



AGENTUR FÜR
QUALITÄTSSICHERUNG DURCH
AKKREDITIERUNG VON
STUDIENGÄNGEN E.V.

SELF-ASSESSMENT REPORT

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1. Preamble

The “Agency for Quality Assurance through the Accreditation of Study Programmes” (AQAS) is a registered association founded by universities and academic societies in 2002; it is dedicated to the quality assurance and quality development of learning and teaching at universities. AQAS has been an integral part of the German accreditation system for almost 25 years and is one of the most experienced agencies in Germany in several areas (e.g. teacher training and joint programmes).

AQAS is accepted by international associations:

- full Member of the European Association for Quality Assurance in Higher Education (ENQA),
- full member of European Consortium of Accreditation (ECA),
- full member in the International Network for Quality Assurance Agencies in Higher Education (INQAHEE): a worldwide network of external quality assurance (QA) bodies.

AQAS has been a member of ENQA since 2008 (renewed in November 2013, May 2017, and December 2021). The Agency is applying for renewal of membership in ENQA. AQAS has been registered in the European Quality Assurance Register for Higher Education (EQAR) since 2008 and is applying for the renewal of its EQAR registration. In Germany, the Agency is approved by the Accreditation Council to carry out assessment procedures in accordance with the Interstate Study Accreditation Treaty.

The main task of AQAS is to assess the quality of study programmes, especially bachelor's and master's programmes, and quality assurance systems at universities in the context of external assessments. When working at national level, the assessment procedures are based on national standards, which are defined by the Standing Conference of the Ministers of Education, Science and Cultural Affairs (KMK) in a manner that is compliant with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). The international procedures are directly oriented towards the ESG. By far the largest area of activities of AQAS is programme accreditation in Germany.

This self-evaluation report (SER) forms the basis for the re-evaluation of AQAS by ENQA. The aim of the review for AQAS is not only to renew its ENQA membership, but also to renew the Agency's listing in EQAR, which is the prerequisite for authorisation in Germany by German Accreditation Council (GAC).

The last assessment by ENQA took place in 2021, at a time that was significantly marked by challenges caused by the coronavirus pandemic. This period represented a global economic and social turning point and also brought about lasting changes to the work of AQAS, e.g. hybrid work mode and online tools.

Compared to other European systems which have one national agency in charge of quality assurance in Higher Education, the German accreditation system continues to be characterised by competition between the various agencies licensed in Germany in a field that is becoming increasingly smaller due to the growing number of system-accredited universities and the longer accreditation period of eight years due to the regulations of the Interstate Treaty from 2018.

The cyclical accreditation periods for the programmes and the universities lead to a situation of changing income over the years. As a non-profit association, AQAS is not allowed to generate profits, but must nevertheless finance itself. This was the reason for the members of AQAS represented in the Managing Board to decide to offer our services also to Higher Education Institutions abroad. Meanwhile, AQAS enjoys high international demand and has built up strong expertise in recent years. Therefore, two teams were implemented, one focusses more on the national area and one is specialised on working in the international context.

Against this backdrop, this self-assessment report (SAR) examines AQAS's work from both perspectives (national and international procedures).

The structure of the SAR follows the Guidelines for ENQA Agency Reviews and documents the implementation of the ESG by AQAS. Comprehensive annexes are appended to the self-assessment report to document the structures and procedures described.

The annexes are structured thematically as follows:

Core annexes¹

- 1.1 Organisational documents
- 1.2 Documents in use for procedure specifics
- 1.3 Internal quality assurance
- 1.4 Documentation of previous reviews

Additional annexes

- 2.1 Commissions/Management Board
- 2.2 Staffing
- 2.3 Further annexes

The aim of this self-assessment report is to provide a comprehensive picture of the profile, structures, and work of AQAS.

2. Development of the self-assessment report (SAR)

The SAR was prepared in a multi-stage process. AQAS involved all employees in the preparation of the review procedure. In summer 2025, two rounds of discussions were held with the entire team as part of a SWOT analysis. The results of the team activities were discussed with the Management Board, whose suggestions were incorporated into the process. Based on the results of these self-reflective discussions, the AQAS Strategy (see Annex I.1.8) was revised and incorporated into this SAR. A core team (Dr. Kloeters, Ms. Herrmann, Ms. Inanici, Dr. Zeyer, Ms. Büning) was responsible for preparing the self-assessment report, but because of the widespread expertise in the whole team, other AQAS colleagues were asked to contribute to the SAR. Moreover, the core team informed the whole team about the progress regularly in internal meetings. Preparation of the SAR started in 2025 after the SWOT analysis and the drafting started in January 2026. The draft was sent to ENQA on 5 June 2026 and a revised version, incorporating the relevant comments from ENQA, was submitted on 1 July 2026.

3. Higher education in the context of the Agency

German agencies operate in a context that is shaped by a multitude of regulators and stakeholders. The Federal Republic of Germany consists of 16 partly sovereign federal states. According to the German Basic Law, the state tasks and competences for cultural and educational policy lie with the federal states ("Länder"). Each federal state has enacted its own law for higher education. The state ministers responsible for education, research, and cultural affairs discuss and decide on aspects that are of general relevance in the "Standing Conference of the Ministers of Education and Cultural Affairs of the Länder in the Federal Republic of Germany" (KMK). However, the KMK has no direct legislative competence. Its decisions are therefore not directly binding but must be enacted by the respective federal state as legislation under state law. Therefore, Germany has 16 laws of higher education that also refer to external quality assurance.

Higher education studies in Germany are offered at three types of higher education institutions (HEIs)²: universities, universities of applied sciences (UAS; German *FH* or *HAW*), and universities of Arts/Music. While universities can offer degrees in medicine, law, or teacher training, universities of applied sciences are often more practically orientated³. Universities of Arts/Music are, as suggested by the name, specialised on arts and music programmes. HEIs are either state or state-recognised institutions that are subject to the relevant state's higher education legislation. According to the German Rectors' Conference (*Hochschulrektorenkonferenz* – HRK), there were 422 HEIs in Germany in 2025. This number has been relatively stable over the past years. From the academic years 2018/19 to 2021/22, enrolment declined, but recently the number of beginning stu-

¹ The list of annexes is provided at the end of the document.

² In the context of its procedures and for the purposes of the SAR, AQAS uses the terms "university" and "higher education institutions" synonymously.

³ For an overview in German, see [che.de/download/che_kurz_und_kompakt_uni_oder_fachhochschule-pdf/?wpdmdl=10317&refresh=6a352071da50a1781866609](https://www.che.de/download/che_kurz_und_kompakt_uni_oder_fachhochschule-pdf/?wpdmdl=10317&refresh=6a352071da50a1781866609).

dents started to rise again (see [GENESIS-Online - Table 'First-year students: Germany, semester, nationality, sex'](#)). More detailed data on the German higher education system can be found in the [HRK overview](#). Since 1998, almost all study programmes have been transformed to the two-tier system (bachelor's and master's degrees). However, there are still programmes that conclude with a state examination (e.g. law, medicine, and also teacher training in some federal states).

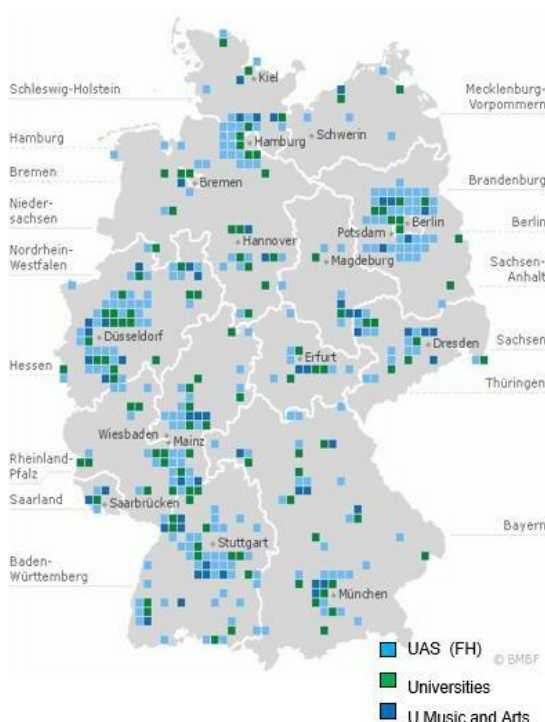


Figure 1: Overview of HEIs in Germany

Responsibility for Higher Education lies with the 16 federal states:

- 422 Higher Education Institutions, 22,310 programmes (10,130 BA/ 10,258 MA + others),
- 2,9 Mio students
- 1 federal framework for HE, but 16 state laws
- Education is funded by the Länder; federal ministry pays only for specific initiatives and projects
- different political viewpoints on education and research, depending on the 16 state governments
- Accreditation system was implemented in 2005; major revision in 2018
- 11 agencies are admitted to work in Germany and compete

Bachelor's and master's programmes may be offered by all of the aforementioned higher education institution types and can be studied consecutively at different HEIs, but also with phases of professional work between the first and the second qualification level.

All key instruments of the Bologna Process are implemented in the German Higher Education System. The Qualifications Framework for German Higher Education Qualifications (*Qualifikationsrahmen für Deutsche Hochschulabschlüsse* – HQR) describes the degrees conferred in the German higher education system, including the classification of the qualification levels as well as the resulting qualification goals and competences of graduates. The three HQR levels correspond to levels 6, 7, and 8 of the European Qualifications Framework for Lifelong Learning (EQF).

All German agencies are admitted to review bachelor's and master's programmes offered by different types of Higher Education Institutions in each of the 16 *Länder*. There is no regional principle implemented, although agencies may have specific competencies or duties in the *Länder* where they are based.

4. Quality assurance of higher education in the context of the Agency

To ensure the quality and comparability of qualifications in Germany, the organisation and structure of study programmes, degree awarding regulations, and accreditation requirements have to be in line with the decisions taken by the *KMK*. Study programmes leading to a bachelor's or master's degree must be accredited in accordance with the [Interstate Study Accreditation Treaty](#) of 1 June 2017. This treaty is based on a decision of the Federal Constitutional Court of Germany that defines accreditation as a binding science-based external procedure for quality assurance and development in learning and teaching in higher education. One of the stipulations of the court was that only the state may take accreditation decisions (not individual agencies). Therefore, this task was assigned to a body of the Foundation for the Accreditation of Study Programmes in

Germany – the German Accreditation Council (*Akkreditierungsrat* – GAC).

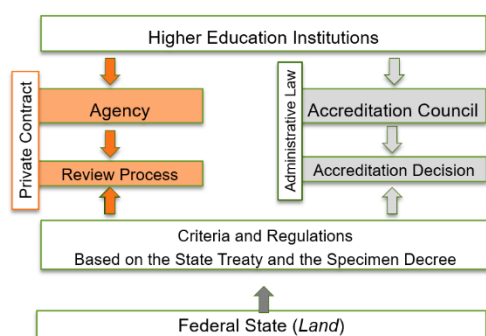


Figure 2: Responsibilities in the German system since 2018

The GAC is a joint institution of the federated states for quality assurance in learning and teaching at German HEIs. GAC's main task is to decide on the accreditation of study programmes (programme accreditation) and the accreditation of quality assurance systems (system accreditation) on the basis of experts' reports forwarded by the Higher Education Institutions but provided by the accreditation agencies.

The decisions taken by GAC are administrative acts. In contrast, the assessment and the preparation of experts' reports by the agencies are carried out on the basis of private law.

GAC officially admits the agencies working in Germany based on their EQAR registration and an application. In 2026, a total of eleven agencies is authorised by GAC to operate in Germany. Alongside eight German agencies, a Swiss agency, an Austrian agency, and a Belgium-based agency also have authorisation. In principle, any agency registered in EQAR that is able to prepare a report in German can obtain permission to conduct assessment procedures in Germany by GAC. Some of the agencies admitted are so-called "comprehensive agencies", which offer the assessment of study programmes in all subject disciplines, and so-called "specialist agencies", which operate exclusively in a specific range of disciplines. Since its foundation, AQAS is a comprehensive agency.

Based on the Interstate Treaty, a so-called Specimen Decree (*Musterrechtsverordnung* – MRVO) was adopted by the KMK in 2018. The MRVO serves as a foundation and standard for assessing study programmes and quality assurance systems. The Interstate Treaty and the MRVO provide the legal basis for the work of AQAS in Germany. In November 2024, following a detailed evaluation by the *Länder*, a revised version of the Specimen Decree was adopted which must be transposed into federal state law by each of the 16 *Länder* individually. By 2025, 15 of the 16 *Länder* had done so. Most of the amendments came into force on 1 April 2026.

The amendments to the MRVO include, on the one hand, clarifications that contribute to procedural certainty and are intended to aid the interpretation of the criteria for all stakeholders involved. On the other hand, there are also some substantive changes:

- The European Approach is now fully implemented. The relevant regulations previously applied only to joint degree programmes and have now been extended to double and multiple degree programmes.
- Higher education institutions are granted greater pedagogical freedom in the design of their module examinations, as it is now permitted to have several examinations per module if there are sound reasons for it.
- System accredited Higher Education Institutions are no longer required to provide quality reports on internally accredited study programmes. In future, the accreditation decision and a brief summary of the quality assessment will suffice for the purposes of public information.

In addition, administrative regulations have been amended, relating, for example, to the possibilities for extending deadlines.

The German accreditation system requires that all bachelor's and master's programmes undergo initial accreditation before being launched or during their initial phase; initial accreditation focuses on the assessment of the concept of the study programme. The special significance of accreditation is also reflected in the fact

that most federal states have linked the successful accreditation of study programmes with state approval. The accreditation cycle for study programmes is eight years. The criteria set out in the MRVO apply to both initial accreditation and reaccreditation and all types of HEIs.

Private and State Higher Education Institutions can also apply for an institutional assessment of its quality assurance system (called “system accreditation”) as explained below. Moreover, the *Länder* request that a private HEI has to be accredited by the Council of Science and Humanities (*Wissenschaftsrat*) which checks the institution as a whole before they can apply for institutional assessment of its QA system by an agency.

5. History, profile and structure of the Agency

5.1 History and profile of the Agency

AQAS is a registered association that was founded by universities and academic societies in 2002, when the autonomy of Higher Education Institutions and deregulation were the guiding ideas of political decision-making. AQAS has been an integral part of the German accreditation system for nearly 25 years and has accredited (until 2018) or assessed (today) almost 10,000 study programmes and successfully completed 34 procedures of system accreditation. These figures demonstrate that AQAS not only regularly conducts external quality assurance procedures in Germany and abroad but is also one of the most experienced agencies in Germany in several areas (e.g. teacher training).

The main task of AQAS is to assess the quality of study programmes, especially bachelor's and master's programmes, and of quality assurance systems at universities in the context of external assessment. The assessment procedures are based on national standards, which in turn have been defined in an ESG-compliant manner. The international procedures of AQAS are directly oriented towards the ESG (see Annex II.3.8). By far the largest area of activities of AQAS are assessment procedures for programmes which lead to an accreditation by GAC. AQAS, as all German agencies, does not serve as an ENIC-NARIC and is not responsible for the national qualifications framework; this distinguishes our agencies from national agencies in other countries.

AQAS e.V. is a comprehensive agency whose work extends across disciplines and types of HEIs. The Agency is currently supported by 86 national and international [member universities](#) and sees itself as an organisation of universities with which AQAS cooperates in a spirit of trust.

Until the legal reorganisation of the German accreditation system, as mentioned above, authorisation in Germany was linked to the accreditation by GAC. AQAS e.V. received its first accreditation from GAC after being founded in 2002 and was reaccredited in 2011 and 2016. Since 2018, the accreditation of agencies in Germany has been based on their listing in EQAR. Accordingly, the relevant assessments have since been carried out by ENQA. The last assessment by ENQA took place in 2021. AQAS's current listing with EQAR is valid until 2027. Based on this, AQAS is granted authorisation to operate in Germany by GAC.

5.2 Structure of the Agency

Several aspects that address the structure, bodies and tasks of AQAS are defined by the German Law for Associations. Therefore, the structure and responsibilities within the Agency are determined by the Articles of Association of AQAS e.V. (see Annex I.1.6). In our specific case, the Agency also has to follow the German regulations for non-profit-associations.

According to the Agency's Articles of Association, the association's bodies are

- General Assembly
- Management Board
- Standing Commission (SC)
- Complaints Commission (CC)

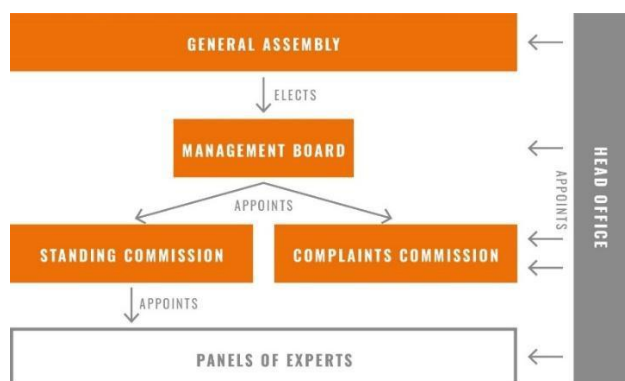


Figure 3: Organisational chart of AQAS e.V.

All AQAS bodies have adopted Rules of Procedure (see Annexes II.1.2, II.1.4 and II.1.6). The work of the commissions is supported by the staff members and the managing directors in the AQAS Office.

5.2.1 The General Assembly

The General Assembly (“members’ meeting”) is the association’s highest governing body, at which, in accordance with German law, all members entitled to vote decide on fundamental strategic and organisational matters (e.g. amendments to the Articles of Association, elections to the Management Board, etc.). The AQAS members – the Higher Education Institutions – are represented by the Vice Chancellor or the President. The ordinary members’ meeting takes place at least once a year.

5.2.2 The Management Board

Members of the Management Board are reputable academics with experience in managing universities or universities of applied sciences (in the past usually vice-chancellors or deputy vice-chancellors). They identify with the goals of the Bologna Process and share the understanding of quality assurance in teaching and learning as expressed in the Agency’s Mission Statement. Some board members also have experience outside the Higher Education sector, such as in business or industry (see Annex II.1.1).

In addition to the statutory duties of an association’s executive committee (representing the association externally in legal and financial matters, managing its finances, and implementing resolutions passed by the general assembly), the Management Board of AQAS has the following responsibilities in accordance with the Articles of Association:

- Appointing the commissions
- Issuing the quality seal on behalf of the GAC, where necessary and legally permitted
- Setting up the budget plan
- Concluding agreements on cooperation with other accreditation agencies
- Adopting resolutions regarding the admittance and expulsion of members

The current Management Board of AQAS e.V. comprises:

- Professor Dr. Stefan Herzig, *Technische Hochschule Köln – University of Applied Sciences, Chair*
- Professor Dr. Eberhard Menzel, *Hochschule Ruhr West – University of Applied Sciences, Deputy Chair*
- Professor Dr. Jens Hermsdorf, *Hochschule für Wirtschaft und Recht Berlin – University of Applied Sciences, Treasurer*
- Professor Dr. Doris Fischer, *Julius-Maximilians-Universität Würzburg, Board Member*
- Professor Dr. Kornelia Freitag, *Ruhr-Universität Bochum, Board Member*

5.2.3 Commissions

AQAS commissions are composed according to the stakeholder principle to accommodate the different perspectives of the groups involved in assessment and accreditation procedures. Consequently, AQAS seeks to include the stakeholders with different backgrounds in the structures and work of the Agency.

Standing Commission (SC)

The Standing Commission⁴ is the central decision-making body of AQAS. The SC is composed on an interdisciplinary and international basis of representatives from academia, representatives from professional practice, and students. The Management Board establishes the number of members of the commission, whereby the representatives from academia must always be the majority to ensure that procedures are conducted in a science-based manner, as required in the German system by regulations given by KMK. The members are appointed by the Management Board for a period of three years. Reappointment is permitted.

In accordance with Section 8 (a) of the Articles of Association of AQAS e.V., the SC is responsible for all decisions required in connection with the implementation of assessment and accreditation procedures at national and international level. In assessment procedures under German law, this body is responsible in particular for appointing panels of experts and adopting the reports on formal criteria in programme and system assessment procedures. In international procedures, the SC nominates the panels of experts and makes decisions on programme accreditation and institutional accreditation based on the recommendation of the respective panel of experts. If decisions need to be made regarding other assessment procedures, e.g. certifications, the commission is also responsible for taking these decisions. It is also responsible for the adoption of resolutions regarding process principles, standards, and criteria at international level. Guidelines and handouts are also approved by the SC. As an element of internal QA, AQAS decided that the SC should be involved in the procedures right from the start and not only at the end. Therefore, the commission takes an official decision to open an international procedure to make sure that the application documents meet a certain quality level.

In 2024, the Standing Commission underwent a major change of its members due to generation-turnover. AQAS tried to keep the procedural expertise that was gained in the past years (see Annex II.1.4). The current members of the SC and their CVs can be found in Annex II.1.3.

Complaints Commission (CC)

The Complaints Commission has the task of assessing formal objections of universities, within the framework of the appeals and complaints procedure. Complaints may concern the conduct of the procedure. Appeals, on the other hand, refer to the formal outcome of the procedure. The appeals and complaints procedure of AQAS is presented in detail in Chapter 8.7 (see Annex I.1.9). In the past years, AQAS received a very small number of complaints or appeals. However, there is a meeting of this commission once per year to keep it updated on new developments in AQAS or the sector.

In accordance with Article 9 of the Articles of Association the CC consists of at least three external representatives: one representative from academia, one student representative, and one representative from professional practice. All commission members are appointed by the Management Board for a period of three years. Reappointment is permitted. The current members of the CC and their CVs can be found in Annex II.1.5.

6. Functions and activities of the Agency

Activities

The core activity (around 90%) of AQAS is the organisation of external assessment procedures for study programmes. At national level, assessments are conducted on the basis of the MRVO and, at international level, in line with the ESG. At national level, the MRVO leaves no room for the agency's own interpretations; both the verification of compliance with the criteria and the process itself are defined in such a way that the Agency essentially only implements the MRVO.

⁴ In some of our documents, we use the term "Accreditation Commission (AC)", as this is better understood in an international context. The terms "Standing Commission" (SC) and "Accreditation Commission" (AC) are synonymous.

Type of procedure	Completed procedures					
	2021	2022	2023	2024	2025	2026 ⁵ (first half)
National procedures						
Programme accreditation in Germany	126	100	111	96	93	32
System accreditation in Germany	2	5	1	3	3	2
PhD programme accreditation in Germany	2	-	-	-	-	-
“Alternative Procedures” (national level)	-	-	-	-	-	-
International procedures						
Programme accreditation international	18	29	46	21	30	18
Institutional accreditation international	1	-	1	1	2	1
European Approach	2	-	4	5	4	4

Figure 4: Distribution of the different procedures

Programme accreditation of bachelor's and master's study programmes is the standard procedure in the international domain. There are only very few institutional assessments since foreign universities often prefer programme accreditation as a starting point to develop their own internal QA system. In the international domain, the Agency has more flexibility to design procedures due to the generic ESG; AQAS opted to base its own criteria closely on the ESG, nonetheless. In 2019, the tools for international programme accreditation were revised based on the experience gained with projects abroad. AQAS developed a Code of Conduct for its international procedure with references to the Key Considerations for Cross-Border Quality Assurance (CBQA) (see Annexes I.2.d.3 and I.2.d.12).

For many years, AQAS has gained experience with the review of joint programmes, which might be the reason for an increasing number of accreditation procedures based on the European Approach (EA).

Overview of the procedures conducted by AQAS that are within the scope of the ESG:

Task areas of AQAS e.V.	Type of procedure/criteria	Decision by AQAS
Programme (BA/MA) accreditation in Germany (including joint programmes with the participation of German universities without EA)	Assessment, MRVO (ESG)	No, by GAC
System accreditation in Germany	Assessment, MRVO (ESG)	No, by GAC
PhD programme accreditation in Germany	Assessment, MRVO (ESG)	Yes
“Alternative Procedures” (national level)	Assessment, MRVO (ESG)	No, by GAC
Programme accreditation international	Accreditation, AQAS criteria, (ESG)	Yes
Institutional accreditation international	Accreditation, AQAS criteria, (ESG)	Yes
Accreditation of joint programmes (using the EA) (with the participation of German universities)	Assessment, MRVO (ESG)	Yes, possible recognition by GAC
Accreditation of joint programmes (using the EA) (without the participation of German universities)	EA/ESG	Yes, possible recognition by foreign agencies

Figure 5: Overview of the procedures conducted by AQAS that are ESG-relevant

⁵ As of May 2026.

In international procedures, the AQAS Standing Commission is the decision-making body. It is a specific practice of AQAS to inform the commission about the national and international procedures from the very beginning and not only at the final stage of the process, because we see it as an element of internal quality assurance. The commission consists of stakeholders (representatives from academia and students as well as representatives of professional practice).

The following list gives a brief overview of the countries in which AQAS worked based on ESG-oriented criteria. AQAS also works in some European countries while applying the European Approach (with or without the participation of German universities) (see Chapter 8.3.2).

Overview of countries in which AQAS has been active	
Programme accreditation international	Armenia • Azerbaijan • Austria • Bosnia & Herzegovina • Chile • China • Egypt • Ethiopia • Ghana • Indonesia • Kyrgyzstan • Malawi • Moldavia • Nigeria • Northern Cyprus • Oman • Rwanda • Tanzania • Türkiye • United Arab Emirates • Vietnam
Institutional accreditation international	Armenia • Chile • Oman
Accreditation of joint programmes using the EA	Austria • Finland • Germany • Greece • Italy • Spain

Figure 6: Overview of countries in which AQAS has been active

These activities were also beneficial for the development of the Agency itself, as the visibility of AQAS has increased considerably in the last years. As a result, several different institutions have approached the Agency asking us to become involved in projects or giving us the opportunity to present our findings and experiences at international conferences. As a result of providing training and being involved in projects, AQAS has gradually developed expertise in the higher education system of several Arab, African, Asian, and Latin American countries. This in turn has led to further requests for project participation and assessment procedures.

AQAS has been collaborating closely with the German Academic Exchange Service (DAAD) for many years, particularly in the accreditation of joint programmes and the implementation of training courses. For years, one of the managing directors is regularly asked by the DAAD to provide training and conference presentations in Africa, especially within the EU's HAQAA project (harmonisation and integration in higher education to meet Africa's local, regional and continental development challenges) and an IIEP-UNESCO project.

AQAS is also represented in the ECA Certification Group, which coordinates the award of the Certificate for Quality in Internationalisation (CeQuint). CeQuint resulted from an Erasmus+ project and has since been available as a service to all ECA member agencies.

In the last five years, AQAS served as a co-host for several events:

- 30 May–1 June 2022: ENQA Agency Reviews' seminar for recently reviewed agencies and for agencies planning to undergo a review
- 27–29 November 2024: ENQA leadership programme
- 17 June 2025: "A Decade of the European Approach – Reflections and Future Directions" together with ECA and EQAR

Since AQAS is particularly keen to cooperate with other accrediting organisations in a spirit of trust, the Agency cooperates at various levels with colleagues from Europe and around the world. AQAS has worked closely with the Basque agency UniBasq in recent years. The Agency has, for example, conducted joint training courses for Spanish experts who speak German and for German experts who speak Spanish, to be able to involve trained international experts in the Agency's own procedures. A report on this project was also presented at an EQAF workshop.

The Agency has enjoyed many years of exchange with partner agencies in international projects. These include HCERES (France), NVAO (the Netherlands), THEQC (Türkiye), PKA (Poland), ANQA (Armenia), as well as agencies outside Europe such as BAN-PT (Indonesia) and NAQAAE (Egypt).

Further activities of the agency at international level

As stated in its Mission Statement, AQAS sees itself as a stakeholder involved in the further development of the European Higher Education Area and intends to contribute to the development of reliable and comparable quality standards and assessment systems in both national and international contexts. For this reason, involvement in national, European, and international networks is an important element of the Agency's work, not only to incorporate gained experience into the networks, but also to reflect on new developments in standards and tools and to integrate them into our own procedures. This helps to ensure the continuous enhancement of our own procedures and is in accordance with the self-conception of AQAS.

As said before, AQAS is a full member of ENQA, INQAHEE, ECA and is registered in EQAR. As we see it, however, membership alone does not reflect our goals; instead, AQAS contributes to various working groups, projects, and committees in networks within Europe and beyond. The Agency dedicates a remarkable part of its staff resources to support discussions and networks at European level. One of the managing directors and the Head of International Procedures serves as member of the ENQA Board (also as Vice-President) and participated as an expert for ENQA in agency reviews in the past. The managing director is also a member of the Drafting Group for the revision of the ESG and the European Approach. The Deputy Director of International Development served as member of the Agency Review Committee of ENQA and was part of the presidency of ECA. He also worked as an expert in several of ENQA's agency reviews. In addition, he has served on the European Quality Assurance Forum (EQAF) Programme Committee for several years, acting as its chair in 2019. Moreover, AQAS played an active role in the "[Facilitating implementation of the European Approach for Quality Assurance of Joint Programmes](#)" (ImpEA) project to implement the European Approach.

As explicitly stated in our new strategy 2026–2031, AQAS strives to be "a centre of excellence for external quality management and makes its expertise available to its national and international member institutions and clients to help them further develop their activities in the field of study and teaching throughout the lifelong learning process." Therefore, AQAS – when working beyond the ESG – carries out workshops for organisations in the education area, e.g. DAAD, Association Global Obreal Observatory, or individual universities, usually organized by AQAS ARCH (see following paragraph).

Activities that are not ESG-relevant

AQAS ARCH (Accreditation, Reviews and Consulting in Higher Education) is a daughter company of AQAS, founded in 2014 according to the decision of the General Assembly in order to achieve a transparent separation between assessment and accreditation based on the ESG, which are conducted by the association (e.V.), and other services in higher education, e.g. providing trainings. By separating its activities between classic accreditation procedures and trainings beyond the field of accreditation, AQAS aims to achieve a greater degree of transparency internally and externally (for details on AQAS ARCH see Annex II.3.7).

7. Compliance with European Standards and Guidelines (Part 3)

On 7 December 2021, the ENQA Board agreed to reconfirm AQAS' membership for five years from that date. The Board concluded that AQAS is in compliance with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015)* and thus fulfils the membership criteria according to article 6, paragraph 1 of ENQA's Rules of Procedure. The follow-up report can be found in Annex I.4.a.2.

The following passage describes how AQAS dealt with the valuable recommendations:

ESG 3.1 Activities, policy, and processes for quality assurance

1. *The panel recommends the agency strengthen its strategic planning and consolidate the annual planning and reporting by linking and aligning all these instruments with the strategic objectives for the agency's development so the agency is clear about what services they will develop or enhance in order to better fulfil its mission and secure their sustainability.*

Since the past ENQA review, AQAS reflects the previous year and sets targets for the upcoming year which are discussed with the staff members at the beginning of each year. In meetings with the Management Board and

during the General Assembly strategic goals are reflected and adapted, if needed. Once every year, the whole team has an internal meeting (*Klausurtagung*) in which strategic aspects are discussed but also major topics which exceed the format of regular staff meetings (*„Jour Fixes“*) are brought to consideration. One of the results of these reflections was to strengthen the activities to promote the European Approach at international level and to exchange more with HEIs on conferences/meetings at national level. Also, the Progress Visit by the ENQA experts pushed the discussion forward. The experts suggested strengthening the membership character of AQAS, to be active regarding the use of Artificial Intelligence (AI) and to foster international activities.

These aspects were immediately integrated into the new Strategy 2026–2031, which was discussed in several meetings of the Management Board and the team in 2025. The new strategy focuses on two main areas:

- activities and services for member universities and
- the improvement of internal structures and processes

AQAS recognises structural challenges in the German accreditation system, particularly the shift toward system accreditation, which reduces the demand for programme accreditation and increases competition. To address this, AQAS aims to:

- develop alternative service models,
- strengthen customer loyalty, and
- establish framework agreements with partner universities to secure long-term income.

Furthermore, AQAS emphasises the need to highlight the added value of evaluation processes beyond its administrative functions. Planned initiatives such as conferences and expanded member forums are scheduled.

Internally, AQAS has implemented several improvements in line with its mission as a learning organisation and its commitment to efficiency. These include:

- measures of staff development (individual courses, joint trainings, yearly appraisals),
- investments in modern technology to optimise internal workflows,
- continuous updating of accreditation guidelines to reflect developments in higher education,
- steps toward a paper-free office, and
- the expansion of digital and remote working structures.

Additionally, AQAS has strengthened its international engagement through events such as workshops and conferences. The new strategy also focusses on strengthening cooperation in higher education systems to:

- support knowledge sharing and best practices,
- foster exchange between national and international higher education institutions,
- stimulate the development of new services.

Overall, AQAS has significantly improved its internal efficiency and digital capabilities, enabling greater flexibility, responsiveness, and quality in its accreditation and quality assurance processes.

2. The panel recommends the agency identify ways to involve students and representatives of the business sector in the agency's governance.

Since its foundation, AQAS has been committed to strengthening its activities between the AQAS Office, the Management Board, and the Agency's stakeholders. Student and representatives of professional practice are included as equal partners in all committees that are directly involved in accreditation procedures, i.e. the Standing Commission, the Complaints Commission, and all expert panels. One of our staff members, Ms. Fischer, is in charge of stakeholder exchange and will develop formats of exchange with different groups on different levels according to our new strategy. Another staff member, Dr. Kroschel, has been nominated by the German agencies as their representative to exchange with the central German student organisation for external QA (*Studentischer Akkreditierungspool*) for several years and has since served as a direct contact person for students, from which a trusting cooperation has developed. In the past years, she also joined meetings with student representatives online to exchange experiences and discuss how to improve cooperation. Moreover, a joint seminar organised by the *Studentischer Akkreditierungspool* and AQAS took place in May 2023. In the

past months, AQAS has undergone activities including a meeting between the chairwoman of the Standing Commission and the AQAS Management Board to discuss operational matters and improve the collaboration and exchange of experiences between the AQAS' bodies.

AQAS strongly believes in an enriching and diversified perspective when including other stakeholders in procedures and commissions which deal with aspects of teaching and learning. Due to the legislation for membership organisations in Germany the members of the Management Board are elected by the members. In the General Assembly members are free to elect candidates for the board. This independence of elections may not be biased in a democratic process. In addition, the AQAS Management Board is liable within the scope of its activities both to the association itself and to third parties with its private assets. All German accreditation agencies are particularly committed to the principle of student involvement in external quality assurance (EQA) and internal quality assurance (IQA) matters, as the accreditation agencies have committed themselves to funding the German Student Accreditation Pool and the training of student experts. This system works well and is based on synergy and trust. For more than two decades, German agencies have relied on and engaged students in all accreditation bodies and expert panels. When it comes to governance bodies of agencies which are not involved in the accreditation process, this has neither been a consideration nor a request on the part of the German students themselves. AQAS has strengthened stakeholder involvement through alternative approaches, such as appointing dedicated staff for stakeholder exchange, enhancing cooperation with student representatives (including collaboration with the *Studentischer Akkreditierungspool*), and organising joint events.

3. Separation of activities between AQAS e.V. and AQAS ARCH GmbH should be clearly communicated through their respective websites.

AQAS continued to update the content of the main homepage concerning the subsidiary AQAS ARCH GmbH. Externals may now find a clearly established link between the two entities, while the aim of the subsidiary is now clearer. The homepage for AQAS ARCH GmbH clearly differentiates in the section "What is AQAS ARCH GmbH" ("Was ist AQAS ARCH") by stating: "The AQAS ARCH GmbH sees itself in this context as a partner to German universities in promoting their efforts towards internationalization. These efforts are often associated with activities within European projects, such as TEMPUS and Twinning projects, or consulting projects of the DAAD and HRK." (Translation from AQAS ARCH GmbH homepage). In fact, the separation between AQAS e.V. and AQAS ARCH is clear due to the completely different areas of activities. In the past, only very few projects were carried out by the daughter organisation of AQAS due to the lack of interest of HEIs to pay for additional services beside external QA. The key idea to implement it was to carry out trainings and not to actively seek projects for the subsidiary. The evidence can be found on the homepages "Zertifizierung, Beratung, Workshops – AQAS e.V." and AQAS ARCH (www.aqas-arch.de) (see Annex II.3.7).

ESG 3.4 Thematic analysis

- 1. The panel recommends the agency widen its approach to thematic analysis by using the general findings of its external quality assurance processes more as a basis for analyses on good practice and trends of the higher education system in Germany, which is the primary market where AQAS operates. In this attempt, the agency should enhance the analytical part of its publications instead of simply discussing its own experiences.*
- 2. The panel suggests that the development of future thematic publications could be part of the strategic planning or annual monitoring process to ensure that the production of such publications each year is covered in terms of staff workload and that there is a strategic approach to the selection of topics relevant to higher education institutions.*
- 3. The panel recommends the agency ensure the thematic analyses they publish are available to all stakeholders, or at least to member organisations of AQAS, and not restricted by a paywall.*

In 2023, first discussions between GAC and the German agencies started on how to work jointly on a thematic analysis with relevance for the German system. In 2024, the new MRVO was implemented which caused

problems in generating a comparable set of data. AQAS believes that thematic analyses conducted solely by the Agency has a too limited focus, as there are eleven agencies working in Germany plus the GAC which is the only body which has an overview of the whole system in Germany.

To enable AQAS to provide more analytical publications, one of the managing directors of AQAS was admitted to the editorial team of the Journal for Quality in Higher Education and Research ([*Handbuch Qualität in Studium, Lehre und Forschung – HQSLF*](#)), which is a standard reference work on quality development in higher education and academia; it is published four times a year and features articles on quality assurance practices in higher education institutions (“background information, practical solutions, best-practice examples”). We see this as a great opportunity to network with professionals in the field of quality assurance in higher education and to share our knowledge with the public. Continuously, AQAS encourages its staff to closely follow current trends of the QA sector, which enables them to detect common themes in accreditation procedures (see list of publications in Annex II.3.2).

AQAS is deeply convinced that our agency contributes to the discussion in the higher education sector in Germany by following the principle of “reporting back”. All activities that are relevant for the sector or feed in new ideas are reflected in contributions of staff members to national or international conferences and workshops. This approach is also in line with the draft version of the new ESG in which Standard 3.3 Activities for enhancement holds: “Agencies should regularly engage in activities, reflect on the experiences and disseminate materials that support the enhancement of quality assurance and learning and teaching in the context in which they work.”

In alignment with our commitment to fostering knowledge dissemination and accessibility, all analyses published by AQAS are made available to the public without any financial barriers. This open access policy reflects our dedication to the principles of inclusivity and the belief that valuable insights should be freely accessible to a broader audience. If AQAS publishes articles in Higher Education Journals in the future, the decision if there is a paywall will not be ours.

ESG 3.5 Resources

7. The panel recommends the agency develop a clear plan to ensure financial stability with diversified sources of income.

As a membership organisation AQAS has the legal duty to produce certain documents for our financial management. To demonstrate our accountability, AQAS provides a budget plan (*Wirtschaftsplan*) and monthly reports for the Board members provided by our tax consultant. The member HEIs of AQAS decide about the financial plan for the upcoming year in each General Assembly which usually takes place in summer. The strategic planning and the financial plan are aligned at this stage. The monthly reports provided by the tax consultant allows the monitoring of the financial developments. AQAS also introduced an Excel table which allows to compare the numbers of procedures needed in the national and international area as well as the number of staff members involved. This instrument allows us to forecast how many accreditation procedures are needed to reach the business target of AQAS, the “black zero” in line with the German regulations for non-profit-organisations. The financial planning of AQAS must follow the yearly principle, according to German law.

As an organisation which was founded by its members to carry out external quality assurance of teaching and learning on national and international level, the sources of income (which are completely set out in this report) are limited and need to be attuned with our members, which might lead to certain limitations when it comes to diversification. Consequently, the input and engagement of members is important when AQAS plans to devise and diversify their income sources. The possibility to plan ahead is easier at the national level because the majority of Higher Education Institutions return to AQAS for reaccreditation.

ESG 3.6 Internal Quality assurance and professional conduct

8. The agency is recommended to develop a more holistic approach to quality management and produce a Quality Manual which would extend beyond the goal of monitoring of AQAS compliance to the ESG only to also include the general processes of the agency and establish quality goals/benchmarks supported by the proper mechanism of implementation, monitoring, and performance improvement.

This quality assurance concept of AQAS is based on the following objectives:

1. The long-term positioning of AQAS e.V. as an agency for quality assurance in the education sector
2. Recognition of AQAS e. V. in the national and international context
3. Safeguarding of the high quality of procedures conducted by AQAS e.V.

The starting point is the Agency's understanding of quality, as expressed in its Mission Statement, which is fundamental to all quality assurance procedures in higher education for which AQAS is responsible. Four internal stakeholders, each with different competencies and tasks, are responsible for the implementation of quality measures: the Management Board, the Standing Commission, the Complaints Commission and the AQAS Office staff.

Our QA concept is deliberately aligned with the ESG to demonstrate that AQAS operates on an ESG basis (see Annex I.3.1). To demonstrate the implementation of the procedures described in operational work, a list of corresponding rules, basic decisions, and procedural materials that have been adopted by the responsible body is provided for each standard. The integration of the relevant procedures into the PDCA cycle is facilitated by a separate QA policy that includes links to documents and folders for AQAS-internal users (see Annex I.3.2).

ESG 2.3 Implementing processes

9. The panel recommends the agency define and implement a consistent follow-up for recommendations as part of the current assessment rather than consider recommendations for the next review cycle.

At national level, the Agency sends the final report provided by the panel of experts to the HEI. The HEI uploads the report in a [database](#) hosted by GAC. GAC has the right to give conditions to the HEI and checks the fulfilment of the conditions in its own responsibility. A specific regulation in the German system is that the HEI has the right to revise weaknesses stated by the panel of experts after the site visit took place. This process ("quality improvement loop"/*Qualitätsverbesserungsschleife*) lies within the responsibility of the agency and is coordinated by it. This is a "follow-up process" on the outcome of the review after the site visit while the assessment procedure is ongoing. After the agency had taken the supplementary documents into account in its report, the report is sent to GAC, which takes the final decision.

As for the follow-up process in international procedures in cases where conditions are given, the university is required to implement the conditions and to document their implementation appropriately. The university has twelve months to inform AQAS about the measures taken. Relevant documents (e.g. module handbook, examination regulations) must be enclosed to prove that the conditions have been implemented. Nearly all HEIs demonstrate that conditions and recommendations are fulfilled and hand in documents which demonstrate that all areas of enhancement are addressed. After reviewing the documents, the Standing Commission reaches a final decision on the fulfilment.

In its meeting in February 2024, the Board of ENQA considered the follow-up report (see Annex I.4.a.2) arising from the external review in 2021. The Board approved the report and took note of the progress that had been made. EQAR renewed the inclusion of AQAS in the register on 14 April 2022.

Progress visit

In December 2024, AQAS took the opportunity of the progress visit, during which two external reviewers evaluated the developments of the Agency and had some focused discussions on institutional accreditation. AQAS is delighted to have received positive and favourable feedback as well as constructive ideas for future development. It was recommended that AQAS diversifies its portfolio, i.e. to provide further support for HEIs. This could happen either in collaboration with the HEIs or AQAS could develop an own strategy. Furthermore, it was

suggested to respond to issues related to AI, not only with regard to AQAS' own work but also with regard to advising HEIs. As quality assurance is seen as an administrative topic (compared to as a developmental task), the reviewers asked AQAS to think about what that means for them. Additionally, AQAS should reflect on the challenging higher education sector. The international activities of AQAS were praised and the reviewers recommended that AQAS might approach countries in which it has not done any work yet more proactively. The accreditation work that AQAS does provides trust to foreign students at German HEIs and was positively underlined during the progress visit. It was furthermore highlighted that it is a value of AQAS that it does not work discipline-oriented but that procedures are carried out across disciplines. Additionally, the strength of AQAS was summarized as follows: "what AQAS does, it does well".

7.1 Activities, policy and processes for quality assurance (ESG 3.1)

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

7.1.1 Mission Statement and its goals

AQAS acts on the basic premise that universities are responsible for the quality of teaching and learning, while quality assurance procedures are appropriate to assess whether specific quality assurance criteria have been met and if there are areas of concern for which quality improvement measures need to be taken. With this in mind, AQAS sees itself as a partner for universities and makes its expertise available to them with the aim of helping to develop and advance their educational programmes. The aim is to contribute to the quality assurance and quality development of learning, teaching and training by means of external assessment procedures. This understanding of quality assurance by AQAS is a guiding principle that is reflected in the Agency's Mission Statement (see Annex I.1.5).

The assessment and accreditation of study programmes promote the diversity and quality of the programmes offered, contribute to international comparability and recognition, and create transparency for study applicants.

AQAS is one of the stakeholders involved in the creation of the European Higher Education Area and contributes to the development of reliable and comparable quality assurance systems in a national and international context. As stated in our Mission Statement, AQAS meets this mandate by:

- Setting high standards for the professional, transparent and responsible implementation of assessment procedures,
- Regularly reviewing the quality of our own work in order to further develop the organisation, its processes and its services,
- Cooperating reliably, respectfully and in a dialogue-driven way with higher education institutions, expert groups and other institutions in the field of education,
- and by deploying natural, material and financial resources efficiently.

AQAS sees itself as a learning organisation and attaches importance to creating a working atmosphere in which employees collaborate to achieve the Agency's goals, interact with each other in a trusting and constructive spirit, and develop their competencies and skills by means of projects, exchange among colleagues, and further training. The aims mentioned above determine the operational work of AQAS.

7.1.2 Implementation of external quality assurance procedures

According to the Articles of Association, AQAS conducts review procedures at national and international level. They consist of the assessment of study programmes and quality assurance systems with external involvement and, where applicable, their accreditation. The activities of the association are aimed at securing high educational quality at universities and promoting the international recognition of degrees, taking into account the national and international specifications. The publication of results can make selecting a university that is suitable for them and a study programme easier for study applicants.

This chapter serves to give an overview over our activities. Each procedure is described in detail in Chapter 8.1.

7.1.3 National procedures in accordance with the MRVO

The frame for all accreditation procedures is set by Article 3 of the Interstate Study Accreditation Treaty that defines the following procedures provided for the national accreditation system:

- (1) Procedures for ensuring and enhancing the quality of individual study programmes with external involvement (programme accreditation),
- (2) Procedures for ensuring the performance of internal quality assurance systems of universities with external involvement (system accreditation),
- (3) Other procedures agreed upon with GAC and the respective state of the university ("alternative procedures").

At the same time, Article 2 of the Interstate Treaty specifies which criteria apply to study programmes and are the subject of quality assurance within the aforementioned procedures. A distinction is made between formal criteria (Part 2 of the MRVO) which are reviewed by the agency, and academic criteria (Part 3 of the MRVO) which are reviewed by the experts.

In programme accreditation, the formal criteria relate to the structural organisation of a study programme (duration of study, programme profiles, entry requirements, degree awarded, modularisation, ECTS). The academic criteria examine the programme's content structure as described below.

In system accreditation, the formal requirements relate to the number of study programmes that have undergone internal quality assurance. The academic criteria concern the structure of the quality assurance system itself (e.g. goals, processes, instruments).

Programme accreditation in Germany

The subject matter of programme accreditation in accordance with the MRVO are bachelor's and master's programmes offered by state or state-recognised universities in Germany. The following aspects are assessed in the context of programme accreditation procedures: the appropriateness of a study programme's qualification goals and the competences expressed therein, as well as their implementation in a coherent study programme concept and the subject-content organisation of the study programme, the resources, the organisation of studies and examinations, and the university's internal procedures for ensuring academic success and quality assurance. The procedures are intended to promote the further development of study programmes and contribute to enhancing their quality.

The following aspects apply to the implementation of programme accreditation procedures:

- The procedures comply with national and European standards (MRVO/ESG).
- The procedure aims to ensure the comparability of study programmes, hence equivalence rather than similarity.

Since the restructuring of the German accreditation system in 2018, 1,914 study programmes have been assessed in 683 procedures in accordance with the requirements of the MRVO. GAC has the right to decide differently from the experts' vote, e.g. by imposing conditions when the experts suggested none (and vice versa). It made use of this possibility for 49 study programmes. This also includes cases in which conditions recommended by the panel of experts no longer had to be issued by GAC, because the university had already notified the fulfilment of the conditions when submitting the application to GAC. Nevertheless, some Higher Education Institutions are irritated by this difference between the assessment by the panel of experts and the decision made by GAC.

PhD programme accreditation in Germany

Under Article 2 of the Interstate Treaty, only bachelor's and master's degree programmes are required to be accredited in Germany. There are no statutory provisions governing the quality assurance of PhD programmes. In individual cases, however, universities may be asked to seek accreditation for PhD programmes if the relevant state ministry requests it. As GAC is not responsible for these procedures for the reasons men-

tioned above, AQAS can take the accreditation decision itself.

European Approach

Until the changes in 2024, the MRVO defined that procedures based on the European Approach may only be conducted for joint programmes that lead to a joint degree if some requirements have been met. The Agency had to check these pre-conditions before starting the procedure and informed GAC about this review process.

Since 2025, the EA can be applied on all types of joint programmes. Procedures following the European Approach are based on AQAS specific Guidelines for HEIs and handouts for the experts to support the stakeholders in the process. The AQAS Standing Commission is responsible for taking decisions in these procedures. However, the result must be recognised by GAC for the German HEI.

System accreditation in Germany

System accreditation was introduced as an alternative to programme accreditation, and places greater emphasis on the university's self-responsibility. The subject matter of a system accreditation procedure is a HEI's internal quality assurance system. The focus of the system accreditation can be presented as follows:

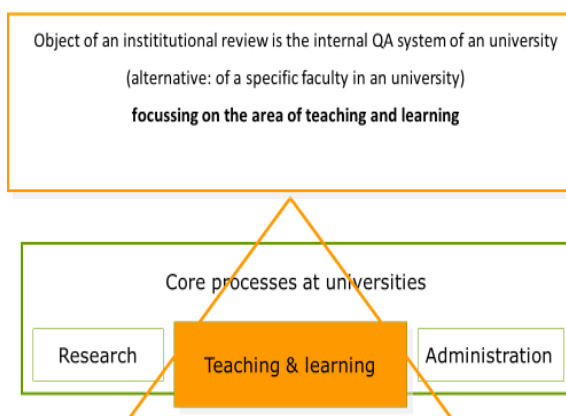


Figure 7: Focus of system accreditation

The process and criteria of the procedure are also stipulated by the MRVO. Universities that seek for a system accreditation must demonstrate that their internal QA system enables them to ensure that their study programmes meet the defined qualification goals and quality standards. In the case of a successful system accreditation, universities are granted the right to dispense with external programme accreditation and to award the GAC seal for study programmes that they have assessed internally.

So far, AQAS has successfully completed 34 procedures of system accreditation under the old and new regulatory framework. At the time of submitting the self-assessment report, one procedure was ongoing (which is a system re-accreditation).

Alternative procedures (national level)

With the entry into force of the Interstate Treaty, the accreditation by using the so-called alternative procedure was introduced as a third possible method. The aim of this type of procedure is to enable HEIs to adapt their internal quality assurance systems so that they best meet their needs and are eligible for accreditation. This allows alternative routes to accreditation to be explored, going beyond programme and system accreditation. Policymakers hoped that this would create opportunities to grant higher education institutions greater autonomy in quality assurance and to promote the further development of the accreditation system.

7.1.4 International procedures

AQAS started working at international level because foreign universities approached the Agency with the request to provide them with services similar to those offered to German universities. They are interested in being assessed by a German agency on the basis of standards which are agreed upon in Europe. The motivation is to raise the profile of their institution, their ambition to enhance the quality of their teaching programmes by

seeking input from an international panel of experts, the wish to use successful accreditation as a marketing tool, or the fact that an external funding body (e.g. World Bank) requires an international accreditation.

In the case of international procedures, a distinction must be made between programme accreditation and institutional accreditation carried out at foreign universities and the accreditation of joint programmes (based on the European Approach).

Programme accreditation international

In total, AQAS conducted 204 accreditation procedures covering 671 study programmes at foreign universities, of which 550 were accredited with conditions and 121 without conditions. For 51 of the 671 study programmes, the procedure was postponed before the final accreditation decision. For 3 study programmes, AQAS denied the accreditation. The accreditation for 12 study programmes was withdrawn, because the universities did not (fully) demonstrate the fulfilment of the condition(s).

At international level, BA, MA and PhD programmes can be assessed within one procedure (see Annexes I.2.d).

Institutional accreditation international

Institutional accreditation procedures focus on the internal QA system of the HEI, which is the guiding idea of the approach which is applied in Germany. The institutional accreditations remain focused on the quality of teaching and learning. The core idea of an institutional accreditation by AQAS is to check if the quality assurance system of a university is in line with the European Standards and Guidelines. Based on the ESG, AQAS developed its own criteria and guidelines that should support the work of the universities while writing the application and the work of the experts to assess the institution. So far, AQAS conducted six institutional accreditation procedures (in Oman, Chile, and Armenia). To enhance the validity of the assessments, AQAS combines the analysis at institutional level with that at programme level (programme sample) to assess how far the QA system has influence on the quality of the study programmes.

European Approach

Procedures based on the European Approach for Quality Assurance of Joint programmes without the involvement of German universities are conducted on the basis of the resolution of the EHEA Ministers. The procedure follows the EA; AQAS developed specific Guidelines for HEIs and handouts for the experts to support the stakeholders in the process. Accreditation decisions are taken by the Standing Commission. So far, AQAS has conducted 22 accreditation procedures based on the European Approach, which led to 10 programmes that were accredited with conditions and 12 without conditions.

7.1.5 Other activities

To have a clear separation between accreditation and other activities in the higher education sector, AQAS ARCH GmbH (as described in Chapter 6) was founded. In the past, it dealt with Erasmus+, Twinning or DAAD projects. AQAS considers it essential to participate in international projects and to share knowledge with international stakeholders because the Agency sees itself as a partner of German universities in promoting their internationalisation efforts.

According to the resolution “Standards for arrangements of system accreditation in relation to consulting services” by GAC, AQAS does not conduct procedures, whether programme accreditation or system accreditation, if the Agency has provided (or is currently providing) consultancy to the same university. Also, it was founded to be able to offer workshops for university staff involved in accreditation, e.g. on the European Approach or on basics of the German accreditation system.

The following table shows how AQAS e.V. task areas differ from those of AQAS ARCH GmbH:

Task areas of AQAS e.V.	Task areas of AQAS ARCH GmbH (see Annex II.3.7)
Programme accreditation in Germany	Involvement in EU projects as a project partner
System accreditation in Germany	Assessment of further education (certificate)
Programme accreditation international	Workshops on specific issues
Institutional accreditation international	Consultancy projects in the area of quality assurance

Figure 8: Task areas of AQAS e.V. and AQAS ARCH GmbH

Concept

The basic model of the daughter company can be outlined as follows:

- Spin-off as a GmbH company (*Gesellschaft mit beschränkter Haftung* – limited liability company) (formation by cash subscription)
- AQAS e.V. (represented by the General Assembly) as the sole shareholder
- The Management Board, representing the e.V., constitutes the shareholders' meeting

Up to now, the GmbH's activities have been limited to individual projects, as the core business of AQAS continues to be assessment and accreditation procedures (see Annex II.3.7). Income from business operations is subject to corporation tax and trade tax.

7.2 Official status (ESG 3.2)

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

7.2.1 Legal basis

AQAS e.V. was founded in 2002 as an association and entered in the Register of Associations of Bonn Local Court (*Amtsgericht Bonn*) (20 VR 8059). After the agency's move to Cologne in 2012, jurisdiction was transferred to Cologne Local Court, where AQAS is entered under No. VR 17554 of the Register of Associations of Cologne Local Court (*Amtsgericht Köln*) on 24 January 2013. AQAS e.V. is recognised as charitable (see Annexes I.1.1 and I.1.2).

Since 2018, German agencies have no longer been assessed by GAC. However, in accordance with Article 5(3)(5) of the Intergovernmental Agreement on Study Accreditation, it remains one of the GAC's tasks to certify agencies for their activities in Germany. Approval is granted on a permanent basis following an agency's registration with EQAR, subject to the possibility of revocation. AQAS engages ENQA to carry out the necessary assessment in accordance with the ESG. The ENQA review report is then the basis for a decision by EQAR on whether the agency can continue to be listed in the register.

The extensive review of AQAS by external institutions also includes regulatory controls under German law. For example, the Tax Office and other authorities check the Agency to ensure that it meets the requirements for being a registered association (financial, tax, and social audits).

7.2.2 National recognition

AQAS e.V. was accredited for the first time by GAC on 14 March 2002 and has been authorised to carry out programme accreditation procedures in Germany ever since. This has also been the case for system accreditation procedures since 2008. Since the Interstate Study Accreditation Treaty came into force on 1 January 2018, GAC has been responsible for accreditation decisions and the associated awarding of seals.

7.2.3 International recognition

AQAS has been a member of ENQA since 2008 (renewed in November 2013, May 2017, and December 2021). AQAS has been registered in EQAR since 2008 (see Annex I.4.a.1 and I.4.b.1).

7.3 Independence (ESG 3.3)

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

When the German accreditation system was founded at the end of the 1990s/beginning of the 2000s, the guiding idea was to strengthen the autonomy of Higher Education Institutions and to transfer the responsibility for certain tasks from the ministries of education to other institutions – in the case of accreditation to the agencies. Therefore, some universities jointly took the chance of founding an agency. Due to this historical background, the only exchange between agencies like AQAS and ministries takes place via GAC. Neither the KMK, nor the HRK, nor any other scientific community strives to influence the work or the decisions of AQAS, but they also hardly support our work on the other hand.

7.3.1 Organisational independence

As explained in Chapter 5.1, AQAS e.V. is an organisation of universities, each of which is represented in the General Assembly by a member of the university management. The daughter organisation AQAS ARCH is organised under private law and operates independently of the state or ministries.

When setting up the Agency, importance was attached to structuring AQAS in such a way that member universities could have a say in its strategic orientation, whilst having no influence on the implementation of individual procedures. In line with the German law of associations, the General Assembly elects the members of the Management Board, decides on the approval of the actions of the Management Board, decides on amendments to the Articles of Association and, if necessary, makes strategic decisions on the future orientation and potential tasks of the Agency (e.g. the AQAS ARCH GmbH). The Articles of Association of AQAS (see Annex I.1.6) define the responsibilities of the General Assembly and the Management Board.

The Management Board is accountable to the General Assembly, decides on the strategic orientation of AQAS in detail, hires employees, and appoints the members of the Standing Commission (SC) and the Complaints Commission (CC). Both commissions operate independently of the General Assembly and the Management Board and are not accountable to them. Simultaneous membership in the General Assembly or Management Board and the SC or CC is not practiced. Consequently, neither the Management Board nor the General Assembly can influence the content of decisions taken by the commissions.

According to the AQAS complaints procedure (see Annex I.1.9), only the CC, which acts independently of the other bodies, can reverse decisions of the SC or work towards their amendment.

Academics from both types of higher education institutions (universities/universities of applied sciences) from Germany and abroad, representatives of professional practice and students are members of the SC. All stakeholder groups are also represented in the CC. In international procedures, the SC is responsible for the final decision on accreditation of a study programme or a quality assurance system. In justified cases, the commission may decide to deviate from the experts' recommendation. In the SC, members are not involved in decision-making regarding procedures relating to their own university.

7.3.2 Operational independence

In national procedures, the steps of assessment procedures for the preparation of a programme or system accreditation are laid down in binding form by the MRVO. In international procedures, the Standing Commission determines the sequences of procedures (see Annexes I.2.d.2 and I.2.e.1).

The SC appoints panels of experts for all assessment procedures conducted by AQAS and does it without influence from other bodies of AQAS. The AQAS Office notifies the university in good time of the composition of the relevant panel of experts and gives the university a certain period of time to raise reasoned objections to members of the panel of experts. Reasoned objections must be submitted in writing. The university has no right of proposal and/or veto. For procedures in Germany, the composition of panels of experts is based on the specifications of the MRVO and the relevant HRK guidelines on the nomination of professors for review panels

of 24 April 2018. The processes for the nomination and appointment of experts in international procedures are laid down in corresponding resolutions of the SC, considering the stakeholder principle. The resolutions reflect the “Principles for the Selection of Experts” of the ECA (see Annex I.2.d.8).

The experts must declare their impartiality in the proceedings in a statement of impartiality in advance of the site visit. Academic experts are considered to be biased with regard to the procedure of programme accreditation, e.g. if they have been working at one of the university departments as a teacher for the past two years, or have participated in an appeal proceeding at the applying university within the last two years, or have close personal or familial ties to a member of the department concerned. Experts from professional practice and student experts also may not have direct connection to the university. More details are explained in the document “AQAS Guidelines for Experts” (see Annexes I.2.b.4 and I.2.d.10).

The SC is the body which decides on the accreditation criteria in international procedures. Usually, the AQAS Office draft documents (criteria or guidelines) which are discussed in SC meeting, revised by the AQAS Office (if needed) and officially decided by SC. The Management Board is informed about changes in procedures and methodologies afterwards, but does not contribute to the changing process, nor does it take decisions on criteria or support documents.

The agency is completely independent in managing its own staff. Usually, the managing directors discuss all issues related to staffing (e.g. employment, promotion, problems, and termination of contracts) with the Management Board, which decides on the actions to be taken by the directors. No other commission of AQAS and no external party is involved in staffing decisions. More information on staffing and staff development is given in Chapter 7.5.3. Information on the finances of AQAS, which are also managed without third party influence, are given in Chapter 7.5.1.

7.3.3 Independence of formal outcomes

AQAS is aware that a core responsibility of an accreditation agency is to ensure that the results of its assessment and accreditation procedures are impartial. After all, the system will only be accepted if there is trust in the neutrality of the different stakeholders.

The measures AQAS takes to ensure impartiality address different levels:

- a) Appointment of members of commissions and panels of experts
- b) Oversight of procedures by the AQAS Office
- c) Separation of the assessment and decision-making levels

Regarding a)

The composition of the SC is defined in the Articles of Association of AQAS e.V. Commission members from academia and the representatives of professional practice have professional expertise or experience relevant to the commission’s work. The student members have previous experience as student experts in accreditation procedures. Other criteria for appointment are a sound professional reputation, openness to different approaches, receptiveness to the Bologna Process, and a good overview of the subject concerned. All commission members are aware that they perform this task on account of their personal expertise and not as representatives of their organisation.

The impartiality of results is ensured by the relevant criteria for the nomination and appointment of experts. Members of the panel of experts must sign a declaration of impartiality which, among other things, addresses the main aspects of potential biases (as explained in Chapter 7.3.2) and in which the experts are committed to treat all documents and the insights gained with confidentiality.

Regarding b)

All communication within the national and international procedure takes place via the AQAS Office, in its capacity as a neutral body in the procedure; the AQAS Office also accompanies all site visits in Germany, Europe and beyond, and coordinates the preparation of the experts’ report. If there is a case in which it becomes apparent during the assessment procedure that members of the panel of experts pursue their own interests, it is the duty

of the consultant overseeing the procedure to intervene in moderating capacity during the site visit.

In national procedures, any individual opinions, dissenting opinions and such must be indicated accordingly so that GAC, as the decision-making body, can consider them. The university is also given the opportunity to submit a written statement to the Agency (with the consultant responsible forwarding the statement to the experts, where applicable), and to submit a written statement to GAC before it takes its decision.

Also, in international procedures dissenting opinions of experts can be indicated, so that the SC can consider it. In line with good practice at European level, the university is also given the opportunity to submit a written statement to the Agency prior to decision-making.

Regarding c)

When designing accreditation procedures, it is common practice in the European context to separate the assessment level from the decision-making level.

In national accreditation procedures, the SC decides on the Agency's proposal regarding the fulfilment of formal criteria in procedures for the preparation of programme and system accreditation. It is the sole responsibility of the panel of experts to review the academic criteria. The experts' assessment is not bound by instructions and is undertaken on the basis of their own expertise. The MRVO gives the university the possibility to comment on the experts' report. The national system does not provide a resolution by the SC. In the course of the internal quality assurance of AQAS, however, the SC is provided with the accreditation report for its information following the completion of the assessment. In national procedures, the final decision is taken by GAC on the basis of this accreditation report.

In international accreditation procedures, the experts' report containing their recommendation for decision and any comments that may have been submitted by the university are the basis for all decisions made by the SC. The SC takes its decisions autonomously and without being bound by other regulations than their own principles.

There are no cases of undue influence of institutions or stakeholders on the findings, analysis, conclusions, and recommendations, nor in the German system where the GAC makes the decision, nor at international level. If universities are not satisfied with the outcome of an accreditation, they hand in an official complaint.

7.4 Thematic analysis (ESG 3.4)

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

Sharing experiences and feeding them back into the system is considered essential by AQAS to enable enhancement of the accreditation system. For this reason, AQAS continuously strives to actively participate in the discourse on accreditation issues at both national and international level. AQAS attaches great importance to presenting its results and experiences such that, by way of "reporting back", it also reaches the stakeholders involved, enabling other actors to benefit as well. To this end, AQAS staff give speeches and presentations at conferences hosted by a wide range of organisations (e.g. DAAD, GAC, HRK, and the Student Accreditation Pool at national level, ECA, ENQA, EQAF, and INQAHEE at international level). Furthermore, AQAS staff participate in panel discussions and in publishing thematic analyses in journals or on the AQAS website. If a thematic area offers sufficient contextual substance, analyses addressing specific issues are published.

As explained in Chapter 7, one of the managing directors of AQAS is a member the editorial team of the Journal for Quality in Higher Education and Research. The benefit of this engagement is to bring practitioners and researchers closer to each other. In Germany, agencies and educational scientists at HEIs work hardly without any exchange which leaves an analytical gap that cannot be closed by the agencies on their own. AQAS sees a chance by this activity in the editorial team to learn more about actual trends in research and to feed in our expertise in official publications.

On a national and international basis, the range of “reporting back” activities include:

- Conference contributions, lectures, and presentations
- Provision of training and workshops
- Participation in interviews and panel discussions
- Posts on social media, as well as publications on the website

Publication of articles on specific issues are for example:

- Fuhrmann, Michaela/Kloeters, Verena: Interview mit Prof. Dr. Ulrich Bartosch und Dr. Olaf Bartz zur novel- lierten Fassung der Musterrechtsverordnung, June 2026 in: Fuhrmann, M. et.al.: (Hrsg.): Handbuch Quali- tät in Studium und Lehre (HQSFLF)
- Kroschel, Simone: Wie kann die Akkreditierung in Deutschland die Etablierung von Future Skills in Studium und Lehre stärken? Ein Erfahrungsbericht. In: Ehlert, H./Falkenhain, L./Hupp, G./Kerkenberg, L. (Hrsg.): Future Skills für Studium und Karriere – Potenziale und Perspektiven, Düsseldorf, Düsseldorf University Press (to be published), ISBN 9783110784671
- Kroschel, Simone: Qualitätssicherung durch Akkreditierung von Studiengängen – Erfahrungen und Per- spektiven in: Deutscher Hochschulverband Physician Assistant (DHPV): 20 Jahre Studium Physician As- sistant (Festschrift), Köln 2025 (20 Jahre Studium Physician Assistant | Softcover | Englisch, Deutsch | ISBN 978-3-7950-1944-0)
- Wipf, Alexandre: The mandatory use of performance indicators in programme accreditation – the German example and the experience from an accreditation agency, 2021 EQAF, ISSN 1375-3797, November 2021.
- Fischer, Ninja/Kloeters, Verena/Kropp, Matthias/Legrum-Khaled, Nadja: „Programmakkreditierung im Fakultätsreview“ – eine Akkreditierung auf Basis der „Experimentierklausel in: Fuhrmann, M./Güdler, J./Pohlenz, P./Schmidt, U.(Hrsg.): Handbuch Qualität in Studium und Lehre, online erschienen als Beitrag F.3.10 am 04.03.2021
- Kloeters, Verena: Akkreditierung nach dem neuen Staatsvertrag – aus Sicht einer Akkreditierungsagen- tur in: Brockerhoff, L./Keller, A. (Hg.) (2019). Lust oder Frust? Qualität von Lehre und Studium auf dem Prüfstand. Bielefeld, wbv. DOI: 10.3278/6004686w, S. 151ff.
- Herrmann, Doris/Michalk, Barbara: Changes in the German Accreditation System, EQAF Wien, November 2018
- Groeger, Dorothee: Applying the ESG outside Europe, AQAS e.V. Köln, August 2018
- Herrmann, Doris: Die Akkreditierung von Joint Programmes im europäischen Kontext. In: Kohler, J.; Poh- lenz, P, Schmidt, U. (Hrsg.): Handbuch Qualität in Studium und Lehre, Stuttgart 2011, online erschienen als Beitrag F.7.4 am 22.04.2013

An overview of the thematic activities undertaken over the past five years is provided in the Annex II.3.2.

7.5 Resources (ESG 3.5)

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

In Germany, the accreditation system is organised on a non-profit basis. Considering this, AQAS e.V. is official- ly registered as a non-profit organisation, which, among other things, means that all procedures must be calcu- lated to break even, without making profit.

Since AQAS gained new HEIs as clients and received a continuously increasing number of contracts in the past, the Agency has been growing steadily for a long time. To be able to operate at break even, AQAS has defined the number of procedures that a consultant should conduct each year. In consultation with the relevant divisional head (see below), the management determines how procedures are allocated among the consult- ants to ensure an equal distribution of the workload.

The management is responsible for the implementation of strategic planning, including financial planning. It reports

regularly to the Management Board and provides it with extensive information on the development of the Agency.

AQAS is not only organised independently with regard to the implementation of procedures, but also concerning the administration of the Agency: for example, preparatory accounting or payroll processing is done by the administrative staff from the AQAS Office (in cooperation with a tax consultancy), without drawing on third-party resources (of individual member universities, for instance). This is also taken into account in resource planning.

AQAS ARCH GmbH does not have any resources of its own but draws on the resources of AQAS e.V. This is governed by a transfer agreement. The GmbH pays a flat rate monthly fee for the use of equipment and infrastructure. Staff costs are invoiced on a project-by-project basis.

7.5.1 Financial planning

AQAS must follow the legal requirements for registered associations in its internal administration, irrespective of its relatively small size. The annual budget plan for AQAS e.V. (*Wirtschaftsplan*) is prepared by the association's Management Board in cooperation with the managing directors and the Agency's tax advisor and adopted by the General Assembly. In addition, AQAS voluntarily prepares balance sheets for the information of its members. The draft of the budget plan for 2026, which has been adopted by the Management Board, is included in the Annex (see Annex I.1.4).

The Agency's non-profit status is reviewed by the Tax Office every three years, most recently on 13 June 2024 for the calendar years 2021 to 2023. Besides reviewing the Agency's non-profit status, the financial administration also conducts external audits of wage tax on an irregular basis, special value added tax (VAT) audits and audits for all forms of taxes. The last audit undertaken by the financial administration was on 19 July 2021, covering the period from 1 January 2009 to 31 May 2011. The external audit of wage tax did not raise complaints.

To monitor the economic development of the Agency, its tax advisor prepares a monthly controlling report documenting, among other things, the Agency's revenues and costs broken down by type. In accordance with a Decision of the Management Board of 21 May 2007, these controlling reports are distributed to all members of the Board monthly.

To keep costs to a minimum in the universities' interest, pricing of assessment and accreditation procedures is calculated tightly. To create cost awareness, the Management Board has adopted a travel expenses policy to determine the extent to which AQAS can pay experts' travel expenses.

In addition, regular checks are carried out to ensure that social security contributions for employees have been properly paid. Social security audits are also conducted every three to four years; the last audit was on 1 February 2022, covering the years from 2018 to 2020. The social security audit was completed without any complaints.

More information on the financial situation of the last five years can be found in Annex I.1.10.

7.5.2 Material resources

The AQAS Office currently has 480 square metres of office space in Cologne city centre. In most cases, offices are shared by two AQAS employees. The meeting room can be used for workshops and board meetings with external partners and as a break room for staff members.

AQAS attaches great importance to appropriate workplace equipment: All workstations are equipped with ergonomic desks and chairs, as well as laptops or computers and all staff members have business smartphones. If technical devices are needed on an individual basis to improve ergonomics, these needs are addressed. Multi-functional devices (for photocopying, scanning, and printing) are also available.

At AQAS, the work of consultants involves a lot of travelling which creates challenges for the internal organisation and private life. Ensuring communication and coordination within the team is therefore key to maintaining work processes. At the same time, one of the Agency's strengths is the smooth cooperation within its team. To facilitate the continuation of work processes and a balance between the different areas of life, AQAS created the technical requirements for working remotely several years before the coronavirus pandemic which greatly facilitated the short-term switch to home office at the beginning of the pandemic. The staff jointly developed a

concept for a hybrid working model. All employees can spend two days per week at the office and three days per week at home. The hybrid working model is intended to enable greater flexibility.

All data and applications are made available in a virtual working environment. AQAS uses Microsoft 365 for this purpose including Microsoft Teams for (internal) communication.

AQAS implements the requirements of the EU's General Data Protection Regulation (GDPR) in all processes, and in 2017 nominated a senior consultant to act as data protection officer; she was appointed to this role by the Management Board after receiving the necessary training. Additional measures are implemented as required by the system administrator or in consultation with the system service provider.

An IT policy adopted by the Management Board governs employees' rights and obligations with regard to ensuring data security (see Annex II.2.3). Among other things, it regulates the use of passwords, company data and company hardware. To set out the possibilities and limitations of using AI at AQAS, the Management Board also adopted an AI policy in 2026 (see Annex II.2.4). Training courses on the use of AI will be held from the second half of 2026 onwards.

7.5.3 Human Resources

The AQAS Office is divided into several areas with clear responsibilities: the AQAS Office is led by two managing directors. The responsibility for individual accreditation procedures lies with consultants who are supported by two project assistants and one organisational assistant. The administration comprises the following areas: Administration of Procedures, Accounting, and Human Resources and Organisation. In addition, two of the consultants are responsible for performing other administrative tasks along the lines of "support processes" (e.g. legal, system administration etc.). Daily work is supported by student assistants.

At the time of submitting the self-assessment report in 2026, a total of 23 employees worked for the Office of AQAS e.V. (as of June 2026): besides the two managing directors, there were thirteen consultants (including three "Senior Consultants"), three administrative employees and the three assistants mentioned above. One student assistant currently supports the work of AQAS.

The AQAS Office is split into two teams that reflect the Agency's main business segments. The responsibilities are divided as follows:

- National: Programme Accreditation: Dr. Kroschel, System Accreditation: Dr. Kloeters
- International: Ms. Herrmann and Mr. Heintze

The Quality Assurance division, led by Ms. Fischer, is an independent area that acts across divisions. The QA concept on which its activities are based is provided in the annex (see Annex I.3.1).

In recent years, the complexity of the national and international accreditation system has increased. For many years, AQAS has taken the approach that the management should also conduct procedures to ensure they 'remain in touch' with practice. For this reason, the two managing directors, Ms. Herrmann and Dr. Kloeters, devote 50% of their time to operational activities (implementation of assessment procedures and projects).

Staff are recruited on the basis of previously defined criteria (related to their respective position) and in an official application procedure. AQAS attaches great importance to all consultants having relevant prior experience. In the international division, additional importance is attached to them having worked and/or studied abroad.

As outlined above, the consultants working at AQAS often have many years of experience in quality assurance or the administration of studies and teaching. Experience shows that this results in a high degree of intrinsic motivation to contribute to the improvement of study programmes and study conditions. As the results of the customer surveys conducted by Centre for Evaluation and Methods (ZEM), the vast majority of AQAS employees are perceived as highly committed and professional. The CVs of the consultants and the management are provided in the annex (see Annex II.2.1).

However, one challenge is that competition between agencies in the German accreditation system creates enormous cost pressure, which affects employees in the form of time pressure and a limited time budget for

cross-cutting tasks and further training. In addition, as public service institutions, GAC and university administrations offer job security, in some cases better pay grades and more favourable working conditions than small institutions, which must cover their costs in an increasingly difficult environment. This repeatedly leads to staff leaving the agencies, which can only be countered to a very limited extent through participation and good teamwork.

The AQAS Office has developed measures for integrating new consultants to prepare them adequately for their work (see Annexes II.2.6 and II.2.7): before taking responsibility for their own procedures, new consultants shadow their experienced colleagues during site visits. Every new consultant is offered the opportunity to participate in a basic seminar on moderation/facilitation. Staff training is provided on the basis of their proposals and/or in the form of in-house training for the entire team or for specific groups. Special measures (e.g. security training, first aid training) are offered as required. Consultants are expected and encouraged to participate in relevant conferences. A list of conferences attended by staff over the previous accreditation period can be provided upon request. The annual in-house retreat also provides an opportunity for professional exchange. At the retreat, staff discuss new developments in the field of higher education and solutions to problems. Where appropriate, working groups are formed and responsibilities for adjustments are agreed upon. Employees' individual skills are enhanced, where required, by offering appropriate professional development measures.

Since 2023, regular appraisals (yearly interviews) are offered as part of our staff and organisational development programme. These involve a structured discussion between division managers and staff members, during which participants can discuss aspects of leadership, professional and interpersonal collaboration, job responsibilities, work performance, working conditions, the working environment, and career development prospects. The reviews are intended to provide an opportunity to develop ideas for improving collaboration and to identify development aspirations and chances. The reviews take place regularly once a year and are a voluntary option for staff. To help all participants to prepare for the reviews, a guidance document is provided to serve as a basis for the discussion of topics (see Annex II.2.8). The guidance document was developed jointly by all staff in a series of workshops led by an external consultant. Within this framework, separate training sessions were also held for the participants (managers, staff) on how to conduct the interviews.

In 2010, the Management Board adopted a concept for individual further development of all staff members (see Annex II.2.5): AQAS provides an annual budget for training that can also be used for health care. In line with the statutory regulations of the Further Education and Training Act for Employees in North Rhine-Westphalia, two years' worth of entitlement to educational leave may be combined. Work-related training that is required by the management or by staff members themselves is unaffected by this regulation.

7.6 Internal quality assurance and professional conduct (ESG 3.6)

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

7.6.1 Quality assurance concept

Being an agency for quality assurance, AQAS places high demands on the reliability and quality of its assessment procedures. The Agency has a quality assurance concept which refers to Part III of the ESG. This concept describes the measures and approaches which ensure that the activities undertaken by AQAS are in line with the ESG; key aspects of this concept are also the basis for this self-assessment report.

The starting point is the Agency's understanding of quality, as expressed in its Mission Statement, which is fundamental to all quality assurance procedures in higher education for which AQAS is responsible. The QA concept refers to the various rules, decisions, and procedure materials that have been adopted by the responsible body of AQAS for the purpose of fleshing out accreditation procedures. The current version of the concept is published on the [AQAS website](#) and is included in the annexes (see Annex I.3.1).

In the view of AQAS, it is key that internal and external quality assessments and feedback loops take place on different levels and that a variety of tools is in use, enabling any potential deficiencies to be identified and eliminated at an early stage.

7.6.2 Internal feedback mechanisms

The following mechanisms are implemented at the AQAS Office level:

From the start of its operation, AQAS has been deeply aware of the fact that good and acceptable work results can only be achieved if a continual sharing of ideas and a critical and constructive reflection of the AQAS Office's own work takes place. The staff continuously share information on aspects that, in their view or based on feedback from universities and experts, should be changed. This is of utmost importance for the internal quality culture. The AQAS team is made up of a balanced mix of experienced and young consultants who support each other, therefore different perspectives are considered. An essential element of how AQAS understands quality is that consultants who coordinate the procedures oversee the accreditation procedures assigned to them from start to finish, i.e. they also participate in every single site visit. Thus, they are familiar with all aspects of the procedure.

If problems arise in national or international procedures, adaptations are implemented immediately, while issues that may be relevant to the entire team are discussed at the next *Jour Fixe* meeting. A regular *Jour Fixe* (held twice a month) institutionalises information sharing among staff. This enables the early identification of weak points in procedures and processes and the development of solutions. The *Jour Fixe* also serves as a platform to discuss current national and international developments. The findings are documented in minutes. The President of the Management Board also attends *Jour Fixe* meetings from time to time. Additionally, to address specifics of working at national or international level, regular team meetings are held at the AQAS Office.

Consultants hold a one-day retreat each year. Besides discussing the latest developments, the participants are also encouraged to reflect on their own work at this event. The management usually reports on how the business is developing. Employees also discuss how materials, tools, and processes can be enhanced, or brainstorm on key issues. The findings of this retreat also focus on an internal analysis of strengths and weaknesses. The general intention is to create an atmosphere in which staff see and embrace the capacity for self-criticism and the willingness to continuously develop as a sign of professionalism. This is also expressed in the "consultants' self-conception" (see Annex II.2.9).

Various measures are in place to assure the quality of the procedures, e.g. a four-eye principle:

- In national procedures, formal reports (*Prüfberichte*) are reviewed by the Head of Quality Insurance, especially the wording of shortcomings, before being sent to the university.
- The summaries of findings (*Ergebniszusammenfassung*; see Chapter 8.3.1.1) which follows a site visit are also checked by a senior consultant.
- AQAS attaches great importance to the coordination of experts' reports so that the situation found at universities is presented in a transparent and appropriate manner. Experts' reports are always read by a senior consultant before being sent to the university.
- Experts' reports that present problems or peculiarities of general interest or that serve as examples for other procedures (e.g. for large cluster procedures, teacher training) are discussed at team meetings.

The following mechanisms are implemented at the level of the Standing Commission:

AQAS attaches importance to dialogue-oriented cooperation with the commission. For this reason, feedback on organisational, technical or content-related problems is usually provided during the meetings of the commission. After each meeting of the SC, AQAS Office staff meet to reflect on the discussions of the meeting.

The members of the SC receive the results of the external ZEM survey of universities and experts (see below, see Annexes I.3.5 and I.3.6) and can discuss the findings.

Once a year, AQAS holds a feedback session with members of the SC where problems and opportunities for improvement can be discussed. Overall, however, the AQAS Office has received much praise for its work throughout the years, particularly with regard to the preparation of meeting documents.

The head of the SC discusses continuous topics in the procedures and experiences with the work in the commission with the Management Board once a year.

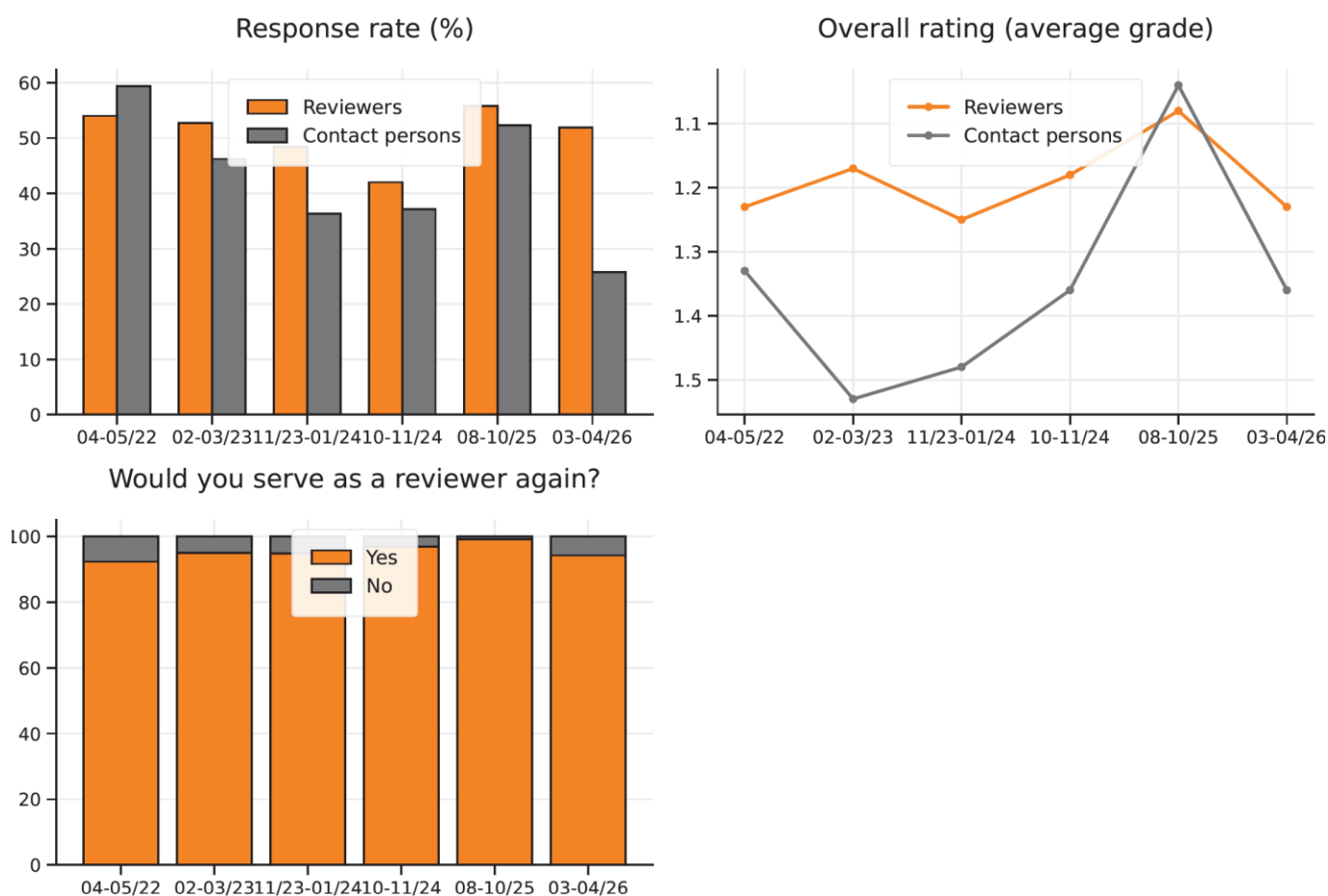
7.6.3 External feedback mechanisms

Since December 2007 (and since 2021 in international procedures), universities and experts have been surveyed on the quality of programme accreditation procedures conducted by AQAS, following their completion. For reasons of objectivity, these surveys were outsourced to an external institution. They are conducted professionally by ZEM at the University of Bonn (see Annexes I.3.3 – I.3.8). The results of surveys are usually summarised in half-yearly reports. These are sent to the Management Board and the AQAS Office who discuss the results. A summary of the results is published on the AQAS website and is presented to the General Assembly and the Standing Commission.

Also, in the current surveys from April 2026, universities and panels of experts surveyed confirmed the Agency's consistently high level of quality. Around 95% of the experts stated that they would be willing to act as experts again for the Agency; AQAS was awarded an average grade of 1.19 (national) and 1.25 (international) (German school grading scale, 1 = top grade, 6 = lowest grade). The universities also gave AQAS very good marks, with a mean value of 1.35 on the satisfaction scale.

A number of exemplary values from the surveys of April 2026 (national procedures) are shown in the scales:

Development of ZEM surveys since 2022



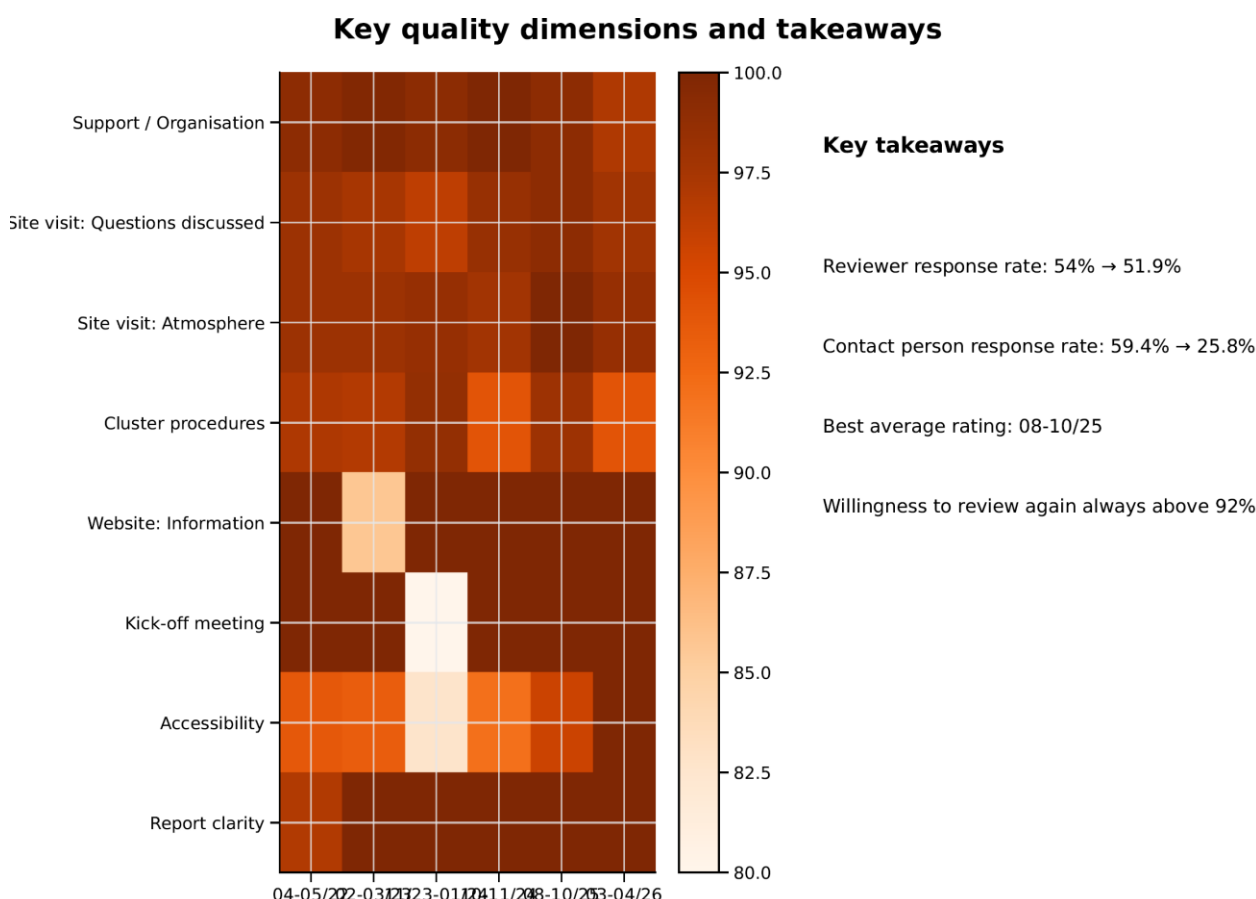


Figure 9: Satisfaction of experts and university representatives with AQAS 2022–26

The questionnaire also contains free-text boxes to provide individual feedback. Several remarks relate to aspects of a systemic nature (e.g. the workload and costs of procedures). Critical remarks regarding AQAS' work refer to information on the website or of digital documents for the panels of experts – those aspects were usually addressed without delay. The AQAS team is very proud to have received consistently good to very good feedback from universities and panels of experts in recent years. Experts are generally exceedingly pleased with their cooperation with the AQAS Office and, in particular, with the consultants. Universities confirm the Agency's high level of professionalism in the implementation of accreditation procedures and speak highly of how procedures are conducted reliably and effectively.

It is worth noting that criticism expressed in this context rarely refers to the work of AQAS, but rather to the new legislation concerning the system and the requirements of the MRVO. Universities mainly criticise the noticeable prolongation of the procedures and the decision-making process at GAC, which – according to the feedback of a few representatives – is not always consistent in decisions taking based on uniform principles.

7.6.4 Accountability and transparency

AQAS is subject to both internal and external accountability:

The AQAS Office is accountable internally to the Agency's bodies, including the Management Board. In view of this, the agenda item "Report of the Management" is an integral part of meetings of the Management Board, the Standing Commission, and the General Assembly. The Management Board is in turn accountable to the members of AQAS e.V. The Management Board reports to them annually in the General Assembly.

For information on accountability to the German authorities (Tax Office), please see Chapter 7.5.1 Financial planning.

Transparency of the quality assurance procedures implemented by AQAS is especially ensured by the following individual measures:

- For both areas of activities, information on the procedure for appeals and complaints and contact details

can be found on the website of AQAS.

- Concerning national assessment procedures, AQAS provides all key information on its website as well as links to other websites that may be relevant for universities. These include links to the website of GAC and to the national decrees (KMK) that essentially determine the criteria and the course of procedures. The AQAS website also provides information on the course of assessment procedures at the Agency; information on special study programmes (such as teacher training programmes and joint programmes);
- In the case of international procedures where the decision falls within its area of responsibility, the SC adopts the following documents, which are published in the relevant information material on the procedure as well as on the AQAS website:
 - General information on the procedures
 - Sequence of the procedures
 - Assessment criteria that reflect the content of the ESG

In preparation of the procedure, the AQAS Office draws up the following documents:

- A cost estimate (including a detailed description of the services provided and a timeline)
- A contract
- Guidelines for drafting the SER and additional handouts

For each procedure, a consultant is designated early on as the responsible contact person; this is announced to the university. Larger projects, whether national or international, are always overseen by a minimum of two consultants. The consultants responsible provide the university with feedback on the status of the procedure at each defined stage so that transparency of the process is given. Each assessment and accreditation procedure is submitted to the SC at the initialisation stage. In national procedures, this occurs in the context of approving the formal report. In international procedures, provision is made for an official opening of the procedure in which the SC usually also nominates the panel of experts. The universities are informed of the result in writing. In international procedures, the SC also takes the final decision on international programme and institutional accreditation.

Experts' reports on all assessment procedures completed by the Agency are published on the [AQAS website](#). In this way, the Agency can also inform the interested public.

AQAS aims to inform its member universities and the interested public about current developments at AQAS and in national and international accreditation systems. The central information medium is the AQAS website; however, social media ("LinkedIn") has also been used increasingly in recent years to provide information about the Agency's activities.

7.6.5 Professionalism and integrity

The professionalism and integrity of all stakeholders involved with procedures is ensured as follows:

Consultants

Consultants at AQAS are recruited and trained in accordance with the requirements described in Annexes II.2.6 and II.2.7. Their professional suitability takes centre stage in this process. As a matter of principle, consultants are not deployed to conduct procedures at universities where they studied and/or obtained a doctorate and/or were employed. Consultants regularly reflect on their role (e.g. during the annual in-house retreat); they have also put their "self-conception" into writing which reflects their professional self-awareness (see Annex II.2.9).

Commissions

When selecting members for the Standing Commission, AQAS strives to recruit renowned experts with previous experience in learning and teaching and an obvious interest in quality assurance. The same applies for representatives of professional practice. Student representatives are usually put forward by the Student Accreditation Pool and have usually gained practical experiences in assessments/accreditation beforehand. The Management Board appoints the members of the commission. The SC has defined its own rules of procedures ("*Geschäftsordnung*"). The AQAS Office informs the SC about current developments and decisions within the accreditation system.

Experts

Experts are nominated and appointed in accordance with the resolution of the SC, considering the relevant requirements of HRK or ECA, respectively. The involvement of students in procedures is expressly prescribed; they are consistently included in national and international procedures. All status groups are treated equally in procedures, i.e. academics, representatives of professional practice, and students have the same rights and obligations to participate in the procedure.

All experts sign a declaration confirming their willingness to participate and their impartiality with regard to the relevant procedure (see Annexes I.2.b.2, I.2.c.2 and I.2.d.9). To prepare for national programme accreditation, experts receive a written handout on expert activities as well as additional information on the procedure (especially on the requirements of the MRVO) (see Annex I.2.b.4). In addition, for each procedure a preparatory meeting of the panel of experts takes place.

Due to the complexity of the procedure, each panel of experts for system accreditation is briefed in a specific preparatory workshop, which is conducted by the respective consultants before they receive the university's documentation. Before each site visit, the panel of experts usually meets for half a day to discuss the criteria with regard to the specific procedure and to record the key points of discussion. The result is made available to the panel of experts in writing in the form of a questions catalogue for the site visit.

The preparation of experts in international procedures is conducted in line with the national procedures. A declaration confirming their willingness to participate and their impartiality has to be signed by all experts. Experts receive a handout containing key information on their role and tasks and the criteria for accreditation. Experts with regional experience are included in all procedures and information on the higher education system is sent to the experts. A preparatory meeting of the panel of experts takes place for each individual procedure before the meetings with the representatives start. In the preparation meeting, the consultant presents key aspects of the AQAS procedure, the university's application is discussed among the panel, and a question list is drafted to prepare the discussion rounds properly.

In recent years, AQAS has offered thematic workshops, e.g. on the European Approach, in which university staff and experts participated (see Annex II.3.7).

7.6.6 Compliance with formal requirements (MRVO/ESG)

Besides its core task of supporting the development of the quality of learning and teaching, AQAS has the remit to check compliance with formal criteria in all external quality assurance procedures. In Germany, these are legally imposed by the Interstate Study Accreditation Treaty and the MRVO; at European level, the ESG form the basis for assessment procedures. AQAS ensures compliance with these external requirements by different measures:

- The AQAS Office informs universities of the criteria and requirements that are relevant to the procedure in question. This takes place in personal discussions and through the AQAS website. In international procedures, AQAS has developed its own criteria based on the ESG. AQAS provides universities with guidelines and/or work aids addressing the relevant criteria and requirements to help them prepare their SERs. The AQAS Office checks all SERs for compliance with the formal requirements and lets the university know if anything is missing in the documents.
- AQAS informs the panel of experts about the criteria and requirements underlying the relevant procedure; these must be observed. In its guidelines for experts, AQAS has developed key questions (national procedures) or potential indicators (international procedures) that draw on the relevant criteria. These are intended to provide guidance to experts in preparing their assessments. In this way, the AQAS Office ensures that experts' reports are complete, i.e. that assessments have been made on all criteria.
- The AQAS Office regularly informs the members of the Standing Commission about current changes in national requirements and of the resolutions of GAC and/or the latest discussions and developments at European level. The AQAS Office also prepares documents for the SC, taking the relevant requirements into account. The commission considers the relevant requirements in its decisions. In national procedures, this is particularly relevant when approving reports on the formal criteria.

The criteria applicable to national accreditation procedures are set out in the MRVO. To demonstrate that the MRVO reflects the ESG in terms of content, GAC compared the two regulations in July 2018 and made the results available to all agencies. In May 2026, the GAC provided an updated version that refers to the revised version of the MRVO (see Annex II.3.1).

The AQAS criteria applicable to international accreditation procedures are closely modelled on the ESG 2015. In addition, procedures according to the European Approach use the criteria ratified by the EHEA Ministers.

7.7 Cyclical external review of agencies (ESG 3.7)

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

Since the foundation of AQAS, the Agency has been externally reviewed on a regular basis. In accordance with the second sentence of Article 3(2) and Article 5(3) No. 5 of the Interstate Study Accreditation Treaty, AQAS must undergo an external review at regular five-year intervals. Previously, reaccreditation was conducted in the context of an agreement between GAC and ENQA, which enabled the ENQA membership to be renewed based on the review report and decision of GAC (see Annexes I.4). This decision was also taken as a basis for EQAR registration. This agreement was terminated following the change of the German accreditation system in 2018. The authorisation of agencies by GAC is subject to their EQAR registration since then.

To undergo an external review by ENQA is considered to be supportive by AQAS. How AQAS addressed the recommendations given during the past review is described in detail in Chapter 7. While AQAS implemented several recommendations given in this review, the Agency was also confronted with changes in the post-pandemic period as returning to on-site visits while keeping the option for hybrid meetings caused staff-turnover due to the high load of travelling, new universities that approached AQAS and required accreditation, the development of new documents for EA and the need to react on AI. Compared to the implantation phase of the German accreditation system, nowadays continuous and fast changes challenge the work of a small or medium-size agency. AQAS considered the progress visit carried out by ENQA to be helpful because it forced us to deal with a very focused format of an external visit. We would consider it to be helpful for our Agency, if the progress visit and the five-years review by ENQA could be better interlinked.

8. Compliance with European Standards and Guidelines (Part 2)

8.1 Consideration of internal quality assurance (ESG 2.1)

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

8.1.1 Procedures in Germany

In the restructuring of the German accreditation system, the ESG were incorporated at various levels, as already mentioned before. The fact that registration with EQAR (and the associated implementation of the ESG) was defined in the Interstate Study Accreditation Treaty as a prerequisite for an agency to operate in Germany is already a clear indication of the importance of the ESG in Germany. Considering this, the KMK also emphasises in the explanatory memorandum to the MRVO that the provisions are based, among other things, on the ESG. Additionally, GAC provided a mapping grid presenting how the criteria of the MRVO in all types of procedures correspond to the standards of Part 1 of the ESG (see Annex II.3.1).

8.1.2 International procedures

International accreditation procedures are not bound to GAC requirements but are solely based on the current version of the ESG. The corresponding mapping grid is provided in Annex II.3.8.

8.1.2.1 Programme accreditation international

The procedures are based on criteria catalogues (“International programme accreditation”, “International PhD programmes”, “International institutional procedures” and “Accreditation procedures following the European Approach”) that have been approved by the SC. AQAS revised the criteria and indicators in 2019, but this was not a major revision, just the wording was adapted where needed. A major revision of our set of criteria is planned for the time when the new ESG 2027 are agreed upon by the Bologna Follow Up Group. In 2023, the AQAS Guidelines for Preparing the SER for Programme Accreditation were revised because we noted that some of the formulations were misunderstood by the universities. Moreover, we gave additional information on the process and the form of the documents AQAS expects to be provided.

Thanks to the active participation of AQAS in the context of its ENQA membership, the Agency can respond quickly to current discussions and implement changes easily. The criteria used by AQAS include a direct reference to ESG Part I (see Annexes I.2.d–f.).

8.1.2.2 Institutional accreditation international

In analogy to the international procedures described above, AQAS has adopted a criteria catalogue for institutional procedures that is closely aligned with the ESG. In contrast to the programme accreditation procedures described above, institutional accreditation procedures focus on universities’ QA systems (which is in line with the approach practiced in Germany). While enhancing its instruments, one of the aspects discussed by the internal working group was the extent to which these complex systemic assessments can be designed so that experts can conduct an evidence-based assessment of the effectiveness of the QA system. As a result, AQAS decided to integrate “programme samples” (as used in German system accreditations in a similar way) into procedures abroad. To this end, the university must briefly present at least one programme. These “programme samples” therefore help to show how the relevant university’s QA system supports the quality of teaching, learning and assessment on programme level. Alternatively, an institutional accreditation procedure can also be combined with programme accreditation in order to create synergies and document evidence.

8.1.2.3 European Approach

Procedures based on the European Approach are carried out with or without the involvement of German universities. AQAS uses the same criteria catalogue in both cases which was developed in close alignment with the EA/ESG. As a participating agency in pilot projects for the European Approach (e.g. “ImpEA”), AQAS was able to successfully assist in the design of criteria and the implementation of the first procedures. Since the introduction of the European Approach, AQAS has conducted 22 European Approach procedures, making the Agency one of the most experienced agencies in this field.

Based on tools developed during the ImpEA project and on our own experiences with the procedures, AQAS developed guidelines for consortia (see Annex I.2.f.2) to support them in the review process in 2026.

The experiences with the EA procedures were positive on an overall level and are reflected in Annex II.3.5.

8.2 Designing methodologies fit for purpose (ESG 2.2)

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

8.2.1 Objectives of procedures

General remarks

The objective of AQAS e.V. is set out in the preamble of the Agency’s Articles of Association, where it is also defined as the purpose of the association.

Within the Agency, the objectives of quality assurance are defined, among other things, in the AQAS Mission Statement, which was adopted by the Management Board on 7 July 2007 and updated on 18 March 2021,

considering the input from the AQAS staff and the board.

Assessment procedures should not only promote the diversity of study programmes but also ensure a high level of quality of teaching and learning. As laid down in the Mission Statement, these procedures should contribute to the international comparability and recognition of study programmes and degrees, providing guidance for university applicants.

In these programme accreditation procedures, panels of experts check the implementation of a study programme's qualification goals and learning outcomes in particular and assess if the concept is coherent in terms of subject matter, content, and academic feasibility, as well as the labour market orientation. The procedures are applicable to all types of HEIs. In this way, AQAS seeks to promote the enhancement of higher education and contribute to the development of quality.

In the case of assessments in preparation for system accreditation in national procedures and institutional accreditation in international procedures, the university's responsibility for the area of learning and teaching is given greater emphasis. In Germany, universities that wish to become system-accredited are given the opportunity to demonstrate that their internal quality assurance system is capable of ensuring the same level of quality as external programme accreditation.

The Articles of the Associates describe that AQAS "defines itself as an institution supported by Higher Education Institutions and academic societies that devotes itself to the quality assurance and development of study and teaching at Higher Education Institutions. The assessment and accreditation of study programmes promotes the diversity and quality of the programmes offered, contributes to international comparability and recognition, and creates transparency for study applicants."

Till today the purpose of the association is to promote education. The activities of the association are aimed at securing high education quality in the EHEA and promoting international recognition of the final degrees, taking the national and international specifications into account. Selecting a university that is suitable for them and a study programme is made easier for the students particularly through the publication of the results.

8.2.1.1 National procedures

The basic procedures of external quality assurance in Germany have been refined and tested in many ways over the past 25 years, so that there should be little doubt about the fundamental fitness for purpose of external quality assurance. The Federal Constitutional Court confirmed the conformity of external quality assurance through accreditation with the Constitution in its decision of 17 February 2016 (see Chapter 4). The decision explicitly states that quality assurance for academic teaching need not be limited to scientific and technical criteria but may also be used to assess the organisation of study programmes, academic requirements, and academic success. However, it also called for a revision of the legal basis. In Germany, the *Länder* are responsible for higher education institutions, for that reason they met this request by elaborating the so-called Interstate Study Accreditation Treaty, which came into force on 1 January 2018. In order to enable national comparability, the states agreed on a Specimen Decree (MRVO) which serves as a basis for the individual state decrees though the of 21 November 2024 was by now not implemented in all *Länder* (see Chapter 3).

According to the Interstate Treaty, the HRK developed a procedure for the appointment of experts in accreditation procedures, to which all agencies are bound. The HRK adopted the relevant guidelines on the nomination of professors for review panels which also define criteria for selecting the experts in 2018. Stakeholder participation is an important issue for Germany and has always been for AQAS since the Agency was founded (see Chapter 7, ESG 3.1).

For many years, AQAS has also maintained trusting relationships not only with higher education organisations (e.g. the HRK, Faculty conference (*Fakultätentage*), DAAD), but also with business-related associations, foundations and consultancies (e.g. German Chambers of Industry and Commerce (*Deutsche Industrie- und Handelskammer, DIHK*), Chamber of Industry and Commerce (*Industrie- und Handelskammer, IHK*), Donor's Association (*Stifterverband*)). Furthermore, AQAS cooperates with the Student Accreditation Pool, a self-organised body for gaining and training student experts. As such, there is exchange with stakeholder groups at

very different levels and their feedback concerning aspects such as dual study programmes, joint programmes, and system accreditation is usually incorporated into our procedures. As already mentioned, the feedback from experts and HEIs in the ZEM surveys is also important for the continuous reflection of our work.

The approval of the formal report by the SC is a special feature of the design of national procedures by AQAS. According to the MRVO, the formal report is drawn up by the Agency. However, AQAS does not want to leave the task of making a proposal to determine compliance with the formal criteria to individual consultants. Instead, this task was assigned to the SC to ensure that this step is science-based and involves all stakeholders. This applies equally to programme and system accreditation procedures.

All AQAS procedures are designed to be very feedback-intensive to achieve full transparency. Universities receive feedback at all key stages of the procedure. Furthermore, AQAS attaches importance to ensuring a continuous flow of information by appointing dedicated contact persons within the Agency for each university and procedure.

Programme accreditation in Germany

The subject matter of programme accreditation in Germany are bachelor's and master's programmes offered by state or state-recognised universities. Within the procedure, a review is undertaken of the appropriateness of a study programme's qualification goals and the competences expressed therein, as well as their implementation in a coherent study programme concept and the subject-content organisation of the study programme, the resources, the organisation of studies and examinations, and the university's internal procedures for ensuring academic success as well as procedures regarding gender equality, diversity and the compensation of disadvantages.

When study programmes are assessed in reaccreditation procedures, the university is requested to demonstrate in the SER whether the study programme concept has proven to be viable and academically feasible, and which measures the university has taken, based on the data and results of internal QA processes, in response to potential problems. This self-evaluation by the university makes it easier for the panel of experts to assess whether the university's internal quality assurance system has proven effective. To present the evidence, the university must provide certain data that GAC requires. All criteria of the MRVO must be checked in reaccreditation procedures again. AQAS aims to focus on the question of how the study programme has evolved since its initial accreditation. For this reason, data on student and graduate numbers and other aspects concerning academic feasibility (e.g. workload surveys) play an important role. AQAS is aware that study programmes are caught between the requirements imposed by various stakeholders. It is therefore important that the HEIs have addressed the results of internal QA, as well as the feedback from their stakeholders, and that possible conclusions are discussed and substantiated decisions are taken to incorporate results into the enhancement of the study programme. In addition to the criteria, this should be the starting point for the expert evaluation.

When conducting assessments, AQAS endeavours to meet the needs of individual universities by structuring each procedure individually. In the preparation phase for programme accreditation, efficient project design is achieved thanks to the option of clustering study programmes. This creates synergy effects not only for the university, but also for the panel of experts that conducts the assessment and for the AQAS Office.

In Germany it is common practice, e.g. in teachers' education, to study more than one subject. In case of these so called "combinatorial study programmes", in which students can select their study field from a wider range of subjects (= sub-study programmes), GAC makes a separate accreditation decision for each combinatorial study programme and for all sub-study programmes. GAC expects the agencies to address each of them in the accreditation report and to assess whether all criteria have been met by all of them. To ensure that all elements are assessed appropriately, the sub-programmes are usually assessed in clusters. AQAS decided to reduce the complexity of these projects by starting these projects with a so-called 'model observation', in which only specific elements of the combinatorial programmes are evaluated before the assessment of the clusters starts. This model observation analyses the basic structure and interdisciplinary aspects of the combinatorial study programmes in particular (e.g. university-wide facilities for advising and supporting students, measures to enable time overlap-free studies, or university-wide quality assurance measures). To ensure consistency in the assessment across the different clusters of the combined study programme, all panel of experts will be informed of the key findings of the model observation when assessing the clusters.

System accreditation in Germany

In the context of system accreditation, German universities can demonstrate that their internal quality assurance system is capable of ensuring the same quality of their study programmes as external programme accreditation.

The subject matter of an assessment in preparation for system accreditation consequently is a university's quality assurance system in the area of learning and teaching (see Figure 7). The procedure involves examining whether the university has implemented a QA cycle which is closed, which systematically ensures compliance with the relevant criteria, and regularly reviews the programmes. Following successful system accreditation, the university is granted the right to dispense with external programme accreditation, and to internally accredit its own study programmes. AQAS thus assumes that system accreditation is an interesting alternative to programme accreditation, particularly for universities that pursue a more quality-oriented management regarding their overall management concept. System accreditation may also help enhance the processes related to the quality of learning and teaching.

8.2.1.2 International procedures

At international level, AQAS offers procedures for programme accreditation as well as procedures with a focus on institutional accreditation. While the focus of programme accreditation is on each respective study programme, institutional accreditation procedures abroad focus on the effectiveness of an institution's quality assurance system in accordance with the ESG criteria. Since the areas of research and governance are not explicitly the subject matter of the procedure, they are only addressed if there are direct overlaps with the processes of learning and teaching. The accreditation period for all international accreditation procedures is six years.

Programme accreditation international

The subject matter of international programme accreditation procedures are bachelor's, master's, and PhD programmes offered by state and state-recognised universities outside Germany. The procedures use the AQAS criteria so that the appropriateness of the learning outcomes of the relevant study programme and the competences expressed therein, as well as the concept and the suitability of the study programme, the resources, the organisation and the universities' quality assurance concepts for the achievement of these goals are checked. The procedures are designed so that the criteria are regarded as the benchmark, while also taking the goals set by the universities themselves into account.

The most common type of procedure at international level is initial programme accreditation (with a growing number of reaccreditation procedures). Usually, the study programmes have already been running at the university for several years. Initial accreditation focuses on study programmes that have never undergone international accreditation by AQAS before, but they might have undergone a national accreditation. The procedures also include evaluating the effectiveness of the internal quality assurance system. In their applications, universities must therefore explicitly address how the QA system works at programme level, whether the study programme's concept has proven to be viable and academically feasible, how student figures have developed over the past few years, and which measures the universities have taken, based on the data and results of internal QA processes, in response to potential problems. Due to the stakeholder principle and the representative of professional practice in the panel, the aspect of employability is of importance, and discussions with graduates can be used to determine whether the study programme is able to achieve its qualification goals.

Although international reaccreditation involves using the same criteria catalogues as in initial accreditation, there is an increased focus on student data from past years. In addition, evidence must be provided on the functioning of the internal QA system. The university is also asked to show to what extent the study programme has developed since the last accreditation and how any possible recommendations have been addressed.

Institutional accreditation international

Institutional accreditation procedures abroad involve assessing the internal QA systems of universities. In these procedures, universities can demonstrate the capability of their internal QA systems to ensure the quality of study programmes and their compliance with the ESG. Consequently, these procedures involve reviewing whether the university has a closed QA system that checks the university's internal procedures for assessing the quality of its study programmes. Based on its previous experience of such procedures, AQAS introduced

an approach whereby the QA system is to be reviewed on the basis of a “programme sample” (see Chapter 8.1.3). The aim of this is to provide the panel of experts with “a kind of case study” that can be used as an example to review the effectiveness of the relevant university’s mechanisms. Several universities decide to carry out an institutional accreditation and a programme accreditation for one or two programmes in parallel, so that these can serve as a ‘case study’. In both procedures, however, separate experts’ reports are prepared based on the procedure-specific criteria and separate accreditation decisions are taken.

European Approach

The subject matter of procedures based on the European Approach are bachelor’s and master’s programme offered by state and state-recognised universities both in Germany and abroad. The criteria used are those of the European Approach introduced in the 2015 Yerevan Communiqué. Emphasis is put on factors such as the issue of “eligibility”, considering the status of the participating universities, joint implementation, and the cooperation agreement (see Chapter 8.1.4 for details).

8.2.2 Calculation, conclusion of contracts, billing

As a non-profit organisation, AQAS e.V. is not permitted to make a profit. Even so, AQAS is an organisation under private law that must finance itself, requiring it to act as a business and calculate break-even costs. AQAS charges flat fees to minimise administrative costs. These fees were empirically tested using sample project time recording and were found to be realistic in the past.

It must be acknowledged that it is becoming increasingly challenging to cover costs while remaining competitive in a highly competitive market. On the one hand, the growing number of system accreditation procedures reduces the number of programme accreditation procedures, our core business. On the other hand, the general costs continue to rise, not least due to inflation and high staff costs in Germany. This is leading to an unhealthy competitive situation in some cases, which is unfortunately often played out exclusively on the basis of price, as universities are also affected by intensive cost-cutting measures.

Programme accreditation in Germany

An individual procedure (in preparation for programme accreditation of a single study programme) currently costs around █████ at AQAS (with a discount for member universities). The fact that the prices quoted have not changed despite high inflation since the last review by ENQA underscores the above statements. These costs are broken down into a basic fee and a procedure fee. The basic fee covers the personnel and material costs incurred at the AQAS Office for the entire duration of the procedure; this fee is invoiced immediately after the conclusion of the contract. The procedure fee covers the costs of the site visit, including travel and accommodation as well as the reimbursement of expenses incurred by experts. The fee includes the costs for a panel of four experts, consisting of two academic experts, one representative of professional practice, and one student.

In addition, AQAS offers the assessment of study programmes in clusters. It is ensured that all study programmes in a cluster are covered by experts with relevant expertise, and that the panel of experts is composed in such a way that synergies are created, and the experts can make a group decision for all study programmes in the cluster. The following principles apply to the calculation of clusters:

For each cluster, the costs for the assessment of a study programme are first taken as a basis for the fee. A bachelor’s study programme and a consecutive master’s study programme are considered to be one study programme for calculation purposes. We set a fee for each additional study programme in the package, depending on structural overlaps between the programmes. A fee is charged for each additional expert involved in assessing a cluster of study programmes.

The university management signs the contract with AQAS which has been signed by the President of the Management Board and the managing director. The contract sets out the course of the procedure, the budget and the envisaged timeline. The basic fee is due immediately after signing the contract; the procedure fee is due once the accreditation report has been sent to the university. The university receives a separate invoice for each fee. Any additional, subsequent agreements with the university are also documented in writing.

System accreditation in Germany

In the public debate in Germany, it is often said that universities expect a reduction in costs and effort from system accreditation (compared to programme accreditation). And yet what is often overlooked is that, despite the procedure of assessing the entire university by the Agency appearing easier (and more cost-effective) compared to programme accreditation, effort is shifted from the Agency to the university. After all, following the university's successful system accreditation, it must organise the systematic review of its study programmes for compliance with the relevant criteria (including external evaluation with the involvement of all stakeholders) and their internal accreditation itself.

The costs for system accreditation cover an individual customised half-day online-workshop to prepare the panel of experts for the assessment of the QA system. The costs for the actual procedure comprise various fees. This enables the costs to be spread over the duration of the project, providing clear arrangements for the eventuality of the university's withdrawal from the contract and for the associated costs. The procedure is divided into three stages. Accordingly, the basic fee and the procedure fees are invoiced.

International procedures

International programme accreditation procedures are calculated based on similar principles as for national procedures. However, adjustments may have to be made, depending on the country and the effort involved in the procedure. This means that costs are calculated individually for each procedure, depending on the number of programmes in the cluster and the size of the expert panel and allowances as well as travel costs. The fixed costs incurred by the AQAS Office are covered by a basic fee, the procedure fee covers the costs associated with the site visit. The fees are due immediately after the conclusion of the contract (basic fee) and after the completion of the procedure (procedure fee). Due to the changes in the costs for travelling since the pandemic, travel costs are invoiced separately, based on the real costs for flights and accommodation. (European) agencies compete also at international level which leads to comparable problems for AQAS as mentioned above.

8.3 Implementing processes (ESG 2.3)

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include

- a self-assessment or equivalent;
- an external assessment normally including a site visit;
- a report resulting from the external assessment;
- a consistent follow-up

8.3.1 National accreditation procedures

All procedures in Germany follow the general 4-steps-principle of “self-evaluation report – peer review – experts’ report – decision”. In this context, the agencies are responsible for the first three steps, i.e. the implementation of the assessment procedure, whereas GAC is responsible for the final accreditation decision. This transfer of decision-making power from the agencies to GAC led to considerable change within the German accreditation system, and also to some disruptions in the beginning.

In all forms of accreditation, the Interstate Treaty differentiates between formal and academic criteria. It is the task of the agency to check the formal criteria of Part 2 of the MRVO (documented in a formal report). Herewith, the agencies are given an explicit mandate to check compliance, including the proposal for a decision (by GAC) on the compliance with the formal criteria. The formal report is sent to the university and made available to the panel of experts, which is then responsible for checking the academic criteria (Part 3 of the MRVO). Both documents are prepared based on forms provided by GAC; together, they make up the “accreditation report”. It is then submitted to GAC by the university for decision-making. This report has the character of an expert opinion.

A specific of the German accreditation system is that the MRVO includes the possibility of an optional “quality enhancement loop” before a final decision is taken. This additional step is intended to give universities “the opportunity to make improvements and address any issues raised in relation to the subject of accreditation

before the application is forwarded to the Accreditation Council" (GAC). The implementation of this additional procedural step must be clearly documented in the report (see explanatory memorandum to the MRVO).

Since accreditation decisions are administrative acts in the German accreditation system, it is the responsibility of GAC to decide which conditions for the accreditation may be imposed.

8.3.1.1 Programme accreditation in Germany

The following graphic shows the course of the procedure for programme accreditation at AQAS:



Figure 10: The course of assessment for programme accreditation

Preparation of the accreditation procedure

The course of programme accreditation procedures at AQAS follow the relevant provisions under the MRVO. There is little flexibility for German agencies to influence the process itself.

Universities usually request a cost estimate or put out a call for (public) tenders before awarding the contract. Depending on the type of procedure, the cost estimate containing information on the relevant criteria is sent, enabling universities to obtain information on the underlying criteria, the specifics relating to the type of procedure, and on AQAS as agency. After accepting the offer, AQAS concludes a contract with the university for the assessment procedure in preparation for programme accreditation by GAC (see Annex I.2.b.1).

It is possible to assess study programmes jointly ("clusters"). In accordance with the MRVO, the prerequisite for this is that the study programmes under assessment have a high affinity on subject level that goes beyond the mere affiliation to a disciplinary culture. According to the specifications of the MRVO, a AQAS cluster should consist of no more than ten study programmes. AQAS also attaches importance to keeping the number of study programmes manageable so that each can be explicitly discussed during the site visit. Clusters with more than four study programmes must be approved by GAC.

Self-evaluation

For the preparation of a SER by the university, AQAS provides a working aid (see Annex I.2.b.2). In the German accreditation system, GAC is exclusively entitled to interpretations that go beyond the requirements of the MRVO and the GAC template for experts' reports. For this reason, the structure of the AQAS working aid essentially follows the structure laid down for the experts' report; all relevant aspects in accordance with the MRVO are addressed using key terms and guiding questions.

A full application for accreditation comprises the following documents:

- self-evaluation report
- module descriptions/handbook
- study and examination regulations
- an example of the Diploma Supplement

The university is expected to document the study programme in its current form. In reaccreditation procedures

universities should focus on the development of the study programme and on certain data and key performance indicators on study success⁶ to enable an evidence-based assessment.

Preparation of the formal report

According to the provisions of the MRVO, the formal report must contain a proposal for determining compliance with the formal criteria (see Chapter 8.1.3). At AQAS, the Standing Commission is responsible for this to implement a science-led process. For each procedure, a member of the SC is nominated as rapporteur (a member of the commission who takes this role for the assessment procedure concerned). The AQAS Office informs the university about the result and, where applicable, about any need for clarification or additions. The university is given the opportunity to submit additional documents before the assessment continues.

Appointment and preparation of experts

As explained above, the experts are selected in accordance with the relevant HRK guidelines. The panel is confirmed by the SC: the rapporteur, the chair, a representative of professional practice, and a student representative. This ensures that all stakeholder groups are involved in the nomination and appointment of experts.

In the case of clusters, AQAS ensures that all study programmes are covered by experts from a relevant academic field. All participating experts confirm their impartiality. During an internal meeting of the panel of experts on the day before the site visit, the consultants explain the requirements and assessment process. The panel of experts also has the opportunity to discuss the university's SER in detail.

Site visit

In order to review the academic criteria, the panel of experts conducts a (one-day) site visit which is always accompanied by a consultant. In preparation, the experts receive the university's SER and are asked to send a short preliminary statement (see Annex I.2.b.5) to AQAS. This statement should address strengths and weaknesses as well as any outstanding issues or open questions. This is supposed to enable the experts to familiarise themselves with the documents at an early stage so that they can request additional information, but also to support the discussion process within the panel. The preliminary statement is sent to the university and the other members of the panel of experts for their information prior to the site visit. These preparatory measures enable everybody involved in the site visit to prepare adequately. For the preliminary statement, AQAS provides a template based on the MRVO academic criteria. Both formal and informal feedback from universities and experts regularly expresses the usefulness of this approach, given that it facilitates the targeted preparation of the site visit, enabling the relevant discussions to be held in a structured and criterion-oriented manner.

The preparatory meeting of the panel of experts on the day before the site visit serves to discuss the criteria underlying the procedure and the SER in detail, and to jointly develop interview guidelines, which the experts can use as a basis for their discussions with the university. During the site visit, discussions are held with all status groups, i.e. with the university management, departmental/faculty leaders, head of programme as well as with lecturers and students. Rooms and facilities that are relevant to the study programme are also visited.

The site visit ends with feedback from the panel of experts, in which they summarise their main impressions and provide information on potential shortcomings regarding meeting the criteria. The feedback is summarised briefly in writing (summary of results) and made available to the university after the site visit. On this basis, the university can decide whether it wishes to make use of the quality enhancement loop.

Preparation of the experts' report

The experts' report is drawn up jointly within the panel and the process is coordinated by the responsible consultant. The report is based on the structure specified by GAC, as described above. In their report, the experts make a proposal regarding the fulfilment of the academic criteria. If a criterion is considered not to be met, conditions are suggested. In addition, the experts can give recommendations. The university receives the re-

⁶ GAC provides concrete specifications regarding this: a template for the necessary data sheet for the query of key performance indicators can be downloaded from [GAC's website](#). An explanation of the calculation models is also provided there.

port for statement and may comment on it, to ensure that the report accurately reflects the current situation and the discussions that took place during the site visit.

Accreditation report

After completion of the experts' report, it is joined with the formal report to create the final accreditation report. The procedure is completed by the agency once the accreditation report has been sent to the university. The HEI can now apply to GAC for accreditation of the relevant study programme based on the accreditation report.

Follow-up

The accreditation decision and any associated imposition of conditions (including checking whether those conditions have been met or not) is the responsibility of GAC and happens at the very end of the accreditation process. By the Agency, the "quality enhancement loop" is offered as a follow-up process after the site visit: following the site visit, the university is given the opportunity to address the areas for improvement identified in the summary of results and to submit, within three months, documentation giving evidence on the implementation of the relevant improvement measures. This documentation is made available to the panel of experts and taken into account when the assessment report is drawn up.

AQAS perceives this as an opportunity: in our experience, the possibility for universities to adjust their study programmes and the relevant documents, such as module descriptions and examination regulations, after the site visit has a positive effect on the ownership of the procedure, and consequently on the quality of study programmes. The advantage is that improvements deemed appropriate by the university are made voluntarily and open-minded and do not have to be achieved by imposing conditions. However, this also changes the role of AQAS from a decision-making body to a facilitator that assists the university in making improvements. The procedure also means more work for the AQAS Office and a longer procedure for all those involved. In these cases, the procedures require twelve months from the formal report to the submission of the final accreditation report with which accreditation can be applied for at GAC. Experience shows that, after submission of the application, it may well take up to another year before GAC makes a decision.

Experience

Exemplary lessons learned in the past years about programme accreditation can be found in Annex II.3.3.

8.3.1.2 PhD programme accreditation in Germany

The assessment of PhD programmes is based on the provisions for the doctoral level set out in the 'Qualifications Framework for German Higher Education Qualifications'. The experts examine whether the programme meets the requirements specified therein. The report addresses the aspects of objectives, curriculum, manageability, resources, and quality assurance. On this basis, the SC decides on accreditation. The decisive factor is whether the programme meets the requirements of the 'Qualifications Framework for German Higher Education Qualifications' in its currently valid version.

Over the past five years, AQAS has made two accreditation decisions regarding PhD programmes (both at the University of Osnabrück in 2021, following consultation between the university and the relevant ministry). In each case, the assessment was carried out as part of a larger cluster of bachelor's and master's programmes for programme accreditation. The procedure was agreed upon with the university: whilst an accreditation report based on GAC's template was drawn up for the other study programmes in the cluster – and GAC made the accreditation decision for these – a brief assessment was prepared for each PhD programme, focusing primarily on compliance with the requirements of the 'Qualifications Framework for German Higher Education Qualifications' and, in other respects, refers to the cross-programme aspects of the assessment of the cluster. On this basis, the SC made the accreditation decision.

As the figures above show, there is nearly no demand for the accreditation of PhD programmes in Germany. Nevertheless, AQAS has included these procedures in its Terms of Reference so that it can continue to offer this service to higher education institutions should they wish to avail of it.

8.3.1.3 System accreditation in Germany

The graphic below shows the course of the system accreditation procedure at AQAS:

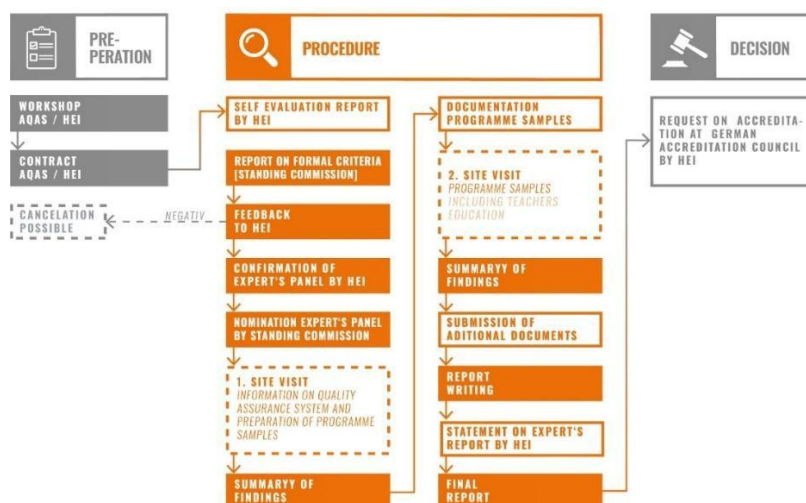


Figure 11: Course of the assessment for system accreditation

Preparation of the accreditation procedure

The course of the system assessment procedure at AQAS follows the relevant rules set out in the MVRO. In the following, the procedure is described without considering teacher training programmes.⁷ In a first step, AQAS holds an information meeting with representatives of the interested university and tells them about the objectives and course of the procedure as well as the criteria. If the university decides to go ahead with the procedure, AQAS concludes a contract with the university in question (see Annex I.2.c.1). The relevant cost calculation and a time schedule are always an integral part of the contract.

Assessment by AQAS

To clearly define the due dates for each payment and the university's option of withdrawing from the contract, AQAS defines a total of three stages within the assessment process:

- (1) **Stage I – informative site visit:**
The first stage of the procedure begins after the conclusion of the contract. It includes the preparation of the formal report, the nomination of the experts by the SC, the first site visit, and the preparation of a summary of results containing the main findings of the first site visit.
- (2) **Stage II – programme sample:**
The second stage of the procedure involves the preparation and implementation of the second site visit (programme sample). It starts with the submission of the summary of results for the first site visit and ends with the submission of the summary of results for the second site visit.
- (3) **Stage III – preparation of report:**
The third stage of the procedure involves the coordination and preparation of the experts' report for system accreditation and preparation of the final accreditation report. It starts after the second site visit and ends with the submission of the accreditation report to the university.

At AQAS, assessments for system accreditation are always overseen jointly by two consultants from the AQAS Office.

⁷ If a university also offers teacher training programmes, Section 31(3) MRVO requires that one study programme from every type of teacher training programme offered (meaning for different types of schools and levels (primary/secondary) of education) is included in the programme sample. AQAS implements this requirement by ensuring that the panel of experts scrutinises the underlying "model" of teacher training and how it is fleshed out taking the example of several teaching subjects. The focus lies on the integration of teacher training in the relevant university's internal QA system.

Preparation of the formal report

In analogy to programme assessment, a distinction is also made between formal and academic criteria. However, the only formal criterion for first-time system accreditation is that proof must be provided at the time of application that at least one study programme underwent an internal assessment using the university's internal QA system (Section 23 (1) No. 3 MRVO) or, in the case of procedures for system reaccreditation, proof must be provided that all bachelor's and master's study programmes went through the internal QA system at least once (Section 23 (1) No. 4 MRVO). At AQAS, the determination of compliance with this formal criterion is made by the Standing Commission, which approves the formal report.

Appointment and preparation of experts

The experts involved in an assessment for system accreditation are selected in accordance with the relevant HRK guidelines. The criteria for selecting experts presented there stipulate, among other things, that academics in the panel of experts must "have already participated in accreditation procedures (experts with experience in system accreditation and newcomers to this type of accreditation)". AQAS can draw on an extensive pool of experts who have expertise in system accreditation. All participating experts confirm their impartiality in a written declaration and undertake to treat all documents made available in the procedure as confidential.

The university's self-evaluation report

The basis of the assessment procedure is the university's SER, plus annexes, demonstrating the binding nature and the individual steps/processes of the internal QA system (e.g. evaluation regulations, process descriptions, QA manual, framework regulations, internal checklists, templates for internal accreditation etc.). The university may therefore submit documents that, due to the existing internal reporting system, are available as part of the internal QA process anyway.

According to Section 24 (2) MRVO, the SER must contain information on at least the university's quality goals and on the formal and academic criteria of system accreditation. AQAS asks universities to use GAC's structure for system accreditation reports as a template when creating their SER. Also, a guideline is available for the preparation of the SER. In analogy to programme assessments, experts in system assessment procedures are also asked to provide a short written preliminary statement before both site visits.

Assessment

The main aim of the first site visit is to check whether the university's internal QA system is fundamentally appropriate to meet the criteria for system accreditation, i.e. whether all essential elements are embedded in the system. Additionally, it is an opportunity for experts to ask key questions for a better understanding of the basic structure of this QA system (broad overview). This should enable them to identify deficits at an early stage and provide advice accordingly, so that the university can use the time between site visits (usually between 6 and 12 months) to make the adjustments, if necessary. In our experience, any shortcomings in terms of meeting the criteria can usually be remedied at this stage. For this reason, AQAS provides room for discussions with all status groups even during the first site visit, i.e. with the university management and diversity management staff, QA officers and the administration, representatives of departments, and student representatives.

The key findings of the first site visit are summarised in a short report which also includes information on which samples the panel of experts has chosen to be evaluated in the next visit and, if applicable, specifications and agreements regarding the documentation of samples. The report is made available to the university.

During the second site visit, the panel of experts reviews the comprehensive application of the QA system within the university, based on programme samples. According to Section 31 MRVO, the subject matter of random sampling is, on the one hand, the consideration of the formal and academic criteria for study programmes within the QA system as determined by the panel of experts. On the other hand, it includes a check of the implementation of the internal review mechanisms, including all criteria, taking the programme that went through the university's QA system as a sample. The specific selection of the "features" to be considered in the sample is left to the panel of experts, enabling them to respond to the individual situation of the university.

The documentation of the sample depends on the design of the university's QA system and is therefore customised accordingly. The course of the second site visit also depends on this. It is devised individually in each system assessment procedure, considering the experts' requirements with regard to content and time frame.

The first site visit includes spending 1.5 days at the university; the second site visit lasts 1.5–2 days of discussions.

Quality enhancement

After the second site visit, a "quality enhancement loop" may be applied, if required by the university. The university can rectify any shortcomings identified by the panel, before the experts' report is finalized. The procedure is the same as in programme assessments, as described above.

It is also possible to remedy shortcomings in system accreditation in the period between the two site visits. In our experience, universities generally like to take up the experts' advice from the first site visit, with the result that many aspects that appeared problematic during the first site visit have already been addressed by the time the panel of experts conducts its second site visit.

Preparation of the experts' report

The experts' report is created collaboratively, following the structure set by GAC. In their report, the experts assess whether the university's QA system meets the academic criteria of the MRVO for system accreditation and is therefore suitable for ensuring the quality of study programmes. If shortcomings are identified, it must be determined whether the cause of the quality deficiencies is of systemic nature or whether the university's QA system is not responsible for the deficiencies. If a criterion is considered to have not been met or only partially met, conditions are proposed accordingly by the panel of experts. In addition, the experts can make recommendations for further improvement. The university receives the experts' report and has the opportunity to comment on it; where applicable, these comments are then forwarded to the experts.

Accreditation report

After completion of the experts' report, it is combined with the formal report for the accreditation report. The procedure is completed once the accreditation report has been sent to the university that can then apply to GAC for system accreditation.

Follow-up

The general remarks above on the follow-up and enhancement process for programme assessment apply accordingly.

Experience

Exemplary lessons learned in the past years about system accreditation can be found in Annex II.3.4.

8.3.1.4 Alternative Procedures

In these procedures the subject of the accreditation is the HEI's own alternative procedure, e.g. an internal review process at departmental level rather than at programme level. The higher education institution must demonstrate that, by means of the alternative procedure, it meets the formal and academic criteria set out in the MRVO and that the alternative procedure complies with the ESG. GAC has adopted corresponding [rules of procedure](#). The procedure is determined on a case-by-case basis for the relevant project: before an alternative procedure is carried out, approval must be obtained from the ministry of the respective federal state and from GAC. Furthermore, alternative procedures are always monitored by GAC.

Until today, only three alternative procedures in which AQAS was not involved have been completed in Germany. However, AQAS has experience with the so-called 'experimental clause', which was a pilot project under the previous legal framework and forms the basis for alternative procedures under the current legal framework.⁸

⁸ Together with Pforzheim University (HS PF), AQAS participated in the tender and was awarded a contract for the "Programme Accreditation in Faculty Review" project. The project was carried out from 2018 until 2020.

8.3.2 International procedures

The regular procedure at international level is programme accreditation. The number of procedures based on the European Approach has been increasing for several years. The number of institutional accreditations is still low; therefore, the process is only described to the extent to which it significantly differs from programme accreditation. Based on the Agency's experiences with cross-border quality assurance (CBQA), AQAS developed a Code of Conduct for CBQA jointly with ACQUIN (see Annex I.2.d.3) to demonstrate that AQAS follows some defined principles when working abroad which might distinguish our approach from other agencies.

All programme accreditation procedures can be divided into three stages: preparatory stage – assessment stage – decision-making including follow-up stage:



Figure 12: Course of the assessment for international procedures

Preparation of the accreditation procedure

Foreign universities usually request a quotation before placing a contract. This cost estimate is prepared for each procedure individually, based on the number of programmes to be reviewed, the options for clustering, and the number of experts needed. This quotation is sent together with general information on AQAS, the relevant criteria, and the sequence of the procedure (see Annexes I.2.d.2, I.2.d.3-4). All core documents for the process have been discussed and decided by the Standing Commission of AQAS. Once the quotation has been accepted, AQAS concludes a contract for the implementation of the accreditation procedure with the university in question (see Annex I.2.d.1).

Preliminary workshop

AQAS offers a preliminary workshop online (or upon request on site) to the HEIs, and emphasises the importance of having such a meeting, e.g. to get an overview over the process and the criteria and to be able to align expectations. The aim is to discuss the procedure with the HEIs, the criteria, and the approach taken by AQAS, so that the person in charge of conducting the procedure at the university feels well informed. Questions related to the content of study programmes are expressly not addressed at this stage, only formal questions regarding the preparation of the SER and organisational questions associated with the implementation of the procedure.

The university's self-evaluation report

Once the contract has been concluded, the university receives guidelines from AQAS to help them prepare the documents. A full application comprises a self-evaluation report and the following core annexes:

- Module/Course Handbook/Syllabi for all courses of the programme(s)
- Examination regulations
- Admission regulations
- Short CVs of teaching staff
- Certificates/transcript of records/diploma supplements for the programme(s)
- Data collection based on the QA policies, including course evaluations, labour market engagement, student progression

Since there may be aspects that are specific to certain countries, foreign universities should also explain the context of the country's higher education system in their SER, the university's position in the system, and national specifics such as the country's credit system.

Additional annexes which refer to specifics of the HEI, e.g. research policy, can also be submitted. This offers the chance to universities to present their individual profile to the panel of experts.

The consultant in charge of coordinating the procedure checks the documents for completeness and lacking information and approaches the university with additional requirements, if needed.

Opening of the procedure

The SC opens all international procedures conducted by AQAS with a formal decision. This gives the commission the opportunity to get familiar with the university and its programmes, and to call for the improvement of the application where there are obvious shortcomings in the presentation (e.g. missing information or lack of clarity). For each procedure, a member of the SC is appointed to act as rapporteur. To support the work of the SC, the responsible consultant prepares an initial report which summarises core information of the SER. Procedures are opened once all application documents have been submitted. If a procedure is not opened, the AQAS Office notifies the university of the reasons; after revising its application, the university may resubmit. After the opening of a procedure, the university is informed of the SC's decision and feedback on shortcomings, if applicable.

Appointment of experts

At the time of submitting its SER, the university has the option of sending AQAS a proposal for the qualification profile of the panel of experts, with the aim of increasing the fit of the experts' field of knowledge and the content of the study programme. It is not permitted to state names of potential experts. During the opening of the procedure, the SC confirms the relevant qualification profile of the panel of experts, and where applicable, appoints the experts (see Chapter 7.3.2). In this way, all stakeholder groups are involved in the nomination of experts.

A panel of experts for a single programme always consists of two professors, one representative of professional practice, and one student. If AQAS clusters programmes, more experts are included accordingly. In the past almost 25 years, AQAS worked with approximately 3,000 experts. Therefore, the network covers experts from all disciplines and from the labour market. The student member of the panel is suggested by the Student Accreditation Pool. Moreover, the Agency is well connected with QA bodies and international organisations abroad, so we can also ask for support from our colleagues if experts from a certain region are needed.

The requested qualification of experts from academia is defined in the HRK guidelines and also applied at international level. They should:

- be actively involved in the “academic community” of their subject and therefore have professional expertise in the field of the study programme under review and, if possible, also in related subject areas;
- have experience in the development, organisation, implementation, and monitoring of study programmes;
- engage in the further development of university teaching;
- have experience with the type of higher education institution at which the programme is offered;
- may have already participated in accreditation procedures (experienced reviewers/newcomers are mixed).

The panel as a whole should reflect diversity (regional distribution, gender, etc.). Each panel member has to sign the agreement and declare their impartiality, before they are officially nominated by the SC.

The AQAS Office informs the university of the composition of the panel of experts and grants the university time to raise any reasoned objections.

Assessment

In preparation, the experts receive the application documents (SER and annexes) and are asked to send brief initial feedback in writing (preliminary statement) to the AQAS Office. The procedure here is similar to national programme assessment as described above.

During the site visit, which comprises between 2,5–4 days (depending on the number of programmes to be as-

sessed), discussions are held with the university management, department/faculty leaders and programme directors, as well as with lecturers, students/graduates, and labour market representatives for the relevant study programme. Rooms and facilities are also visited. AQAS attaches importance to allowing sufficient time so that issues can be discussed rather than just obtaining the relevant information. As a result, each discussion round may take up to 1.5 hours. These in-depth discussions often make it easier for the panel to raise awareness on the part of the university that changes should be made to the study programme. At the end of the site visit, universities are given brief verbal feedback, outlining strengths and weaknesses identified in the process.

Preparation of the experts' report

Following the site visit, the experts prepare a written experts' report containing a recommendation for accreditation, which serves as the basis for the SC's decision. The experts' report follows a structure specified by AQAS, which was determined by the SC. Once the experts' report has been written and confirmed by the panel, the AQAS Office forwards it to the university. The university is given the opportunity to comment on it.

Specific characteristics under the European Approach

AQAS gained experiences with the accreditation of joint programmes at an early stage, therefore, our agency is very much involved in the implementation of the European Approach. Procedures conducted under the European Approach always consider entire joint programmes. In 2025, AQAS developed additional information for universities and experts to support them in these international assessment process.

The steps of the process are similar to an international programme accreditation. The differences are that:

- more information is needed by the universities from the Agency in the application process,
- all consortium partners must be involved in the process from the beginning,
- agencies in the countries in which the universities are based must be informed by HEIs/AQAS,
- experts based in different countries must be selected,
- stakeholders from consortium partners must be involved (online), if the site visit is carried out in one country.

The external review will be based on a SER jointly submitted by the cooperating HEIs. The SER should contain comprehensive information that demonstrates the compliance of the whole programme with the ESG. In addition, it should contain necessary information about the respective national frameworks of the cooperating institutions that foreign agencies and experts might need in order to understand the context, especially the positioning of the programme within the national higher education systems. The SER should focus explicitly on the distinctive feature of the joint programme as a joint endeavour of HEIs from more than one national higher education system.

In line with the requirements of the EA, AQAS appoints a panel of at least four members, combining expertise in the relevant subject(s) or discipline(s), including the labour market, and expertise in quality assurance in higher education as well as the student perspective. Collectively, the panel should possess knowledge of the Higher Education systems of the institutions involved and the language(s) of instruction used. The panel includes members from at least two countries involved in the consortium.

The site visit should enable the review panel to discuss the joint programme based on the SER and assess whether the programme complies with the EA. The site visit therefore includes discussions with representatives of all cooperating institutions and in particular the management of the institutions and the programme, the staff, the students, and other relevant stakeholders, such as alumni and the professional field. Although the site visit should normally be restricted to one location, the provision at all locations is considered.

The review panel prepares a report that contains relevant evidence, analysis, and conclusions about the compliance with the standards of the EA. The conclusions and recommendations pay particular attention to the distinctive features of the joint programme. The institutions have the opportunity to comment on the experts' report and request correction of factual errors.

The SC will take a decision on the basis of the review report, considering the comments by the HEIs. The accreditation decision is valid for 6 years. During this period, AQAS must be informed about changes in the consortium offering the joint programme, or other major changes in the programme. When the SC decides on an

accreditation with conditions, the following steps, that are valid for all international procedures, are taken.

Decision

In all international procedures, the SC decides based on the experts' report and the recommendation for the decision made by the panel of experts, taking into account the university's comments, where applicable.

The SC has the following options for decision-making:

- a) Accreditation without the imposition of conditions
- b) Accreditation with the imposition of conditions
- c) Suspension of the procedure
- d) Denial of accreditation

The basis for the accreditation decision is the expert opinion as well as the statement of the HEI on the experts' report. In order to ensure the comparability of the decisions, each expert report usually follows the same structure. The consistency of the decisions of the SC is guaranteed by the long-lasting experience of its members. Based on this, the SC determined the Principles of Procedure & Rules of Decisional Practice (see Annex II.1.7).

The AQAS Office communicates the SC's decision to the university. The university then has four weeks to object to the decision or the imposition of conditions in writing. The basis for this is the complaints procedure (see Annex I.1.9). If no written objection is made, AQAS publishes the result of the accreditation procedure, the final report and the names of the members of the panel of experts on the website and in the European Database of External Quality Assurance Reports (DEQAR). These are also published in the case of negative decisions.⁹

Follow-up: (1) Notification and documentation of the fulfilment of conditions

If accreditation is granted with conditions, the university is required to implement the conditions and to document their implementation appropriately. The university usually has twelve months to inform AQAS on this. The university is asked to describe how the conditions have been implemented, and which changes have been made. Relevant documents (e.g. module guide, examination regulations, etc.) must be enclosed to provide evidence that the conditions have been implemented.

The implementation of conditions relating to more formal aspects (e.g. publication of information about a study programme on the internet) can be reviewed by the AQAS Office. Conditions relating to aspects of concept, or content, or staffing are reviewed by the panel of experts who comment on whether the conditions have been met or not.

After reviewing the documents, the SC reaches a final decision. After the decision, the university is informed of the result in writing. If additional submissions or further revisions are deemed necessary, because conditions have not been (fully) met, an additional deadline (usually of three months) may be granted by the SC. Once all conditions have successfully been met, this is noted in the published final report and on the accreditation certificate. If conditions are not fulfilled finally, the accreditation is withdrawn by the SC. Some of these cases have occurred in the past (see data above).

Follow-up: (2) Postponement of the procedure

The SC may postpone an accreditation procedure if the requirements for accreditation have not been met, but the university is likely to be able to remedy the shortcomings identified within 18 months. Before a postponement is decided, the university is given the opportunity to comment.

After 18 months at the latest, the university must apply for the procedure to be reopened, at the same time submitting revised application documents. If no request for reopening the procedure is made within the set period, AQAS reopens the procedure and denies accreditation.

If the university applies for the procedure to be resumed and submits revised application documents, these are

⁹ In this context, negative decisions are non-accreditations or programme that have not been accredited following the reconsideration of the procedure and the associated follow-up process.

sent to the experts with a request to review the extent to which the shortcomings have been rectified. If the panel considers it necessary, another site visit may be conducted digitally or on site (e.g. to revisit labs).

The panel of experts prepares a short report with their findings and with a recommendation for the decision, which the SC uses as a basis for its decision making, considering the comments by the university. At this point, the SC may decide to grant accreditation with or without conditions, or to finally deny accreditation. It is not possible to postpone the procedure a second time.

Specific characteristics of institutional accreditation

In its international institutional accreditation procedures, AQAS applies a methodology that is closely oriented towards the ESG and focused on the effectiveness of the institution's internal quality assurance system for teaching and learning. The procedure assesses whether the institution has established reliable structures, responsibilities, decision-making processes, and feedback mechanisms that enable it to assure and further develop the quality of its study programmes. In order to strengthen the institutional perspective, AQAS combines the institutional level with at least one selected programme sample, which allows the panel to examine how the internal quality assurance system works in practice and to what extent it contributes to the quality of learning and teaching. The selected programme sample also impacts the appointment of experts as AQAS assures that there is adequate competency for the sample in the group. This approach reflects the understanding that institutional quality assurance should not be assessed only at the level of formal policies and structures, but also through its demonstrable effects on the design, implementation, monitoring, and further development of programmes. The institutional procedure is therefore deliberately developmental in character: it is intended not only to confirm compliance with the relevant criteria, but also to provide institutions with external feedback that is useful for their further strategic and quality development.

AQAS continuously reflects on whether its methodology remains fit for purpose and sufficiently responsive to the evolving needs of higher education institutions. Already in the context of the last ENQA progress visit, AQAS undertook a refinement of the criteria and procedural materials to enhance coherence, clarity, and applicability of the methodology as part of the Agency's continuous internal quality development. The discussions during the progress visit further encouraged AQAS to enhance the institutional methodology, so in the previous year, AQAS conducted a pilot procedure to explore how elements of evaluating research could be meaningfully incorporated into an institutional review. The purpose of this pilot was not to shift the core profile of AQAS procedures away from teaching and learning, but to test whether a broader institutional perspective could better serve the specific needs and expectations of institutions, particularly where institutions seek external feedback on the interrelationship between teaching, research, institutional strategy, and quality assurance. The pilot therefore served as an exploratory instrument for methodological learning and provided initial insights into the opportunities and limitations of a broader assessment framework.

Based on encouraging impressions of this pilot, at present, AQAS initiated a process discussing with the Standing Commission on how the methodology and criteria for institutional procedures could be further developed. These discussions are part of the agency's continuous reflection on the adequacy and developmental value of its procedures. The core of the procedure will remain quality assurance in teaching and learning, fully in line with the ESG. Additional elements, such as selected aspects of research, innovation, institutional strategy, societal engagement, or knowledge transfer, may be considered in the future where they are relevant to the institutional profile and the purpose of the procedure. However, these reflections are still at an early stage. Any further development will require careful methodological consideration, clear criteria, appropriate expert profiles, and a transparent distinction between the ESG-based core of the procedure and any complementary elements that may be added to respond to institutional needs.

Experience

Exemplary lessons learned in the past years about system accreditation can be found in Annex II.3.5.

8.4 Peer-review experts (ESG 2.4)

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

8.4.1 Selection of experts

AQAS consistently follows the European principle of stakeholder involvement when appointing panels of experts. In all procedures conducted by AQAS, the panel comprises representatives of academia, professional practice, and students. Therefore, at least four members with different backgrounds are involved in each panel. In general, no specific roles and/or responsibilities are assigned within the panel. The only exception are system accreditation procedures in Germany, where the expert panel nominates a chair who acts as the main contact person for both the agency and the panel of experts during the long and complex procedure. AQAS generally takes care to ensure that the range of subjects is adequately represented by the panel. In cases of clusters, the panel comprises more members from the different disciplines.

In national procedures, the Agency must follow the HRK guidelines (see Annex I.2.a.3). The representatives of academia always have the majority in the panel. Procedures in Germany must follow the so-called “proportionality rule”. This means that, for large clusters requiring four or more representatives of academia, an additional representative of professional practice and a second student must be included in the panel of experts. As a result, in the case of large clusters of, which have been approved by GAC beforehand, very large panels of experts (with up to 13 members) must be appointed in some cases, making it difficult to run the site visit efficiently.

At the time of submitting their SER, all universities are given the opportunity to submit a profile for the panel of experts to ensure a better matching of expertise. If so, the profile is part of the initial report in international procedures. The SC examines the profile and takes a decision on it. In national procedures, it appoints the panel of experts in accordance with the aforementioned guidelines. In the case of system or international institutional accreditation, it is also ensured that experts have experience in higher education management, enabling them to assess the relevant universities using a systematic approach.

Thanks to almost 25 years of cooperation with experts from all disciplines, AQAS has been able to establish a very large pool with various areas of expertise (e.g. with experience in system accreditation, or with an international profile, or with specific knowledge of the region). More than 20 years back, the experts were suggested by the German academic societies of the different disciplines. This allowed us to build up the large network. Other experts were and are suggested by the SC which also uses its networks. Moreover, expert volunteer from time to time and send us their CVs. While searching for experts from the labour market might take slightly more effort, it works relatively well in Germany. We make use of our networks with universities of applied sciences (which have contact with the labour market via their research projects) or contact organisations like the chambers (IHKs), trade unions, or business organizations of the employers. AQAS takes care to ensure that experienced experts usually work together with newcomers, facilitating the transfer of experience.

Student experts are recruited via the German Student Accreditation Pool, which also trains them for the task. There is an agreement with the pool that three student experts will be proposed for each procedure; AQAS can then appoint members accordingly. Problems in the search for experts invariably arise when there are no students in the pool for certain subjects (e.g. students from universities of applied sciences or historians) and AQAS has to contact individual student bodies directly to find students. Due to the lack of central funding from public money, most German agencies support the student pool with an annual basic amount; AQAS also covers the cost of one training course per year. In the view of AQAS, cooperation with the pool has proven successful because student experts are thoroughly prepared for the procedures.

In all international procedures, AQAS endeavours to incorporate regional expertise into procedures to be able to understand the context of the university better. In most cases, the regional competence is included by an academic representative or from professional practice. Regional experts are found via our networks of agencies or via German organisations abroad. Experience shows that the inclusion of such expertise helps to explain potential country specifics, such as nationally mandated study programmes.

For accreditation procedures abroad or for procedures based on the European Approach, there are at least two experts with knowledge in different national higher education systems and/or with relevant language skills. In these procedures, student experts are proposed by either the Student Accreditation Pool, the Austrian pool, or the European Students' Union (ESU).

AQAS usually has positive experiences with internationally composed panels of experts. Universities benefit from the wide range of expertise within groups, and cooperation between international experts is usually very motivating and enriching.

8.4.2 Preparation of experts

AQAS attaches great importance to the thorough preparation of experts regarding the procedure. The extent of preparation varies depending on the complexity of the procedure. As AQAS experts have generally completed several workshops on their role, synergies can be achieved when appointing new experts. This training system, which includes a preparatory workshop before each site visit, ensures that experts' knowledge aligns with the accreditation procedure, the ESG system, and the use of the criteria.

All procedures have in common is that experts receive additional written information material and handouts on the procedure together with the university's SER. In addition, the panel of experts usually holds half-day preparatory meetings on the day before the site visit, which relate specifically to the procedure in question and its special features. These are relatively work-intensive workshop-style sessions lasting several hours, which are led by the AQAS consultant responsible for the procedure. During these meetings, the criteria underlying the procedure, previously made available to the experts together with the university's documents, are discussed, enabling the experts to use them as a framework for discussing their assessment. In terms of time and space, the workshop is kept separate from other items on the programme, such as dinner.

It is a key procedural feature of AQAS to ask the experts involved in any procedure to write a statement based on the criteria, for which they receive a template, before the site visit after reading the documents provided by the university. These statements are used for the expert panel's preparatory meeting and sent to the university.

Experts generally have previous experience with accreditation and assessment procedures. This means that general training without a specific focus on a particular assessment is usually unnecessary; instead, procedure-related preparation proves to be more effective. It is important to remember that accreditation procedures are based on the stakeholders' voluntary involvement, so care must be taken not to overburden experts by prerequisites. AQAS has received considerable feedback from experts stating that they would no longer be willing to act as experts if, after years of involvement in the accreditation system, they were imposed to attend a compulsory general training.

Programme accreditation in Germany

At AQAS, experts are prepared for a national programme assessment procedure in two steps: besides receiving the university's self-evaluation report, they are usually also provided with the following documents:

- Specimen Decree (MRVO)
- Handout for experts
- Report on formal criteria by the SC of AQAS

This may be accompanied by preliminary information on the further course of the procedure. The "Guidelines for experts in assessment procedures for programme accreditation" address all key aspects.

System accreditation in Germany

In these procedures, the panel of experts attends a workshop before the first site visit. The aim of this workshop is to familiarise experts with the course of the procedure and the underlying criteria. The experts only receive the university's SER after having attended this workshop. Given the complexity of the subject matter of the assessment, it seems more expedient to keep the basics and criteria of system accreditation separate from the discussion of the university's documents.

The workshop is held by the two consultants who also oversee the procedure. The workshop covers:

- The subject matter and objectives of a system accreditation,
- MRVO specifications regarding the procedure and the assessment criteria in system accreditation,
- the AQAS concept (course of procedure, stakeholders, structure of the documents, assessment criteria),
- information on expert involvement (status, tasks, distribution of roles within the panel of experts),
- determination of the timeline for further steps of the procedure.

In this way, experts are familiarised with the general requirements for system accreditation, and, at the same time, can be individually prepared for the procedure, regarding the special circumstances of the university in question.

In addition, there is also a preparatory meeting on the first day of each site visit. During this meeting, the panel prepares the content of discussions with the university and concentrates on sharing information with one another about the specific subject of discussion concerning the assessment, taking the criteria into account.

International procedures

In all international procedures, the panel of experts is prepared in two steps. The experts receive written information on the procedure together with the SER. These include the initial report prepared by AQAS, the relevant criteria with the associated indicators, and an overview of the course of the site visit.

The half-day expert training takes place on site and marks the official beginning of the procedure (usually held at the university on the day before the site visit). The preparatory meeting specifically refers to the relevant accreditation procedure and its particularities. In addition, the application by the university is discussed jointly based on criteria, regarding the preliminary experts' statements. The relatively intensive workshop-style sessions are led by the AQAS consultant responsible for the procedure to ensure optimal preparation for the site visit and to bring the stakeholders' different perspectives within the panel of experts together.

8.4.3 Impartiality of experts

The declarations of impartiality that have to be signed by experts for each procedure outline the criteria pertaining to impartiality (see Annexes I.2.b.3 and I.2.c.2).

8.5 Criteria for outcomes (ESG 2.5)

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

8.5.1 National procedures based on the MRVO

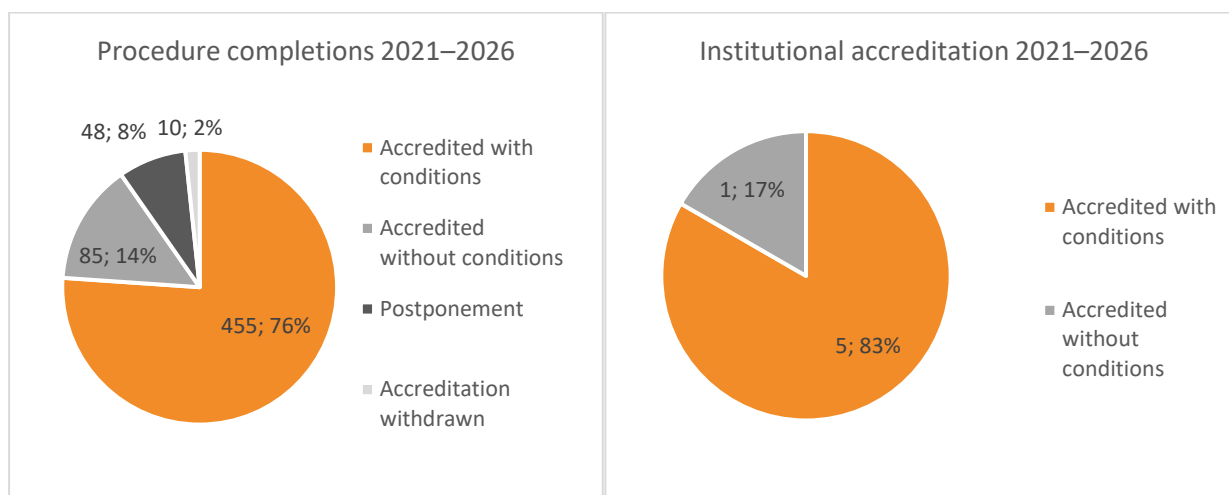
The criteria for programme and system assessment are governed by the Interstate Treaty and the MRVO (see Annexes I.2.a.1 and I.2.a.2). AQAS does not apply any additional specific criteria for these procedures, and therefore follows the MRVO, which is based on the ESG. These criteria relate to all cases in which GAC makes the decision.

To ensure that the panel of experts apply the criteria consistently, AQAS pays special attention to prepare the experts accordingly (see Chapter 8.4.2) and provide the experts with guiding questions for the report (see Chapter 7.6.6).

8.5.2 International procedures

As already explained, for all procedures outside Germany AQAS uses different sets of criteria for programme accreditation (see Annexes I.2.d.4–5) and institutional accreditation procedures (see Annex I.2.e.2). These are based closely on the current version of the ESG and vary only in terms of the focus of the procedure (study programmes or the quality assurance system). The generic character of the ESG means that panels of experts can introduce the academic standards of the relevant scientific community into the procedures. In this context, AQAS attaches importance to the fact that the universities' well-founded and coherent concepts may also successfully undergo accreditation, provided they can be communicated plausibly to the panel of experts.

The documents to help universities prepare for procedures and the handouts for the panels of experts share the same structure regarding criteria. Consequently, the university's SER, the initial report by AQAS, the statements by the panel of experts, and the experts' report all address the same thematic areas, allowing easy orientation. The indicators provided by AQAS reflect the ESG guidelines and support panels of experts in determining whether the criteria have been met. The key questions contained in the expert's report templates ensure that panels of experts fully address the relevant criteria in their assessments.



Figures 13¹⁰ and 14: Decisions in international procedures

8.5.3 European Approach

In the past, contradictory decisions were sometimes taken in the assessment of joint programmes, because each European country in which the participating universities were based applied their own national criteria as a benchmark. In one case, for example, this led to AQAS accrediting a German-Dutch study programme with the imposition of conditions, while the Accreditation Organisation of the Netherlands and Flanders (NVAO) initially denied accreditation. Thanks to the European Approach, which focuses on the joint character of programmes and defines the ESG as the main set of criteria, joint programmes can be assessed in their entirety, making the system more effective for universities and agencies alike. For these procedures, AQAS only uses criteria that were agreed by the EHEA Ministers in the 2015 Yerevan Communiqué (see Annex I.2.f.1).

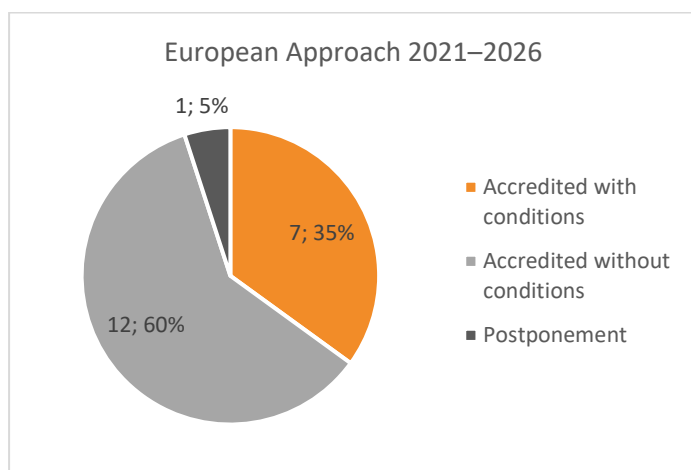


Figure 15: Decisions in procedures following the European Approach

¹⁰ Out of 48 postponed procedures for study programmes, 38 were accredited following the resumption of the procedure. The decision is still pending for 10 study programmes.

8.6 Reporting (ESG 2.6)

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

8.6.1 Publication of experts' reports

Since the transformation of the German accreditation system, all accreditation decisions and the corresponding accreditation reports are published centrally by GAC ([ELIAS database](#)). To comply with the disclosure requirements, the AQAS website provides a link for every study programme which was reviewed by AQAS to GAC's database, which can be used to retrieve accreditation reports.

Procedures in which the accreditation decision was taken by AQAS are published on the AQAS website. This is the case for all decisions in (old) national procedures and in international procedures. The experts' reports prepared for the latter and for procedures based on the European Approach are additionally uploaded onto DEQAR ([Database of External QA Results \(DEQAR\) - EQAR](#)).¹¹ With these procedures, the internal process requires that experts' reports are published on the AQAS website and on DEQAR after the expiry of the objection period, i.e. approximately four weeks after the final documents have been sent to the university.

8.6.2 Structure of the reports

8.6.2.1 National procedures

Section 24 of the MRVO stipulates that, in the German accreditation system, accreditation reports are to be prepared in the structure prescribed by GAC. Therefore, GAC has published various templates for the different procedural models within the German system in the context of programme and system assessment; these were updated by GAC in June 2024 and are binding for all agencies. As such, AQAS has no freedom in the design of its reports, apart from the layout.

The structures contain all criteria set out in the MRVO. Additions are only permissible if they do not compromise the structure as a whole; they must be briefly explained and substantiated in chapter 3.1 of the template ("information on the procedure"). There are no specifications as to the length of individual chapters. In this context, agencies or panels of experts should decide on a case-by-case basis which aspects require a more detailed presentation, and which can be dealt with more briefly.

Altogether, four different templates are available on the GAC website.

- Programme accreditation type – individual procedure
- Programme accreditation type – cluster procedure
- Programme accreditation type – combination course
- System accreditation type

In addition, there is an Excel spreadsheet for recording statistical data/key performance indicators related to programme accreditation procedures.

In its guidelines for experts for national programme accreditation, AQAS has developed key questions that draw on the relevant criteria and requirements. These are intended to provide guidance to experts in preparing their assessment. In this way, the AQAS Office ensures that experts' reports are complete, i.e. that all criteria have been assessed.

8.6.2.2 International procedures

All relevant documents in the procedures follow the same structure to provide transparency and orientation. Experts' reports are preceded by a brief overview of the key points relating to the relevant study programme/university and the decision of the SC. The actual text of the experts' report begins with a reference to

¹¹ As of May 2026, 12,254 experts' reports prepared by AQAS are available on DEQAR.

the criteria underlying the procedure, followed by a brief description of the course of the procedure. The section entitled “General information” enables the study programme to be set in the context of the university. The actual assessment of the study programme follows in the subsequent chapters.

Experts’ reports are structured as follows:

Programme accreditation (bachelor’s or master’s programmes/chapters for PhD programmes in bold):

- Quality of the curriculum/**Aim and structure of the doctoral programme** (ESG 1.2)
- Procedures for quality assurance (ESG 1.1, ESG 1.7 & ESG 1.9)
- Learning, teaching, and assessment of students/**Learning and assessment of students** (ESG 1.3)
- Student admission, progression, recognition and certification/**Legal status, admission and certification** (ESG 1.4)
- Teaching staff/**Academic level of supervisory staff** (ESG 1.5)
- Learning resources and student support/**Support and research environment** (ESG 1.6)
- Public information (ESG 1.8)

Institutional accreditation

- Policy and procedures for quality assurance (ESG 1.1)
- Design and approval of programmes (ESG 1.2)
- On-going monitoring and periodic review (ESG 1.9)
- Learning, teaching and assessment of students (ESG 1.3)
- Student admission, progression, recognition and certification (ESG 1.4)
- Teaching staff (ESG 1.5)
- Learning resources and student support (ESG 1.6)
- Information (ESG 1.7 & ESG 1.8)

European Approach

- Eligibility
- Learning outcomes (ESG 1.2)
- Study programme (ESG 1.2)
- Admission and recognition (ESG 1.4)
- Learning, teaching and assessment (ESG: 1.3)
- Student support (ESG 1.5)
- Resources (ESG 1.5 & ESG 1.6)
- Transparency and documentation (ESG 1.8)
- Quality assurance (ESG 1.1)

8.7 Complaints and appeals (ESG 2.7)

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

The Management Board has adopted an appeals and complaints procedure for AQAS (see Annex I.1.9). The subject matter are not only procedural processes, but also decisions by the SC in national and international procedures. Complaints refer to the implementation of the procedure or to the executing body. In contrast, appeals refer to the formal results of the procedure (i.e. the nomination/appointment of experts and the composition of panels of experts, the formal report, accreditation reports and the accreditation decision of the SC). The appeals and complaints procedure is published on the [AQAS website](#). In international procedures, the HEIs are informed about the appeals and complaints procedure with the sequence of the procedure, which is part of the contract.

A university’s complaint regarding the implementation of the procedure may, for example, relate to the timing of the procedure or to incorrect advice provided by AQAS Office staff. The university’s complaint is first presented to

the management of AQAS that discusses sufficiently substantiated cases with the Management Board. If no agreement with the university can be reached, the AQAS Complaints Commission deals with the subject matter. Details are regulated in the appeals and complaints procedures (see Annex I.1.9).

Within the appeals procedure against decisions of the SC, the university's objections are submitted to the SC at first. The SC takes a decision if the arguments of the university can be followed, if the expert panel should be contacted for a statement, or if the appeal is rejected. If the university continues to maintain its objection after this step, the case is referred to the Complaints Commission for final decision. In the case of appeals against the SC's decision concerning the formal report, the appointment of experts and the composition of the panel of experts, complaints must be submitted in writing within two weeks of receipt of notification (unless otherwise stated). Appeals against accreditation decisions/conditions must be submitted in writing to the AQAS Office within four weeks of receipt of notification.

The Complaints Commission has been in existence since 2013. Usually, it meets once a year to be informed about latest developments. The inaugural meeting of the current members took place in January 2026. AQAS receives only a small number of complaints or appeals (one case since 2021). The low number of may result out of the fact that AQAS does not make decisions in the national system and that appeals against accreditation decisions are therefore to be addressed to GAC.

9. SWOT analysis

In summer 2025, the Agency's staff analysed and discussed the strengths and weaknesses of AQAS and options and threats for AQAS. In particular, three fields of action were derived from the results of the discussions: external presentation and visibility, exchange with our members, and implementation of AI. Two working groups were set up in 2025 that developed a work schedule. One working group deals with the implementation of AI at AQAS and the other one works on the revision of the website. Their work is still ongoing at the time of the application. Based on the analysis of strengths and weaknesses, the team also discussed the Agency's opportunities and threats. The results of the SWOT analysis were also incorporated into the development of the new AQAS' strategy 2026–2031 which was approved by the Board in February 2026 (see Annex I.1.8).

The SWOT analysis is presented in the overview below:



Figure 16: Overview SWOT analysis

From the staff perspective, the analysis of threats referred to the following thematic areas:

Key improvement areas address the internal and the external communication structure. A communication policy should define which tools should be used in which way to make internal exchange more smoothly. Regarding the external communication, a revision and update of the content of the website is a first step and supports shifting towards a more market- and target-group-oriented marketing mindset with clearer core messages that reflect AQAS's broad expertise in several areas and highlights our strengths. Moreover, AQAS should strive to exchange with its members more regularly and search for new formats of exchange with its stakeholders.

Flexibilization, specifically of the international procedures and their duration, is another concern: that the SC takes the opening decision is an element of the internal QA but creates a bottleneck timewise. Therefore, internal workflows should be made more flexible, and this should also be highlighted in external communication.

Beyond AQAS direct influence but nevertheless a major threat is the strained financial situation of universities, which may shift decisions toward price rather than quality, and growing competition from other agencies, including price competition. Proposed ideas and opportunities focus on highlighting AQAS's strengths, offering "framework agreements" to frequent client universities, promoting programme accreditation by communicating its advantages, providing topic-focused workshops, addressing university leadership more strategically, increasing personal contact beyond email and expanding consulting for system accreditation. Additionally, AQAS aims to leverage AI responsibly: a working group explores the test version's potential while ensuring data protection and guidelines should be adjusted. Training on tools for the staff members is planned for 2026.

10. Key challenges and areas for future development

AQAS anticipates that the coming years will bring various challenges arising both from the specific characteristics of the higher education sector and the accreditation system in Germany, and from wider societal developments: The Agency's main task will be to drive growth and innovation in a market characterised by tough competitive conditions, whilst at the same time stabilising its structures, staffing and finances.

The number of system-accredited higher education institutions continues to rise steadily, which means that the number of programme accreditations in Germany is continuing to fall, thereby making the market for accreditation agencies ever smaller. Added to this is the general economic trend: persistently high inflation and far-reaching government budget cuts in the education sector mean that universities, too, are increasingly having to pay ever closer attention to costs. Often, the price is the sole criterion when selecting an agency for programme or system accreditation. This trend is further intensifying competition among German agencies, which has led to increasingly fierce price wars in recent times. A similar trend can also be observed in the international market. This intense competition between agencies calls for more flexible procedures, faster response times and a clear focus on service: universities increasingly expect bespoke services rather than standard processes. In addition to that, cyclical fluctuations in the volume of accreditation applications must continue to be managed.

To address these challenges, digitalisation, internationalisation, and a customer-focused approach are seen as key drivers for making AQAS future-proof, more flexible, and more visible at international stage.



In the future, services for higher education institutions are to be more tailored to individual needs, more innovative and more focused on quality development. At the same time, engagement with stakeholders and international peer learning are to be expanded so that programmes can be tailored to meet specific needs. It is important that there remains scope for quality improvement and that procedures can be further developed in

such a way that, even in the case of repeated reaccreditations, universities derive added value and receive impetus for further development.

[REDACTED]

The issue of digitalisation presents both opportunities and risks: on the one hand, assessment procedures can be made more efficient using online and AI tools (such as conducting site visits online or in a hybrid format and using AI to generate records and reports). This requires rules, policies, and the development of skills among all those involved. On the other hand, however, the use of relevant new technologies and associated tools can also lead to internal and external quality assurance processes being carried out in a data-driven, 'virtually automated' manner, which could result in peer review losing its significance as a core element of accreditation procedures.

AQAS intends to continue strengthening its role as Germany's leading accreditation agency and to further expand its international standing. With a highly qualified team, supportive governing bodies and committed experts, and building on the agency's strong reputation in the higher education sector, AQAS is confident that it can shape future developments by responding flexibly to change.

Glossary of terms

AI – Artificial Intelligence

AQAS – Agency for Quality Assurance through the Accreditation of Study Programmes

AQAS ARCH GmbH – Accreditation, Reviews and Consulting in Higher Education

CBQA – Cross-border quality assurance

CC – Complaints Commission

CHE (Centrum für Hochschulentwicklung) – Centre for Higher Education

DAAD (Deutscher Akademischer Austauschdienst) – German Academic Exchange Service

DEQAR – European Database of External Quality Assurance Reports

DIHK (Deutscher Industrie- und Handelskammertag) – German Chambers of Industry and Commerce

GAC – German Accreditation Council

EA – European Approach

ECA – European Consortium for Accreditation

ELIAS (Elektronisches Informations- und Antragssystem) – Electronic application processing system

ENIC-NARIC – European Network of Information Centres - National Academic Recognition Information Centres

ENQA – European Association for Quality Assurance in Higher Education

EQA – External quality assurance

EQAF – European Quality Assurance Forum

EQAR – European Quality Assurance Register for Higher Education

ESG – Standards and Guidelines for Quality Assurance in the European Higher Education Area

ESU – European Student Union

EUA – European University Association

EQF – European Qualifications Framework for Lifelong Learning

GDPR – General Data Protection Regulation

HEI – Higher Education Institution

HRK (Hochschulrektorenkonferenz) – German Rectors' Conference

HQR (Qualifikationsrahmen für Deutsche Hochschulabschlüsse) – Qualifications Framework for German Higher Education Qualifications

IHK (Industrie- und Handelskammer) – Chamber of Industry and Commerce

ImpEA - Facilitating implementation of the European Approach for Quality Assurance of Joint Programmes

INQAHEE – International Network for Quality Assurance Agencies in Higher Education

IQA – Internal Quality Assurance

KMK (Kultusministerkonferenz) - Standing Conference of the Ministers of Education and Cultural Affairs

MRVO (Musterrechtsverordnung) – Specimen decree pursuant to Article 4, paragraphs 1 – 4 of the interstate study accreditation treaty

QA – Quality assurance

SAR – Self-assessment report

SC – Standing Commission

SER – Self-evaluation report

VAT – Value added tax

ZEM (Zentrum für Evaluation und Methoden) – Centre for Evaluation and Methods

Overview of documents referenced with hyperlinks in the self-assessment report

Appeals and complaints procedure (in German): [EinspruchBeschwerdeverfahren.pdf](#)

Detailed data on the German higher education system by HRK: [Microsoft Word - 2025-08-12 ONLINE HRK-Statistikfaltblatt 2025 final](#)

DEQAR database: [Database of External QA Results \(DEQAR\) - EQAR](#)

ELIAS database by GAC: [Datenbank - ELIAS](#)

Excel files for data sheets provided by GAC: [Antragstellung | Stiftung Akkreditierungsrat](#)

ImpEA: [EA Introductory training – impea project](#)

Interstate Study Accreditation Treaty: [Studienakkreditierungsstaatsvertrag.pdf](#)

Journal for Quality in Higher Education and Research: [Handbuch Qualität in Studium, Lehre und Forschung - online - Abonnement: Abonnement für Verbraucher*innen | Franz Steiner Verlag](#)

Member universities of AQAS: [Die Agentur – AQAS e.V.](#)

Published experts' reports on AQAS website: [Programmakkreditierung – AQAS e.V.](#)

Quality assurance concept of AQAS: [QM-KonzeptAQAS_2026.pdf](#)

Rules of procedures by GAC for alternative procedures:

[AR Beschluss Verfahrensordnung Alternative Akkreditierungsverfahren 2019-06-04 Drs. AR 63-2019-en.pdf](#)

Annexes

I Core annexes

I.1 Organisational documents

- I.1.1 Excerpt from the Register of Associations
- I.1.2 Notice of exemption
- I.1.3 Excerpt from the Commercial Register for AQAS ARCH
- I.1.4 Businessplan 2026
- I.1.5 Mission Statement
- I.1.6 Articles of Association
- I.1.7 Approval by GAC
- I.1.8 Strategy 2026-2031
- I.1.9 Appeals and complaints procedure
- I.1.10 Sources of revenue and main expenditure

I.2 Documents in use for procedure specifics

a German System

- a.1 Interstate Study Accreditation Treaty
- a.2 Specimen Decree (MRVO)
- a.3 Selection principles according to the HRK

b Programme accreditation

- b.1 Sample contract (programme accreditation nat)
- b.2 Working aid (programme accreditation nat)
- b.3 Declaration of experts' impartiality (programme accreditation nat)
- b.4 Guidelines for experts (programme accreditation nat)
- b.5 Sample of preliminary statements (programme accreditation nat)
- b.6 Structure of experts' report (programme accreditation nat)

c System accreditation

- c.1 Sample contract (system accreditation nat)
- c.2 Declaration of experts' impartiality (system accreditation nat)
- c.3 Structure of experts' report (system accreditation nat)

d International procedures (programme accreditation)

- d.1 Sample contract (programme accreditation int)
- d.2 Sequence of international procedures (programme accreditation)
- d.3 Code of conduct
- d.4 Criteria & indicators (Bachelor's & Master's programmes)
- d.5 Criteria & indicators (PhD programmes)
- d.6 Guidelines "How to draft a SER" (Bachelor's & Master's)
- d.7 Guidelines "How to draft a SER" (Bachelor's, Master's & PhD)
- d.8 Selection principles ECA
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- d.11 Structure of experts' report (Bachelor's, Master's & PhD)
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e International procedures (institutional accreditation)

- e.1 Sequence of international procedures (institutional accreditation)
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- e.3 Guidelines “How to draft a SER” (institutional accreditation)
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- a.1 Confirmation letter 2021
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II Additional annexes

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- II.1.1 CVs of Management Board Members
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- II.2.8 Guidelines for conducting regular employee interviews
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II.3 Further annexes

- II.3.1 Comparison ESG – Specimen Decree pursuant to Article 4, paragraphs 1–4 of the Interstate Study Accreditation Treaty **(provided by GAC)**
- II.3.2 Overview of thematic activities (2021–2026)
- II.3.3 Lessons learned programme accreditation (nat)
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