The General Meeting assembles the relevant stakeholder groups including (§ 11 (1) HS-QSG):

- The Advisory Council for Economic and Social Affairs (six representatives),
- The Austrian Students' Union (three representatives),
- The Universities Austria (six representatives),
- The Association of Austrian Universities of Applied Sciences (four representatives),
- The Austrian Private Universities' Conference (two representatives),
- The Federal Ministry of Education, Science and Research (two representatives)

The representatives are appointed by the federal minister at the nomination of the respective organisations for a period of five years and reappointments are allowed. The General Meeting elects a chairperson 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 ten members of the Board (§ 12 (1) HS-QSG) who need to be accepted by way of a two-thirds majority vote (§ 7 (2) HS-QSG). All other decisions are made by a simple majority vote, assuming that at least fifteen members are present (§ 12 (2) HS-QSG). **Annex 12** lists the current membership of the General Meeting. Different from the Board, the members act as representatives of the respective organisations from which they are sent.

Governing Committee

The Governing Committee is the strategic advisory body. It consists of five members who are elected by and from among the General Meeting (§ 5 (1) HS-QSG). There is one member respectively representing the public university sector, the private university sector and the sector of the universities of applied sciences (§ 12 (2) HS-QSG), 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 (§ 5 (2) HS-QSG), especially with regard to the methodologies and standards of the agency as well as regarding the annual budget, the annual report, job applications and the rules of operation. The Governing Committee meets at least two times a year. **Annex 13** gives information regarding the current membership of the Governing Committee.

Appeals Committee

The Appeals Committee is responsible for dealing with appeals and complaints from higher education institutions (see **annex 04**, see also § 13 HS-QSG). 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 (§ 13 (2) HS-QSG). They are appointed for a period of three years by the General Meeting with the possibility of reappointment (§ 13 HS-QSG). The members are not allowed to belong to any other body of the agency, and they must operate without instruction (§ 13 (4) HS-QSG). The Committee makes decisions based on a simple majority vote. For a list of the members of the Appeals Committee, see **annex 14**.

At least 45% of the members of all agency bodies must be women (§ 4 (2) HS-QSG).

Secretariat

The secretariat of AQ Austria is led by the managing director, who handles the day-to-day operations of the agency (see **annex 03**). 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 33 staff (approx. 29 FTE) are employed. The employees have qualifications

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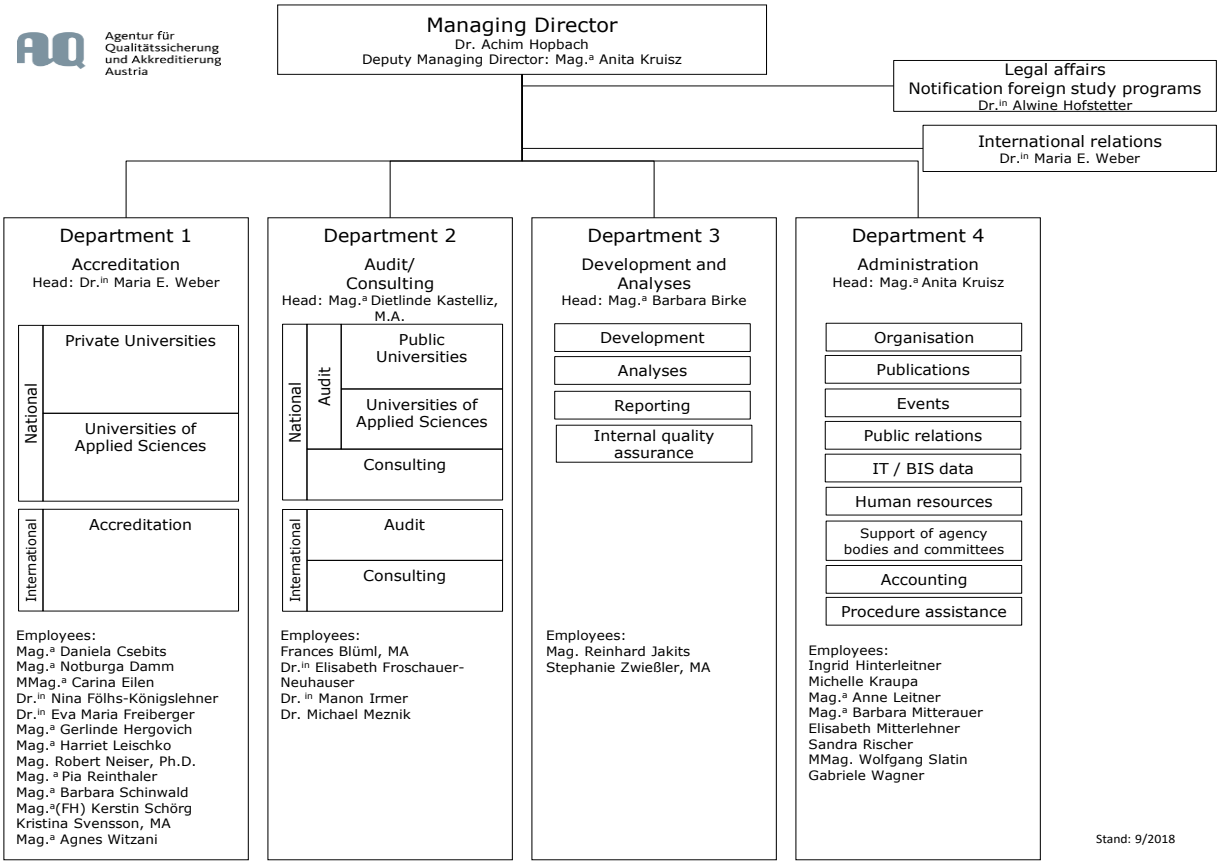
and work experience in teaching, research, university management, and quality assurance (see **annex 44**).

Figure 7: Secretariat of AQ Austria (*as of September 2018*)



Staff recruitment follows a defined procedure: If a vacancy is to be filled AQ Austria publishes an advertisement in the relevant media and on its website. In addition other relevant organisations are informed. The deputy managing director who is in charge of human resources composes a team for the selection process that normally comprises the managing director, the deputy managing director and the heads of department. The deputy managing director conducts a screening of all applications and suggests a long-list with those applicants that have the formal qualifications and are most suitable for the post. The next step consists of two rounds of interviews conducted by the whole recruitment team based on interview guidelines. The first round focuses on relevant knowledge and experience. The team agrees on those applicants to be invited for the second interview that focuses on personal skills and that also contains a practical task. After the second interview the team agrees on the applicant to be offered the post. The deputy managing director is in charge of negotiating the contract. In accordance with HS-QSG a report on the recruitment has to be submitted to the Governing Council that has to give a statement on the recruitment.

New staff is provided with an induction programme that contains the following elements:

- Information package: New staff receives electronic versions of the most relevant documents such as laws, regulations by AQ Austria, administrative procedures, etc.
- Mentoring: Every new staff has an assigned mentor that is available for weekly meetings and any kind of questions.
- Shadowing: Every new staff observes two quality assurance procedures

- Training: Various introductory discussions are held by senior staff such as introduction to the various divisions and their activities, introduction to international aspects of AQ Austria's activities, introduction to legal aspects, introduction to administrative aspects.
- Information visits to main actors such as the ministry, uniko, ÖPUK and FHK.
- Project work: In addition the new staff analyses an external quality assurance procedure and reports to the mentor.
- The induction phase lasts three months and ends with a guided interview, also in order to agree on further training needs if applicable.

AQ Austria puts emphasis also on staff development and applies a policy with the following elements:

- Annual staff interviews by the immediate superior, based on standardized forms.
- Support measures such as participation in conferences without an active role, or any kind of trainings. Participation in these support measures is voluntary, either suggested by staff or the superior or management. In addition the management can request participation in support measures like e.g. software trainings. Every member of staff has an annual number of days that equals the amount of his or her weekly working hours to invest in this type of support measures. Budgetwise approx. 500 euros per person are allocated.
- Development measures such as participation in conferences with an active role, in external working groups or advisory bodies etc. Every member of staff has an annual number of days that equals the amount of his or her weekly working hours to invest in this type of support measures.

Every member of staff is expected to participate in 1 to 3 support and/or development measures per year.

4 Higher education quality assurance activities of AQ Austria

The agency's remit comprises a large array of legally regulated functions in the field of external quality assurance, notably quality assurance procedures based on its legal mandate such as:

- audits of the internal quality management systems of public universities of applied sciences
- accreditation of private universities and their programmes (equals state approval)
- accreditation of universities of applied sciences and their programmes (equals state approval)
- notification of foreign degree programmes (2014-2018, new law in preparation).

In addition to these quality assurance procedures AQ Austria is also responsible for the supervision of accredited higher education institutions as far as the compliance with the accreditation criteria is concerned. Although not a quality assurance procedure in the narrow sense this is an important activity as regards the continuous collaboration with accredited higher education institutions.

In addition AQ Austria offers quality assurance procedures such as

- voluntary evaluation of programmes

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- voluntary accreditation of continuing education programmes at Austrian higher education institutions
- system accreditation and programme accreditation in Germany
- institutional accreditation in Switzerland
- programme accreditation in EHEA countries
- audits of the internal quality management systems of higher education institutions in EHEA countries

AQ Austria also offers consultancy to HEI such as support for the preparation of external reviews or for the development of strategies. Different from the above mentioned activities these activities are not external quality assurance reviews and are hence not conducted in accordance with ESG.

5 Processes and their methodologies

AQ Austria applies the following pre-defined quality assurance procedures

(1) Quality audits of the internal quality management systems of public universities and universities of applied sciences in Austria;
(2) Accreditation of Austrian private universities and Austrian universities of applied sciences and their programmes;
(3) Voluntary accreditation of continuing education programmes at Austrian higher education institutions;
(4) Voluntary programme evaluation in Austria and other EHEA countries;
(5) Programme and system accreditation in Germany and institutional accreditation in Switzerland;
(6) Programme accreditation in EHEA countries.

In all accreditation and quality audit procedures, AQ Austria applies a standard set of procedural steps as follows:

Figure 8: Procedural Steps

1	In audit and voluntary accreditation procedures, the institution submits a request for conducting a procedure with AQ Austria. The secretariat agrees with the institution on a contract about the conduct of the audit procedure. The contract includes a time line etc. In case of a mandatory accreditation, no contracts are necessary; the institutions just submit the applications.
2	The institution submits a self-assessment report.
3	AQ Austria secretariat notably the assigned staff member pre-screens the submission. In case the submission is incomplete the institution is given time to complement the material.
4	The Board of AQ Austria nominates experts based on criteria for nomination of experts. The secretariat prepares the nomination. Based on a clarification of the necessary profile of the expert panel, the secretariat uses the database and does specific search via internet. For students the secretariat collaborates with the respective student experts' pools of the students unions in Austria, German, Switzerland and ESU.
5	The experts participate in preparatory activities. AQ Austria organizes training seminars for nominated experts. The seminars are about the national higher education system, the role of experts in the proce-

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	dure, conduct of site visits, and report writing. In addition, a panel convenes for a preparatory (virtual) meeting, discussing the submitted material, the programme of the site visit, and the most relevant topics to be discussed at the site visit.
6	The secretariat agrees with the institution on the programme of the site visit. The site visit starts with a preparatory meeting of the panel of experts of about half a day. The purpose of the site visit is to assess the compliance with accreditation criteria or, respectively, the effectiveness of the quality management system. The panel hold a debriefing meeting after the site visit. The purpose of the de-briefing is to agree on the main outcomes and to organize the process of writing the report.
7	The review-coordinator supports the panel of experts in writing the report, in particular as regards completeness, clearness, and fairness.
8	The secretariat sends the draft of the report to the institution for comments.
9	The secretariat sends the comments to the panel of experts that decides whether the report needs modification.
10	The secretariat prepares the decision of the Board by providing the Board with the submission of the institution, and with an overall report on the procedure that contains the panel report, the statement of the institution, and a recommendation for decision.
11	The Boards takes the decision.
12	The secretariat communicates informally the decision to the institution. For mandatory accreditation in Austria: the secretariat drafts the act and sends it to the ministry for approval[8], after that to the institution.
13	The secretariat drafts the report on the procedure that contains a short overview about the procedure, the decision of the Board with reasons, the panel report and the statement of the institution.
14	The secretariat and the institution publish the report on their respective websites.

Whenever the Board decision contains conditions (only possible in institutional reaccreditation at private universities and at universities of applied sciences in Austria, voluntary accreditation of programmes of continuing education at Austrian higher education institutions, international programme accreditation), the following additional steps apply:

Figure 9: Additional Procedural Steps

1	Within the given timeframe, the institution submits material that documents the fulfilment of the condition(s).
2	AQ Austria secretariat notably the assigned staff member pre-screens the submission. In case the submission is formally not correct or incomplete the institution is given time to complement the material.

[8] Further explanation in **chapter 8.3**

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3	The secretariat recommends to the Board whether a panel of experts shall assess the fulfilment of condition or whether the Board shall take the decision directly based on an assessment by the secretariat.
4	The Board of AQ Austria decides whether experts or a panel of experts and a site-visit are necessary to assess the fulfilment of conditions.
5	Either the Board nominates expert(s), which is normally the same panel of experts that conducted the review. In this case, the same steps like above are taken.
6	Alternatively, the Board takes the decision based on the assessment by the secretariat.
7	The secretariat prepares the decision of the Board by providing the Board with the submission of the institution, the panel report, the statement of the institution, and with an overall report on the procedure.
8	The secretariat communicates informally the decision to the institution.
9	The secretariat drafts the report on the procedure that contains a short overview about the procedure, the decision of the Board with reasons, the panel report and the statement of the institution. For mandatory accreditation in Austria: the secretariat drafts the final act and sends it to the ministry for approval[9], after that to the institution.
10	The secretariat and the institution publish the report on their respective websites.

This standard set of procedural steps varies merely due to the differing nature (statutory vs non-statutory procedure) of the case – so as to secure fitness for purpose. The variations look as follows:

- In case of an audit procedure or programme and system accreditation in Germany and institutional accreditation in Switzerland as well as programme accreditation in EHEA countries, the HEI submits a request, AQ Austria agrees with the institution on conducting the respective procedure in form of a contract, in Switzerland subject to approval of the Accreditation Council. Meanwhile, in mandatory accreditation procedures a contract between the HEI and AQ Austria is not necessary; instead, the submission of an application for a new institution or programme (report on the compliance with all accreditation criteria) is sufficient to commence the procedure.
- Most procedures allow for decisions under conditions. However, for a large number of actual procedures (first programme or institutional accreditation at Austria private universities and universities of applied science) the legal basis requires unconditioned decisions.
- According to the laws in Switzerland and Germany, the Swiss respectively German Accreditation Council take the final decision. In these cases, the agency conducts the review according to its defined process, yet does not take an accreditation decision.
- The procedures of voluntary programme evaluation in Austria and other EHEA countries follow this scheme but are agreed on a case-by-case basis.

[9] Further explanation in **chapter 8.3**

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6 AQ Austria's internal quality assurance

AQ Austria uses an internal quality management system which was developed in 2013/14 and revised in 2016 (see **annex 39**). One of its core features is its scope that covers all management processes, core processes, and also support processes since these processes have a significant impact on the quality of the core processes. As its second core feature it focuses on processes and instruments that are critical for the quality of the core processes such as the quality assurance procedures conducted at higher education institutions. It is thus not limited to regular ex post analyses or evaluations. Apart from the design of the external quality assurance procedures (see also **chapter 9.2**) the system addresses the competences of all individuals involved in the agency's activities and the professional conduct.

The system addresses management processes, core processes and support processes including:

- Management processes
  - Strategic Management of the agency
  - Management of core processes
  - Staff management
  - Financial management
- Core processes
  - Review processes
    - Acting individuals
    - Regulations
    - Conduct
  - Consultancy
  - Analyses and Reporting
- Support processes
  - Accounting
  - Support to agency's bodies
  - Infrastructure/IT
  - External and internal communication

For each process/section AQ Austria defined a 'quality standard' stating the agency's expectations as regards the nature of the item or the conduct of the process. Referring to the quality standards AQ Austria defined measures and instruments to be used in order to assess whether the standards are met. Last but not least the responsibilities for applying the measures and instruments are also laid down in the quality management system.

The instruments used vary and cover activities such as: provision of relevant information; training activities in the wider sense (training and briefing for external experts, induction for Board members and staff, staff development); AkkreditierungsWiki and templates; regular internal meetings (department meetings, staff meetings, management meetings, meetings of staff and presidency, meetings of all agency bodies); internal and external workshops; analyses of external feedback based on feedback surveys for HEIs and external experts (**annex 37**); regular meetings with stakeholders for gathering feedback.

Mainly two ways are applied to make use of the information gathered and of the results of the internal quality management: Firstly, feedback from reviewed HEIs and external experts as well as experience made by review coordinators are fed back to department meetings in order

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to be able to make immediate use of it as far as practical questions of conduct are concerned. Secondly, feedback from reviewed HEIs and external experts is analyzed on an annual basis and discussed by the Board. The Board also discusses the *Quality Report* (**annex 36**) on a biennial basis that presents the results from the quality management processes applied.

The internal quality management arrangements as regards the item "procedural rules" of the external quality assurance procedures is presented as example:

"Quality Standard:

The procedural rules are fit for purpose, comply with the legal requirements, implement the ESG (Standards and Guidelines for Quality Assurance in the European Higher Education Area) in an appropriate manner and are easy to understand and to apply for all concerned.

Measures:

- The review coordinator obtains feedback on the procedural rules from the institutions and the panel members, analyzes the feedback and, if necessary, reports directly to the head of department or to the next department-meeting. In urgent cases, the head of division proposes a change to the management and prepares a resolution by the Board. The feedback is analyzed annually and discussed in the office and by the board.
  Instrument: Standardized feedback form
  Responsible: review coordinator
- The procedural rules are evaluated every two years. For this purpose, the feedback forms (institutions, panel members) and reports of the review coordinators are analyzed and current developments in the higher education system and in quality assurance are taken into account. The results will be discussed in division-meetings. If deemed necessary, suggestions for changes are drafted. These are discussed in biennial workshops with representatives from institutions and, where appropriate, proposed to the Board for decision-making. (Legal changes will be considered immediately)
  Instrument: Workshop

  Responsible: Management"

(see **annex 39, "Internal Quality Management of AQ Austria",** chapter 3.1.2)

7 AQ Austria's international activities

AQ Austria considers its international orientation as a core feature of the agency.

The international activities follow its internationalization strategy which complements the mission and starts from the following goals:

Internationalization Strategy

"AQ Austria, through its international operations, pursues the following strategic objectives:
• AQ Austria supports the recognition of Austrian universities, universities of applied sciences and private universities in the field of European higher education.
• 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.

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• The expertise of AQ Austria contributes to the development of quality assurance processes and standards at an international level. At the same time the AQ Austria draws on the experience of other agencies for its own work."

(see **annex 07, "Internationalization Strategy"**)

AQ Austria's international activities are organized following two streams:

Firstly, AQ Austria engages in mutual learning and developing quality assurance procedures further, together with other quality assurance agencies, higher education institutions or stakeholders as partners. In doing so AQ Austria, its members and staff were or are currently involved in activities such as the ENQA working groups *Staff Development* and *Quality Assurance in E-learning*; the working groups for the *revision of the ESG* and the design of the *European Approach for Quality Assurance of Joint Programmes*. AQ Austria and its staff participated and participate in developmental projects such as

- Qrossroads: **http://ecahe.eu/home/qrossroads/**
- CeQuint: **http://ecahe.eu/home/internationalisation-platform/certification/**
- STREAM: **http://www.ecostreamrus.com**
- IQM-HE: **http://www.iqm-he.eu/**
- HAQAA: **https://haqaa.aau.org/**
- SHARE: **https://www.share-asean.eu/**

AQ Austria also initiated a collaboration of quality assurance agencies in order to develop a *European approach for quality assurance of medical programmes* (2015-2017) which was, however cancelled because the partner from the medical field changed its priorities.

Collaboration and partnerships with other quality assurance agencies are important means, not just for keeping abreast with new developments in quality assurance but also for triggering new developments and last but not last learning from each other and supporting each other. Therefore AQ Austria collaborates with other agencies on a bilateral basis such as SKVC as regards search for experts (since 2016). An activity of particular relevance for AQ Austria was its leading role in the TWINNING-Project Strengthening Institutional Capacity for Quality Assurance (2014-2015) that supported the development of the Higher Education Authority of Bosnia-Herzegovina.[10]

AQ Austria is an active member of various international associations and networks of quality assurance agencies (ENQA, CEENQA, INQAAHE, Quality Audit Network) and also of EUA and EURASHE. These memberships are embraced actively, as they serve as a platform for the exchange of experience and support the participation in international initiatives and projects. AQ Austria is also listed on EQAR.

Secondly, AQ Austria also conducts quality assurance procedures in foreign countries of the EHEA. Since conducting procedures outside the country is not organized as a business in order to generate additional income, AQ Austria applies a defined geographical focus of these activities and conducts only selected procedures that promise to contribute to the purposes of AQ Austria's international engagement. Drawing on its rich experience of working with different countries and regions the agency focuses its activities on the German-speaking neighbouring countries and Central and Eastern Europe, mainly Southeast-Europe.

AQ Austria is certified by the respective Accreditation Councils of Germany and Switzerland for conducting accreditation in the respective countries. AQ Austria, however withdrew from its status of certified agency in Kazakhstan where the agency conducted various accreditation

[10] **https://www.aq.ac.at/de/internationales/internationale-aktivitaeten.php**

procedures between 2013 and 2017. Apart from activities based on these formal arrangements, AQ Austria conducted and conducts reviews in countries such as Bosnia-Herzegovina, Liechtenstein, Lithuania, Luxemburg and Slovenia.

8 Compliance with European Standards and Guidelines (Part 3)

8.1 Standard 3.1: Activities, policy and processes for quality assurance

***Standard**:*
Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

Guidelines:
To ensure the meaningfulness of external quality assurance, it is important that institutions and the public trust agencies.
Therefore, the goals and objectives of the quality assurance activities are described and published along with the nature of interaction between the agencies and relevant stakeholders in higher education, especially the higher education institutions, and the scope of the agencies' work. The expertise in the agency may be increased by including international members in agency committees.
A variety of external quality assurance activities are carried out by agencies to achieve different objectives. Among them are evaluation, review, audit, assessment, accreditation or other similar activities at programme or institutional level that may be carried out differently. When the agencies also carry out other activities, a clear distinction between external quality assurance and their other fields of work is needed.

As the national quality assurance agency AQ Austria's main legal obligations are to conduct external quality assurance procedures and related activities. Since its foundation AQ Austria has conducted approx. 600 external quality assurance procedures.

Based on its legal mandate and elaborating this further AQ Austria's goals and objectives cover aspects such as support to higher education institutions in continuous quality enhancement, providing impulses to the development of the higher education system and providing information about the quality of higher education to the public.

AQ Austria's goals and objectives provide support to HEIs through continuous quality enhancement, providing impetus to the development of the higher education system and providing information about the quality of higher education to the public.

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
T +43 1 532 02 20-0, F-99, office@aq.ac.at, www.aq.ac.at, DVR Nr.: 093 31 63

They are laid down in a mission statement which also contains the major principles that the agency adheres to in its day-to-day operations, as quoted in **chapter 3.4** and published on its website.[11]

AQ Austria translates its goals and principles into its day-to-day operations through a strategy. The current strategy was adopted in 2016 by revising the 2014 version and is valid until 2021.

The strategy contains four goals,

1. AQ Austria has established itself in Austria and internationally as a competence-center in questions related to quality of HEIs and higher education and makes a substantial contribution to the further development of the entire Austrian higher education system, beyond the boundaries of the subsystems. Its services are used also by foreign universities. Its expertise is recognized by stakeholders, referred to in higher education policy discussions and reflected in policy decisions.

2. AQ Austria supports public universities through consultancy services and the conduct of audit and other quality assurance procedures in their continuous quality enhancement.

3. AQ Austria shapes constructively the conflict between regulatory and supervisory functions and supporting role in quality development existing in the sector of universities of applied sciences. It supports the universities of applied sciences by offering consulting services, audits and other quality assurance procedures, thereby contributing to their further development recognized by the universities of applied sciences.

4. AQ Austria is not primarily perceived as a regulatory authority by private universities but also as a quality assurance agency and contributes to the differentiation and further development of the sector, while ensuring European quality standards.

(see **annex 06, "Strategy 2016"**)

For every goal relevant activities are defined. The implementation of the strategy is monitored by regular overviews about the operations tabled at Board meetings and by annual implementation reports to the Board. The Board discusses whether adjustments are necessary.

The second major way of operationalizing the mission is the design of the quality assurance procedures (see **chapter 9.2**) and the choice of other activities.

Stakeholder involvement is a key feature of AQ Austria. There are various types of such involvement.

The Board

As regards the governance of the agency, as explained in **chapter 3.4** the Board as the main decision-making body benefits from stakeholders' expertise because four members have to be nominated from the field of professional practice. Since all members of the Board act in their personal capacity this might not be considered stakeholder-involvement in the narrow sense. However, the perspective of experts from the various stakeholders areas add important views to the higher education and quality assurance experts from academia.

[11] **https://www.aq.ac.at/en/about-us/about_us.php**

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General Meeting/Governing Committee

In a formal way representation of stakeholder organisations in AQ Austria's governance is guaranteed by the General Meeting which consists of 23 representatives from 11 stakeholder organisations. Consequently the Governing Committee is composed by representatives of stakeholder-organisations as well. Differently from the regulations for the Board, the law explicitly stipulates that members act as representatives of the respective organisations. The management of the agency attends the meetings of the General Meeting and discusses its activity-report and current topics. In addition AQ Austria organizes an annual meeting of all bodies of the agency, notably the Board, the General Meeting including the Governing Committee and the Appeals Committee together with senior staff. The purpose is to exchange experience and to discuss current topics.

Stakeholder involvement is a key feature of AQ Austria.

External Experts

Stakeholder expertise is also used of in the external quality assurance procedures, mainly the accreditation procedures and evaluation procedures. Experts from the field of professional practice regularly form part of the expert panels. AQ Austria involves stakeholders also in its analytical work.

The particularly important stakeholder involvement in the revision of the quality assurance procedures is presented in **chapter 9.2**.

Meetings with Stakeholders

In addition and beyond these formalized ways of involving stakeholders AQ Austria meets regularly with the main stakeholder organizations namely uniko, ÖPUK, FHK, ÖH, and the ministry at least on an annual basis and discusses any topics of relevance.

As stipulated in the law AQ Austria conducts not only external quality assurance procedures based on the ESG, but also thematic analyses, reporting and consultancy such as supporting a HEI in developing its internationalization strategy or supporting a HEI in the preparation of an external review. Whereas the distinction between quality assurance and activities in the fields of analyses and reporting should be straightforward the distinction between quality assurance based on ESG and consultancy recently caught attention. AQ Austria describes its various activities on its website by also making explicit reference to whether or not the activities are within the frame of quality assurance in the narrow sense governed by ESG.

Reflection

AQ Austria is mandated with a broad range of activities. These include thematic analyses, reporting and consultancy and consequently go beyond conducting external reviews. This broad mandate triggers the goals and objectives of the agency as defined in the mission statement. They enable AQ Austria to fulfil its mission, in particular to support the development of the Austrian higher education system as a whole and in order to contribute to reaching the aim of HS-QSG namely supporting cross-sectoral standards for quality and quality assurance. The evaluation of the HS-QSG revealed that AQ Austria's role in triggering cross-sectoral discussions about quality of higher education institutions and its role in making quality standards more comparable are highly valued by the institutions and the stakeholders. (see also **chapters 10, 12, 13**)

The broad legal mandate enables AQ Austria to fulfil its mission in supporting HEIs and the higher education system as a whole.

However, it is fair to say that this breadth of activities enshrined in HS-QSG from the start turned out to be challenging with regard to its full acceptance by all parties involved.

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The challenge occurs with regard to the private universities and the universities of applied sciences and results mainly from the double-role of acting as statutory body with a supervisory function on the one side and as provider of quality assurance services and expertise with a supportive function on the other side. Experience from the first five years of operation shows that for the aforementioned higher education institutions this combination is not easy to handle. AQ Austria has to acknowledge that for a private university and a university of applied sciences it is not natural to collaborate with an agency for the purpose of its own development when the agency is at the same time the accreditation authority. Whereas these institutions highly value the role of the agency as regards providing a cross-sectoral communication platform and the cross-sectoral thematic analyses they, at the same time hesitate to commission the agency with any non-regulatory projects or reviews on an individual basis. Hence, it is more difficult for AQ Austria to make full use of its potential to reach its aims in these two sectors.

Performing the double-role as statutory body and service provider is challenging.

A second challenge results from the fact that AQ Austria has been established in a partially competitive national quality assurance system. As regards accreditation of private universities and universities of applied science and their programmes it is solely AQ Austria that performs this statutory function. Different from this the non-statutory function of audit of internal quality management systems at public universities and universities of applied science can be performed by AQ Austria or other internationally recognized quality assurance agencies that have to be registered with the ministry. This unique situation impacts on AQ Austria's activities in the field of analyses and reporting. As regards thematic analyses AQ Austria had to realize that the level of knowledge about an institution necessarily depends partly on whether an agency conducted a review or other activities at the institution or not.

AQ Austria will continue its efforts to familiarize private universities and universities of applied sciences with the various opportunities of using the agency for analyses and consultancy purposes. As a follow-up of its internal evaluation AQ Austria will discuss this topic with its stakeholders.

Concerning the involvement of stakeholders in the agency's governance and day-to-day operations AQ Austria considers the clear distinction of using independent stakeholders' expertise in the Board and in expert panels from the formal stakeholder representation in the General Meeting and the Governing Committee as well functioning solution to guarantee both stakeholder involvement and independence of the agency.

The distinction between making use of expertise from the field of professional practice in the Board and formal stakeholder representation in the General Meeting is essential.

This distinction and in particular the principle that Board members must not act on behalf of the nominating organization but contribute to the discussions from their professional perspective serves as a core guarantee of the independence of the agency.

8.2 Standard 3.2: Official Status

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

Guidelines:

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T +43 1 532 02 20-0, F-99, office@aq.ac.at, www.aq.ac.at, DVR Nr.: 093 31 63

In particular when external quality assurance is carried out for regulatory purposes, institutions need to have the security that the outcomes of this process are accepted within their higher education system, by the state, the stakeholders and the public.

AQ Austria is a legal entity under public law with the HS-QSG as a legal basis (§ 3 (2) HS-QSG). The legal mandate and the responsibilities of AQ Austria are stipulated in the law, as explained in detail in **chapters 3.3 and 3.4** namely being responsible for external quality assurance of all higher educational institutions except the colleges of teacher education, IST Austria and the Philosophical-Theological Universities (§ 1 (1) 1 HS-QSG). Also the law stipulates the bodies of the agencies and regulations concerning its funding. Last but not least also some basic principles of the quality assurance procedures are defined in line with the ESG, such as predefined standards, appointment of external experts, publication of results, etc. (§§ 2, 21 HS-QSG).

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 and by the Swiss Accreditation Councils as an accreditation agency in the two countries since 2013 and 2018 respectively (see **annexes 08** and **09**). From 2012 the agency was also recognized as accreditation agency by the Kazakh ministry but AQ Austria terminated its accreditation activities in Kazakhstan in 2018.

The formal recognition as quality assurance agencies by public authorities in Austria is based on the legal definition of AQ Austria's mandate and on the legal consequences of its accreditation decisions. For private universities and universities of applied sciences accreditation by AQ Austria equals the pre-the licence to operate as HEI and -through programme accreditation- to offer programmes. For public universities and universities of applied sciences the certification of internal quality management systems by the Quality Audit is recognized as being compulsory.

8.3 Standard 3.3: Independence

Standard:
Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

Guidelines:
Autonomous institutions need independent agencies as counterparts.
In considering the independence of an agency the following are important:
- Organisational independence, demonstrated by official documentation (e.g. instruments of government, legislative acts or statutes of the organisation) that stipulates the independence of the agency's work from third parties, such as higher education institutions, governments and other stakeholder organisations;
- Operational independence: the definition and operation of the agency's procedures and methods as well as the nomination and appointment of external experts are undertaken independently from third parties such as higher education institutions, governments and other stakeholders;
- Independence of formal outcomes: while experts from relevant stakeholder backgrounds, particularly students, take part in quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.
Anyone contributing to external quality assurance activities of an agency (e.g. as expert) is informed that while they may be nominated by a third party, they are acting in a personal capacity and not representing their constituent organisations when working for the agency. Independence is important to ensure that any procedures and decisions are solely based on expertise.

AQ Austria's independence and its operational autonomy are legally guaranteed at different levels:

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
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The foundation of AQ Austria's independence is to be seen in its establishment as legal entity under public law with its own legal basis that regulates the agency's responsibilities, structure and governance, funding, and operations.

Organisational independence: The HS-QSG explicitly stipulates in § 9 (2) that the Board as the central decision-making body is not subject to any instructions. This is at the core of the agency's independence because the Board is the body responsible for all relevant decisions regarding quality assurance procedures, the appointment of the Director and the Deputy Director, and the decision upon the budget. Neither the General Meeting nor the Governing Committee as bodies of stakeholders are involved in any way in the agency's day-to-day operations, in particular not in the accreditation and certification decisions.

Also the process of nomination of Board members is crucial for the agency's independence. Ten members are nominated by the General Meeting by a two-thirds majority which ensures a broad agreement of all stakeholders. Four members are formally nominated by the Minister of Science (§ 7 HS-QSG).

Operational independence: The HS-QSG stipulates in § 9 (1) No 2 that the Board is responsible for deciding upon procedures and standards. Consequently the Board designs the procedures by taking into account the relevant legal stipulations and also appoints the external experts.

Independence of formal outcomes: The independence of the Board in decision-making is enshrined in § 9 (2) HS-QSG and is explicitly highlighted again with respect to accreditation decisions in § 25 (3). Hence no other body of the agency or external body can interfere in the decision-making; accreditation decisions must be approved by the responsible Minister according to § 25 (3), and can only be withheld for reasons of unlawfulness or conflict with "overarching political deliberations".

Reflection

As also concluded in the evaluation of the HS-QSG AQ Austria considers its independence and operational autonomy, which is enshrined in national law as strength.

The legal provisions on the structure of the agency are to be considered an example of good practice in the EHEA. This also applies to the implementation of independence in the design of quality assurance processes, in the implementation of the processes and the final decisions on formal outcomes, especially in securing the independence of experts. AQ Austria considers the independence of peers a crucial feature of the independence of a quality assurance agency.

The various legal provisions for assuring AQ Austria's independence can be considered good practice.

The legal provisions for involving stakeholders in the agency's governance allow the agency to combine effectively the principles of independence and participation of the relevant stakeholders. The stakeholders have a clear mandate to contribute to the further development of the agency and its review processes through the discussions at the General Meeting, without being able to exercise influence on decision-making.

As regards the composition of the Board it's noteworthy that at least 40 percent of the members have to be foreign members. This regulation does not only assure a profound international perspective and expertise in AQ Austria's operations. In addition it supports the agency's independence in particular because Austria is a small country.

Regarding the necessary approval of accreditation decisions by the minister it should be emphasized that, firstly, the Minister cannot alter or amend the accreditation decisions of the agency. Secondly, the Minister cannot refer a decision back to the agency for review. The Minister can only deny approval of a decision. It is important to note though that the Minister

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can disapprove a decision only for two reasons. Firstly and not surprisingly, if the decision violates Austrian law. Secondly, if is clashing with 'overarching political deliberations'. This conversely means that the quality assessment is the sole responsibility of the agency. Since the implementation of accreditation in Austria 25 years ago no such case ever occurred. As part of actual discussions about a revision of the HS-QSG this regulation is under question.

8.4 Standard 3.4: Thematic analysis

Standard:

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

Guidelines:

In the course of their work, agencies gain information on programmes and institutions that can be useful beyond the scope of a single process, providing material for structured analyses across the higher education system. These findings can contribute to the reflection on and the improvement of quality assurance policies and processes in institutional, national and international contexts.

A thorough and careful analysis of this information will show developments, trends and areas of good practice or persistent difficulty.

As explained in **chapter 3.4** AQ Austria, based on its legal mandate publishes various types of thematic analyses and reports such as thematic analyses in the wider sense that deal with current questions related to quality in higher education and are not solely linked to the results of the reviews conducted by the agency and thematic analyses in the narrow sense that directly address results from the reviews.

Reflection

AQ Austria sees it as a strength that the analysis and reporting task has been enshrined in law. Consequently, a separate, yet small department was established in the secretariat, which is responsible for this area of activities. In principle the work is organized on a project-base so that almost all staff can be involved. However, it is fair to say that in the first years after establishing the agency the workload of establishing the organisation and its quality assurance procedures and growing numbers of reviews hampered the development of the department. In addition two structural decisions turned out to be not favourable. On the one hand the managing director was also head of the department and on the other hand two staff were assigned partly to this department and partly to the accreditation department. Since time was often pressing in the accreditation procedures the two colleagues were not able to invest as much time in the analytical work as originally planned. Consequently the agency changed the structure. The department has now its own head, and staff is assigned solely to this department, also staff resources have been raised by 1 FTE. However, in principle the organisation of the work shall be kept as it is which means that analyses are conducted in project groups that consist of colleagues from all departments. In addition, in 2018 the agency implemented a new policy: Every member of the accreditation and audit departments has to conduct one small thematic analysis per year, either alone or in cooperation with other colleagues. The topics of these small analyses, which will be done in addition to the larger ones, will be agreed upon within the secretariat.

AQ Austria's analytical activities go beyond thematic analysis in the narrow sense.

Although one might consider only the second group of reports mentioned above thematic analyses as defined by ESG AQ Austria would emphasize that it recognizes also the other types of thematic analyses and reports as being equally important in order to fulfil its mission

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
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of supporting the development of the higher education system. Reducing the concept of thematic analyses to aspects directly related to particular reviews would mean utilizing only parts of the potential of a quality assurance agency, if one accepts the concept of a quality assurance agency being more than an organisation conducting reviews.

Today the agency can confirm that it benefits from the recent analytical projects carried out, particularly the evaluation of the HS-QSG and the thematic analyses of the procedures because most relevant results were used for the revision of the strategy and the revision of the procedures.

8.5 Standard 3.5: Resources

Standard:

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

Guidelines:

It is in the public interest that agencies are adequately and appropriately funded, given higher education's important impact on the development of societies and individuals. The resources of the agencies enable them to organise and run their external quality assurance activities in an effective and efficient manner. Furthermore, the resources enable the agencies to improve, to reflect on their practice and to inform the public about their activities.

Human Resources

AQ Austria employs 33 staff (29 full-time equivalents) (see **annex 10**). Since 2012 the number of staff has increased slightly. Three positions were added, one due to the new task of notification of foreign degree programmes, one in order to support international activities (which is self-funded), and one in the back-office. The secretariat is organized in four departments, notably the departments for accreditation, for audit and consultancy, for analyses and reporting, and finally the department for administration that includes also the back office for procedures and projects. Although every staff member is assigned to a department and hence specializes in certain procedures or projects all staff, as a matter of principle might also conduct reviews or projects in other departments. This is to widen experience and expertise of staff and it also helps to balance uneven distribution of workload between the departments over time.

Staff plays a critical role for professional, correct, and timely conduct of all activities. Hence, AQ Austria puts efforts in staff recruitment and staff development procedures as explained in **chapter 3.4**. Staff retention is high; during the last four years only three staff left the agency.

In addition to staff also the members of the Board play a crucial role in performing the agency's tasks. As stipulated in the law the Board consists of 14 experts in higher education. This number not only guarantees a broad representation of different perspectives and experiences in the decision-making body and to engage in working groups such as the working group for the revision of the procedures or the self-assessment in preparation of the ENQA review etc. It also helps distributing the heavy workload in preparing more than 100 decisions on review cases and numerous other decisions per year.

Material resources

The secretariat will move into new premises in early December 2018. Office at time of approval of the SAR: The office premises extend to approximately 700 sqm and are equipped

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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, 13 PC workstations, 19 laptop workstations, and 6 further laptops. A meeting room is available for meetings, workshops and training seminars.

New office at time of the Site Visit: The agency will have moved to new, larger office premises (see **annexes 41 and 42**) which extend to approximately 1000 sqm and are equipped with a modern office infrastructure. There is more space and more rooms available for meetings etc.

The agency uses a central data storage system that has been developed into a document management system, and a document platform with restricted external access. Also, a library of about 2.500 titles is available to the staff.

Financial Resources

The funding of AQ Austria is regulated by law and originates from the federal budget and from own revenues resulting from fees for the reviews and other income. The annual budget is negotiated with the ministry (see **annex 40**). The draft budget for 2019 amounts to 2.8 million euros with 900.000 euros generated income from the agency's activities.

The agency may decide freely how it spends its funds. As usual staff costs are the biggest budget item. The budget contains specific budget items for staff development (17.000 euros), publications (15.000 euros) and for events (50.000 euros).

Reflection

Overall staffing is to be considered sufficient, however planning of physical resources is challenging, mainly for two reasons. Fixed application dates for accreditation requests don't exist. Consequently, private universities can submit applications at any time, and AQ Austria has to finish the procedure within nine months. Although the agency, with support of the institutions, keeps record of envisaged applications, institutions sometimes have to change plans at short notice and postpone applications for various reasons. As regards accreditation applications by universities of applied sciences planning is easier because, due to funding decisions by the ministry the applications are submitted within a time corridor of around three months. Normally, the agency knows in advance how many applications can be expected; on the other hand most of them are submitted within a period of two months which means that they have to be processed in parallel. Other reviews like audits and voluntary procedures are not foreseeable. The only type of procedures that is foreseeable is institutional reaccreditation. Therefore planning of physical resources has to be renewed almost on a quarterly basis. In conclusion, although staffing is sufficient in quantitative terms timing can cause overwork. Obviously, the agency cannot react to a peak of applications by hiring new staff on a short notice because training of new staff takes too long.

All in all, the agency has a sound financial basis. However, timing of decision on the annual budget leads to a certain level of uncertainty. The budget proposal is drawn together in May for the following year. It is extremely difficult to predict the amount of upcoming reviews in Austria let alone reviews outside the country which often have a lead time of just two to four months. This makes planning of physical and financial resources challenging.

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8.6 Standard 3.6: Internal quality assurance and professional conduct

Standard:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

Guidelines:

Agencies need to be accountable to their stakeholders. Therefore, high professional standards and integrity in the agency's work are indispensable. The review and improvement of their activities are on-going so as to ensure that their services to institutions and society are optimal.

Agencies apply an internal quality assurance policy which is available on its website. This policy

- ensures that all persons involved in its activities are competent and act professionally and ethically;

- includes internal and external feedback mechanisms that lead to a continuous improvement within the agency;

- guards against intolerance of any kind or discrimination;

- outlines the appropriate communication with the relevant authorities of those jurisdictions where they operate;

- ensures that any activities carried out and material produced by subcontractors are in line with the ESG, if some or all of the elements in its quality assurance activities are subcontracted to other parties;

- allows the agency to establish the status and recognition of the institutions with which it conducts external quality assurance.

Based on its mission statement, AQ Austria sees itself as a learning organization that sets high quality standards for its own activities, ensures the achievement of its goals through professional conduct and develops its own activities further through regular reflection. AQ Austria uses an internal quality management system that was developed in 2013/14 and revised in 2016 (see **annex 39**). As explained in **chapter 6** the scope of the quality management system covers management processes and support processes in addition to the core processes, since these processes have a significant impact on the quality of the core processes. For each process a quality standard together with a process and instruments have been defined in order to assess whether the quality aims are fulfilled.

External quality assurance at higher education institutions as understood and performed by AQ Austria is not a technical box-ticking exercise based on quantitative data. Notwithstanding the fact that designing methodologies fit for purpose (see also **chapter 9.2**) and consistent application of these (see also **chapters 9.3 to 9.5**) are at the core of professionalism of a quality assurance agency one has to take into account that review procedures that are based on peer review place people in the focus of the reviews. This is the reason why AQ Austria considers information, training and briefing as core and puts huge emphasis on the competences of people involved in its activities. This starts with the experts and comprehensive training and briefing activities as detailed in **chapter 9.4**, continues with the staff development activities for staff and especially the review coordinators as detailed in **chapters 3.4 and 9.5** and covers also the members of the agency bodies, in particular the members of the Board. New Board members receive an induction meeting that helps them to familiarize with the legal framework of the agency and its activities, the role of the Board and the individual members, the standard procedures of the Board, and finally actual topics and future developments.

Internally once a year the presidency of the agency holds a formal meeting with the secretariat in order to discuss the collaboration and the communication between Board and secretariat

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and also in order to discuss actual and future developments. Also, once a year all bodies of the agency meet in order to discuss actual topics and developments.

Guaranteeing consistent application of regulations has to go beyond fostering a common understanding. In order to support consistent conduct AQ Austria supports the conduct with descriptions of standard operating procedures and various templates etc (see **annex 24**). In addition to the consistent application of the regulations the agency also has to adhere to basic principles such as impartiality and tolerance etc. Hence AQ Austria applies codes of conduct for all people involved that highlight these topics (see **annex 22**).

AQ Austria does not collaborate with subcontractors.

Results

The biennial quality report plays a major role in the internal quality management of the agency. This report presents the activities in terms of internal quality management and gives information about the results. The report contains recommendations based on the results that refer both to the internal quality management and also to the core processes of the agency.

Based on the Quality Report 2015-2017 the Board came to the conclusion that the agency applied comprehensive internal quality assurance instruments according to its internal regulations and that these instruments haven proven to be appropriate and effective. One core aspect of the report is the analysis of the feedback from reviewed HEIs and from the external experts during the previous two years. Although the turnout of the report was very positive (96 percent of HEIs and experts assessed the work of the agency positive, also critical statements were made, mostly referring to the usability of the review reports for the development of programmes and to the contribution of the reviews to the HEIs' internal quality management. Both topics played a major role in the revision of the regulations. Also the recommendation of the experts to use an online-tool for drafting the reports was taken up and respective software is in use since 2018. The report contained 22 recommendations, of which only a small number referred to the review processes as such but more to internal communication. A revision of the internal quality management system was not deemed necessary.

AQ Austria wishes to emphasize that it considers the monitoring of its reviews at least as important as formalized quality assurance procedures ex post. In this respect the regular department meetings play a major role. The core purpose is the discussion of relevant issues popping up in reviews such as interpretation of criteria, particular challenges that are new etc. Also the feedback gathered from reviewed HEIs and from review experts are immediately discussed in a meeting in case interesting and/or relevant information is given. The department meetings support a consistent application of the regulation and a similar conduct of the reviews. The experience gathered led to staff development activities such as training workshops for conducting of and communicating at site-visits, the revision of the content of experts training seminars etc. One should not underestimate the relevance of the department meetings as regards internal quality management. Also as regards the feedback of reviewed HEIs and external experts the department meetings are at the core of utilizing experience gathered because it turned out that this kind of feedback is most relevant for practical questions of the conduct of quality assurance procedures and hence for the secretariat. The feedback is discussed in the relevant department and actions are taken immediately.

AQ Austria is subject to various other accountability regulations. 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. The annual activity report is submitted to the national parliament via the Federal Minister to be discussed by the committee for science and is published (§ 28 (1) HS-QSG). The agency is also subject to review by the Austrian Court of Audit and the Ombudsman's Office (§ 30 (1) HS-QSG).

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Reflection

AQ Austria considers its focus on the definition and description of critical steps and processes of the review procedures and on the individuals involved in its activities as effective. However, during the last two years, mainly because of the results of the various analytical and self-critical projects such as revision of the strategy, evaluation of the HS-QSG and the revision of the external quality assurance procedures AQ Austria learned that there might be quite some potential in linking the internal quality management closer to the regular analytical work. Hence, as a result of the internal evaluation AQ Austria will discuss a revision of its internal quality management system with view to linking it closer to thematic analyses and to impact of external quality assurance on higher education and also in order to introduce some key performance indicators such as length of reviews.

In general one should not underestimate the relevance of informal reflection for professional and high quality conduct of the agency's activities. The various opportunities for staff to exchange experience and to discuss actual questions on practical and other issues at department meetings etc. plays a crucial role for keeping the agency's standards high.

8.7 Standard 3.7: Cyclical external review of agencies

Standard:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

Guidelines:

A periodic external review will help the agency to reflect on its policies and activities. It provides a means for assuring the agency and its stakeholders that it continues to adhere to the principles enshrined in the ESG.

The HS-QSG stipulates in § 3 (4) that AQ Austria has to undergo regularly an external evaluation against international standards. So far AQ Austria has been evaluated by the German Accreditation Council in 2013 and by ENQA in 2014. Due to legal changes in the German Accreditation system AQ Austria, notably the recognition as agency for the German accreditation system through the inclusion in EQAR the external evaluation by the German Accreditation Council will discontinue.

9 Compliance with European Standards and Guidelines (Part 2)

9.1 Standard 2.1: Consideration of internal quality assurance

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

Guidelines:

Quality assurance in higher education is based on the institutions' responsibility for the quality of their programmes and other provision; therefore it is important that external quality assurance recognises and supports institutional responsibility for quality assurance. To ensure the link be-

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tween internal and external quality assurance, external quality assurance includes consideration of the standards of Part 1. These may be addressed differently, depending on the type of external quality assurance.

AQ Austria is committed to contributing to the quality enhancement of higher education institutions (see **chapters 3.4 and 8.1** about AQ Austria's mission). By addressing the internal quality management systems of HEIs and in particular their effectiveness, AQ Austria not only wants to ensure that these systems correspond with high national and international standards but also that they improve the quality of higher education provision and other activities. The agency also wants to strengthen the primary responsibility of higher education institutions for the quality of their activities.

When assessing the consideration of ESG Part 1 in external quality assurance procedures it is important to widen the perspective from a separate assessment of each compulsory quality assurance procedure applied and take into account all compulsory procedures applied and other activities because they are designed to complement each other.

The way AQ Austria addresses the effectiveness of internal quality management systems of higher education institutions necessarily varies between the different quality assurance procedures applied by the agency and depends on the subject matter of the procedure and on its purpose:

The way AQ Austria addresses the effectiveness of internal quality management systems of HEIs necessarily varies between the different quality assurance procedures.

- Audit, Institutional Accreditation (in Switzerland): The purpose of these procedures is to evaluate and certify the effectiveness of the internal quality management system of a higher education institution. Hence, the internal quality management system and its effectiveness as such are subject matter of the procedure.
- Institutional Accreditation (in Austria): The purpose of institutional accreditation of universities of applied sciences and private universities is to assess whether all accreditation criteria are complied with. The list of criteria is similar to many others for accrediting institutions and covers the institutions' internal quality management system. The effectiveness of internal quality assurance is particularly addressed in § 16 (4) of the accreditation ordinances that calls for effective internal processes for design, delivery and quality assurance of degree programmes. This stipulation is also at the core of easing institutional reaccreditation by way of focussing on these procedures rather than assessing all the programmes as done so previously.
- Programme Accreditation (in Austria), Voluntary Accreditation of Continuing Education Programmes at higher education institutions (in Austria), International Programme Accreditation (in the EHEA), Programme Accreditation (in Germany): The purpose of programme accreditation at universities of applied sciences and private universities is to assess whether all accreditation criteria are complied with. The list of criteria is similar to many others for accrediting programmes and covers the institutions' internal quality management system, and in particular, as mentioned above, the processes for designing degree programmes taking into account results from the internal quality management system.
- System Accreditation (in Germany): The purpose of system accreditation is to evaluate the effectiveness of the internal quality management system in teaching and learning of a higher education institution. Hence, the internal quality management system and its effectiveness as such are subject matter of the procedure.

How the standards of ESG part I are addressed in the various procedures is shown in table 1.

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Table 1: AQ Austria's procedures and ESG: Mapping table

	Audit	Inst. Accr.[12]	Progr. Accr.[13]	Accr. Cont. Ed. Progr.[14]	Internat. Accr.[15]	Progr. Accr. (GER)[16]	System Accr. (GER)	Inst. Accr. (CH)
ESG 1.1	Stand-ards 1, 2	§15 (12)	§17 (1) No 2	(25)	Standard 1.1	§14	§17	1.1-1.4
ESG 1.2	Standard 3	§15 (4) No 2	§17 (1) No 1			§§11, 12, 13	§17	3.2
ESG 1.3	Standard 3	§15 (5) No 5, 7 §15 (5) No 6, 8	§17 (2) No 5, 7 §17 (2) No 6, 8	(23) g	Stan-dards 1.2-1.6	§§12, 15	§17	3.4
ESG 1.4	Standard 3	§15 (5) No 9-11 §15 (5) No 10-12	§17 (2) No 9-11 §17 (2) No 10-12	(23) e,g,i,j,k,l, m	Stan-dards 1.7-1.9	§§5, 6, 12, 14	§17	3.4
ESG 1.5	Stan-dards 3, 5	§15 (8)	§17 (3)	(24)	Stan-dards 2.1-2.3	§12	§17	4.2, 4.3
ESG 1.6	Standard 3	§15 (6), (9), (10)	§17 (4), (5)	(26)	Standard 4	§12	§17	4.1
ESG 1.7	Standard 2	§16 (11) No 2	§17 (1) No 2	(23) n; (25) b	Standard 3	§14	§18	2.2
ESG 1.8	n/a	§15 (13), § 16 (12)	§15 (13), § 16 (12)	(23) m,n		'[17]	§18[18]	5.1, 5.2
ESG 1.9	Standard 3	§15 (4) No 2, (12)	§17 (1) No 2	(25)	Standard 4	§14	§18	3.2
ESG 1.10	Rule 7	§9 (2)[19]	§9 (2)[20]	(17)	Rule 3.5	§26	§26	

[12] 1st line: Accreditation Ordinance for Private Universities, 2nd line: Accreditation Ordinance for Universities of Applied Sciences

[13] 1st line: Accreditation Ordinance for Private Universities, 2nd line: Accreditation Ordinance for Universities of Applied Sciences

[14] The Guidelines are currently under revision. Purpose is the alignment with the recently revised accreditation ordinances. Adoption is envisaged for February 2019

[15] The Guidelines are currently under revision. Purpose is the alignment with the recently revised accreditation ordinances. Adoption is e3nvisaged for February 2019

[16] NB: the information refers to Specimen decree pursuant to Article 4, paragraphs 1 – 4 of the interstate study accreditation treaty

[17] Publication of examination regulations which contain information on study programmes is obligatory according to higher education acts of the German states.

[18] Publication of examination regulations which contain information on study programmes is obligatory according to higher education acts of the German states.

[19] Further explanation **chapter 3.3**: universities of applied sciences move to the audit scheme after their first re-accreditation.

[20] Further explanation **chapter 3.3**: universities of applied sciences move to the audit scheme after their first re-accreditation.

Reflection

As mentioned above an isolated perspective on every compulsory quality assurance procedure disregards the partly complementary character of or at least the links between some procedures. Whereas institutional reaccreditation covers also the programmes the audits focus on internal quality management anyway. What is common to both systems is that the most important function of programme accreditation is to form a basis for the initial state approval, meaning that these procedures take place when an already accredited institution wants to introduce a new programme. Consequently, at programme level the effectiveness of the internal quality management system does not have to be addressed at the same level of detail as in the procedures at institutional level. AQ Austria took this into account at the recent revision of the procedures.

If various quality assurance procedures are applied to a HEI compliance with ESG has to be assessed by taking an inclusive perspective.

AQ Austria addresses internal quality management systems of higher education institutions and their effectiveness not only as part of the various compulsory external quality assurance procedures in Austria. In addition, two other activities of AQ Austria mainly focus on internal quality management of higher education institutions. Firstly, AQ Austria collects and analyses annual reports on recent developments from all accredited higher education institutions, and results from the internal quality management system are one item in the reports. Secondly, AQ Austria publishes on a triennial basis an analysis of the state of development of internal quality management at Austrian higher education institutions. The information gathered with these two instruments not only forms the basis for individual feedback to higher education institutions; it also feeds into public discourse about good practice in the field of internal quality management of Austrian higher education institutions.

Both aspects show that such a segregated application of the ESG might provide a comprehensive picture of those agencies that have a broader remit than only offering on single quality assurance procedure.

9.2 Standard 2.2: Designing methodologies fit for purpose

Standard:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

Guidelines:

In order to ensure effectiveness and objectivity it is vital for external quality assurance to have clear aims agreed by stakeholders.
The aims, objectives and implementation of the processes will
- bear in mind the level of workload and cost that they will place on institutions;
- take into account the need to support institutions to improve quality;
- allow institutions to demonstrate this improvement;
- result in clear information on the outcomes and the follow-up.
The system for external quality assurance might operate in a more flexible way if institutions are able to demonstrate the effectiveness of their own internal quality assurance.

The purposes of the quality assurance processes carried out by AQ Austria are defined by the agency taking into account the corresponding legal provisions as far as compulsory processes are concerned. Generally speaking, the purposes of the various processes have one common

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
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feature: to assess whether the subject matter –programme, institution, or internal quality management system- complies with pre-defined standards or criteria..

The legal consequences vary: no legal consequences as far as audits at public universities, the voluntary accreditation of continued education programmes, or international accreditation are concerned on the one side and direct legal consequences such as (precondition for) state approval as far as compulsory accreditation procedures are concerned on the other side. A second purpose that is common to all processes is to support the HEI in enhancing the quality. However the extent to which the second purpose is served varies from process to process. In general the enhancement function is stronger in processes at institutional level.

Dependent on the core purpose of a quality assurance procedure core elements such as enhancement, follow up etc necessarily have to be designed differently.

Despite variations in the purposes or legal consequences of the processes, all of them follow the common pattern of external quality assurance in the European Higher Education Area: self-assessment, external assessment by peer review experts including a site visit, a report written by the peer review experts and published, and finally a follow-up. Based on this common pattern the design of the processes varies in detail in order to serve the specifics of the purposes.

The specifics of accreditation and audit trigger differences mainly regarding the criteria or standards used in the procedures.

In order to serve the purpose of audits AQ Austria applies a short list of only 5 standards that are formulated in a broader and more generic way than accreditation criteria. The standards address core aspects of a quality management system such as definition of responsibilities and structures, of its demonstrable effectiveness and of is further development. Nevertheless, since audits lead to a certification decision the standards are, although generic formulated in a way that makes a yes/no decision on its effectiveness possible. In doing so AQ Austria takes into account the particular subject matter of an audit, namely the internal quality management system and its further development as the second purpose of the audits. Obviously internal quality management systems may vary significantly due to differences of the HEI in terms of profile, size, structure and internal culture. Because such systems have to take into account the specific needs of the given institution standards for evaluating internal quality management systems necessarily have to provide leeway for the institutions.

In order to serve the purpose of accreditation AQ Austria applies a list of criteria that address the common features of good quality of an institution with all its areas of activities or of an internal quality management system or of a programme and that also address the various formal legal requirements which are also relevant for approval of the institutions and their programmes. In order to guarantee reliability and foster consistent application the criteria are formulated as clear and unambiguous as possible. In addition the criteria contain elements that serve the dimension of quality enhancement such as the design and application of internal quality assurance processes in order to further develop programmes etc. (§ 15 (4), § 16 (4), § 17 (1) of the Accreditation Ordinance for universities of applied sciences; the same applies for private universities) Naturally the accreditation criteria are more detailed than the audit standards because they address a much broader range of activities of the institutions.

The explanations regarding accreditation criteria also apply for the other accreditation procedures of AQ Austria, namely voluntary accreditation of continuing education programmes, international accreditation and accreditation in German and in Switzerland.

In general: enhancement

Although the purposes of the procedures vary and locate at different points on the continuum between compliance-dimension and enhancement-dimension AQ Austria, in accordance with

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its mission strives to place as much emphasis as possible on quality enhancement. How enhancement is supported and to what extent this is feasible varies from procedure to procedure. It is straightforward in audits and institutional accreditations because the internal procedures and instruments for quality enhancement are in one focus of the assessment. In particular the new design of institutional re-accreditation follows this route by moving the effectiveness of internal quality management systems more into focus (see **previous chapter**) which lowered significantly the level of workload for the institutions.

In procedures at programme level the enhancement dimension is applied in a more direct way by way of providing recommendations for further development of the programmes. (§ 7 (1) of the accreditation ordinances; the same applies for the universities of applied sciences) In general also the new design of the reports support this direction by way of emphasizing progress made since the last review (in institutional re-accreditation) and by way of highlighting commendations and recommendations as regular part of each report (see **annex 24**). (§ 7 (1) of the accreditation ordinances; the same applies for the universities of applied sciences)

In one regard the enhancement dimension is hampered by the legally defined impossibility to give conditions in initial accreditation, whereas the law does permit this instrument for institutional re-accreditation and for decisions on substantial changes (§ 23 (8) and § 24 (9) HS-QSG). Experiences from institutional re-accreditation and international experience show that the application of conditions in accreditation decisions strengthens the developmental aspect in accreditation processes, which is why AQ Austria advocated for an amendment to the law in this regard.

In general: information

Further explanation in **chapter 9.6**

In general: follow-up

As regards the follow-up differences occur according to the legal provisions. Following its principle that external quality assurance shouldn't be a one-off activity but quality assurance agencies should support the quality enhancement at the institutions AQ Austria puts a lot of emphasis in supporting activities out of which follow-up in the narrow sense is just one element.

The basis for the follow-up is laid down during the external quality assurance processes themselves. As a regular feature external experts are requested to give recommendations for further developments.

AQ Austria applies one common follow-up instrument that is giving conditions and assessing whether or not these conditions are fulfilled. This instrument is applied in all processes except for initial accreditation in Austria. (§§ 9 resp. 13 of the accreditation ordinances and pp. 9, 10, 21 "Guideline for the Audit of Higher Education Institutions' Quality Management Systems")

Assessing how an institution fulfils conditions might be the most wide-spread follow-up instrument. However, it is not, from AQ Austria's point of view the most important one in Austria. The agency uses more instruments that differ according to the legal nature and framework of the quality assurance processes. As far as universities of applied sciences and private universities are concerned AQ Austria's statutory mandate goes beyond taking accreditation decisions and provides for another instrument that plays an important role in the follow up. The institutions have to submit an annual report on major internal developments. Currently the ordinances on annual reports are revised and the drafts place a stronger emphasis on the reports' follow-up function. One item to be discussed in the reports will be the follow-up on results of external quality assurance processes and in particular on the follow-up on recommendations made in recent reviews. These reports will provide AQ Austria with an important source of information as well as acting as a monitoring tool. They will enable AQ Austria to

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monitor the implementation of requirements or recommendations and other relevant developments and where appropriate, allow it to give feedback and advice. In addition, the annual reports will be 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.

As far as audits are concerned AQ Austria applies an additional instrument that is a voluntary follow-up workshop. (Explanation No 9) The purpose of this workshop is to go beyond discussing conditions, if any, but to discuss the recommendations and possible ways of implementing them. Although convinced of the relevance of such a workshop AQ Austria decided deliberately not to include this follow-up workshop as a regular step in the audit process. The reason is the fact that regarding audits in Austria AQ Austria has to compete with foreign quality assurance agencies, none of which has such a step in its processes. Since workload, duration, and costs of a process are relevant criteria for choosing an agency it would not be beneficial for AQ Austria to integrate a follow-up workshop as compulsory.

Specific case: cross-border provision of programmes

If a private university or a university of applied sciences wants to offer a programme abroad specific additional regulations apply. In general the institutions have to guarantee that the quality of the provision at the additional location is comparable to the main location, that the specific features of cross-border provision are adequately addressed by the internal quality management, and finally that national regulations are complied with if applicable. In terms of procedural rules, the same regulations apply, meaning that external experts are appointed and a site-visit is conducted at the new location. However, the Board decides on a case-by-case basis which procedural steps are going to be taken in order to conduct the process appropriately and efficiently.

Specific case: Substantial changes

If a private university or a university of applied sciences wants to introduce substantial changes to the institution or to one of the programmes the agency has to assess whether or not all this affects compliance with the accreditation criteria. The changes might refer to the title of the programme or the qualification objectives or to new foci in the curriculum. The Board decides on a case-by-case basis which procedural steps are going to be taken in order to conduct the process appropriately and efficiently. External experts are only appointed and will only conduct site visits if an expert assessment of an amendment is deemed necessary. This might apply for changes of greater significance in the curriculum but not for the change of the name of the programme. The Board organizes these processes as lean as possible in order not to stifle change and innovation. Although in the beginning the case-by-case – decisions created some level of uncertainty on the side of the institutions, the agency refrained from designing fixed rules about when and why which procedural step has to be applied because this would have most likely led to a very bureaucratic approach. The effectiveness of the institutions' internal quality management plays a critical role for the decision about the procedural steps to be applied. In case the applicant institution demonstrates a sound internal process as foundation of the application the Board normally immediately decides upon the application without any further steps.[21] During the years 2013 to 2015 it took a while to establish a standing practice in this regard but today this light approach is well established.

21 § 12 Decree on Accreditation of Private Universities (Appendix 5.2) and § 12 Decree on Accreditation of Universities of Applied Sciences (Appendix 5.3)

Designing methodologies: Utilizing experience and involving stakeholders in the design of the procedures

In order to apply procedures fit for purpose and in accordance with its mission and the legal requirements AQ Austria, during the recent revision of its procedures made use of its ample experience through various analytical projects (see **chapter 2**) and also involved stakeholders. At an early stage strengths and weaknesses of the procedures and whether the procedures were fit for purpose were discussed with experts from the higher education sectors. As a third source of information AQ Austria utilized the evaluation of the HS-QSG that it had conducted in 2016/17. This report revealed interesting observations and perceptions of the quality assurance procedures and the agency's activities in general and which were of particular relevance as regards the balance of assurance and enhancement dimensions in the quality assurance procedures. The new regulations were designed by consulting in various occasions with stakeholders as usually done by AQ Austria:

Combining compliance and enhancement dimensions in quality assurance procedures is challenging but possible. Practical questions of conduct are essential, not only regulations.

- Survey among HEI as regards needs for revision in November 2016,
- Discussion with experts from the HEIs about general questions of the procedures in April 2017,
- Workshops with experts on „zero-drafts" in October 2017,
- Discussion with stakeholders and international experts in January 2018
- Public consultation in May 2018.

An overview of the process and the stakeholders' involvement is shown in **annex 23**. The new regulations were presented in public workshops.

Reflection

As a general remark, AQ Austria wishes to emphasize that designing procedures fit for purpose is only one side of the coin. The other side is the conduct of the procedures fit for purpose. Further explanations are made in the following chapter.

It is fair to say that combining compliance and enhancement dimensions in quality assurance procedures is challenging. Difference in the nature of these sets of standards and criteria causes discussion among private universities and universities of applied sciences about the level of detail of the accreditation criteria. As an agency responsible for accreditation AQ Austria is caught in the situation that institutions on the one side criticise criteria as being too many, too prescriptive and too detailed. On the other side the same institutions ask for as much standardization across the sector as possible and for as much precision and guidance as possible. In particular the latter is understandable since the approval of institutions or programmes is linked to accreditation and reliability and almost predictability of the application of the criteria is important. In the recent revision of its procedures AQ Austria tried to find a balance between flexibility and precision. In particular the agency added information about meaning, interpretation and possible ways for giving evidence to those criteria that occured to be most challenging to the institutions. The additional information explains current practice and is based on the experience gathered during the last five years. However, dissatisfaction on side of the institutions seems to be natural in this tension created by simultaneously being flexible and precise.

AQ Austria addressed the enhancement dimension of its procedures sensitively in the recent revision of its procedures. It is fair to say regarding all kinds of procedures that result in a formal decision, institutions understandably request a certain or even high level of standardization which, on the other side might hamper the enhancement dimension. But, as mentioned

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
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before AQ Austria wishes to emphasize that conducting reviews is only one way of contributing to the enhancement of quality of higher education institutions. The analytical work, thematic analyses and the continuous communication and collaboration with the institutions shouldn't be underestimated in this regard.

With regard to audits it is fair to acknowledge featuring enhancement in the design of the procedures does not guarantee an enhancement-oriented application of the procedures. One particular feature of the Austrian quality assurance system crystalizes in the case of the universities of applied sciences. AQ Austria performs the function of the statutory body with supervisory functions as did its predecessors since the mid-nineties. At the same time AQ Austria offers its non-statutory function in the field of quality audits. In 2012 Austria designed its audit procedure explicitly development-oriented, hence it should not be perceived as being a means of control. It 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 turned out to be not just a cultural change but also led to the question in general whether for such a development oriented approach an agency should be chosen that has such a statutory and supervisory function.

AQ Austria acknowledges that the process of revising the procedures was complex and the involvement of stakeholders also demanding for the participating experts. However the agency considers this approach indispensable in order to make use of experience made in the last five years, in order to guarantee a good understanding of current developments within the national framework and at international level, and in order to be able to design procedures that meet the challenging goal of combining international good practice with national legal obligations and of designing procedures that are relevant and able to contribute to high quality in Austrian higher education; all of this in a way that is well understood by the HEI.

9.3 Standard 2.3: Implementing processes

Standard:
External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include
- a self-assessment or equivalent;
- an external assessment normally including a site visit;
- a report resulting from the external assessment;
- a consistent follow-up.

Guidelines:
External quality assurance carried out professionally, consistently and transparently ensures its acceptance and impact.
Depending on the design of the external quality assurance system, the institution provides the basis for the external quality assurance through a self-assessment or by collecting other material including supporting evidence. The written documentation is normally complemented by interviews with stakeholders during a site visit. The findings of the assessment are summarised in a report (cf. Standard 2.5) written by a group of external experts (cf. Standard 2.4).
External quality assurance does not end with the report by the experts. The report provides clear guidance for institutional action. Agencies have a consistent follow-up process for considering the action taken by the institution. The nature of the follow-up will depend on the design of the external quality assurance.

All external quality assurance procedures regularly carried out by AQ Austria follow predefined regulations that are published on the agency's website:

- **Decree on the Accreditation of Universities of Applied Sciences 2019**
- **Decree on the Accreditation of Private Universities 2019**
- **Guideline for the Audit of Higher Education Institutions' Quality Management Systems**
- **Guidelines for the Voluntary Accreditation of Courses of Continuing Higher Education**
- **Guidelines International Accreditation**
- **Specimen decree pursuant to Article 4, paragraphs 1 – 4 of the interstate study accreditation treaty** (Resolution of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany of December 7, 2017)
- **Guidelines for Institutional Accreditation in Switzerland**

In order to foster professional and consistent conduct the various regulations are supplemented by explanatory information that guide higher education institutions and external experts. (see **chapter 9.5**)

An overview about where in the respective processes the above mentioned steps and instruments are regulated is shown in table 2.

Table 2: Procedural steps and ESG: Mapping table

	Audit	Compulsory Accreditation in Austria	Accreditation Cont. Education Programmes	International Programme Accreditation	Programme/ System Accreditation (GER)	Institutional Accreditation (CH)
Self-Assessment by HEI	p. 7 (Selbstevaluierungsbericht)	§ 3	(3)	3.1	§ 23 (1)	6.2
External assessment by peers	p. 6 (Gutachter/innen)	§ 5	(6)-(10)	3.2	§ 24 (4)	6.3
Site-Visit	P. 7 (Vor-Ort-Besuch)	§ 6	(11)-(13)	3.3	§ 24 (5)	6.4
Published Report	p. 7 (Gutachten), p. 8 (Veröffentlichung)	§§ 7, 10	(14), (15), (18)	3.4, 3.6	§ 29	6.7
Follow-up	p. 8 (Follow-up)	§ 13	(17)	3.5	§§ 27, 28	6.9

AQ Austria deviates from the regular procedural design of the process of approval of substantial changes of accredited institutions or programmes as explained in **chapter 9.2**.

In addition to the *regular* processes AQ Austria conducts voluntary evaluation processes that are designed on a case by case basis. However, the only difference is that they normally don't result in a formal decision by the Board. All other steps and instruments are applied as well.

9.4 Standard 2.4: Peer-review experts

Standard:
External quality assurance should be carried out by groups of external experts that include (a) student member(s).

Guidelines:
At the core of external quality assurance is the wide range of expertise provided by peer experts, who contribute to the work of the agency through input from various perspectives, including those of institutions, academics, students and employers/professional practitioners.
In order to ensure the value and consistency of the work of the experts, they
- are carefully selected;
- have appropriate skills and are competent to perform their task;
- are supported by appropriate training and/or briefing.
The agency ensures the independence of the experts by implementing a mechanism of no-conflict-of-interest.
The involvement of international experts in external quality assurance, for example as members of peer panels, is desirable as it adds a further dimension to the development and implementation of processes.

As explained in the sections about standards **2.2** and **2.3** it is AQ Austria's standard procedure to carry out all external quality assurance processes by engaging external experts. Whenever deviating from this practice, the Board of AQ Austria has to give reasons for this deviation and take a formal decision that ensures a transparent course of action. Deducing from its mission AQ Austria considers the role of external experts crucial in order to achieve the ultimate goals of the procedures and in order to make external quality assurance meaningful for institutions. Consequently, AQ Austria puts external experts at the core of the external assessment and makes great efforts in composing expert panels, briefing the experts and supporting the panels in the course of the procedure.

Selection of experts

AQ Austria applies formal regulations for composing expert panels and selecting experts. § 5 (2) of the accreditation ordinance for private universities shall be quoted as example:

"When composing the expert panel, the Board shall ensure that all aspects relevant for the procedure will be reviewed, taking into account the specific features of the Austrian private universities and the Austrian higher education system. The Board shall take into account special requirements on a case-by-case basis, it shall aim for diversity in the composition of the expert panel, and ensure that their current activities cover the following fields of competence:
1. proven scientific and artistic qualifications in the disciplines core to the private university's course offerings;
2. research activities in the relevant disciplines and familiarity with the academic research at universities;
3. verifiable international experience obtained through professional activity abroad;
4. verifiable knowledge of a professional field relevant for the private university's course offerings obtained through relevant work experience;
5. experience in quality management and quality assurance in higher education;
6. experience in higher education management and organisational structures;
7. experience in teaching as well as in the development, implementation, and evaluation of curricula;
8. student experience in a discipline of the private university's course offerings."

With regard to programme accreditations and changes thereto, no 1, 2, 4, 7, and 8 apply to the discipline of the respective degree programme; no 6 does not apply. Variations apply ac-

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T +43 1 532 02 20-0, F-99, office@aq.ac.at, www.aq.ac.at, DVR Nr.: 093 31 63

cording to whether it is a process at programme level or at institutional level or whether the programme has a specific profile like e-learning or continuing education which requests particular experience and competencies in the panel. In case of institutional processes proven experience in the management of higher education institutions and organisations as well as in quality management is inevitable. The latter applies in particular to audits. In any case a student-expert is member of the panel. In case of processes at programme level an expert from the professional field is mandatory. AQ Austria also puts emphasis on involvement of foreign experts in the processes. However, for AQ Austria it has never been challenging to appoint foreign experts, quite the opposite. Because Austria is a small country many institutions were reluctant to accept Austrian experts in the reviews. Hence in the beginning AQ Austria nominated almost solely foreign experts. The mere exception were experts from the field of professional practice from Austria. Only since 2014 AQ Austria started nominating/deploying more and more Austrian experts and the institutions get used to it. In fact, some institutions explicitly welcomed the new approach. AQ Austria sees this as a positive development with regard to its relationship with the Austrian higher education institutions.

The composition of a panel in reviews at programme level normally comprises four members, whereas audit panels and panels for an institutional accreditation normally comprises five to six members.

The Board nominates experts on suggestion of the secretariat. When selecting experts the secretariat draws upon its database of approx. 1,600 experts and searches experts with competencies not yet represented in the database. In selecting student experts AQ Austria collaborates with the student expert pools of the student unions of Austria, Germany and Switzerland and also with ESU.

Regarding the composition of the panel AQ Austria wants to highlight two aspects:

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. First, the secretariat checks for potential conflicts of interest during the search for experts. Following their appointment, AQ Austria asks the respective institution to examine possible conflicts of interest and incompatibilities. Subsequently, each expert confirms his or her impartiality in a no-conflict-of-interest declaration, which must be signed before the commencement of the review process.

The following reasons apply for possible bias:

1. employment or any other contractual relationship with the applicant institution within the last five years;
2. applications to the applicant institution within the last five years;
3. involvement/co-operation with the applicant institution or their bodies within the last five years;
4. personal research co-operation or co-operation with persons linked to the applicant institution within the last five years;
5. examinations taken or degrees obtained at the applicant institution within the last five years; or
6. private proximity to persons linked to the applicant institution.

Training and Preparation of Experts

The work of the experts is the core component of every quality assurance process. Therefore AQ Austria considers the preparation of the experts of utmost importance. The preparation and training of the experts comprises the following elements:

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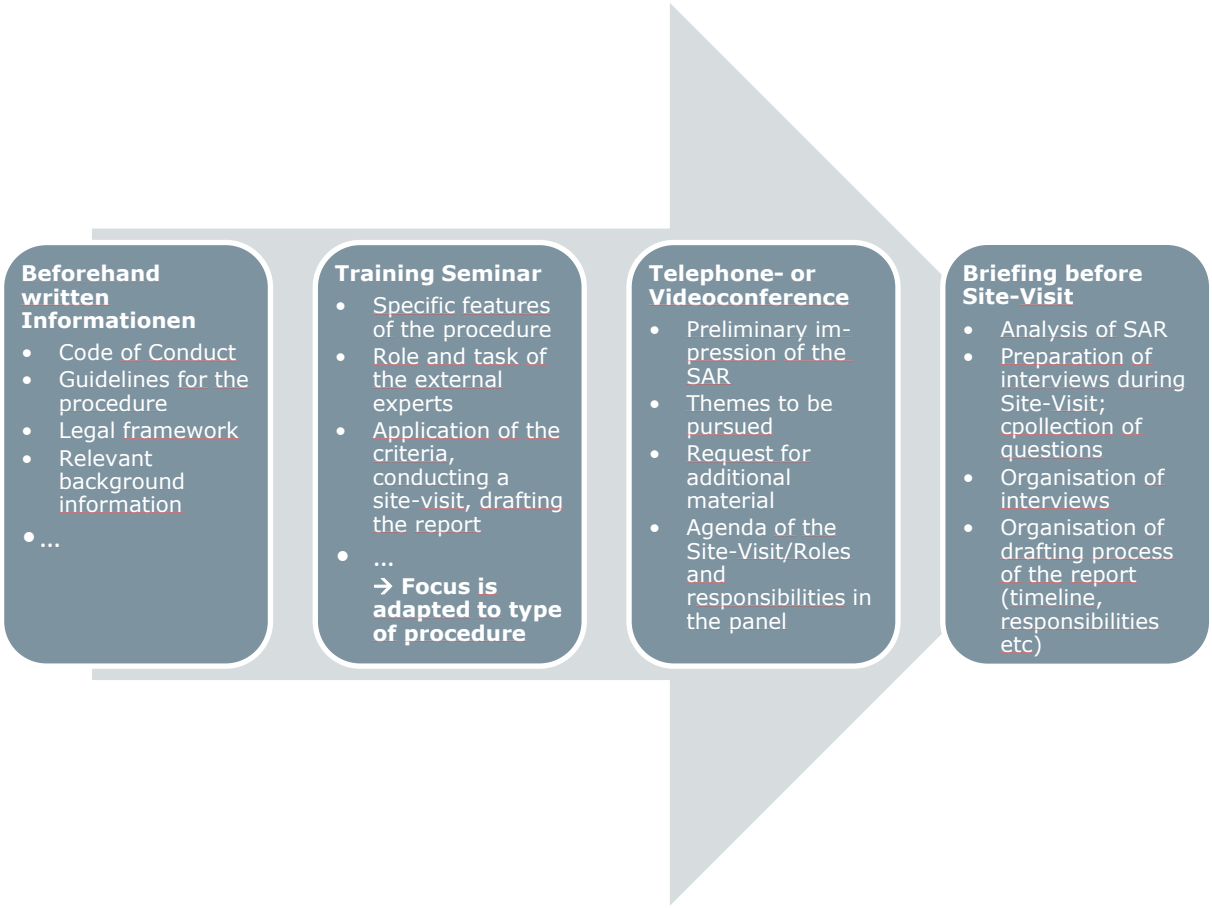
- Preparatory information
  Experts are provided with the SAR submitted by the institution and in addition with various preparatory and guiding material such as information on the Austrian higher education system, all relevant regulations by AQ Austria and extracts from relevant laws, timeline of the process, draft programme of the site visit, template for the report, etc.
- Training seminars for nominated experts.
  The intended learning outcomes are knowledge of the Austrian higher education system and the quality assurance framework; knowledge of the various steps and criteria/standards of the quality assurance processes; role of the expert; behaviour of the expert, detailed knowledge of the respective case and preliminary discussion of next steps (see **annex 20, "sample schedule of workshop").** Since 2015 AQ Austria organized 17 training seminars.
- Electronic briefing session of the panel approx. four to two weeks before the site visit.
  This session focuses on the material submitted by the institution and whether the experts will need additional information, the time line of the whole process, and the organisational preparation of the site visit.
- Physical briefing session usually the day before the interviews of the site visit begin.
  This session focuses on the preparation of the site visit in terms of topics to be discussed and the division of responsibilities within the panel.
- De-briefing session after the end of the site-visit.
  This session focuses on the main findings and the writing of the report.

Figure 10: Training and Preparation of Experts



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Reflection

In addition to these regular training and briefing activities AQ Austria once organized a training seminar for potential external experts that hadn't been nominated yet. The intended learning outcomes were the same as for the regular training seminar with more emphasis on the role of experts in general and without any reference to actual procedures. However, since the participants would be expected to participate in regular trainings as well, this approach was too costly and currently AQ Austria has no plans to repeat this activity.
Without doubt, training and preparation of experts is of utmost importance. AQ Austria, however, has to acknowledge that for a national agency of a small country that predominantly uses foreign experts this is a challenge in financial terms. Nevertheless the agency seeks successfully to increase the number of experts undergoing such training. In recent years almost all experts nominated to a certain procedure participated in one of the training seminars. A second challenge applies specifically to foreign experts who have to be familiarized with the legal framework of higher education in Austria. In this respect the agency has been faced with complaints by institutions about experts lacking knowledge about the Austrian framework but found out that many of these complaints did not refer really to the legal framework but rather to particular traditions evolved in the Austrian higher education sector. Consequently AQ Austria sensitises the experts regarding such topics. In general, AQ Austria feels reassured of the effectiveness and relevance of its activities by the positive feedback on the training seminars.

9.5 Standard 2.5: Criteria for outcomes

Standard:
Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

Guidelines:
External quality assurance and in particular its outcomes have a significant impact on institutions and programmes that are evaluated and judged.
In the interests of equity and reliability, outcomes of external quality assurance are based on predefined and published criteria, which are interpreted consistently and are evidence-based. Depending on the external quality assurance system, outcomes may take different forms, for example, recommendations, judgements or formal decisions.

AQ Austria carries out its quality assurance processes according to pre-defined regulations that contain not only criteria or standards but all relevant procedural rules as well. The Board of AQ Austria therefore enacted the decrees and guidelines for the quality assurance processes it carries out which are published on the website. (see **chapter 9.3**)

In order to ensure consistent conduct of the quality assurance processes AQ Austria emphasizes:

Common understanding of all regulations

In 2016 AQ Austria introduced a new instrument in order to support a common understanding of the various regulations by organizing seminars for private universities and universities of applied sciences specifically on the application procedure, on drafting the SAR and on interpretation of criteria that seemed to create difficulties in interpretation (see **annex 21**). AQ Austria used the recent revision of its procedures to add information on the interpretation and application of procedural rules, standards, and criteria to the decrees and guidelines. This guiding material combined various previously existing manuals of that kind and added more material where it was considered necessary based on experience (see **chapter 9.2**).

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Training and briefing of external experts

Explained in the **previous chapter**.

Support to the experts by review-coordinators

One and sometimes two coordinators are assigned to a process. Apart from organisational aspects of the process the coordinators play an important role in briefing the experts, in particular as regards assuring correct and consistent understanding of the regulations. The coordinator supports the chairperson in ensuring that the site visit is conducted in an orderly manner and in particular that all relevant topics are discussed. During the drafting of the report the coordinator takes care that all relevant aspects are addressed and that the assessments are fair, correct and consistent.

Training of review-coordinators

It goes without saying that the coordinators play a crucial role in guaranteeing the consistent application of all regulations. As mentioned in **chapter 3.4** staff development is a priority of AQ Austria. More specifically staff discuss all questions related to understanding or interpretation of regulations and their correct and consistent understanding and application in department meetings. In addition the accreditation department runs a database which is called 'accreditationWiki' that contains relevant information on background and meaning of certain criteria, typical issues arising and regular decisions. Whether or not accreditationWiki will be used in the future as well is currently under question because the content is integrated in the explanations added to the new ordinances.

Preparation of the Board's decisions

After the final report has been submitted to the agency the coordinator in collaboration with the head of department prepares the submission to the Board containing a report on the whole process and a summary of the report and the statement by the institution. In addition the submission contains an assessment of whether or not all regulations have been applied correctly and whether or not, based on the comments of the institution the Board should deviate from the proposal by the experts. This submission is also approved by the Director.

For every decision a member of the Board is assigned as rapporteur who in addition to the coordinator gives introductory remarks on the case. This instrument has turned out to be very effective and helpful because it gives, in addition to the report by the review coordinator a second view on the case by somebody who was not involved in the conduct of the procedure.

9.6 Standard 2.6: Reporting

Standard:
Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

Guidelines:
The report by the experts is the basis for the institution's follow-up action of the external evaluation and it provides information to society regarding the activities of an institution. In order for the report to be used as the basis for action to be taken, it needs to be clear and concise in its structure and language and to cover
- context description (to help locate the higher education institution in its specific context);
- description of the individual procedure, including experts involved;
- evidence, analysis and findings;
- conclusions;

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- features of good practice, demonstrated by the institution;
- recommendations for follow-up action.

The preparation of a summary report may be useful. The factual accuracy of a report is improved if the institution is given the opportunity to point out errors of fact before the report is finalised.

Providing the wider public with information about the quality of institutions and programmes is a very important purpose of external quality assurance. AQ Austria publishes a report that contains its decision, the full report of the experts and also the statements by the institutions (if the institution agrees). The experts' report contains a brief descriptive part about higher education and external quality assurance in Austria, a short description of the process, the findings, conclusions, commendations and recommendations. As regards accreditation procedures and audits in Austria the publication of reports is also a legal obligation according to § 3 (3) No 4 HS-QSG. In terms of publication, the same rules apply to all processes conducted by AQ Austria. The final reports are made available on the website of AQ Austria after the completion of the review process.[22]

In order to support a consistent appearance of the reports and a consistent application of the elements of the reports AQ Austria uses templates with a given structure. (see **annex 24**)

Reflection

The answer to the questions about the purpose of publishing reports and about the addressees is, however, not straightforward. Most of AQ Austria's procedures result in formal decisions and many are linked to approval of institutions or programmes. In particular in the latter the various potential addressees might have very different interests. First and foremost, the reviewed institution wants to know that it met expectations and standards and to what extent/how well. Also the institution may want to learn from a report at what point it might improve in order to (even) better meet the expectations. Others, students, employers, authorities might also be interested in this kind of information but normally not at the same level of detail. To expect that the wider public would be interested in detailed information of that kind might even be naive. It is obvious that the institution´s interests have to be served in the first place. In order to do so AQ Austria uses templates for its reports that assure comprehensiveness, fairness and readability of the information provided. The reports usually also contain commendations and recommendations in order to make it easier for the institutions to make further use of the reports. In order to accommodate the information needs of other constituencies as well AQ Austria publishes the report together with the decision and a short summary that might be interesting for the 'quick reader'.

AQ Austria wants to emphasize one aspect regarding the reporting: Since external quality assurance is first and foremost based on external experts and moreover institutions shall benefit from review reports as regards recommendations for further development AQ Austria took the conscious decision that the reports are written by the experts themselves. However, it's the role of the coordinators to support the experts and to assure that the reports are complete, correct, fair and readable but the ultimate responsibility for the findings, the conclusions drawn from these findings and the final assessment, on whether a standard or criteria is met, lies with the external experts.

[22] **https://www.aq.ac.at/de/aktuelles/aktuelle-entscheidungen.php**

9.7 Standard 2.7: Complaints and appeals

Standard:
Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

Guidelines:
In order to safeguard the rights of the institutions and ensure fair decision-making, external quality assurance is operated in an open and accountable way. Nevertheless, there may be misapprehensions or instances of dissatisfaction about the process or formal outcomes. Institutions need to have access to processes that allow them to raise issues of concern with the agency; the agencies, need to handle such issues in a professional way by means of a clearly defined process that is consistently applied.
A complaints procedure allows an institution to state its dissatisfaction about the conduct of the process or those carrying it out.
In an appeals procedure, the institution questions the formal outcomes of the process, where it can demonstrate that the outcome is not based on sound evidence, that criteria have not been correctly applied or that the processes have not been consistently implemented.

Higher education institutions have the right to complain and appeal against the review process and the accreditation or certification decision. These cases are handled by an appeals committee. This committee consists of at least three members and two substitute members none of whom belong to any AQ Austria body. Substitute members replace other members in the case of bias. **The process looks as follows**:

1. A higher education institution may appeal or complain against the way a process is handled and in case of international accreditation 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 or complain to the Appeals Committee and informs the Board
3. The appeal is handled by the Appeals Committee, whereby the Appeals Committee deals with the appeal or complaint either by correspondence or in the form of a conversation with the higher education institution that submitted the complaint. The Appeals Committee may carry out, in agreement with the institution that submitted the appeal or complaint, a third party consultation.
4. The Appeals Committee must report the results of their investigations to both the complainant higher education institution and the Board. Where appropriate, the Appeals Committee shall propose appropriate measures to solve problems. Due to the legal framework, appeals against compulsory accreditation decisions at private universities and universities of applied sciences in Austria are not possible.

So far, the Appeals Committee has had to handle five cases out of which one appeal was made by an Austrian private university while the others were filed by Austrian partners of foreign universities offering programmes in Austria. The appeal by the private university was not upheld, and two appeals by Austrian partners of foreign universities weren't processed due to the repeal of the respective legal provision as explained in **chapter 3.4.**

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
T +43 1 532 02 20-0, F-99, office@aq.ac.at, www.aq.ac.at, DVR Nr.: 093 31 63

10 Information and opinions of stakeholders

AQ Austria's key stakeholders are the higher education institutions (including the relevant associations uniko, ÖPUK and FHK), the students (including ÖH), the Ministry of Education, Science and Research, and also interest organisations that work with issues related to higher education such as the Austrian Economic Chamber, Austrian Chamber of Labour (employers' and employees´ organisations).

Information

As mentioned in chapters **3.4** and **8.1** the main stakeholders are represented in the General Meeting which is a major forum for informing stakeholders about the agency and its activities. In addition regular meetings between the Board or the Presidency and the associations of the HEIs, the ÖH and the ministry take place on an annual basis in order to discuss topics that are more specific to these stakeholders. Further meetings are organized if necessary i.e. in case feedback from institutions shall be discussed. On a daily basis the secretariat is in contact with stakeholder organisations if necessary. As regards spreading information concerning the conduct of reviews the role of the review coordinators who are in contact with the HEIs on a daily basis is key.

Feedback

The aforementioned meetings are good and important opportunities to collect feedback from stakeholders. As far as feedback on the individual reviews is concerned AQ Austria applies a formal feedback mechanism after each review. As mentioned in **chapter 6** the feedback collected from the reviewed institutions and from the experts is analysed on an annual basis and discussed in the secretariat and in the Board. In summary, based on the information obtained for the national accreditation procedures, it can be stated that 77% of the responding institutions rate the work by AQ Austria as good or very good. The feedback by the experts shows an even higher level of satisfaction by over 90% responding good or very good. Critical feedback by the institutions, although rather little, referred mainly to the usefulness of the expert reports and to the contribution of the reviews to internal quality enhancement. Overall, since 2014, the time of the first feedback-report, the overall satisfaction rate has constantly been at a high level.

In addition to these regular feedback surveys, AQ Austria, as mentioned in **chapter 9.2** used various opportunities between 2016 and 2018 to collect feedback from stakeholders, namely in a survey on the agency position as regards the HS-QSG and in the process of revising the external quality assurance procedures:

The feedback collected from stakeholders when evaluating the HS-QSG revealed the particular view of certain private universities and universities of applied sciences institutions on AQ Austria's broad remit as mentioned in **chapter 8.1**

The feedback collected during the revision of the quality assurance procedures mainly referred to the workload for institutions deemed to be too high and to the design of the procedures.

The various feedback collected between 2016 and 2018 was taken into account during the self-assessment process and fed into the SAR, mainly as regards the design of the methodologies (esp. the enhancement orientation), the conduct of the reviews (esp. the briefing of foreign experts), and the perception of AQ Austria's broad remit. At a meeting with stakeholders on 19th September 2018 the draft of the SAR was discussed by focussing on the stakeholders´ views. The stakeholders considered the SAR to be sound and comprehensive and AQ Austria's self-perception to be fair and accurate. Based on the draft stakeholders were asked to comment on the challenge of accepting the broad remit of AQ Austria, notably the

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consultancy activities and voluntary reviews in a more balanced way in all sectors of the higher education system. The representatives from of one sector, and some representatives from another sector reconfirmed the findings presented in the SAR on this topic. In addition some stakeholders took the opportunity to raise concerns as regards the conduct of individual reviews, notably the involvement of non-Austrian experts and AQ Austria's position on practices in part-time study programmes.

11 Recommendations and main findings from previous review(s) and AQ Austria's resulting follow-up

This chapter gives an overview about the findings and recommendations from the previous ENQA review and about the follow-up measures taken by the agency. It is thus also an update of the follow-up report submitted to ENQA in June 2016 (**annex 43**). The recommendations from the previous ENQA-panel are quoted in the boxes below; the explanations frequently refer to the follow-up plan approved by the Board on 14th September 2014.

Recommendation 1) *"Modify properly the intensity of the evaluation process depending on the effectiveness of the IQA system applied, independently from the type of HEI"*

[Refers to standard 2.1 ESG(2005) and standard 2.2 ESG(2015) respectively]

The panel concluded correctly that the type of external quality assurance procedure, be it quality audit, institutional accreditation or programme accreditation, to be applied at a higher education institution is defined by law which, in this respect makes clear distinctions between the three sub-sectors public universities, private universities and universities of applied sciences. The law, however, not only differentiates between types of higher education institutions as such but also between different purposes of external quality assurance which necessarily has an impact on the design of the procedures.

Hence, when criticising the "intensity of the evaluation process" the legally defined purpose including the legally defined areas of assessment have to be taken into account. It is not surprise that in Austria (as well as in other countries with programme accreditation as precondition for state approval and in case of universities of applied sciences:- funding of the given programme) the law stipulates a number of assessment areas and related criteria that go beyond considering the effectiveness of internal quality assurance and which are designed to provide comprehensive additional information about a programme to support the yes/no accreditation decision.

AQ Austria supports the position that also more enhancement-oriented or 'quality audit-like' external quality assurance procedures can and do support the accountability function of external quality assurance and it has consequently sought to trigger discussion on this topic. Another opportunity to give more credit to effective internal quality assurance systems was the revision of the regulations in the course of 2017 and 2018, when this question was be particularly relevant for re-accreditation of the private universities.

However, it has to be taken into account that the political will and consequently the law makes a distinction between public institutions, semi-public institutions and private institutions and how these institutions are to be treated in terms of the approval of programmes and quality assurance. This situation is not specific to Austria but common to many countries in the EHEA.

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Follow-up measures:

As part of its follow-up plan AQ Austria, in 2016 submitted a proposal to the Ministry to evaluate the Austrian quality assurance system. (This also refers to the observation by the panel "that a detailed analysis of the impact of the merger process on the development of quality assurance in Austria has not yet been made." It is not surprising, though, that such an evaluation had not been conducted only one year after a new law came into effect and a new agency became operational respectively.) However the Ministry did not take up the initiative. Consequently AQ Austria has itself conducted a slightly less comprehensive evaluation which focused mainly on its position in the Austrian quality assurance system and on the appropriateness and usefulness of the legal regulations for its work. The report was published in 2017.

In addition AQ Austria has modified its procedures for the approval of significant changes in accredited programmes (see also comment on recommendation no. 2).

Recommendation 2) *"Design transparent criteria for amendments of accreditation procedures, depending on the type of amendment requested, since it is not perfectly understood by the HEIs"*

[Refers to standard 2.1 ESG(2005) and standard 2.2 ESG(2015) respectively]

As part of its follow-up plan the agency planned to analyse all cases up to the end of 2015 and, based on that analysis develop regulations on how to conduct these types of non-standard assessments.

However, in the course of 2015 it had already become clear that the variety of cases is too big to make a typology feasible, because such a typology would simply turn into a long list of potential cases which would only pretend to be exact and comprehensive and which would lead to many discussions whether a case falls under type 'A' od type 'B' etc. and thus to unnecessary bureaucracy. Hence the Board decided to deal with every request on a case by case basis. Nevertheless in practice so called 'most likely approaches to be applied' evolve which are communicated to the institutions:

- Slight revision of the qualification targets and the profile of the programme: Expert(s) review the curriculum and other relevant aspects such as the qualifications of staff, without undertaking a site visit.
- The additional offer of a programme at a different site (i.e. different city within Austria) in collaborative provision together with a partner: Including a site visit, expert(s), primarily assess the arrangements, practice, resources and regulations of the collaboration, while not focusing on the curriculum providing it has not changed.

Meanwhile the institutions and AQ Austria developed a process to deal with the applications. In line with this policy AQ Austria took up this topic during the revision of the accreditation procedures and added regulations in the new accreditation ordinance (§ 14).

Recommendation 3) *"The implication of negative results in the audit process for public universities should be made more transparent"*

Ads already mentioned in the follow-up report this statement is not fully correct. If a public university receives a negative certification decision in an audit it is clearly defined in the law that it has to undergo a re-audit after two years. In the case of second negative decision in the re-audit it is also clear that there are no legal or financial or other formally defined consequences. Hence the consequences are defined: none. It can be assumed however, that since the results are published a negative result might well have implications for the reputation of the university.

Follow-up measures: None.

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Recommendation 4) *"Increase the availability of the assessment reports for all stakeholders." (This issue was also brought up by the Register Committee in its Decision on inclusion of AQ Austria on EQAR highlighted in the in the decision in para no 4)*

[Refers to standard 2.5 ESG(2005) and standard 2.6 ESG(2015) respectively]

The agency started publishing all review reports and decisions on its website already before the site-visit of the 2014 review, based on the 2013 version of the regulations for accreditation and audit procedures which also stipulated that, in addition to the decision both the panel report and the statement of the institution (the latter being subject to non-objection by the institution) on the panel report are to be published on the agency's website. Consequently full documentation of those reviews that started after July 2013 is published.

Follow-up measures: None.

Recommendation 5) *"Establish an adequate follow-up procedure for audit in public universities."*

[Refers to standard 2.6 ESG(2005) and standard 2.3 ESG(2015) respectively]

It was not easy to understand why this recommendation has been given by the panel. On the one side a follow-up procedure is formalized for cases of conditional certification. Public universities (as well as universities of applied sciences) have to fulfil the conditions within two years. In addition to this AQ Austria offers a follow-up workshop at the institution approx. one year after the certification decision, regardless of the outcome of the certification. During this workshop a member of the review panel together with a staff member discuss and evaluate the follow-up measures taken by the institution. This does not only refer to the follow-up on recommendations by the panel but to all actions taken by the institution as a consequence of the audit. It is noteworthy that, although this step is not legally stipulated and thus cannot be made compulsory, the institutions with limited exceptions ask for this workshop which indicates that AQ Austria is successful in implementing the audit not as a one-off event but as a component of a continuous process.

Follow-up measures: None.

Recommendation 6) *"System-wide analysis should be performed and results should be published." (This issue was also brought up by the Register Committee in its Decision on inclusion of AQ Austria on EQAR highlighted in the in the decision in para no 5)*

[Refers to standard 2.8 ESG(2005) and standard 3.4 ESG(2015) respectively]

The panel rightly pointed out that no thematic analysis was published by the time of the site visit. This is due to the fact that only very shortly before the site visit the first accreditation procedures were accomplished hence it was not possible to conduct any thematic analysis by that time.

Follow-up measures:

See **chapters 3.4** and **8.4**

Recommendation 7) *"Medium-term goals have to be included in a strategic plan, as well as a risk management plan."*

[Refers to standard 3.5 ESG(2005) and standard 3.1 ESG(2015) respectively]

As part of its follow-up plan the Board approved a Strategic Plan 2015/19 which was revised in 2017 (see also **chapters 3.4** and **8.1**).

In addition to the strategic planning the Board considers at every meeting the regularly updated work plan for the coming 15 months.

Agency for Quality Assurance and Accreditation Austria, Renngasse 5, 4.OG, 1010 Vienna, Austria,
T +43 1 532 02 20-0, F-99, office@aq.ac.at, www.aq.ac.at, DVR Nr.: 093 31 63

Recommendation 8) *"Although an IQA system of AQ Austria is being developed right now, it is important to speed up the process of its implementation". (This issue was also brought up by the Register Committee in its Decision on inclusion of AQ Austria on EQAR highlighted in the in the decision in para no 7)*

[Refers to standard 3.6 ESG(2005) and standard 3.8 ESG(2015) respectively]

The panel stated correctly that, by the time of the site visit no results from any internal quality management processes had been provided. This was partly due to the fact that the agency first developed the regulations for its external quality procedures and then focused on its internal quality policy. Another reason was that the results of the internal quality management procedures are analysed once a year, in autumn. Hence the first analysis took place only a couple of months after the site visit.

Follow-up measures:

see **chapters 6** and **8.6**.

Recommendation 9) *"It is desirable that AQ Austria develops its training opportunities for evaluators and continues to collaborate with ÖH in providing student evaluators and stakeholder consultancy. We recommend that joint trainings for all evaluators, including students, are considered."*

Recommendation 10) *"Due to the participation of international experts, careful preparation (training) is needed to understand properly the Austrian Higher Education system."*

[Refers to standard 2.4 ESG(2005) and standard 2.4 ESG(2015) respectively]

AQ Austria agreed that for foreign experts familiarity with the national framework of an institution or programme to be reviewed is essential. Hence from the beginning AQ Austria has put emphasis on this aspect in the briefings for its foreign panel members.

Follow-up measures:

AQ Austria has reviewed its briefing activities in order to place more emphasis on specificities of the Austrian higher education system. The first step was a collection of feedback from the institutions about what specific national features were not taken into account properly by foreign experts. It is noteworthy that the result of this survey showed a very short list of only few aspects but a longer list of aspects that referred to common practices of an institution which are not connected with the legal framework. Nevertheless AQ Austria revised its briefings and in addition it now also conducts training seminars for panel members which focus on the national higher education system and on the general tasks of panel members as such without reference to specific reviews. In addition to its own training activities AQ Austria actively supports, by regularly contributing to the programme, the training seminars of the Austrian students' union (ÖH) that conducts training seminars for students twice per year. It similarly contributes to the training seminars of the Swiss students' union, because AQ Austria also collaborates with Swiss students in its panels. For further details see **chapter 9.4**.

Additional comment:

In its decision of 29th November 2014 on the approval of AQ Austria's application for inclusion on EQAR the register committee highlighted in para 6:

"ESG 3.6: The Register Committee noted that formal approval of accreditation decisions by the Minister in charge of higher education does not include the possibility to change or to ask for a revision of AQ Austria's decision. The Minister could, however, deny an accreditation approval, although this has not happened so far. The Register Committee noted that this could be a constraining factor in the independent activity of the agency and warrants further attention in the next review of the agency."

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As explained in **chapter 8.3** the situation hasn't changed.

Follow-up measures:

During 2017/2018 the ministry organized a working group for the preparation of a revision of HS-QSG and this regulation was discussed. In which way the regulation will be changed is not predictable.

12 SWOT analysis

Figure 11: SWOT Analysis

Strengths	**Weaknesses**
Legally defined position as national quality assurance agency, • that fulfills its task of cross-sectoral activity and • whose activities go beyond the implementation of compulsory quality assurance procedures and include the utilization of its expertise for the further development of HEIs and the higher education system. The agency's independence and international orientation as well as the involvement of stakeholders are structurally secured. Expertise and high level of identification with the agency by Board members and staff. Professional implementation of activities. High degree of satisfaction of the HEIs and the experts. Intensive stakeholder participation in the agency's activities.	Sector-specific unequal acceptance of the agency's wide range of tasks and offered services. Insufficient public communication activities and which is are not specifically tailored to various addressees.
Opportunities	**Threats**
Strengthening the position of AQ Austria as quality assurance agency with a broad range of tasks by expanding its activities in the field of analyzes and reports as well as in the area of consulting individual universities. Strengthening the position of AQ Austria by expanding public communication (related to higher education policy). Strengthening quality enhancement in the reviews through the revised quality assurance procedures. Amendments to the HS-QSG and other relevant laws following the recommendations of the agency's report on the evaluation of HS-QSG.	Permanent persistence of sector-specific unequal acceptance of the wide range of tasks and offered services. Difficulty to attract highly qualified experts for programme reviews due to generally high numbers of review procedures in the German-speaking countries Low level of predictability with regard to the number of reviews

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13 Current challenges and areas for future development

As regards current challenges a more balanced implementation of the broad remit of AQ Austria ranks high, particularly as regards consultancy and voluntary evaluations in all sectors of the Austrian higher education sector. For AQ Austria the legally defined broad remit, together with the purpose of the HS-QSG to overcome the previous separation of concepts, discourses and procedures in quality assurance is one core reference point for its activities. In doing so AQ Austria does not merely follow its legally defined remit. As highlighted on **page 15** AQ Austria "considers its broad remit and particularly its role as regards thematic analyses and consultancy as an important component of its role as quality assurance and accreditation agency which is not to be separated from conducting reviews. In general a quality assurance agency should be more than just the organizer of external reviews but shall also contribute to the development of the Austrian higher education system as a whole, not just to individual institutions. Therefore a broad approach is paramount." The reluctance of at least one sector of the Austrian higher education system to support this broad remit and to collaborate with AQ Austria beyond compulsory external reviews has the potential to compromise the ability of AQ Austria to fulfil its mandate to its best. The challenge will be to establish collaboratively with the institutions the view that the function as authority and the function as provider of voluntary and supportive activities are compatible.

Closely linked to the aforementioned challenge the strengthening of the enhancement dimension in the external quality assurance procedures in the sectors just mentioned will be challenging as well. Accepting this dimension means a cultural shift for institutions that prefer compliance-oriented approaches or that treat external quality assurance in a compliance-oriented way because of the link to the licencing of the institution and/or its programmes. Although AQ Austria considers the recently revised accreditation procedures as an opportunity to embed the enhancement dimension better than in the past, the agency will, in collaboration with the institutions have to explore ways how to make the enhancement dimension not only enshrined in the regulations but effectively addressed in the conduct of the procedures.

As far as future developments are concerned three shall be mentioned:

Three laws are envisaged to be revised which are most relevant for AQ Austria: HS-QSG, the law on private universities and the law on study programmes of universities of applied sciences. Currently it is not foreseeable yet what the main outcomes of the revisions will look like. Two topics which have been discussed in the past might lead to new legal regulations with a significant impact on AQ Austria's procedures. Firstly a suggestion to introduce the possibility of accrediting private higher education institutions that do not have the status of universities but rather of universities of applied sciences. Secondly, the regulations for study programmes of foreign higher education institutions offered in Austria will be revised. Also in this regard it is not predictable what the new regime will look like, whether there will be a regulation at all and if so, what procedures might come into place.

Part of the revision of HS-QSG might be the integration of the university colleges of teacher education into HS-QSG and some form of responsibility of AQ Austria.

Also, a discussion about quality assurance of continuing education programmes started recently. However, it's not foreseeable whether this will be taken up during the revision of HS_QSG.

In 2016 the Austrian Qualifications Framework came into force. In general this will have a certain impact on the transparency of the Austrian education system and it will support the outcome-orientation in all education sectors. As far as the mapping of non-formal qualifications is concerned, in 2018 a procedure has been put in place which requires educational institutions to consult recognized service-centres when applying for inclusion on the register. On

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request of the higher education institutions AQ Austria applied for recognition as service centre. Although the assumption is that AQ Austria will not receive large numbers of applications this new area of activities will add on to the broad remit of AQ Austria.

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