

**The Expert Report on the Application of the  
Evaluation Agency Baden-Württemberg (evalag)  
for Accreditation of October 21st, 2008**

- submitted on 7th September 2009 -

**1. Basis of the Procedures**

**1.1 Legal Mandate**

As per § 2 para. 1 no. 1 of the German Statute on the Establishment of a "Foundation for the Accreditation of Study Programmes in Germany", the Foundation has the mandate to accredit and reaccredit accreditation agencies. It grants, for a limited period of time, the right to accredit study programmes and internal quality assurance systems of higher education institutions by awarding the seal of the Foundation.

The decision of the Accreditation Council to award accreditation as well as the processing of the procedure for accreditation of an accreditation agency follow on basis of the following resolutions:

- Criteria for the Accreditation of Accreditation Agencies (resolution of the Accreditation Council of 15.12.2005 in the version of 08.10.2007).
- General Rules for the Implementation of Procedures for Accreditation and Reaccreditation of Accreditation Agencies (resolution of the Accreditation Council of 22.06.2006 in the version of 31.10.2008).
- Decisions of the Accreditation Council: Types and Effects (resolution of the Accreditation Council of 15.12.2005 in the version of 29.02.2008).

In order to promote the international recognition of the decisions of the Accreditation Council and the accreditation agencies, the Accreditation Council, while approving its accreditation criteria, accepted above all the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, as they were approved by the ministers responsible for higher education at the Bologna follow-up conference in Bergen in May 2005. Further important sources for the formulation of the criteria of the Accreditation Council were the *Code of Good*

*Practice of the European Consortium for Accreditation of 03.12.2004 and the Guidelines of Good Practice of the International Network for Quality Assurance Agencies in Higher Education of April 2005.*

## **1.2 The German Accreditation System**

The accreditation system in Germany is characterised by decentralised agencies, which conduct the accreditation of study programmes and internal quality assurance systems of higher education institutions, and a central accreditation institution (Accreditation Council), which accredits and reaccredits the agencies and also ensures, by defining the basic requirements of the accreditation procedures, that the accreditation is carried out according to reliable, transparent and internationally recognised standards. At the same time the Accreditation Council takes care, that the issues of the total system, for which the **states** are responsible, are taken into consideration during the accreditation. The accreditation procedures are conducted without being controlled by the government.

The Accreditation Council also functions as a central documentation agency for the accreditation system and manages the database of study programmes accredited in Germany.

The accreditation of study programmes was introduced in 1998. The objective of accreditation is ensuring standards, which, along with the review of the study programme concept and the academic feasibility of the courses offered, also includes the quality of teaching as well as the scrutiny of the professional relevance and the promotion of gender mainstreaming. As a rule, accreditation and re-accreditation are prerequisites for offering Bachelor and Master study programmes. In addition to programme accreditation, system accreditation was introduced in 2007, which has the same legal consequence. Object of system accreditation is the internal quality assurance system of a higher education institution. A positive system accreditation certifies that the quality assurance system of the higher education institution in the area of teaching and learning is suitable to ensure achieving the qualification goals and a high quality of the study programmes, whereby the ESG, the guidelines of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder and the criteria of the Accreditation Council are applied.

## **2. Workflow of the Procedure**

The Evaluation Agency Baden-Württemberg (evalag) has, with its letter of 21st October 2008, submitted an application to the Accreditation Council for accreditation as an accreditation agency and for admittance for procedures for study programme accreditation and system accreditation.

On 3rd April 2009 evalag submitted an explanatory statement for the application together with additional documents within the stipulated period.

The following experts were nominated by the Accreditation Council in its resolution of 31st October 2008:

- Prof. Dr. Johann **Schneider**, FH Frankfurt am Main and a member of the Accreditation Council (higher education institution representative) up to February 2009, as chairman
- Anja **Gadow** (representative of the students)
- Dr. Bernd **Kaßbaum**, IG Metall, department of education and training policies and general education policy (representative of professional practice)
- Prof. Dr. rer. pol. Ute **von Lojewski**, president of FH Münster (representative of the Accreditation Council)
- Thierry **Malan**, former Inspecteur général de l'administration de l'éducation nationale et de la recherche (international representative)
- Dr. Irene **Müller**, director of the area "international coordination" of the Austrian Exchange Service GmbH (OeAD-GmbH) and a member of the council of the university of applied sciences (international representative)

The expert group was supported by Mr. Franz Börsch on the part of the office of the Accreditation Council (Foundation for the Accreditation of Study Programmes in Germany).

On 28th April 2009 the chairman of the expert group participated as a guest in part of a *Quality Management Audit* carried out by evalag in the [REDACTED]

On 25th August 2009 an on-site visit took place at the office of the agency in Mannheim, for which the expert group met in a preliminary meeting on 24th August. The expert group held discussions with the management of the agency, members of the Accreditation Commission and personnel of the office.

The experts presented the report on hand on 7th September 2009.

### **3 The Evaluation Agency Baden-Württemberg (evalag)**

#### **3.1 Incorporation and Purpose**

The Evaluation Agency Baden-Württemberg was established as a foundation under public law in the year 2000. The establishment was based on agreements between the Ministry of Science of the state of Baden-Württemberg and the higher education institutions of the state. These agreements were laid down in a key issues paper, which also contained general principles of evaluation for higher education in Baden-Württemberg.

evalag works on a non-profit basis and worked in the years 2001-2006 mainly in Baden-Württemberg for the higher education institutions and the Ministry of Science. Meanwhile its constitution has been amended to expand its functional areas and extend the fields of activity to all states of the Federal Republic.

The main tasks of evalag are evaluations in the area of science, development of systems for quality assurance and their application in the area of science, offering consultancy to higher education institutions and other scientific institutions on questions of quality assurance and enhancement, as well as procedures for programme and system accreditation; for this the agency determines assessment norms, criteria and principles of procedure, on the basis of the prevailing statutory provisions.

### **3.2 Organisation**

As per the constitution of the foundation, evalag consists of altogether four organs: the Foundation Council, the Accreditation Commission, the Appeals Commission and the Foundation Executive Board. The expert groups are nominated for each of the individual procedures and are not organs of the foundation. The office consists of the departments: (a) evaluation, institutional quality assurance and other activities serving the promotion of science and (b) programme and system accreditation.

The **Foundation Council** monitors the legality, usefulness and cost effectiveness of the conduct of the foundation business and decides on matters of fundamental importance. It consists of (a) eight external experts, who are appointed by the Minister of Science after consultation with the Rector's Conferences, (b) a member without voting rights appointed by the Minister of Science and (c) the chairperson, who is appointed by the Minister of Science after consultation with the Rector's Conferences.

The **Accreditation Commission** is responsible for all accreditation-related tasks in connection with the accreditation of study programmes and of quality assurance systems of higher education institutions. Its tasks include, among others, the determination of assessment norms, criteria and principles of procedure for programme and system accreditation, the (further) development of principles of procedure for programme and system accreditation, the selection of the expert groups and its chairpersons and the decision-making for the accreditation of study programmes (programme accreditation) or of quality assurance systems (system accreditation). The Accreditation Commission consists of fifteen members with voting rights and is composed of: (a) Altogether eleven members are nominated by the universities (at least three members), the universities of applied sciences (at least three members) and the universities of education (at least one member). Representatives of other types of higher education institutions can be

included when required. (b) Two members are representatives of professional practice, whereby both the employers' and employees' sides must be represented. (c) Two members are students, of them one as a representative of universities and one as a representative of universities of applied sciences. (d) At least one member under (a) should be a foreign expert. The members should have experience in the field of development and curriculum design of study programmes as well as accreditation. Furthermore for each type of higher education institution, at least 50% of the members should have experience in the field of management of higher education institutions and quality assurance internal to higher education institutions, i.e. particular experience in the management of higher education institutions and in quality assurance of teaching and learning.

As per the constitution the **Appeals Commission** consists of three to five members and is responsible for the scrutiny of objections to procedural steps of programme and system accreditation procedures. Neither the Foundation Council nor the Accreditation Commission has the authority to issue directives to it.

The **Foundation Executive Board** consists of a managing director who is appointed by the Foundation Council and who conducts the regular business of the foundation. It prepares the resolutions of the Foundation Council as well as the Accreditation Commission and implements them.

### 3.3 Facilities

The capital of the foundation consists of a capital fund of ████████ € provided by the state, as well as of asset items and funds, which are provided to the foundation by the state as well as by third parties, earnings from these funds and from properties and rights, which were created or acquired with these funds. In the past years the state ministry has provided evalag with grants amounting to approximately ████████ €. Apart from that, evalag carries out activities outside the state of Baden-Württemberg against full reimbursement of costs. In the years 2007-2008 evalag has raised funds amounting to more than ████████ € here. In the years 2006-2008 the expenses for management were between ████████ € and ████████ €. The accounting of accreditation procedures is basically carried out on a full cost covey basis.

The office of evalag has space of altogether ███ sqm (███ work rooms, ███ conference hall, ███ service rooms). The department responsible for programme and system accreditation occupies ███ sqm and uses the conference hall. At present, 17 persons are employed by evalag. At the time of preparing the report the department of programme and system accreditation comprises of 0.5 employees plus the work share of the managing director.

### 3.4 Activity Spectrum

As a centre of excellence for quality assurance and enhancement, evalag pursues the following objectives as per its constitution:

- a) Evaluations in the area of science on its own as well as on mandate from higher education institutions and the Ministry of Science of the state of Baden-Württemberg;
- b) Development of systems for quality assurance and their application in the area of science, particularly in the field of higher education;
- c) Consulting higher education institutions and other scientific institutions on questions of quality assurance and enhancement,
- d) Accreditation of study programmes (programme accreditation) and processing of procedures for system accreditation;
- e) Other activities serving the promotion of science.

From 2001 to 2006 evalag has carried out nine evaluation procedures of subjects across various types of higher education institutions. Since 2006 fifteen evaluation procedures for specific subjects have been / are being managed on behalf of higher education institutions, other scientific institutions and Ministries of Science in Baden-Württemberg, Bavaria and North Rhine-Westphalia (Part 3, Annex 3a).

From 2003 to 2005 the agency has reviewed 67 Bachelor and Master study programmes at higher education institutions in Baden-Württemberg with a view to removing their time limits of their approval.

In the activity field of institutional quality assurance, evalag currently supports seven universities, the universities of education of Baden-Württemberg as well as two universities of applied sciences and one academy of arts in the development of systems of quality assurance and enhancement as well as quality management.

## **4. Assessment**

### **4.1. General Assessment**

The documents of evalag (substantiation of application and Annexes), received in time, give altogether a comprehensive presentation of the agency as an institution, its self-image and its assessment criteria and rules of procedure.

The agency has in fact long-standing and extensive experience in the field of evaluation, but it has not carried out any accreditation procedures till now, so that an empirical assessment of the procedural practice is possible at present only to a limited extent. Thus it is a case of a first application for the field of activity of programme and system accreditation.

For evalag the objective of the planned new field of activity of accreditation is not only the extension of the previous activity spectrum in the sense of a comprehensive promotion of quality, but indirectly also the improvement of its evaluation and consultancy services for the promotion of quality in higher education institutions and scientific institutions in Baden-Württemberg.

In its self-image the agency proceeds from a strict separation of consultancy / evaluation and accreditation. Wherever evalag was or is active in consultancy, the implementation of accreditation procedures is out of question for it. This concerns primarily higher education institutions in Baden-Württemberg, who however will indirectly benefit again from the accreditation experiences.

The agency is based on a foundation of the state, the independence of its activity is ensured because of its structuring. The accreditation department of evalag will finance itself. The agency has assured that the repayment of the financial funds, which are available to the agency through its start-up financing, will commence on conclusion of the first procedure and will be completed at the latest after two years. Thus a fair competition with the other agencies is ensured.

As the accreditation serves primarily to complement the profile, which is considered to be necessary, and its own further development and as there is a certain uncertainty in the agency about the demand situation, it follows a very cautious planning of the resources to be used, which can however, in the opinion of the experts, endanger the quality of its work. This applies even considering the fact, that evalag has long-standing experience and appropriately qualified staff at its disposal in the field of quality assurance and enhancement, which is however working to capacity with its current activities.

It emerges over and over again from the submitted documents how much the self-image of the agency is characterised by the procedures of evaluation, which is based on the promotion and support of the higher education institutions in questions of quality. This also finds expression in

individual procedural steps (see for example the assessments of the criteria 1.3 and 1.4). But, in the opinion of the experts, the agency is aware that the differences between the two procedures must be clearly and explicitly taken into account.

Apart from a few conceptual ambiguities and inconsistencies, the papers submitted by evalag are convincing, well-prepared and transparently documented. Moreover, the accreditation application of evalag, along with the extensive annexes, is well-suited to give sufficient information about meeting the "Criteria for the Accreditation of Accreditation Agencies" specified by the Accreditation Council. In addition, the partly explicit and partly implicit consideration of all relevant resolutions of the Accreditation Council is to be emphasised positively.

All in all, the experts could gain a very positive impression on-site. A number of ambiguities could be clarified and even in critical points a consensus over the solution to be attempted could be arrived at quickly. These ambiguities referred primarily to the procedure for selection and appointment of experts, the establishing of technical committees and the question of an integrated commission for programme and system accreditation. The position of the agency could be made clear, the corresponding revision of the documents by the agency was assured.

The experts recommend to the Accreditation Council an accreditation with conditions.

## **4.2 Assessment based on Criteria of the Accreditation Council**

### **Criterion 1: Understanding of the Accreditation Task**

Criterion 1.1: The agency owns a publicly documented understanding of quality from which it derives the basics of its accreditation activities. Its activity is focussed at enhancing the quality and bases the main responsibility of the higher education institutions on the pattern and quality of learning and teaching.

#### **Documentation**

evalag's understanding of quality manifests itself in the documents on "Mission Statement" (Annex 4a) and "evalag's Understanding of Quality – with special reference to programme and system accreditation" (Annex 4b), approved by the Foundation Council of the agency. The agency bases its work on the quality concepts of fitness for purpose as well as the legitimacy and fitness of purpose, and affirms its intention to contribute to the strengthening the management ability and to the promotion of quality culture of higher education institutions. In this sense evalag assumes that higher education institutions, as autonomous institutions, are aware of their direct responsibility for quality enhancement, quality assurance and quality management and collaborate in the implementation with external stakeholders in a cooperative and goal-oriented manner. While acting in its capacity as accreditation agency evalag aspires to make a contribution to the enhancement of quality in teaching and learning. The objective of the agency

is to increase the transparency of the study programmes offered, to safeguard the implementation of standards and criteria of quality assurance and to ensure national and international recognition of the degrees, in order to give higher education institutions, students and employers a reliable orientation with regard to the quality of study programmes.

Indications of how far the basics of their work are derived from the agency's quality comprehension can be found implicitly in the "Mission Statement" (Annex 4a) of evalag as well as in "Internal Quality Management System of evalag" (Annex 10), which have been approved by the Foundation Council of the agency.

### **Assessment**

The quality concept of evalag emerges clearly and transparently from the presented documents, which have a binding character as decisions of the Foundation Council of the agency. That evalag affirms the necessity of a continuous quality enhancement of its own services throughout, is to be stressed positively. The agency's understanding of quality finds expression in its own work in several ways. As an example of the importance of quality enhancement in view of its own activity, among other things, the function of the quality assurance officer can be cited, who has the responsibility, to continuously review all procedures with regard to the compliance with and further development of the internal quality assurance as well as the externally predefined standards and principles (European Standards and Guidelines for Quality Assurance in the European Higher Education Area, resolutions of the Accreditation Council) and if necessary to initiate modifications (for this see also the explanations on criterion 5).

### **Result:**

**Criterion 1.1 is met.**

Criterion 1.2: The agency accredits all higher education institutions and even all departments in case of admittance for programme accreditations.

### **Documentation**

At present evalag supports seven universities, the universities of education as well as two universities of applied sciences and one academy of arts in the development of systems of quality assurance and enhancement as well as quality management.

In the composition of the committees it is taken care that universities and universities of applied sciences as well as the relevant subject groups are represented adequately through qualified experts. As per § 13 of the constitution of the foundation (Annex 1a) the Accreditation Commission consists of, among others, representatives of universities, universities of applied sciences and the universities of education. Moreover, the decision of the Foundation Council "Composi-

tion, Tasks and Responsibilities of the Expert Groups appointed for Accreditation Procedures" (Annex 2a) provides that among others two to three members of higher education institutions of different types are represented in each expert group for procedures for programme accreditation. However, according to the footnote, only those types of higher education institutions are included, in which the study programme to be accredited is offered.

### **Assessment**

In view of the present activity spectrum of evalag as well as the composition of the Accreditation Commission and of the expert groups to be appointed in each case, it can be assumed that accreditation activity of evalag spans several types of higher education institutions. A technical restriction is also not to be expected.

### **Result:**

**Criterion 1.2 is met.**

Criterion 1.3: To be admitted to programme accreditation, the agency shall demonstrate internal processes, rules and expertise that ensure application of the "Criteria for the Accreditation of Study Programmes" and the "General Rules for Carrying out Procedures for the Accreditation and Reaccreditation of Study Programmes".

### **Documentation**

The internal policies and procedures for programme accreditation are specified in the document "Workflow of Procedures for Programme Accreditation" (Annex 7) as well as the accompanying Annexes 7a) to 7n). The Annexes consist of the following documents:

- a) Application form for the higher education institution submitting the application, in which the higher education institution declares, among other things, that no procedure has been applied for or been completed at an other agency for the study programme awaiting accreditation and no negative decision has been received about this.
- b) Model contract, which under § 1 defines the object of the contract or the objective of the accreditation procedure as follows: "In the procedure the objectives, the concept, the available resources, the implementation and quality assurance relevant for the operation of the study programme are examined to the effect, whether they – while applying the European Standards and Guidelines for Quality Assurance in Higher Education (ESG), the guidelines of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder and the criteria of the Accreditation Council – are suitable to ensure achieving the qualification goals as well as to ensure the quality standards of the study programme. § 4 para. 1 of the model contract states, that the contractor (evalag) is bound to the resolutions of the Accreditation Council "Criteria for Programme Accreditation" in

the version of 29.02.2008 and "Decisions of the Accreditation Agencies: Types and Effects" in the version of 29.02.2008 as well as to all decisions modifying or replacing them.

- c) Covering sheet for self-documentation of the study programme, which contains a questionnaire for formalities, such as the name of the study programme and degree, the average duration of study, the number of planned seats for the course etc.
- d) Guideline for the higher education institutions for the preparation of self-documentation. The guideline (for procedures for programme accreditation) contains altogether 68 questions on the focal points: I. Objectives / profile of the study programme, II. Curriculum, III. Enabling employability, IV. Academic feasibility, V. Personnel and material resources and VI. Quality assurance and enhancement. The questions contained in the document cover the "Criteria for the Accreditation of Study Programmes" comprehensively.
- e) Overview of annexes, which must be submitted or may be submitted if necessary, on self-documentation of the study programme, such as study and examination regulations, diploma supplement, module manual etc.
- f) Criteria for (re-)accreditation of study programmes. Following the structure of the guideline (Annex 7d), this document contains the subject areas: 1. Objectives / profile of the study programme, 2. Quality of the curriculum, 3. Enabling employability, 4. Academic feasibility, 5. Resources, 6. Quality assurance and enhancement and 7. Résumé. The criteria of evalag reflect the "Criteria for the Accreditation of Study Programmes" comprehensively with one exception. The exception concerns the question how far a study programme implements the conception of the higher education institution with regard to gender mainstreaming.
- g) Special rules for the accreditation of study programme packages, which follow the resolution of the Accreditation Council "General Rules for the Implementation of Procedures for Accreditation and Re-accreditation of Study Programmes" (Part III).
- h) Resolution of the Foundation Council "Composition, Tasks and Responsibilities of the Expert Groups appointed for Accreditation Procedures" (Annex 2a). This document specifies the prerequisites for the proof of no-conflict-of-interest of experts, rules for selection and appointment of experts, the composition of expert groups as well as the tasks and responsibilities of the experts. Where necessary, this happens in each case with reference to the procedures for programme and system accreditation.
- i) Model contract for the participation of experts in a procedure of programme accreditation. This document, among other things, specifies the tasks of the experts, the obligation to

submit a no-conflict-of-interest declaration and the obligation to confidentiality of information concerning the specific procedure.

- j) Concept for the briefing of experts (Annex 6). With reference to the relevant decisions of the Accreditation Council, which require the briefing of the experts for the procedures, the Foundation Council of evalag has approved a concept for the briefing of experts (for this see in greater detail the explanations on criterion 2.3).
- k) As an example, the process of an on-site visit in a procedure of programme accreditation.
- l) Prototype structure of an expert report on programme accreditation, which at the same time gives information about the responsibilities of the experts and the office in the preparation of the report.
- m) Possible results of the programme accreditation procedure. Under consideration of the decision of the Accreditation Council "Decisions of the Accreditation Agencies: Types and Effects" in the version of 31.10.2008, this document explains the possible decision details, as well as – primarily with regard to the laying down of conditions – reasons, implementation, review, time limits and consequences of non-compliance.
- n) Appeals procedure (for this see the explanations on criterion 6 (internal appeals procedure)).

### **Assessment**

evalag has internal policies and procedures for the implementation of programme accreditations, which ensure the application of "Criteria for the Accreditation of Study Programmes" and the "General Rules for the Implementation of Procedures for Accreditation and Re-accreditation of Study Programmes". The above-mentioned resolutions of the Accreditation Council are, on the one hand, specified explicitly as important assessment or procedure norms, on the other hand the resolutions are also reflected in the contents of individual documents. It emerges both from the document "Workflow of the Procedure of Programme Accreditation" (Annex 7) and from the model contract between the agency and the higher education institution (Annex 7b), that the implementation of the accreditation procedures is carried out on the basis of the "Criteria for the Accreditation of Study Programmes" of the Accreditation Council. However, obviously the study programmes are formally assessed on the basis of the document "Procedures for Programme Accreditation: Criteria for (Re-)Accreditation of Study Programmes" (Annex 7f). As regards content the "Criteria" of evalag include, however, all criteria of the Accreditation Council with the exception of the partial criterion 4 "Implementation of the Conception of the Higher Education Institution with regard to Gender Mainstreaming". This partial criterion must find appropriate consideration in the criteria of evalag. Next to the study programme objectives, the

quality of the curriculum, the resources and the quality assurance, the criteria "Academic Feasibility" and "Enabling Employability" are treated as "independent" test fields in the evalag document and their importance is thus emphasised.

The "General Rules for the Implementation of Procedures for Accreditation and Re-accreditation of Study Programmes" are implicitly reflected above all in the set of regulations of evalag, for example in the documents "Composition, Tasks and Responsibilities of the Expert Groups appointed for Accreditation Procedures" (Annex 7h), "Workflow of the Procedures for Programme Accreditation" (Annex 7) or "Procedures for Programme Accreditation: Possible Results of the Programme Accreditation Procedure " (Annex 7m).

The planned procedural practice of evalag differs, however, from the specifications of the Accreditation Council in one point: As per the "General Rules for the Implementation of Procedures for Accreditation and Re-accreditation of Study Programmes" the higher education institution receives the assessment report of the expert group (without recommendation of decision) only after the on-site visit for a comment. The workflow of the procedure at evalag provides, however, that the higher education institution receives an initial opinion of the experts already before the on-site visit (Annex 7, p. 4). With this practice, which originates from the evaluation practice, the agency intends to prepare the higher education institution submitting the application on the content-wise focal points of the on-site visit. Even if this intention is understandable, one should consider that the experts assess the study programme concept presented for accreditation only from files at first. Since many questions and misunderstandings, as experience shows, result from an inaccurate presentation in the submitted application documents and become superfluous in the course of the on-site visit, such advance information is possibly rather counterproductive. Moreover, the practice followed by evalag could lead the higher education institutions to react to the points of criticism made by the experts before the on-site visit – independent of their validity – by changing the application documents only to ensure a smooth course of the on-site visit. After discussion with the experts the agency is obviously prepared to dispense with this procedural step or satisfied, if the experts appointed by evalag clarify open questions through the office of the agency.

Apart from this, the regulations and procedures of evalag are complete, transparent, clear and well suited to inform all those involved in the procedure, above all the experts and the representatives of the higher education institutions submitting the application, comprehensively about the requirements of the procedure.

What should be positively emphasized is particularly the clear information for the preparation of a convincing and comprehensible report in the document "Workflow of the Procedure of Programme Accreditation" (Annex 7).

The required expertise, which is to guarantee the application of the "Criteria for the Accreditation of Study Programmes" and the "General Rules for the Implementation of Procedures for Accreditation and Re-accreditation of Study Programmes" as per criterion 1.3 of the Accreditation Council, is adequately ensured by a number of resolutions of the Foundation Council of evalag. These include above all the procedures introduced by evalag for the selection and briefing of the experts (Annex 2a and 3b), the measures for training of the employees of the office – particularly for the internal exchange of experience and the on-the-job training (Annex 5), the concept of expert briefing (Annex 6) in connection with the participation contract between the agency and experts (Annex 7i or 8d) as well as the internal quality assurance system of evalag and here particularly the quality monitoring and the defined principles of procedure for programme and system accreditation (Annex 10).

**Result:**

**Criterion 1.3 is partly met. The expert group recommends to the Accreditation Council to state the condition, that the "Criteria for the (Re-)Accreditation of Study Programmes" of evalag must also include the implementation of the conception of the higher education institution with regard to gender mainstreaming, as per criterion 4 of the "Criteria for the Accreditation of Study Programmes".**

**Moreover, the expert group recommends reconsidering the practice of the agency of informing the higher education institutions about the experts' pre-assessments before the on-site visit itself.**

Criterion 1.4: To be admitted to system accreditation, the agency shall demonstrate internal processes, rules and expertise that ensure application of the "Criteria for System Accreditation" and the "General Rules for Carrying out System Accreditation Procedures". In addition, the agency's bodies shall demonstrate expertise in the management of Higher Education Institutions and the quality assurance in the field of Higher Education Institutions.

**Documentation**

The internal policies and procedures for system accreditation are specified in the document "Workflow of System Accreditation" (Annex 8) as well as the accompanying Annexes 8a) to 8m). The Annexes consist of the following documents:

- a) Guideline preliminary discussion, which serves the purpose of giving the higher education institution an overview of the necessary information for the preliminary discussion.
- b) Guideline preliminary scrutiny, on the basis of which the higher education institution is informed about important contents, steps and criteria of the procedure.

- c) Model contract, which under § 1 defines the object of the contract or the objective of the accreditation procedure as follows: "In the procedure the processes of quality assurance relevant for teaching and learning are assessed to the effect, whether they – while applying the European Standards and Guidelines for Quality Assurance in Higher Education (ESG), the specifications of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder and the criteria of the Accreditation Council – are suitable to ensure attaining the qualification goals as well as the high quality of the study programmes." § 4 para. 1 of the model contract states, that the contractor (evalag) is bound to the resolutions of the Accreditation Council "Criteria for System Accreditation" in the version of 29.02.2008 and "Decisions of the Accreditation Agencies: Types and Effects" in the version of 29.02.2008 as well as to all decisions modifying or replacing them.
- d) Participation contract; document is missing or is wrongly equated with Annex 7i, which however refers only to procedures for programme accreditation.
- e) Criteria for admittance to the procedure of system accreditation, which specify the formal admittance requirements and call for a plausible demonstration from the higher education institution of a formalised quality assurance system for the whole institution.
- f) Guideline for the documentation of the quality assurance system. The guideline (for procedures for system accreditation) consists of the following four subject areas: basics, structure, performances and transparency of the internal quality assurance system.
- g) Test grid of the documentation of the quality assurance system. The test grid presents the central assessment norm of evalag for procedures for system accreditation and consists – following the relevant guideline of evalag – of four test areas: basics, structure, performances and transparency of the internal quality assurance system.
- h) Resolution of the Foundation Council "Composition, Tasks and Responsibilities of the Expert Groups appointed for Accreditation Procedures" (Annex 2a). This document specifies the prerequisites for the proof of no-conflict-of-interest of the experts, rules for selection and appointment of experts, the composition of the expert groups as well as the tasks and responsibilities of the experts. Where necessary, this happens in each case with reference to the procedures for programme and system accreditation.
- i) Concept for briefing of experts (Annex 6). With reference to the relevant resolutions of the Accreditation Council, which require the briefing of the experts for the procedures, the Foundation Council of evalag has approved a concept for the briefing of experts (for this see the explanations on criterion 2.3).

- j) Prototype on-site visit plan for procedures for system accreditation. The sample workflow plan confines itself to the first on-site visit, since the second on-site visit – according to the information given by evalag – depends on the requirements for assessment of the selected features and therefore is planned individually.
- k) Selection of the feature random sample in procedures for system accreditation. The document follows with one exception the wording of the corresponding resolution of the Accreditation Council "Rules for the Composition of the feature random sample".
- l) Procedure for the selection of the programme random samples in procedures for system accreditation. The document regulates selection, execution and reporting of the programme random sample.

The agency proves the required expertise in management of higher education institutions and quality assurance internal to higher education institutions with the following measures: As per § 13 of the constitution of evalag (version of 2nd March 2009) the members of the Accreditation Commission should have experience in the field of development and curriculum design of study programmes. Furthermore for each type of higher education institution, at least 50% of the members should have experience in the field of management of higher education institutions and quality assurance internal to higher education institutions, i.e. particular experience in management of higher education institutions and in quality assurance of teaching and learning. Furthermore, in February 2009 the Foundation Council of evalag has come to an understanding (Annex 3a) on the selection procedure for the members of the Accreditation Commission, which contains competence profiles as well as detailed selection criteria. In this the criteria are different for each group represented by a member (higher education institutions, professional practice, students). Among others, management experience in self-administration in higher education institutions and (international) experience in quality assurance, quality enhancement and quality management in higher education institutions are mentioned there as central criteria for the selection of members of the commission for a qualified assessment in the context of system accreditation. The members of the Accreditation Commission will be appointed by the Foundation Council of evalag.

### **Assessment**

evalag has internal policies and procedures for the implementation of system accreditations, which ensure the application of "Criteria for System Accreditation" and the "General Rules for the Implementation of Procedures for System Accreditation" to the greatest extent. It can be seen that all provisions for assessment and process descriptions of the agency closely follow the specifications of the Accreditation Council. Here on the one hand there is explicit reference to the corresponding resolutions of the Accreditation Council, on the other hand compliance as

regards content with the specifications of the Accreditation Council follows implicitly – as for example with the so-called test grid of evalag for system accreditation (Annex 8g), in which even here extensive consideration of the "Criteria for System Accreditation" can be seen.

The procedure for the system accreditation introduced by evalag also corresponds to the specifications of the Accreditation Council with few exceptions. The details on the nomination or appointment of experts and expert groups in the model contract between the higher education institution and agency (Annex 8c) as well as on dealing with the reports on the programme random samples (Annex 8l) are contradictory (however, for this see the explanations on criterion 2.2). However, in one point the rules of procedure differ from the specifications of the Accreditation Council: As per the "General Rules for the Implementation of Procedures for System Accreditation" the higher education institution receives the assessment report of the expert group (without recommendation of decision) only after the on-site visit for their comment. As against that the procedure in evalag provides that the higher education institution receives the initial opinion of the experts already before the on-site visit itself (Annex 8, p. 4, p. 5, p. 7).

This procedure element resulting from the evaluation practice is judged critically by the expert group, not least because of the fact that through this the importance of the on-site visit for the clarification of questions and misunderstandings and also for discussions on controversies is called into question. Moreover, there is the danger that the application documents submitted by the higher education institution will be modified before the on-site visit to suit the perceived opinion of the experts, in order to avoid (possibly very fruitful) discussions between representatives of the higher education institution and the experts (for this see also the explanations on criterion 1.3).

Altogether, the regulations and procedures of evalag are complete, transparent, clear and thus suited to inform all those involved in the procedure, above all the experts and the representatives of the higher education institutions submitting the application, comprehensively about the requirements of the procedure.

Inconsistencies can be seen in the specifications of evalag for the composition of the expert group (Annex 2a, p. 4). Contrary to the details of the resolution "General rules for the implementation of procedures for system accreditation", the aspects "Experiences in the management of higher education institutions" and "Nomination of a member from abroad" are not accommodated here. However, this aspect is taken into account in the evalag document "Selection procedures and competence profiles of members of expert groups" (Annex 3b), so that a modification should be made here.

The required expertise in management of higher education institutions and in quality assurance internal to higher education institutions is ensured in the organs of the agency by suitable selection procedures and based on the corresponding specifications in the constitution of the agency.

There is an insignificant variation from the resolutions of the Accreditation Council regarding the feature random sample. At evalag two of the totally three features to be selected for the feature random sample are determined by lots before the first on-site visit itself. The question arises here why all features should not be selected in the course of the first on-site visit, as provided in the resolution of the Accreditation Council.

**Result:**

**Criterion 1.4 is met. However, the expert group recommends reconsidering the practice of the agency of informing the higher education institutions about the preliminary assessments of the experts before the on-site visit itself.**

**Besides, the experts recommend that the procedure for the selection of the feature random sample should be modified in order to comply with the specifications of the Accreditation Council.**

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| Criterion 1.5: If the agency only files an application for admission to system accreditation, it shall demonstrate its capabilities to carry out procedures of programme accreditation in accordance with the criteria stipulated hereinafter. |
|--|

*Not relevant for the current procedure*

**Criterion 2: Organisational structure**

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|---|
| Criterion 2.1: The agency, which has a legal personality of its own, is not operated profit-oriented. |
|---|

**Documentation**

evalag was established on 18th July 2000 as a foundation under public law with registered office in Mannheim and entered in the foundation register of the Regional Council Karlsruhe. As per § 3 para. 1 of the constitution evalag does not work for profit. According to information given by the agency the non-profit status was granted by the competent tax office, most recently on 19.12.2006.

The implementation of procedures for programme and system accreditation is carried out organisationally by a department created for this purpose (Annex 1b).

## Assessment

The details given by the agency prove that evalag has a legal identity of its own and does not work for profit. The accounting of the accreditation procedures is carried out on a full cost recovery basis. The agency has assured, that the repayment of the financial funds to the extent of about ████████ €, which will be available to the agency through its start-up financing, will commence on conclusion of the first procedure and will be completed at the latest after two years.

### Result:

**Criterion 2.1 is met.**

Criterion 2.2: Depending on its admission to programme and/or system accreditation, the agency has understood all accreditation-relevant tasks, regularised the competencies, responsibilities and composition of its bodies accordingly and participates the interested parties (representatives of academic disciplines, students and practitioners of the profession) relevant for achieving the tasks.

## Documentation

The constitution of evalag (Annex 1) specifies the organs of the agency as (a) the Foundation Council, (b) the Accreditation Commission, (c) the Appeals Commission and (d) the Foundation Executive Board (managing director). Composition, tasks and responsibilities of the above-mentioned organs also are regulated in the constitution.

The Foundation Council is the strategic organ of the foundation, which decides on matters of fundamental importance. It participates in the development of procedures and instruments of quality assurance and quality management in research and teaching, appoints members of the Accreditation Commission (§ 9 para. 2l of constitution) and appoints experts in all the procedures implemented by the agency (§ 9 para. 2o). In addition, the Foundation Council exercises the general authority to lay down guidelines for the Accreditation Commission as per § 9 para. 2, which particularly includes the approval of principles of procedure and the specification of formal requirements for the appointment and composition of expert groups.

The Foundation Council consists of (a) eight external experts, who are appointed by the Minister of Science after consultation with the Rector's Conferences, (b) a member without voting rights appointed by the Minister of Science and (c) the chairperson, an external person appointed by the Minister of Science after consultation with the Rector's Conferences.

The Accreditation Commission is responsible for all accreditation-related tasks concerning the accreditation of study programmes and of quality assurance systems of higher education institutions. It determines assessment norms, criteria and principles of procedure for programme and

system accreditation, selects the expert groups and its chairpersons and takes decisions on the accreditation of study programmes in the framework of programme and system accreditation.

The Accreditation Commission consists of fifteen members with voting rights: Altogether eleven members are nominated by the universities (at least three), the universities of applied sciences (at least three) and the universities of education (at least one member). Two members are representatives of professional practice, one representing employers and one the employees. Two members are students, one as a representative of universities and one as a representative of universities of applied sciences. At least one member from the group of representatives of higher education institutions should be a foreign expert. For each type of higher education institution, at least 50% of the members should have experience in the field of management of higher education institutions and quality assurance internal to higher education institutions, i.e. especially experience in management of higher education institutions and in quality assurance of teaching and learning.

The Foundation Council of evalag has regulated the composition, tasks and responsibilities of both the expert groups and the preliminary examination committee (for procedures for system accreditation) by resolution of February 2009 (Annexes 2a and 2b).

As per § 9 para. 3 along with § 12 para. 1i the Foundation Council can establish technical committees, the members of which will be appointed by the Accreditation Commission. At present, the Foundation Council has not made use of this possibility yet, since – as stated by evalag – technical committees should be set up when a certain number of procedures is reached. However, because of the comparatively high meeting frequency of the Foundation Council, the agency can react quickly to an increasing demand and – according to the principle of scalability – promptly decide on the appointment of technical committees. The selection procedures and competence profiles of the members of the technical committees are specified in the document of evalag having the same name (Annex 3).

The workflows of procedure of programme and system accreditation are laid down by evalag in two different documents (Annexes 7 and 8). The procedures for the selection of the random samples of features and programmes in procedures for system accreditation are regulated by resolution of the Foundation Council of February 2009 (Annexes 8k and 8l).

### **Assessment**

The experts could ascertain that evalag has covered all accreditation-relevant tasks and has regulated the authorities, responsibilities as well as the composition of its organs correspondingly. Moreover, those interested in the execution of the tasks have been involved / consulted. The individual regulations have been laid down with binding effect by the constitution of evalag

or by corresponding resolutions of the Foundation Council and are well documented. Although it is not clear from the documents "Workflow of the procedure for programme accreditation" and "Workflow of the system accreditation procedure" themselves whether they are binding sets of regulations; the experts were however informed during the on-site visit that all documents of evalag have been approved on 26th February 2009 by the Foundation Council of the agency with binding effect.

There is uncertainty with regard to the nomination or appointment of the expert groups. Regarding this, contradictory statements have been made by the application for accreditation, the constitution of evalag (Annex 1a), the document "Composition, Tasks and Responsibilities of the Expert Groups appointed for Accreditation Procedures (Annex 2a), the specimen contract between the agency and higher education institutions (Annexes 8c) the document "Workflow of the system accreditation procedure" (Annex 8), the document "Procedures for selection of the programme random sample (Annex 8l) ".

During the on-site visit the representatives of evalag have explained that the experts for procedures for programme and system accreditation are to be selected basically by the Accreditation Commission, the formal appointment will, however, be made by the chairman of the Foundation Council.

As per § 12 of the constitution, the Accreditation Commission of evalag is responsible for all accreditation-related tasks, and this means both for the procedures for programme accreditation and for procedures for system accreditation. On the other hand, the documents "Workflow of the system accreditation procedure" (Annex 8), "Procedures for the selection of programme random samples" (Annex 8l) and "Appeals procedures" (Annex 11) distinguish at times between Accreditation Commission, programme Accreditation Commission and system Accreditation Commission.

During the on-site visit the agency explained to the experts, that it will have only *one* commission for programme and system accreditation for the time being and also wants to do without the establishing of technical committees at present. This should however be also clearly and coherently formulated in the documents. The agency does not rule out making corresponding modifications when required.

Except for the above-mentioned inconsistencies the accreditation-related tasks as well as the responsibilities and procedural processes of evalag are, however, documented completely, in detail and transparently.

**Result:**

**Criterion 2.2 is essentially met. The agency must, however, guarantee the consistency of its descriptions of procedure. This applies particularly to**

**1. The regulations for the selection and appointment of experts in the documents of the agency (selection of experts by the Accreditation Commission, appointment by the Foundation Council);**

**2. The description of the organisational structure: It must be unambiguous and clear from the documents of evalag that the agency at present has only one Accreditation Commission for programme and system accreditation and no technical committees.**

Criterion 2.3: The competency of all those involved in the procedures with regard to any and all areas relevant for the particular evaluation procedure of programme accreditation or system accreditation shall be ensured by appropriate selection and preparation processes.

**Documentation**

The composition of the organs of the agency (Accreditation Commission, Foundation Council and if necessary Appeals Commission) directly involved in the accreditation procedures as well as the appointment of the members is specified in the constitution of evalag. For the composition of the expert groups and the preliminary examination committee (in procedures for system accreditation) the Foundation Council of evalag has passed its own resolutions (Annexes 2a and 2b). By a resolution the Foundation Council of evalag has also specified selection procedures and competence profiles for the members of the technical committees (Annex 3), for the members of the Accreditation Commission (Annex 3a) and for the members of the expert groups (Annex 3b).

The Foundation Council has decided on a concept for the briefing of experts, which is based on five pillars (Annex 6): (1) Providing all information necessary for the procedure (application documents of the higher education institution, criteria and rules of procedure etc.). (2) Full-day information sessions, which give information about the objectives of the procedures, about criteria for assessment and decisions, about relevant legal regulations and/or about the tasks and role of the experts in accreditation procedures. The information sessions should be regularly organised twice a year and if necessary held in cooperation with another accreditation agency. (3) Expansion of the evalag website, which should provide information about programme and system accreditation, the current legal fundamentals as well as on current developments in the area of accreditation. Additionally, over the medium term a newsletter appearing about three to five times a year is planned, which is to be sent by e-mail to the experts. (4) Personal support of the

individual experts by the responsible advisor of evalag. (5) Expert conferences, which evalag would like to organise in cooperation with other accreditation agencies at least every two years on current issues in the area of quality assurance. For these expert conferences experts working for evalag should also be invited.

The Foundation Council of evalag has decided on a training concept to ensure the competence of the employees (Annex 5), which is based on six pillars: (1) internal information exchange, (2) internal exchange of experience and on-the-job training, (3) participation in (inter-)national conferences and workshops, (4) conception and organising of expert conferences, (5) exchange of experience with other accreditation agencies and (6) directed personnel development.

### **Assessment**

The selection procedures as well as the measures for the briefing of the individual groups involved are well thought-out, transparent, well-documented and seem consequently suitable to ensure the competence of those involved in the procedures. Special attention is paid here to the selection and briefings of the experts. The regulations laid down by evalag regarding this refer explicitly to the specifications of the Accreditation Council (resolution "Briefing of experts in accreditation procedures" and "General Rules for the Implementation of Procedures for Accreditation and Re-accreditation of Study Programmes") and reflect these comprehensively also in content.

**Result: Criterion 2.3 is met.**

Criterion 2.4: Independency of the agency's bodies related to individual cases is ensured. This also applies to the independency and impartiality of the persons working for the agency.

### **Documentation**

As per § 12 of the constitution of evalag, the Accreditation Commission is responsible for all accreditation-related tasks concerning the accreditation of study programmes and of quality assurance systems of higher education institutions and for the specification of assessment norms, criteria and principles of procedure. As per § 13 para. 3 the members are free from directives while carrying out their tasks. The compliance with formal specifications and directives of the Foundation Council regarding this are excepted.

According to information given by the agency the Foundation Council of evalag consists of experts who are not employed at higher education institutions, scientific institutions or other public institutions in Baden-Württemberg ("external experts"). In their decisions they are bound only to

the constitution of the foundation and are subject to the relevant legal regulations (application, p. 9).

The experts nominated by evalag must – as per § 6 of the participation contract (Annexes or 8d) – sign an declaration of no-conflict-of-interest (Annex 9), in which they have to disclose before their appointment such circumstances which on being known could create the impression of having conflict-of-interest.

### **Assessment**

The expert group arrived unanimously at the conclusion that the independence of the organs from directives in individual cases as well as the independence and impartiality of persons working for the agency are obviously ensured.

### **Result:**

**Criterion 2.4 is met. However, it is recommended that the possible reasons for conflict-of-interest in the relevant declaration of the experts should be formulated in such a manner, that they also apply to representatives of professional practice and students.**

### **Criterion 3: Procedure Organisation**

The agency conducts programme and/or system accreditations using a procedure that is based on efficient and binding rules, and ensures the implementation of the Accreditation Council's guidelines and the consistency of its decisions.

### **Documentation**

The agency has (binding) rules for the assessment and the Workflow of the Procedures for Programme Accreditation and system accreditation. The related documents are particularly "Criteria for the (re-)accreditation of study programmes" (Annex 7f), "Workflow of the procedure for programme accreditation" (Annex 7), "Test grid of the documentation of the quality assurance system" (Annex 8g) and "Workflow of the system accreditation procedure" (Annex 8).

The consistency of the decisions is to be ensured by the internal principles for quality assurance and primarily by so-called quality monitoring (Annex 10).

### **Assessment**

The documents presented by evalag suggest that the agency implements the programme accreditation or system accreditation with a procedure, which follows mandatory rules. At that the set of regulations of evalag follows the specifications of the Accreditation Council comparatively closely, partly explicitly by a direct reference, partly implicitly by conformity in content. The im-

plicit and explicit reference to resolutions of the Accreditation Council is carried out throughout, that means, not only in the relevant documents, which concern the assessment norms and the procedure, but also in those, such as, for example, the model contracts between the agency and higher education institution or the specifications for the selection of experts and members of the Accreditation Commission, which concern individual aspects of the accreditation activity.

One can assume that evalag takes the efficiency principle into consideration. The efficiency of the procedure could however suffer by the fact, that the Accreditation Commission itself – as per the descriptions of procedure of evalag – examines the self-documentation of the higher education institution submitting the application and decides thereafter, whether the procedure is taken up.

**Result:**

**Criterion 3 is met.**

#### **Criterion 4: Equipment**

In respect of human and material resources, the agency is sustainably and adequately equipped for its function in all required functional areas.

#### **Documentation**

evalag has its registered office in Mannheim. According to the details given by the agency, it has at its disposal office space of altogether ■ sqm (■ work rooms, conference hall, ■ service rooms). Altogether, 17 persons are employed by evalag (Annex 12). The department responsible for programme and system accreditation occupies ■ sqm and uses the conference hall. At present, the department of programme and system accreditation comprises of a partially occupied post, providing one more post is, however, planned.

#### **Assessment**

The personnel, material and space resources are good at present, in case of a positive development of the accreditation business more space would be necessary and is also planned for. Nevertheless, at the beginning of accreditation sufficient, qualified staff must be provided in order to ensure sufficient quality from the beginning.

**Result:**

**Criterion 4 is only partially met. The experts recommend to the Accreditation Council to specify the condition that proof of the occupation of one more post is furnished.**

## **Criterion 5: Internal Quality Management**

The agency has and is continuously using a formalised internal quality management system that particularly comprises the following components:

- systematic internal feedback processes and the analysis of its own processes,
- systematic external feedback processes with Higher Education Institutions, and
- training employees and experts

### **Documentation**

evalag has built up a formalised internal quality assurance procedure for programme and system accreditations (Annex 10), which is based on a publicly documented understanding of quality (Annexes 4a and 4b).

The quality management system takes into account the different performance areas of the agency (evaluation, institutional quality assurance, other activities of promoting science and accreditation) and consists of the areas (a) quality enhancement and assurance and (b) quality monitoring. The internal feedback processes consist, among others, of regular discussions in the office on internal quality control, interviews of the experts involved in the evalag procedures to be carried out annually, as well as the regular reporting of the Foundation Executive Board about the activities of the office and, the subsequent defects analysis of the Foundation Council (Annex 10). The external feedback processes cover, among others, the possibility of the higher education institution to comment, discussions with the higher education institutions about the quality of the procedures carried out by evalag and ensuring punctual information and sufficient time limits for the applicants (and all committee members).

### **Assessment**

One can conclude from the documents presented by evalag that the agency has a formalised internal quality management system. The system includes both internal and external feedback processes and contains various measures, which ensure the on-the-job training of the employees at the office as well as adequate briefing for the experts.

The individual measures for quality assurance and enhancement, which are described in the quality management system of evalag (Annex 10), are reflected in the resolutions of the Foundation Council, such as the concept of training the employees of the office (Annex 5), the selection procedure for members of expert groups (Annex 3b) or the concept of briefing of the experts (Annex 6). This can be used as evidence for the consistency and functional efficiency of the quality management system of evalag.

The discussions held with representatives of the agency during the on-site visit indicated however, that in the daily work of the agency the informal processes at present play a more important role than the formal processes of internal quality assurance. The measures planned for the future – at least most of them – are at present still in the concept stage and have yet to establish themselves in practice. In order to make the formal processes of internal quality management transparent, the experts suggest that an overview of the individual concrete measures, processes and procedures should be written down similar to a quality manual.

**Result:**

**Criterion 5 is met. However, the experts recommend documenting the agency internal process flows, measures and responsibilities keeping quality management in view.**

**Criterion 6: Internal Complaint Procedure**

The agency has implemented a formalised internal procedure for the review of accreditation decisions, if requested by a Higher Education Institution. Said procedure defines the subject matter of the review. The persons deciding in the review procedure are independent of instructions.

**Documentation**

evalag has laid down a formalised internal procedure, which allows the higher education institutions to submit appeals in the course of the accreditation procedures (Annex 11). The procedure decided on by the Foundation Council defines the following appeal possibilities for higher education institutions: (1) Appeal against an unfavourable decision in the procedure for admittance to system accreditation, (2) Appeal against the appointment of individual experts, in which – as per the specifications of the Accreditation Council – the higher education institution does not have any rights for proposal or veto, and (3) Appeal against an unfavourable accreditation decision or the suspension of the procedure.

The Appeals Commission of the agency decides on the appeal of a higher education institution against the accreditation decision of evalag. In well-founded cases the Appeals Commission, along with a statement, can send back a procedure to the Accreditation Commission for renewed processing. The decision of the Accreditation Commission on a procedure referred back to it is final.

As per § 16 of the constitution, the Appeals Commission has three to five members with voting rights and consists of two members of the Accreditation Commission, one representative of an organisation concerned with the quality assurance in higher education, one representative of

another domestic accreditation agency, one representative of a foreign accreditation agency and one students' representative.

### **Assessment**

The documents presented by evalag prove that the agency has a formalised and documented appeals procedure for reviewing accreditation decisions. The appeals procedure (Annex 11) defines the subject to be reviewed, does not however consider the possibility of raising an objection against a condition laid down by the Accreditation Commission of evalag.

According to its terminology the "Internal description of the procedure" refers obviously only to procedures for system accreditation (Annex 11, p. 2). A suitable addition is required here.

Besides that, it should be ensured that the representatives of the Accreditation Commission do not represent the majority of the members of the Appeals Commission.

### **Result:**

**With the assured clarifications (conceptual consideration of programme accreditation, objection against conditions as well as majority proportion) criterion 6 is met.**

### **Criterion 7: Reporting**

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| The procedures and decisions of the agency are transparent and are sufficiently communicated to the public |
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### **Documentation**

The regulations and principles of evalag for the implementation of procedures for programme and system accreditation are specified in the documents "Workflow of the procedure of programme accreditation" (Annex 7) and "Workflow of the system accreditation procedure" (Annex 8) and the Annexes (7a to 7n and 8a to 8l) accompanying them.

According to the statement of the agency, the important documents will be published on the website of evalag. At the end of the accreditation procedure the applying higher education institutions as well as the experts involved in the procedure receive a written report with the substantiated accreditation decision. A notification about the completed accreditation procedures is sent to the Accreditation Council and in the case of a positive decision published on the home page of evalag (application, p. 13).

### **Assessment**

The documents presented by evalag are suitable to document the procedures of the agency completely and transparently. The described procedures ensure also that the accreditation decisions of the agency are or will be adequately transparent and comprehensible.

The intended measures of the agency for public communication correspond to the specifications of the Accreditation Council. However, the indication, that the study programmes accredited in the course of system accreditation are entered in the database of the Accreditation Council, is missing in the description of the procedure of system accreditation (Annex 8).

**Result:**

**Criterion 7 is met (with a text modification in Annex 8).**

### 4.3. Assessment based on European Standards and Guidelines (ESG)

#### 3.1 Use of external quality assurance procedures for higher education

**STANDARD:**

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

**GUIDELINES:**

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

### ESG Part II

#### 2.1 Use of internal quality assurance procedures

**STANDARD:**

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

**GUIDELINES:**

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

*Programme and system accreditation:* The assessment norms and rules of procedures of evalag take into account the specifications of the Accreditation Council and ensure that the existence and effectiveness of internal quality assurance are object of the procedures.

*Evaluation:* In evaluation procedures, which cover the performance area of teaching and learning, evalag strives for an assessment of the standards contained in the ESG part 1 according to the quality demands of the agency. This can be seen in the questions and data catalogue (see for example part 2, Annex 4). evalag has laid down binding principles for the methodical design and formal workflow of evaluation procedures (Part 2, Annex 5) and can thus ensure that the standards and guidelines are covered in the procedures.

*Institutional quality assurance:* With the "Key points for institutional quality assurance" (Annex 17a-c) a conceptional basis was worked out in 2007 with an international working group (Annex 16). The "key points" also follow the ESG.

**Conclusion:**

**evalag fully complies with Standard 2.1**

## **2.2 Development of external quality assurance processes**

### **STANDARD:**

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

### **GUIDELINES:**

In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used. As external quality assurance makes demands on the institutions involved, a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

evalag has laid down the assessment criteria and rules of procedures for each of the individual task areas by resolution of the Foundation Council. The documents are or will be published on the website of the agency.

*Programme and system accreditation:* The design of the procedures for programme and system accreditation follow primarily the relevant resolutions of the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder, the Accreditation Council and if necessary state-specific specifications. The relevant stakeholders (representatives of higher education institutions, professional practice and students as well as foreign experts) were involved in the development of the specifications of the Accreditation Council. The policies and procedures for programme and system accreditation are laid down in the documents "Workflow of the procedure of programme accreditation" (Part 1, Annex 7) and "Workflow of the system accreditation" (Part 1, Annex 8) and are published on the website of evalag.

*Evaluation:* The objectives, purposes and design of the evaluation procedures were developed after the establishing of the foundation in 2000 with the members of the Foundation Council, other experts and representatives of higher education institutions of Baden-Württemberg (Part 3, Annex 2 and Part 2, Annex 14).

*Institutional quality assurance:* The "Key points for institutional quality assurance" (Part 2, Annex 17a), developed in 2007 by an expert committee having also international members, are the basis of all activities of evalag in this functional area. Representatives of universities, universities of applied sciences and universities of education (as guests in the committee meetings) participated in its preparation.

### **Conclusion:**

**evalag fully complies with Standard 2.2**

### **2.3 Criteria for decisions**

#### **STANDARD:**

Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

#### **GUIDELINES:**

Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

The decisions of the agency are made on the basis of criteria which are explicit, published and used uniformly. The agency is bound by contract to this procedural principle by the specifications of the Accreditation Council.

#### **Conclusion:**

**evalag fully complies with Standard 2.3**

### **2.4 Processes fit for purpose**

#### **STANDARD:**

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

#### **GUIDELINES:**

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

Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance. Amongst these elements the following are particularly noteworthy:

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task;
- the exercise of care in the selection of experts;
- the provision of appropriate briefing or training for experts;
- the use of international experts;
- participation of students;
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached;
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review;
- recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality.

evalag has designed the procedures for the different functional areas of the agency in a way, which ensures the achievement of the objectives associated with the procedures (fitness of purpose). This can be shown with the procedural elements and measures listed below:

- The selection and nomination of the experts are carried out according to specified criteria and procedures, (Part 1, Annexes 2a and 3b, Part 2, Annex 5); through the criteria the representation of relevant stakeholders (representatives of higher education institutions, professional practice and students) as well as the consideration of international experts in the expert groups is ensured.
- The agency has developed procedures for training of experts (Part 1, Annex 6);
- The agency evaluates the feedback of the experts and the accredited / evaluated higher education institution on the procedure and lays down follow-up measures (conditions / recommendations);
- The specified procedures of the agency consist of (a) the preparation of self-documentation of applying higher education institution, (b) on-site visit, c) preparation of an expert / final report, with a possibility for the higher education institution to respond and (d) publication of the results;
- The internal quality management system of evalag (Part 2, Annex 3) describes the importance and measures for quality enhancement for the different fields of activity of the agency.

**Conclusion:**

**evalag fully complies with Standard 2.4**

**2.5 Reporting**

**STANDARD:**

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

**GUIDELINES:**

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

evalag attaches importance to the writing of reports oriented towards the intended readership and supports the experts intensively in their preparation. In accreditation procedures the experts are informed about the requirements of reports and their prototype structure (Part 1, Annexes 7 and 7I); in evaluation procedures the experts receive infor-

mation about the prototype structure of a final report and about the structure of the published evaluation reports (Part 2, Annexes 12a and 12b).

The reports pay attention to the fundamental distinction between presentation of facts of the matter, assessment and recommendations arising from them. Apart from the relevant language requirements of unambiguity and comprehensibility, evalag also attaches importance to an adequate representation of sensitive facts, preservation of personal rights and observing the protection of data privacy.

The results of the accreditation procedures are published in the form of short reports on the website of evalag and entered in the database of the Accreditation Council. The reporting on completed evaluation procedures of evalag is accessible to the public to the greatest extent. The reports are provided on the website either in a full version or as a summary. The intended publication is pointed out to the applicants during the discussion on the mandate and in drafting the contract. In well-founded cases, in which the applicant does not wish a publication or even rejects it, evalag comes to an understanding with the applicant at least upon a general summary of the procedure, which is made accessible to the public.

#### **Conclusion:**

**evalag fully complies with Standard 2.5**

#### **2.6 Follow-up procedures**

##### **STANDARD:**

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

##### **GUIDELINES:**

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

The follow-up in case of programme accreditation confines itself essentially to the verification of the conditions being fulfilled.

In order to clarify the importance of follow-up, the Foundation Council of evalag passed a resolution in October 2008, that in evaluation procedures the follow-up is a step of every procedure. Thus this is binding for applicants or they have to take this into account. However, the concrete and adequate follow-up measures have to be laid down in each indi-

vidual case. This is frequently initiated by the applicant himself. If the applicant does not wish to have a follow-up by evalag, evalag specifies by contract that at least a mandatory closing session with the units involved in the procedure is held.

**Conclusion:**

**evalag fully complies with Standard 2.6**

**2.7 Periodic reviews**

**STANDARD:**

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

**GUIDELINES:**

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

The accreditation procedures in Germany are defined cyclically as per the relevant decisions of the Accreditation Council. In procedures for programme accreditation the term is five years, in the case of the re-accreditation, if necessary, up to seven years, in system accreditation six to eight years.

In case of evaluations and audits evalag offers periodic reviews and dynamic process support. These measures are however voluntary on the part of the applicant. This is primarily due to the subject-related character of the evaluation activities and of many activities in the context of the enhancement of quality assurance and quality management.

**Conclusion:**

**evalag fully complies with Standard 2.7**

**2.8 System-wide analyses**

**STANDARD:**

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

**GUIDELINES:**

All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider in-

cluding a research and development function within their activities, to help them extract maximum benefit from their work.

Once a year the work of the agency is presented and reflected in the business report (Part 3, Annex 4). Information about the processed procedures is presented in progress and experience reports. According to information given by evalag, research reports and newsletters are conceivable in future as further development of these processes.

According to information given by the agency, the integration of one's own area of research in the activities of evalag was not possible till now and was confined to temporary activities of individual employees (e.g. lectures).

The agency tries to collect qualitative and quantitative data from the area of higher education on the basis of the final reports. Likewise the methods and instruments, which evalag uses in its procedures, are examined for their practicability over and over again and if necessary are modified and improved. According to information given by evalag, an analysis of the information acquired in accreditation procedures can be carried out only after some years on the basis of adequately extensive experience.

**Conclusion:**

**evalag fully complies with Standard 2.8**

**Total evaluation of Standard 3.1:**

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

**Conclusion:**

**evalag fully complies with Standard 3.1**

**3.2 Official status**

**STANDARD:**

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

**Documentation:**

evalag was established on 18th July 2000 as a foundation under public law with registered office in Mannheim and entered in the foundation register of the Regional Council Karlsruhe. The basic fields of work of evalag and the framework conditions of its activity are regulated by law.

**Assessment:**

evalag was established on a legal basis by the competent government offices. This provides the "formal recognition".

**Conclusion:**

**evalag fully complies with Standard 3.2**

**3.3 Activities****STANDARD:**

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

**GUIDELINES:**

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

**Documentation**

From 2001 to 2006 evalag has carried out nine procedures of evaluation of certain subjects across various types of higher education institutions and possesses extensive experience in quality assurance. Furthermore, since 2006 fifteen evaluation procedures for specific subjects have been or are being carried out at the behest of higher education institutions, other scientific institutions and Ministries of Science in Baden-Württemberg, Bavaria and North Rhine-Westphalia (Part 3, Annexes 3a and 6).

With reference to explicit competences in the area of programme accreditation, one has to mention here that from 2003 to 2005 evalag has reviewed 67 Bachelor and Master study programmes at higher education institutions in Baden-Württemberg with regard to removing the time limit of their approval (see part 3, Annex 3b).

In the activity field of institutional quality assurance, evalag currently supports seven universities, the universities of education as well as two universities of applied sciences and one academy of arts in the development of systems of quality assurance and development as well as quality management.

**Assessment**

evalag regularly carries out external quality assurance procedures. After being accredited by the Accreditation Council, programme and system accreditation will be added in future to the current activity spectrum (evaluation, institutional quality assurance).

**Conclusion:**

**evalag fully complies with Standard 3.3**

### **3.4 Resources**

#### **STANDARD:**

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

#### **Documentation**

evalag has its registered office in Mannheim; it has at its disposal office space of altogether ■ sqm (■ work rooms, conference hall, ■ service rooms). Altogether, 17 persons (14 full time equivalents) are employed by evalag at present (see Part 1, Annex 12). The department responsible for programme and system accreditation has ■ sqm (■ work room).

At present, the department of programme and system accreditation comprises of half an occupied position, the occupation of another position is, however, planned.

According to the details given by the agency the material resources with furniture and technical equipment is sufficient, up-to-date and technically state-of-the-art.

According to the statement of the agency the financial resources are sufficient, as the management has shown in the last few years. The foundation assets amount to ■ € and ■ has provided evalag with grants amounting to approximately ■ € (PLAN) in the previous years. Apart from that, evalag carries out activities outside the state of Baden-Württemberg against full reimbursement of costs. In the years 2007-2008 evalag has raised funds amounting to more than ■ € here. In the years 2006-2008 the expenses (actual) for management were between ■ € and ■ €.

#### **Assessment:**

The personnel, material and space resources are obviously good at present, in case of a positive development of the accreditation business more space would be necessary and is also planned for. Nevertheless, at the beginning of accreditation sufficient, qualified staff must be provided, in order to ensure sufficient quality from the beginning.

#### **Conclusion:**

**evalag partially complies with Standard 3.. This restriction, however, only refers to the human resources of the accreditation department**

### **3.5 Mission Statement**

#### **STANDARD:**

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

#### **GUIDELINES:**

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

## **Documentation**

evalag's understanding of quality manifests itself in the documents on "Mission Statement" (Part 1, Annex 4a) and "evalag's understanding of quality – with special reference to programme and system accreditation" (Part 1, Annex 4b), approved by the Foundation Council of the agency. Objectives and tasks of evalag, moreover, are specified in the constitution of the foundation (Part 1, Annex 1a). The mentioned documents are to be published on the website of evalag.

The agency bases its work on the quality concepts of fitness for purpose as well as validity and fitness of purpose, and affirms its intention to contribute to the strengthening of the self-controlling ability and to the promotion of the quality culture of higher education institutions. The agency works on the basis of peer-review procedures, in which the quality of an assessment is ensured by the experts involved. evalag implements procedures for programme and system accreditation and with that contributes to the enhancement of quality in teaching and learning. The procedures of evalag follow international standards. This includes, among others, the participation of all relevant stakeholders, the independence of the experts as well as the publication of the results (see also Part 2, Annex 5). Indications of how far the basics of their work are derived from the agency's understanding of quality can be found implicitly in the "Mission Statement" of evalag (Part 1, Annex 4a) as well as in "Internal Quality Management System of evalag" (Part 1, Annex 10), which have been approved by the Foundation Council of the agency.

### **Assessment:**

The Mission Statement and the understanding of quality of evalag describe clearly and comprehensively the tasks and objectives of the agency and the procedures implemented by it.

### **Conclusion:**

**evalag fully complies with Standard 3.5.**

## **3.6 Independence**

### **STANDARD:**

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

### **GUIDELINES:**

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

- its operational independence from higher education institutions and governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts);
- the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence;
- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

## **Documentation**

As a foundation under public law evalag has a legal identity of its own and is legally identifiable as an institution. This applies also to the responsibility of the organs and persons working in it and on its behalf. As a foundation it is subject to the Foundation Act of the state of Baden-Württemberg (see Part 2, Annex 34), the German Foundation Act (see Part 2, Annex 35) as well as in financial matters the provisions of the budgetary regulations of the state of Baden-Württemberg (see Part 2, Annex 36).

The future activities of programme and system accreditation will be financially self-supporting. However, according to information given by the agency, a start-up financing will be required here, which will be repaid gradually and according to plan.

As per § 12 of the constitution the Accreditation Commission of evalag is responsible for all accreditation-related tasks relating to the accreditation of study programmes and of quality assurance systems of higher education institutions and for the specification of assessment norms, criteria and principles of procedure. As per § 13 para. 3, the members are free from directives while carrying out their tasks. The compliance with formal specifications and directives of the Foundation Council regarding this is excepted.

In accreditation procedures evalag is bound by the rules of procedure and decision criteria of the Accreditation Council. The agency is independent in the specific designing of the rules of procedure (e.g. guidelines for the higher education institutions) and in the operative implementation of the procedures. This covers also the nomination of the experts and the formulation of the results of the procedures.

The Foundation Council of evalag consists – according to information given by the agency – of experts who are not employed in higher education institutions, scientific institutions or other public institutions in Baden-Württemberg ("external experts"). A representative of the ministry enjoys guest status in the Foundation Council of the agency without voting rights. In their decisions the members of the Foundation Council are bound only by the constitution of the foundation and are subject to the relevant legal regulations.

The experts nominated by evalag have to sign a declaration of no-conflict-of-interest, in which they have to disclose, before their appointment, such circumstances which on being known could create the impression of having conflict-of-interest. The experts are independent while making their decisions (Part 1, Annex 9).

### **Assessment**

The expert group arrived unanimously at the conclusion that the independence of the agency, the individual case related independence of the organs from directives as well as the independence and impartiality of persons working for the agency are obviously ensured.

### **Conclusion:**

**evalag fully complies with Standard 3.6**

#### **3.7 External quality assurance criteria and processes used by the agencies**

##### **STANDARD:**

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

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

##### **Guidelines:**

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

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

### **Documentation**

evalag has defined and documented procedure workflows, assessment criteria and procedural steps for each of its different areas of activity (Part 2, Annex 3).

*Programme and system accreditation:* evalag has developed an extensive set of regulations for the procedures for programme and system accreditation, which includes particularly the following documents: "Workflow of the procedure for programme accreditation" (Part 1, Annex 7), "Criteria for (re-)accreditation of study programmes" (Part 1, Annex 7f), "Workflow of system accreditation" (Part 1, Annex 8), "Test grid of the documentation of the quality assurance system" (Part 1, Annex 8g);

*Evaluation:* For the implementation of evaluation procedures evalag explicitly follows the standards and guidelines of quality assurance and has regulated the workflow and the individual procedural steps (Part 2, Annex 4 to Annex 15), for example in the documents "Process description evaluation" (Part 2, Annex 6), or "Principles of procedure of the evaluation agency Baden-Württemberg for evaluation procedures across higher education institutions" (Part 2, Annex 14);

*Institutional quality assurance:* The workflow and the key points of the procedure as well as the (formal) criteria for the assessment were laid down by evalag in advance (Part 2, Annex 16 to Annex 22). Higher education institutions, which give a mandate to evalag to carry out an audit, are informed about objectives, possible goals and processes as well as further conditions in the course of one or more discussions.

The accreditation and evaluation procedures developed by evalag are based on the three procedural steps (1) self-evaluation (self-documentation), (2) external assessment and (3) concluding decision-making (accreditation decision by the Accreditation Commission on the basis of an assessment report or adoption of an evaluation report by the Foundation Council). Following a completed procedure the results are published, if necessary a corresponding follow-up procedure (monitoring the fulfilling of conditions in the accreditation, determination of dealing with recommendations in the evaluation) is carried out.

As stated by the agency, the internal quality management system of evalag takes care, that the principles of procedure are adhered to and the procedures are dealt with professionally. For the activity area of programme and system accreditation an appeals procedure has been established formally.

The relevant criteria, rules and principles of procedure of the agency as well as short reports about the respective accreditation results are published on the website of evalag. Additionally, the accreditation results are entered in the database of the Accreditation Council.

## **Assessment**

The procedure types of evalag assigned to the different fields of activity of the agency include the procedure elements as stipulated in Standard 3.7.

## **Conclusion:**

**evalag fully complies with Standard 3.7**

### **3.8 Accountability procedures**

#### **STANDARD:**

Agencies should have in place procedures for their own accountability.

**GUIDELINES:**

These procedures are expected to include the following:

1. A published policy for the assurance of the quality of the agency itself, made available on its website;
2. Documentation which demonstrates that:
  - the agency's processes and results reflect its mission and goals of quality assurance;
  - the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts;
  - the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties;
  - the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.
3. A mandatory cyclical external review of the agency's activities at least once every five years.

**Documentation**

evalag has built up a formalised internal quality assurance procedure for programme and system accreditations (Part 2, Annex 3), which is based on a Mission Statement (Part 1, Annexes 4a) and a publicly documented understanding of quality (Part 1, Annex 4b). The quality management system takes into account the different performance areas of the agency (evaluation, institutional quality assurance, other activities of promoting science and accreditation) and consists of the areas (a) quality enhancement and assurance and (b) quality monitoring. The internal feedback processes consist, among others, of regular discussions in the office on internal quality control, interviews of the experts involved in the evalag procedures to be carried out annually, as well as the regular reporting of the managing director (Foundation Executive Board) about the activities of the office and, following it, the defects analysis of the Foundation Council (Part 2, Annex 3). The external feedback processes cover, among others, the possibility for the higher education institution to give a response, surveys of the higher education institutions about the quality of the procedures carried out by evalag and ensuring punctual information and sufficient time limits for the applicants (and all committee members).

The individual measures for quality assurance and enhancement, which are described in the quality management system of evalag (Part 2, Annex 3), are reflected in the resolutions of the Foundation Council, such as the concept of training the employees of the office (Part 1, Annex 5), the selection procedure for members of expert groups (Part 1, Annex 3b) or the concept of briefing of the experts (Part 1, Annex 6). This can be used as evidence for the consistency and functional efficiency of the quality management system of evalag.

evalag has developed a multistep procedure to ensure no-conflict-of-interest on the part of the experts involved in the different procedures. The procedure provides the written assurance of

the no-conflict-of-interest by the experts or the disclosure of potential reasons for conflict-of-interest. In addition, the procedure regulates the selection procedure of the experts as well as the composition of the expert group. The agency utilises only experts for its activities, and not subcontractors.

Moreover, principles of procedure for the implementation of procedures for programme and system accreditation are laid down, which rule out that evalag and experts engaged by evalag work at the same time in an advising and certifying capacity in a higher education institution.

In addition, reporting about the activities of evalag is ensured by the following procedures and documents:

- The Foundation Council as a topmost organ of evalag bears the responsibility for guaranteeing internationally recognised quality standards in all areas of activity of the agency (Part 3, Annex 5).
- The managing director (Foundation Executive Board), responsible for the operational activities, is accountable to the Foundation Council and regularly reports about the operative management in meetings taking place 3-4 times a year.
- The managing director (Foundation Executive Board) presents a business report every year (Part 3, Annex 4).

evalag undergoes externally (in regular rotation) the ENQA review as well as (if necessary) accreditation by the Accreditation Council.

### **Assessment**

The documents presented by evalag suggest that the agency has a formalised internal quality management system. The system includes both internal and external feedback processes and contains various measures, which ensure the on-the-job training of the employees in the office as well as adequate briefing of the experts. The individual measures for quality assurance and enhancement, which are described in the quality management system of evalag (Part 1, Annex 10), are reflected in the resolutions of the Foundation Council, such as the concept of training the employees of the office (Part 1, Annex 5), the selection procedure for members of expert groups (Part 1, Annex 3b) or the concept of briefing of the experts (Part 1, Annex 6). This can be used as evidence for the consistency and functional efficiency of the quality management system of evalag.

The discussions held with representatives of the agency during the on-site visit indicated however, that in the daily work of the agency the informal processes at present play a more important role than the formal processes of internal quality assurance. The measures planned for the

future – at least most of them – are still in the concept stage at present and must establish themselves first in practice. In order to make the formal processes of internal quality management transparent, the experts suggest that an overview of the individual concrete measures, processes and procedures similar to a quality manual should be written.

## **Conclusion**

**evalag substantially complies with Standard 3.8**

