



**FIBAA**

YOUR PARTNER FOR EXCELLENCE  
IN HIGHER EDUCATION

# Self-Assessment Report<sup>1</sup>

by the Foundation for International Business Administration Accreditation (FIBAA)

for Renewal of Membership to the European Association for Quality Assurance in Higher Education (ENQA) and

for Re-Registration in the European Quality Assurance Register for Higher Education (EQAR)

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## 1. Introduction

FIBAA (Foundation for International Business Administration Accreditation) is a European, internationally oriented agency for quality assurance and quality development in higher education. The non-profit organisation has its head office in Bonn, Germany, and is registered in Zurich, Switzerland. FIBAA has been a full member of ENQA (European Association for Quality Assurance in Higher Education) since 2002 and listed in the EQAR (European Quality Assurance Register for Higher Education) since 2009. FIBAA is accredited resp. authorised<sup>2</sup> by the German Accreditation Council (GAC) since 2000 and also recognised by the Austrian Federal Ministry for Science and Research, the Swiss Federal Department of Economic Affairs, Education and Research (EAER), the Ministry of Education and Science of Kazakhstan, the Netherlands Vlaamse Accreditatie Organisatie (NVAO), the Higher Education Quality Council of Turkey (HEQC) the Ministry of Education and Culture of Indonesia as well as the Ministry of Education and Science of Ukraine.<sup>3</sup>

This self-assessment report (SAR) serves the external review against the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) for the purpose of renewing full membership in ENQA, as well as on renewing the listing of FIBAA in EQAR. For FIBAA, the ENQA-membership as well as the EQAR-listing are of high priority because FIBAA has a large international network and with increasing cross-border activities. The SAR follows in terms of content and structure the “*Guidelines for ENQA Agency Reviews*” and aims to prove the ongoing compliance of FIBAA with ESG.

Annex 1 – FIBAA’s Admissions of different national recognition institutions

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

The concrete preparations for process of the renewal of membership to ENQA and for re-registration in the EQAR started in mid-2020. Together with the closest circle of employees, the managing director defined who was responsible for the organisation and implementation of the process. It was decided that a steering group would meet at regular intervals (every two weeks) to reflect on the status quo and to discuss how to proceed. The steering group consisted of: The managing director, the Division Manager Controlling & Accounting, the Division Specialist FIBAA Consult and the Division Manager Office. At a first meeting of the steering group, a schedule for the process was drawn up. This schedule included steering group meetings, workshops with the entire staff, a deadline for the first draft of the SAR and correction loops.

The individual tasks of the steering group members were defined as follows: the managing director has the overall supervision and ultimate responsibility for the organisation of the process. In addition, the managing director contributes to the optimisation of the SAR in the context of the correction loops. The Division Manager Controlling & Accounting has many years of knowledge about the organisation of and access to data that contribute to the evidence-based character of the SAR. The Division Specialist FIBAA Consult, who had already worked on the follow-up report for ENQA and the substantive change report for EQAR in 2019, had the task of preparing a first draft of SAR as a working basis and to revise

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<sup>2</sup> Based on the reform of the German accreditation system that came into force in 2018, there are no longer separate agreements between agencies and the GAC, but an authorisation by the GAC, which the agencies prove with the ENQA full membership. For further information see section 9.2. See also Annex 1.

<sup>3</sup> See Annex 1.

the SAR editorially after input from the individual divisions. He received special support from the Division Manager Office, a longstanding employee who was involved in the renewal of membership to ENQA and in re-registration in the EQAR in 2012 and 2017.

All FIBAA employees, division managers, project managers and support employees were involved in the SAR process through workshops: The steering group informed the staff about the challenges ahead. An exchange of information then led to the preparation of a SWOT analysis of FIBAA, which was included in the SAR (see section 13).

The Division Specialist FIBAA Consult built the framework of the SAR, the division managers filled in missing parts, corrected the text and updated the procedures. Likewise, a draft version was sent to selected members of the Accreditation and Certification Commission. These members are also representatives of the respective universities and thus also customers of FIBAA. After this, the Division Manager Office and the managing director put all comments and hints together and brought all information, texts, annexes and counts together in the present form. At the end, the Steering group and the division manager undertook the final proof, before the SAR was sent to ENQA and EQAR.

On our own account: please take into account, that FIBAA has relaunched the German website in November 2020. The Relaunch for the English Website is planned for the 2<sup>nd</sup> quarter of 2021. In this case, the references, links on the German website, in the SAR of FIBAA are mostly in German language. If you need these documents separately, please inform us and we provide them on your request.

### 3. Higher education and quality assurance (QA) of higher education in the context of the agency

#### The German Higher Education System

The German Higher Education System includes state-maintained and state-recognised higher education institutions (HEIs), which are of the following types<sup>4</sup>:

- Universities and equivalent institutions of higher education (Technical universities, pedagogical HEIs, theological colleges et alii)
- Colleges of art and music
- *Fachhochschulen* (Universities of applied sciences/research)

In addition, Germany's tertiary sector also includes either state-run or state-recognised so called *Berufsakademien* in some federal states. The *Fachhochschulen* and the *Fachakademien* in Bavaria are also part of the tertiary sector.

In a system of consecutive qualifications, the Bachelor is the first higher education qualification as a qualification for a profession and the standard qualification for a subsequent Master's degree as the second cycle studies. Finally, students can join a doctoral programme as the third cycle studies. All Bachelor's and Master's study courses are subject to QA through accreditation.

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<sup>4</sup> In the summer semester 2020, a total of 423 higher education institutions were listed within the framework of the yearly statistic data about HEI.

(cf. [https://www.destatis.de/DE/Themen/Gesellschaft-Umwelt/Bildung-Forschung-Kultur/Hochschulen/\\_inhalt.html#sprg229108](https://www.destatis.de/DE/Themen/Gesellschaft-Umwelt/Bildung-Forschung-Kultur/Hochschulen/_inhalt.html#sprg229108))

In the winter semester 2020/2021, there were a total of 20,359 study programmes at higher education institutions in Germany, of which 18,745 were Bachelor's or Master's programmes (cf. <https://de.statista.com/statistik/daten/studie/2854/umfrage/bachelor-und-masterstudiengaenge-in-den-einzelnen-bundeslaendern/>) 2021 around 2,9 Mill Students were enrolled in the different types of universities. (cf. [https://www.destatis.de/DE/Themen/Gesellschaft-Umwelt/Bildung-Forschung-Kultur/Hochschulen/\\_inhalt.html#sprg411560](https://www.destatis.de/DE/Themen/Gesellschaft-Umwelt/Bildung-Forschung-Kultur/Hochschulen/_inhalt.html#sprg411560))

Germany is a federal republic and the legislation for HEI is made by the individual federal states. The individual state laws govern, for example, whether accreditation by the GAC<sup>5</sup> must be obtained before a new study programme begins or whether accreditation by the GAC is also possible after the programme has begun. With January 1<sup>st</sup>, 2018, there was implemented the so called *Studienakkreditierungsstaatsvertrag* treaty with a Specimen Decree to organise a joint accreditation system for quality assurance in study and teaching at German HEIs. Its assessment criteria were the basis for the 16 individual state laws and country legislative decrees. The relevant laws and regulations for the accreditation system can be found on the GAC website.<sup>6</sup>

### **Quality Assurance (QA)**

With regard to the QA, the GAC and the accreditation agencies are the most important stakeholders, with the GAC being the sole decision maker for awarding the national accreditation seal. The German accreditation system provides for the following types of procedures: the programme accreditation and the institutional so called *system accreditation* (an audit of the internal quality system of HEIs in relation to study and teaching).<sup>7</sup> The procedures for programme and institutional accreditation are characterised by a two-stage procedure: The preparation of an accreditation report with decision and evaluation recommendation according to the standards defined in the Specimen Decree<sup>8</sup> is organised by an accreditation agency commissioned by the HEI. At the application of the HEI, the GAC decides on the accreditation of a programme or of the system accreditation of a HEI. The decision is made on the basis of the accreditation report, whereby a justified deviation from the expert recommendation is possible. The background to the final decision by the GAC is a reform of the German accreditation system that came into force in 2018 and was described in a follow-up report for ENQA and a substantial change report for EQAR (both May, 27<sup>th</sup>, 2019). The GAC had proved the compliance of the criteria in the Specimen Decree with ESG, and the agencies reported this proof to ENQA and EQAR in 2019.

A further FIBAA offer in Germany and worldwide includes procedures by which different kind of FIBAA Quality seals can be obtained. The FIBAA Accreditation and Certification Committee (FACC) decides on the award of these seals. Details on FIBAA's activities and procedures of FIBAA are given in section 5.

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<sup>5</sup> The Foundation Accreditation Council is a joint institution of the Länder for quality assurance in study and teaching at German higher education institutions. The tasks of the Foundation are defined in the State Treaty on the Organisation of a Joint Accreditation System (State Treaty on Study Accreditation), which the 16 Länder agreed on last year (2017) (<https://www.akkreditierungsrat.de/de>).

<sup>6</sup> URL: <https://akkreditierungsrat.de/de/akkreditierungssystem/akkreditierungssystem> (only in German language available).

<sup>7</sup> Information on the German accreditation system can be found on the website of the GAC: <https://www.akkreditierungsrat.de/de> (only in German language available).

<sup>8</sup> URL: [https://www.kmk.org/fileadmin/Dateien/veroeffentlichungen\\_beschluesse/2017/2017\\_12\\_07-Musterrechtsverordnung-englisch.pdf](https://www.kmk.org/fileadmin/Dateien/veroeffentlichungen_beschluesse/2017/2017_12_07-Musterrechtsverordnung-englisch.pdf).

## 4. History, profile and activities of the agency

FIBAA was founded in autumn 1994 by the leading German, Swiss and Austrian employer associations of the business community as an internationally oriented foundation for assuring transparency and quality in higher education. In Germany, Austria, Switzerland, Kazakhstan, Netherlands, Turkey, Indonesia and Ukraine, FIBAA is nationally recognised. FIBAA cooperates with state and state-recognised private HEIs as well as with HEIs that are in the process of being found. The core operation areas are Europe, Central Asia, South East Asia and Middle East. The following is a brief description of FIBAA's structure.

### Executive Committee of FIBAA Foundation Council

FIBAA's most important organisational bodies are the Executive Committee of FIBAA Foundation Council and the management with the managing director at the head. The Executive Committee of FIBAA Foundation Council consists of six to fifteen members in accordance with the statute. Five trade associations and consortia from Switzerland, Austria and Germany have each dispatched one member to the committee and is authorized to appoint new and re-appoint consisting members. The term of office is two years, a re-election is permissible without restriction. Currently the FIBAA Foundation Council is made up of two German, three Austrian and two Swiss representatives. The members can be found on FIBAA's website.<sup>9</sup> The FIBAA Foundation Council determines the foundation policy in accordance with the statute, appoints and monitors the management and appoints the members of the committees and FIBAA Appeals Committee.<sup>10</sup>

Annex 6 – Statute of the Executive Committee of FIBAA Foundation Council

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<sup>9</sup> URL: <https://www.fibaa.org/fibaa/ueber-uns/unsere-struktur-und-gremien/> (only in German language available).

<sup>10</sup> See Annex 6 – Statute of the Executive Committee of FIBAA Foundation Council (only in German language available).



# Organisation Chart of FIBAA

Last update: January 1st, 2021

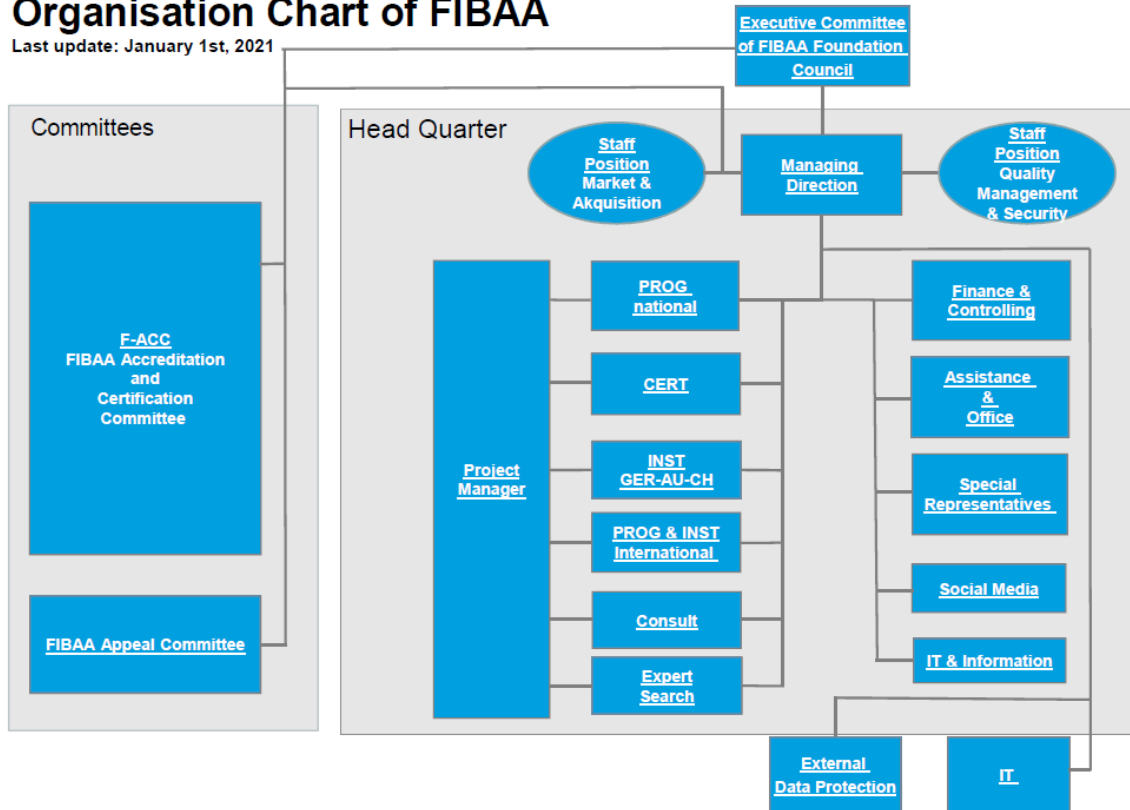


Figure 1: Organisation Chart

## Head Office

The managing director is the chief executive of the head office in Bonn. Thus, the PROG, INST, CERT and CONS divisions, which were mentioned above, are directly responsible to the managing director. Expert Management forms a further organisational unit which is responsible for the search for experts and the composition of expert panels for the various divisions (e.g. PROG and INST). More details on Expert Management can be found in Section 10.4. The project managers are charged with the concrete realisation of accreditation and certification procedures and, depending on the procedure, are under the supervision of the respective head of division. The project managers are, of course, regularly trained through workshops. They are the contact persons for HEI and Expert Panels. Furthermore there are several support divisions, like finance and accounting, the back office, IT, social media and Assistance to the managing director who provide the division and the project manager as well as the managing director in all background processes and are responsible for executive tasks. There is also a quality manager, who is responsible for the QM Manual, evaluations and the quality report (see 9.6 ESG Standard 3.6 Internal quality assurance and professional conduct for more information).

Annex 7 – List of employees (as of February 28<sup>th</sup>, 2021)

## FIBAA Accreditation and Certification Committee (FACC)

Till December 31<sup>st</sup>, 2020, FIBAA had three committees:

- FIBAA Accreditation Committee for Programmes (FAC PROG) for programme accreditation,
- FIBAA Accreditation Committee for Institutional Procedures (FAC INST) for all kinds of institutional accreditation and certification and
- FIBAA Certification Committee for Continuing Education Courses (FCC CERT) for all training courses on minimum level 5 of the European qualification frame (EQF)<sup>11</sup>.

These three committees were responsible to decide about programme accreditation (FAC PROG), institutional procedures (FAC INST) or certification of continuing education courses (FCC CERT). In the case of strategic development and the changes in the German accreditation rules to January 1<sup>st</sup>, 2018, FIBAA made the choice to join all the forces in one committee for all accreditation and certification procedures, the FIBAA Accreditation and Certification Committee (FACC). The majority of the members are representatives of science, while the others are representatives of professional practice and the student body.

In total, the FACC is made up of 25 members (16 higher education institution representatives, seven business representatives and two students). Of these two members are from Austria and there is one member each from the Netherlands, Spain and Switzerland.

The FACC define rules of procedure that govern their tasks. These include:

- defining of evaluation and assessment methods, in particular the FIBAA Assessment Guides;
- deciding in accreditation and certification procedures for awarding the FIBAA seals;
- deciding on the fulfilment/non-fulfilment of conditions (in such procedures);
- defining and further developing the standards of FIBAA's own procedures;
- determining the appointment criteria for experts;
- appointing and dismissing the experts;
- for the appointment of Expert Panels, electing a subcommittee consisting of at least two representatives of science, one of professional practice and one of the student body.

Annex 3 – Rules of procedures of FACC<sup>12</sup>

## FIBAA Appeals Committee

The FIBAA Appeals Committee is responsible if appeals arise in a procedure for awarding the FIBAA seal. As the final decision to award the national seal of the GAC is taken by the GAC, the HEI appeal directly to the GAC in case of appeals against the decisions. The FIBAA Appeals Committee is currently made up of two representatives of science, one representative of professional practice representative and one of the student body. It has adopted rules of procedure which define the details of the FIBAA Appeals Committee.<sup>13</sup>

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<sup>11</sup> For more information: <https://europa.eu/europass/en/european-qualifications-framework-eqf>.

<sup>12</sup> The signed version of the rules of procedures of FACC will be published on FIBAA's Website soon.

<sup>13</sup> URL: <https://www.fibaa.org/en/fibaa/fibaa20> (German only).

For more information on complaints and appeals see section 10.7 (ESG Standard 2.7)

FIBAA regularly performs procedures for QA in higher education in its four business areas of programme accreditation (PROG), institutional procedures (INST), certification of continuing education courses (CERT) and consulting (CONS).

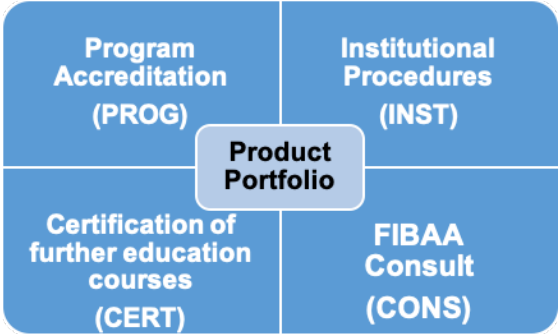


Figure 2: Product Portfolio

Programme accreditation of degree programmes, especially in the fields of economics, law and social science, is FIBAA’s main business with over 2600 programmes at HEIs of Germany, Netherlands, Austria, Switzerland, Russian Federation, Kazakhstan, Georgia, Azerbaijan, Slovenia, Ukraine, Jordan, Lebanon, Oman, Qatar, Turkey, Cyprus, Albania, Vietnam, Indonesia, et alii in total since FIBAA was founded.

In addition, FIBAA carried out overall 30 institutional procedures in Germany, Austria, Switzerland, Lebanon, Kazakhstan, Russian Federation and 40 certifications of continuing education courses.

The organisational unit FIBAA Consult (CONS) also offers a wide range of consulting services. Approximately five such procedures are carried out per year. The strict separation of consultancy and accreditation in accordance with ESG 3.1 is a matter of course for FIBAA<sup>14</sup>. For this reason, the strict separation was emphasised even more clearly in the last re-accreditation in accordance with the recommendation by ENQA (see below: section 9.1 and 12).

FIBAA works in accordance with national requirements, always ensuring compliance with ESG. In Germany, the approval of FIBAA as accreditation agency for national procedures is based on the registration of the agency with EQAR.<sup>15</sup>

The activities of FIBAA would not be possible without the participation of experts. FIBAA has an expert pool of about 750 experts, who receive regular training (for the experts see below: section 10.4).

<sup>14</sup> The decision can be found here: [https://www.fibaa.org/fileadmin/redakteur/pdf/PROG/Beschluesse\\_FIBAA\\_Kommission\\_Stiftungsrat/Anlage\\_1\\_Beschluss\\_Stiftungsrat\\_Trennung\\_Beratung\\_Pruefung\\_signed.pdf](https://www.fibaa.org/fileadmin/redakteur/pdf/PROG/Beschluesse_FIBAA_Kommission_Stiftungsrat/Anlage_1_Beschluss_Stiftungsrat_Trennung_Beratung_Pruefung_signed.pdf) (only in German language available).

<sup>15</sup> Further information are on the Website of the GAC: <https://www.akkreditierungsrat.de/de/akkreditierungssystem/agenturen/agenturen> (only in German language available).

In recent years FIBAA has also expanded its publication activities. The result of this process is the preparation of several thematic analyses, including a paper created after the ENQA call for articles for 20th anniversary<sup>16</sup>. FIBAA summarises its activities annually in a FIBAA Annual Report (for the thematic analyses see below: section 9.4).<sup>17</sup>

## 5. Higher education quality assurance activities of the agency

The external QA and cross-border QA activities are defined in the following chapter. Details on the processes and their methodologies can be found in section 6.

### Programme-level Accreditation

- Procedures for awarding *programme accreditation* on behalf of the GAC (in Germany): The work sharing between FIBAA and GAC is clearly regulated. FIBAA prepares an accreditation report on behalf of the HEI and the GAC decides on the accreditation at the request of the HEI. The aim of programme accreditation is to transparently present the quality of study programmes with regard to objectives, admission, content, structure and didactics, academic framework conditions and quality assurance - and further development.
- Procedures for awarding the FIBAA seals (in Germany and worldwide): FIBAA offers HEI's procedures for awarding the FIBAA seal (*FIBAA Quality Seal* for programmes or *FIBAA Premium Seal* for established degree programmes which have demonstrated their outstanding quality). Here FIBAA itself is responsible for all process steps and the FACC decides on the final accreditation.

### Institutional Accreditation

- Procedures for awarding *system accreditation* on behalf of the GAC (in Germany): Equivalent to the programme level accreditation, FIBAA in Germany also carries out institutional level accreditations on behalf of the GAC. FIBAA prepares the accreditation report on behalf of the HEI and the GAC decides on the accreditation at the request of the HEI. The aim of system accreditation is to assess the quality management of a higher education institution from the perspective of whether it is suitable for re-accreditation of its own study programmes.
- Procedures in the framework of *Institutional Audit Austria*: For Austria the FIBAA offers this procedure in accordance with the requirements of the Austrian Act on Quality Assurance in Higher Education (German abbreviation: HS-QSG). The audit aims to certify the institution's internal quality management system.
- Procedures in the framework of *Institutional Accreditation (Switzerland)*: In Switzerland FIBAA offers this procedure in accordance with the requirements of the Higher Education Funding and Coordination Act (HEdA) for the acquisition of the Institutional Accreditation Seal of the Swiss Accreditation Council. Likewise, in Switzerland, the entire institution and thus quality

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<sup>16</sup> The article is published here in Russian and English language:  
[https://www.fibaa.org/fileadmin/redakteur/pdf/FIBAA\\_Consult/Projekte\\_Publikationen/Digital\\_Transformation\\_Quality\\_Assurance.pdf](https://www.fibaa.org/fileadmin/redakteur/pdf/FIBAA_Consult/Projekte_Publikationen/Digital_Transformation_Quality_Assurance.pdf).

<sup>17</sup> URL: <https://www.fibaa.org/fibaa/was-uns-auszeichnet/fibaa-annual-report/>. The annual report 2020 is in progress and will be published on the FIBAA website in the course of March 2021.

assurance in the areas of research, continuing education, services and organisation/administration is also taken into account. This also applies to the budget of the university.

- Procedures for awarding the *Institutional Accreditation* according to the FIBAA quality requirements (in Germany and worldwide): FIBAA also offers its FIBAA seal at the institutional level (*FIBAA Quality Seal* or *FIBAA Premium Seal*). The Institutional Accreditation procedure offers a detailed review of the university's/university's/school's performance areas in their entirety. It assesses whether the structures and processes of the following areas of the institution meet European standards: Mission statement, university profile and strategic goals Management structure and quality management, Study and teaching, Research, Services (administration, counselling, academic support), Resources and Information Policy/Transparency. So the aim is also in this procedure, to look at the entire institution and thus quality assurance.
- Procedures for awarding the *Institutional Accreditation: Strategic Management* (in Germany and worldwide): FIBAA offers procedures for the award of this special FIBAA seal, which focuses particularly on assessment of HEI's internal strategic management. The specialised procedure Institutional Accreditation: Strategic Management is primarily aimed at innovative, entrepreneurial and internationally oriented higher education institutions. The procedure includes a comprehensive evaluation of the institutional strategy. The higher education institutions receive feedback regarding their structures and processes beyond the status quo as well as impulses regarding their specific opportunities for further development.

### **Certification of Continuing Education Courses**

FIBAA certifies continuing education courses that do not lead to an academic degree. The continuing education courses are at level 5 to 8 of the European Qualification Framework for Lifelong Learning (EQF) or the equivalent level of the national qualification framework. Such certifications are offered nationally and internationally. The aim is a quality certificate for continuing education in which a level assessment is carried out according to the European Qualifications Framework (EQF), taking into account the European Credit Transfer and Accumulation System (ECTS) as well as the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), in order to promote permeability within and between different educational institutions and sectors.

### **Consulting**

The organisational unit FIBAA Consult offers a wide range of consulting services (not in the scope of ESG). These include SWOT analyses, the evaluation of HEI exams by external experts, presentations and workshops (on the accreditation system, for example) and the founding of private HEIs. The overall aim of the advisory services is to support higher education institutions in their quality development and enhancement.

### **Cross-Border QA Activities**

FIBAA has Cross-Border QA Activities with the countries Netherlands, Austria and Switzerland. The different kind of procedures are described in detail in 9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance.

Table 1: Activities of the last five years

	2016	2017	2018	2019	2020
Study Programme Accreditation GAC (Decision FAC PROG)	77	104	125	68	7
Study Programme Accreditation GAC (Decision GAC)				24	65
Study Programme Accreditation FIBAA-Seal	80	47	54	49	40
International Programme Accreditation	25	30	57	39	24
System Accreditation GAC (Decision FAC PROG)	0	0	0	0	0
System Accreditation GAC (Decision GAC)	0	0	6	4	0
Institutional Audit Austria	0	2	0	0	0
Institutional Accreditation Switzerland	0	0	0	0	0
Institutional Accreditation FIBAA	0	0	0	1	0
Institutional Accreditation Strategic Management	0	0	0	0	0
Certification of Continuing Education Courses	3	3	2	7	6
Consulting	18	13	13	8	6

## 6. Processes and their methodologies

This section provides an overview of process steps, methodologies, the role of experts and relevant documentation. How FIBAA ensures compliance with ESG is explained in section 9 and 10.

### Programme-level Accreditation

- Procedures on behalf of the GAC (in Germany): On request of a German HEI, FIBAA carry out the procedure to write an accreditation report for a single or multiple programmes after the on-site visit at the HEI with peer review experts. The HEI's statement is taken into account in the accreditation report. FIBAA sends the final version of the accreditation report to the HEI.

At the request of the HEI, the GAC then decides on the accreditation on the basis of the accreditation report, whereby the GAC is absolutely independent in its decision. The assessment criteria are defined in the Specimen Decree.

- Procedures for awarding the programme accreditation according to the FIBAA quality requirements (in Germany and worldwide): On request of a HEI, FIBAA carry out the procedure for awarding the programme accreditation according to the FIBAA quality requirements for a single or multiple programmes. FIBAA perform an on-site visit at HEI with peer review experts. The peer review experts assess the criteria which are defined in the “*Assessment Guide for the Accreditation of Programmes in Management Studies, Economics, Law and Social Sciences by FIBAA*”. FIBAA prepares an accreditation report. The HEI's statement is taken into account in the accreditation report that is decided on by the FACC. So FIBAA itself has defined the assessment criteria in accordance to ESG, takes the decision and awards the seal (*FIBAA Quality Seal* or *FIBAA Premium Seal*). The principles for awarding are defined and published.<sup>18</sup>

### Institutional Accreditation

- Procedures on behalf of the GAC (in Germany): The work sharing and the procedure are similar to the above described programme accreditation on behalf of the GAC. One difference is that there are two on-site visits at the HEI.
- Procedures in the framework of *Institutional Audit Austria*: For Austria the FIBAA offers the *Institutional Audit Austria* (“certification”) in accordance with the requirements of the Austrian Act on Quality Assurance in Higher Education (German abbreviation HS-QSG). The basic procedural steps correspond to the descriptions above. The assessment criteria are defined in a special Assessment Guide, which FIBAA has developed. FIBAA works in accordance with the national requirements, always ensuring compliance with ESG.
- Procedures in the framework of *Institutional Accreditation (Switzerland)*: In Switzerland FIBAA offers the *Institutional Accreditation (Switzerland)* in accordance with the requirements of the Higher Education Funding and Coordination Act (HEdA) for the acquisition of the Institutional Accreditation Seal of Swiss Accreditation Council. The basic procedural steps correspond to the descriptions above. The assessment criteria are defined in a special FIBAA Assessment Guide, which FIBAA has developed. Here again, FIBAA complies with the national requirements and ensuring compliance with ESG.
- Procedures for awarding the *Institutional Accreditation* according to the FIBAA quality requirements (in Germany and worldwide): As in all procedures, a self-evaluation report of the HEI, an on-site visit with peer-review experts, a draft of the report by FIBAA and a statement by the HEI are main elements of the process. The assessment criteria are defined in the *FIBAA Assessment Guide for Institutional Accreditation* and the decision about the accreditation is made by the FACC.
- Procedures for awarding the *Institutional Accreditation: Strategic Management* (in Germany and worldwide): The procedure contains a comprehensive evaluation of the institutional strategy and is completed by the decision of the FACC. The basic procedural steps correspond to the descriptions above. The assessment criteria are defined in the *FIBAA Assessment Guide for Institutional Accreditation: Strategic Management*.

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<sup>18</sup> URL: [https://www.fibaa.org/fileadmin/redakteur/pdf/PROG/Premium-Siegel/2017\\_Premium\\_PROG\\_de.pdf](https://www.fibaa.org/fileadmin/redakteur/pdf/PROG/Premium-Siegel/2017_Premium_PROG_de.pdf) (only in German language available).

## **Certification of Continuing Education Courses**

Analogous to accreditation procedures, FIBAA carries out certification procedures on behalf of institutions offering continuing education courses. As in all procedures, a self-evaluation report of the institution, an on-site visit with peer-review experts, a report by FIBAA and a statement by the institution are provided for the process. The assessment criteria are defined by a special FIBAA Assessment Guide and the decision about the certification is made by the FACC.

## **Consulting**

FIBAA's consulting services are not in the scope of ESG. The process steps – depending on the mission – are individually and target-oriented arranged between the respective institution and FIBAA. For further information see page 45.

## **Selection Process of Peer-Review Experts and Role of External Experts**

The selection process can be summarised as follows for all procedures: After conclusion of the contract between the HEI and FIBAA, a project manager is appointed to coordinate the procedure. The project manager arranges an appointment with the HEI for the on-site visit and submits a request for experts to the FIBAA Expert Management. The FIBAA Expert Management can rely on four legal sources which provide information on the selection of experts: ESG 2015, Guidelines of the German Rectors' Conference<sup>19</sup>, the Interstate Treaty<sup>20</sup> and the Specimen Decree<sup>21</sup>.

In selecting the experts, FIBAA Expert Management can access to a pool of about 750 experts from more than 20 countries. The experts are carefully selected and regularly trained. For the concrete procedure, the experts are selected according to the specific demands and criteria, which are explained in detail in section 10.4. The size of the expert panel depends on the type of procedure, but at least 4 experts are always required for procedures with on-site visits. Expert panels always consist of at least two representatives of science, one of professional practice and one of the student body. Before any procedure is carried out, two instances of FIBAA must give their approval to the expert panel: The Project Manager Expert Management and a subcommittee for the appointment of expert panels (in German "Gutachterausschuss") which consist of a group appointed by the FACC. Of course, the HEI is also informed about the expert panel and can, in justified cases, raise an objection against a person or the whole expert panel.

In all accreditation procedures, the expert panel has the role to carry out an assessment on the basis of the relevant assessment criteria and to contribute to the preparation of the report. Each procedure requires specific preparation, participation in the on-site visit and follow-up. The FIBAA project manager supports the experts, writes down their findings and provides them (in cooperation with the HEI) with the information required.

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<sup>19</sup> URL: <https://www.hrk.de/positionen/beschluss/detail/leitlinien-zu-der-benennung-von-gutachterinnen-und-gutachtern-und-der-zusammenstellung-von-gutachter> (Only German language available).

<sup>20</sup> URL: [https://www.kmk.org/fileadmin/Dateien/veroeffentlichungen\\_beschluesse/2016/2016\\_12\\_08-Studienakkreditierungsstaatsvertrag-englisch.pdf](https://www.kmk.org/fileadmin/Dateien/veroeffentlichungen_beschluesse/2016/2016_12_08-Studienakkreditierungsstaatsvertrag-englisch.pdf).

<sup>21</sup> URL: <https://www.akkreditierungsrat.de/de/media/23> (Only German language available).



## 7. Agency's internal quality assurance

FIBAA has developed and established several measures for internal QA. Since 2011 the position of quality manager has been established, who ensures the integration of the internal QA measures in all work processes and areas. This includes defining and updating all business processes in a quality management Manuel (QM Manuel), systematic and regular revision of working documents as well as the creation and modification of internal checklists and documents (e.g. tutorials for end users of a software system). Further on, all FIBAA procedures are evaluated by those involved (both internal and external participants) and they are summarised in an annual quality report. The results from the evaluations are used for the improvement of the respective procedure. For more information on the QM Manuel, the revision of working documents, the evaluations and the other aspects of the internal QA procedures, see section 9.6.

Regarding the continuous improvement of the internal QA, FIBAA has defined procedures like *jours fixes* and subsequent improvements from the committee meetings. The QM Manuel reflects the development of the internal QA and an article in the FIBAA Annual Report 2018 dealt with FIBAA's internal QA procedures.<sup>22</sup> FIBAA's Quality Management is directly responsible to the managing director, which shows that the internal QA is of great importance for the strategic development of FIBAA. FIBAA's quality principles, as well as the procedures and instruments of the internal QA, are transparent and available on FIBAA's website.<sup>23</sup>

Annex 3 – Acces to the Quality Management Manuel

## 8. Agency's international activities

As mentioned before, FIBAA is recognised by the Austrian Federal Ministry for Science and Research, the Swiss Federal Department of Economic Affairs, Education and Research (EAER), the Ministry of Education and Science of Kazakhstan, the Nederlands Vlaamse Accreditatie Organisatie (NVAO), the Higher Education Quality Council of Turkey (HEQC), the Ministry of Education and Culture of Indonesia as well as the Ministry of Education and Science of Ukraine.

FIBAA carries out programme accreditation and institutional accreditation procedures as well as certifications of continuing education courses in these and other countries.

Furthermore, FIBAA applied for recognition by the Vietnamese Ministry of Education and Training (MOET) as an international accreditation agency. The final decision has not yet been made. The reason for these efforts is the fact that FIBAA has received an increased request from Vietnamese HEIs for the last two years.

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<sup>22</sup> URL: <https://www.fibaa.org/fibaa/was-uns-auszeichnet/fibaa-annual-report/> (Only in German language available).

<sup>23</sup> URL: <https://www.fibaa.org/> (Only in German language available).

In addition, there has been an increased interest from Indonesian Higher Education Area in the past year. This has been fostered by cooperation between FIBAA and the Malikal Zentrum Institute<sup>24</sup>, which helps FIBAA to inform and explain Indonesia HEIs about European accreditation in more detail. As of January 2021, six contracts with Indonesian HEIs were closed within one year. The first accreditation procedure in Indonesia has been carried out in autumn 2019. The other six will be carried out in 2021 and 2022.

Given the current request from Vietnam and Indonesia, FIBAA is confident that the accreditation procedures in Southeast Asia will continue to raise in the next years.

FIBAA's international orientation is emphasized by several memberships in world-wide associations and networks: FIBAA has a membership in the International Network for Quality Assurance Agencies in Higher Education (INQAAHE), in the European University Association (EUA) and in the Central and Eastern European Network (CEENQA).

In 2019 there was cooperation between FIBAA, the National Accreditation Agency of the Russian Federation (NAA) and the Mari State University (Russian Federation) within the framework of the Jean Monnet project "European Quality Assurance for Students" (EQAS). The aim of this project was gathering, analysing and disseminating European good practice in involving students in external and internal higher education quality assurance. FIBAA was pleased to present its expertise in systematically involving students at all levels of the accreditation process. Beginning with the expert's system via on-site visits up to the decision committee – FIBAA has presented that the students are represented at all essential steps of FIBAA's accreditation process.

Finally, FIBAA's Division Manager for International procedures gave a presentation about its experience with accreditation procedures in Russian Federation in the framework of an online conference which has been organised by "Russian Register".

Thus, the exchange with Russian cooperation partners remains very vivid and fruitful.

Joint activities with e.g. AACSB (joint workshops in 2018 and 2019) highlight FIBAA's outreach in the English speaking world. At the same time, FIBAA's rising position in Central Asia are supported by memoranda of understanding with the Kazakh Independent Agency for Accreditation Rating (IAAR), the Independent Kazakhstan Quality Assurance Agency for Education (IQAA) and the Education Network Association (EdNet) in neighbouring Kyrgyzstan. In 2018, FIBAA successfully joined the Asia-Pacific Quality Network (APQN) and closed a Memorandum of Understanding with the Taiwan Assessment and Evaluation Association (TWAEA).

In the Russian Federation FIBAA builds on long-term partnerships with the Agency for Higher Education Quality Assurance and Career Development (AKKORK), Russian Register, National Agency in Education Sphere (NAA) and National Centre for Public Accreditation (NCPA). The MoU between NCPA and FIBAA has been renewed in 2020.

Due to FIBAA's strong network with stakeholders from tertiary education sector worldwide, FIBAA could carry out programme accreditation and institutional procedures in several countries in the last five years (Netherlands, Austria, Switzerland, Russian Federation, Kazakhstan, Georgia, Azerbaijan, Slovenia, Ukraine, Hungary, Egypt, Tunisia, Jordan, Lebanon, Oman, Qatar, Turkey, Cyprus, Albania, Vietnam, Indonesia).

Further information on FIBAA's international network can be found online.<sup>25</sup>

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<sup>24</sup> URL: <https://www.malikalzentrum.com>.

<sup>25</sup> URL: <https://www.fibaa.org/fibaa/was-uns-auszeichnet/unsere-internationale-vernetzung/> (only in German language available).

## 9. Compliance with European Standards and Guidelines (Part 3)

### 9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance

#### **Standard**

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

#### Policy for QA

##### *Mission*

FIBAA is a non-profit organisation. Customer-oriented, efficient, fast and flexible work are some of its trademarks. The task of quality assurance lies within the responsibility of higher education institutions. FIBAA supports them in achieving their self-defined objectives. It offers impulses for further quality development. It promotes quality and transparency in academic education by assessing HEI's, Business Schools, programmes and further study offers nationally and internationally based on international standards and regulations and by means of documenting and publishing the results.

FIBAA's complete and detailed mission is transparent and can be read on the website.<sup>26</sup> All processes follow this mission and are in accordance with it.

#### Activities and processes for QA

In accordance with ESG, FIBAA regularly performs procedures for QA in higher education in its business areas of programme accreditation (PROG), institutional accreditation (INST) and certification of continuing education courses (CERT). The consulting services of the organisational unit FIBAA Consult (CONS) are not in the scope of ESG and are strictly separated from the other divisions.

##### *Programme-level Accreditation*

- Procedures on behalf of the GAC (in Germany): On request of a German HEI, FIBAA carry out the procedure to write an accreditation report for a single or multiple programmes. The steps of this procedure are as follows:
  - The HEI submits its self-evaluation report;
  - FIBAA assesses the formal criteria (so called “Prüfbericht”);
  - FIBAA carries out an on-site visit at HEI with peer review experts. The peer review experts assess the content-related criteria (so called “Gutachten”);

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<sup>26</sup> URL: <https://www.fibaa.org/fibaa/ueber-uns/mission-vision/> (Only in German language available).

- The “Prüfbericht” and “Gutachten” form the accreditation report which is compiled after the on-site visit. It can contain recommendations on conditions or other recommendations for the specific programme. The basis for the accreditation report is given by the GAC with the so called “Raster”. There are two different type of “Raster”<sup>27</sup> which are used for programme-level Accreditation:
  - Typ Programmakkreditierung - Einzelverfahren (Procedures with only one programme)
  - Typ Programmakkreditierung - Bündelverfahren (Procedures with more than one programme)
- The HEI has the possibility to send a statement to the draft of the accreditation report which is taken into account;
- FIBAA sends the final version of the accreditation report to the HEI. With that the procedure is finished on behalf of FIBAA.

At the request of the HEI, the GAC then decides on the accreditation on the basis of the accreditation report, whereby the GAC is absolutely independent in its decision. The assessment criteria are defined in the Specimen Decree and in the individual regulations of the federal states of Germany<sup>28</sup>.

- Procedures for awarding the programme accreditation according to the FIBAA quality requirements (in Germany and worldwide): On request of a HEI, FIBAA carry out the procedure for awarding the programme accreditation according to the FIBAA quality requirements for a single or multiple programmes. The steps of this procedure are as follows:
  - The HEI submits its self-evaluation report;
  - FIBAA carries out an on-site visit at HEI with peer review experts. The peer review experts assess the criteria which are defined in the “*Assessment Guide for the Accreditation of Programmes in Management Studies, Economics, Law and Social Sciences by FIBAA*”;
  - FIBAA writes the accreditation report on the basis of the review of the experts after the on-site visit. It can contain conditions or recommendations for the specific programme;
  - The HEI has the possibility to send a statement to the draft of the accreditation report which is taken into account;
  - On the basis of the report, the decision recommendation of the review panel and by taking account the statement of the HEI, the FACC will reach a decision about the accreditation. For study programmes which have successfully been accredited according to the FIBAA international quality standards, the FIBAA Quality Seal for programmes is awarded. If the programme has demonstrated outstanding quality awarding of the FIBAA Premium Seal is also possible. The principles for awarding are defined and published.<sup>29</sup>

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<sup>27</sup> URL: <https://akkreditierungsrat.de/de/antragstellung/antragstellung> (only in German language available).

<sup>28</sup> URL: <https://www.akkreditierungsrat.de/de/akkreditierungssystem-rechtliche-grundlagen/gesetze-und-verordnungen/gesetze-und-verordnungen> (only in German language available).

<sup>29</sup> URL: [https://www.fibaa.org/fileadmin/redakteur/pdf/PROG/Premium-Siegel/2017\\_Premium\\_PROG\\_de.pdf](https://www.fibaa.org/fileadmin/redakteur/pdf/PROG/Premium-Siegel/2017_Premium_PROG_de.pdf) (only in German language available).

- FIBAA is authorised to conduct nationally recognised accreditation procedures at Dutch HEIs according to the standards and quality criteria of Nederlands Vlaamse Accreditatie Organisatie (NVAO) (which are based on ESG as well; NVAO is a member of ENQA and is listed in EQAR). NVAO recognises the accreditation reports prepared by FIBAA as the basis for its accreditation decision. Three FIBAA employees are certified 'Panel Secretaries' at NVAO.

In the area of programme accreditation FIBAA has concentrated for a long time on law, social sciences and economics-focused programmes as well as management qualifications. PROG represents FIBAA's main field of business. In total FIBAA has to date (as of 28. February 2021) accredited 2,527 programmes at home and abroad and since 2018 with the legal base of the GAC of January 1<sup>st</sup>, 2018 reports for 91 study programmes completed. The following diagram shows the number of the programmes accredited by FIBAA since 1996 (FIBAA-Seals and Seals of the GAC with legal base till December 31<sup>st</sup>, 2017):

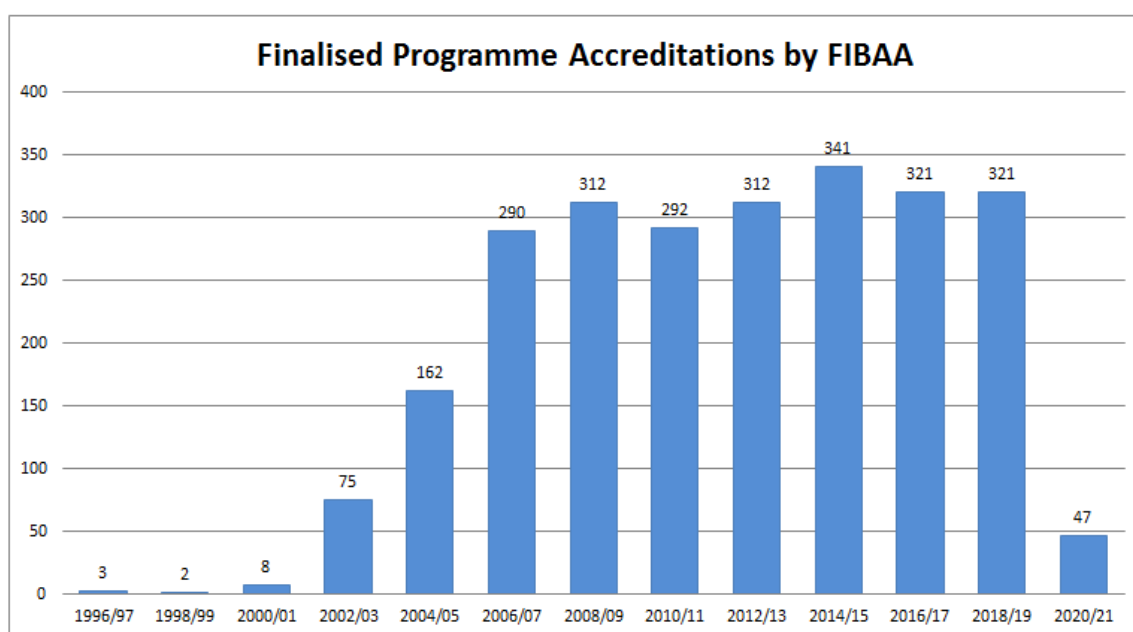


Figure 3: Development of Programme Accreditations

The following table shows the development of the accreditations by FIBAA (FIBAA-Seals and Seals of the GAC with legal base till December 31<sup>st</sup>, 2017) versus completed reports with the legal base of the GAC of January 1<sup>st</sup>, 2018. Thus, HEIs in Germany have to accredit their study programmes now under the legal base of the GAC of January 1<sup>st</sup>, 2018, the number of accredited study programmes by FIBAA decrease substantially. This is a shift away off the decision through the committees of the agencies towards the decision through the GAC. But further on, FIBAA performs many procedures and the share of procedures with legal base of the GAC of January 1<sup>st</sup>, 2018 increases in future.

At the end of 2017, many HEIs made contracts for using the legal base till December 31<sup>st</sup>, 2017, so there were an extreme high number of study programmes, which were accredited 2018.

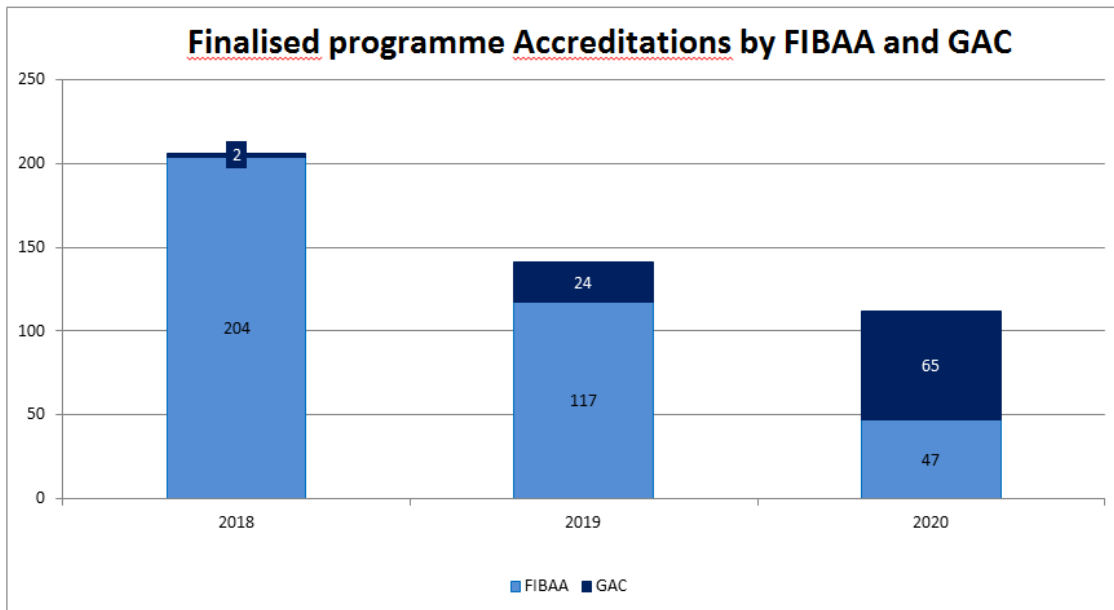


Figure 4: Programme Accreditation by FIBAA & GAC

### Involvement of Stakeholders

All stakeholders and international representatives are consistently and firmly integrated into FIBAA's structures. The procedures to be conducted, which make up the daily work of FIBAA, involve these stakeholders. Representatives of science, professional practice and the student body are represented in FIBAA's organisational units such as the committee and subcommittee for the appointment of expert panels. This means that they are also involved in important issues (e.g. awarding FIBAA seals). Furthermore, each expert panel also consists of representatives of science, professional practice and the student body. Stakeholders' independence is regularly checked and they are all required to sign a code of conduct and a data protection declaration, for example. For each procedure, the impartiality is checked again specifically.

All stakeholders are involved in the regular evaluations by FIBAA after completion of each procedure, event or committee meeting. Participants of FIBAA events, Projekt Manager, HEIs, experts and committee members get a link to the evaluation platform "LimeSurvey" to evaluate the procedures and committee meetings online with different questionnaires.<sup>30</sup> Their feedback is incorporated into the internal QA. Within Germany, a regular exchange between the accreditation agencies and the GAC ensures further development in the German accreditation system. For this purpose, the agencies, for example, have a permanent seat in the committee meeting with an advisory vote. Regular meetings also take place within the framework of the meetings of the Accreditation Council to which the agency representatives are invited. There is also a representative of the agencies in the Complaints Commission with an advisory vote. For example, the agencies are also invited to the working groups for the evaluation of the model legal ordinance for accreditation. Further on, FIBAA has close relations to HEI associations. In the past, joint workshops have been held with these associations.

<sup>30</sup> For more information, please look at 9.6 ESG Standard 3.6 Internal quality assurance and professional conduct.

## Internal Strategy Debates

In recent years, FIBAA has integrated activities to intensify its internal strategy debates:

FIBAA had set up a working group on internal strategy debates. With the intention to reflect the latest developments in the accreditation system and to adequately align the FIBAA, the working group meets whenever an exchange is required in the FIBAA Head Office in Bonn. The managing director and the division managers (from fields of PROG, INST, CERT, International, Expert Management and CONS) attend the meeting, to debate the strategic development of FIBAA. In terms of content, the meetings deal with information on digitalisation, FIBAA seals and workshops. The working group understands its task as a continuous process, for which, of course, the changes in the German accreditation system are important.

The working group is supported by the FIBAA Strategy Circle, which consists of current and former FIBAA committee members and meets dependant to the demand. The FIBAA Strategy Circle, which can assess the customers in the accreditation market, receives minutes of the working group meetings and gives a feedback to the internal strategy debates, so that the working group can prepare a concept or give an advice for the strategic development of FIBAA. It is not only involved in the process by providing feedback regularly, but also supports the working group in product development with own suggestions. Topics that the FIBAA Strategy Circle deals with include the advancement of the criteria for awarding an extended seal taking new developments in the Higher Education Instructions (HEI) into account.

Through the exchange between working group and FIBAA Strategy Circle new areas of activity of certification, institutional procedures including system accreditation and evaluation methods can be explored. The working group and the FIBAA Strategy Circle also discuss the changes in the German accreditation system that are relevant for the strategic development. Concepts developed by the working group and the Strategy Group must be approved by the FIBAA Foundation Council and implemented by the FIBAA Head Office.

As results of the Strategy Circle and internal working group in the last years, FIBAA has developed a new seal in the field of digitalisation: “excellent in digital education” which undergo currently three pilot processes and which occupy with the quality of digital learning and teaching.<sup>31</sup> In Addition, the structure of the three accreditation and certification committees (FAC PROG, FAC INST and FAC CERT) were dissolve on December 31<sup>st</sup>, 2020 and transferred in one great committee, the FIBAA Accreditation and Certification Committee (FACC) on January 1<sup>st</sup>, 2021.<sup>32</sup>

## Critical Reflection<sup>33</sup>

FIBAA sees her own strengths in her customer-oriented, efficient, fast and flexible work. She tries to give impulses for enhancement of the QA of HEIs, where this is permitted and offers a wide range of seals and procedures, national and international with international recognized standards. Important

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<sup>31</sup> See Annex 4 – Concept paper of the FIBAA Seal “excellent in digital education” (Only in German language available).

<sup>32</sup> See Annex 5 – Strategy paper for the restructuring of the FIBAA committees (Only in German language available).

<sup>33</sup> All „Critical Reflections“ are derived from the SWOT-Analysis in Chapter 13.

for the development of her own work, is the involvement of all participating stakeholders with online evaluations.

Annex 4 – Concept paper of the FIBAA Seal “excellent in digital education” and draft of the Assessment Guide for the FIBAA Seal “excellent in digital education”

Annex 5 – Strategy paper for the restructuring of the FIBAA committees

## 9.2 ESG Standard 3.2 Official Status

### **Standard**

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

FIBAA is a Swiss charitable foundation documented in the public deed from July 4<sup>th</sup>, 2000 and the Commercial Register entry of the Canton of Zürich from October 7<sup>th</sup>, 1987. It has been organised as such since 1994 pursuant to art. 80ff. of the Swiss Civil Code. The foundation was established by the leading German, Swiss and Austrian employer associations of the business community. The head office of FIBAA is located in Bonn, the registered office is in Zurich.

Based on the reform of the German accreditation system that came into force in 2018, FIBAA is one of the 10 agencies authorised by the GAC to carry out accreditation procedures in Germany on behalf of the GAC.<sup>34</sup> The GAC makes the final decision in these accreditation procedures. There are separate agreements between agencies and the GAC, which the agencies prove with the ENQA full membership and the registration in ENQR. The only language of communication in the procedures on behalf of the GAC is German. HEIs commission FIBAA to carry out accreditation procedures on the basis of private law contracts. As mentioned before, FIBAA has been a full member of ENQA since 2002 and listed in the EQAR since 2009.

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<sup>34</sup> Information from the GAC on the agencies can be found on its website:  
<https://www.akkreditierungsrat.de/de/akkreditierungssystem/agenturen/agenturen> (only in German language available).



## International Recognition

 <p>BUNDESMINISTERIUM FÜR BILDUNG, WISSENSCHAFT UND FORSCHUNG</p>	Austria – Recognition by the Federal Ministry of Science, Research and Economy
 <p>SCHWEIZERISCHER AKKREDITIERUNGSRAT CONSEIL SUISSE D'ACCREDITATION CONSIGLIO SVIZZERO DI ACCREDITAMENTO SWISS ACCREDITATION COUNCIL</p>	Switzerland – Recognition by the Swiss Accreditation Council
	Kazakhstan – Recognition by the Ministry of Education and Science of Kazakhstan
	Netherlands & Flemish Community of Belgium – Recognition by the Netherlands Vlaamse Accreditatie Organisatie (NVAO)
 <p>Higher Education Quality Council Turkey</p>	Turkey – Recognition by Higher Education Quality Council of Turkey
	Ukraine – Recognition by the Cabinet of Ministers of Ukraine
	Indonesia – Ministry of Education and Culture

Further information on the international recognition of FIBAA can be found online.<sup>35</sup>

## Critical Reflection

The legal form of a Swiss foundation could be considered as a disadvantage, because FIBAA has no base finances and her prices for the same procedure for the GAC in Germany has to be more expensive than other agencies. Moreover, there is a tax disadvantage and FIBAA do not have access to European projects and subsidies.

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<sup>35</sup> URL: <https://www.fibaa.org/fibaa/was-uns-auszeichnet/unsere-internationale-anerkennung/> (only in German language available).

## 9.3 ESG Standard 3.3 Independence

### **Standard**

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

#### Independence and Autonomy

The operational independence, i.e. the autonomy and independence of individuals (of the experts and committees), is guaranteed by FIBAA's legal entity status, by the regulations in the foundation statutes and in the rules of procedure. All experts and committee members employed by FIBAA perform their duties on the basis of their individual expertise and not as representatives of organisations. Influence by third parties is precluded both in law and through the voluntary commitment of those involved.

The FIBAA Foundation Council appoints the members of the FIBAA committees (FACC and Appeals committee). It has no right to issue instructions in accreditation or certification decisions or in the development of procedures. The committee members have signed a confidentiality agreement, a data protection notice and an impartiality declaration. If a committee member is not impartial in a procedure, for example due to an affiliation with the HEI, they do not take part in the formation of an opinion or the decision-making process when the corresponding procedure is addressed and must leave the conference/virtual room during the discussion and voting. If a committee member was involved in a quality assurance procedure by FIBAA as an expert, they likewise do not participate in the decision-making process for the relevant procedure. In addition, all committee members are required to provide notice immediately of any possible conflicts of interest that arise. This is stipulated in the rules of procedure of the respective committee. Additionally, a code of conduct forming part of the rules of procedure stipulates for committee members that

- committee members and experts must act and make decisions exclusively on the basis of quality considerations and must not be bound by third-party instructions,
- they must not use their membership to pursue their own interests or the interests of third parties and
- they must not disclose confidential information and operational or business secrets.

#### Responsibility without influence of third party

Furthermore, the independence of FIBAA's activities is ensured by the fact that the FACC reach his decisions solely on the basis of the expert evaluations in the reports and on the basis of the statements made by the HEIs. The FACC may deviate from the recommendations and recommended decisions given by the experts, provided that this seems necessary in terms of coherence, conformity of the specified procedural principles or consistency with other decisions. The same applies for members of the FIBAA Appeals Committee whose independence is also guaranteed by the rules of procedure of the FIBAA Appeals Committee and through declarations of impartiality. The experts in all quality assurance procedures also perform their duties as independent experts. All internal and external FIBAA employees also sign an impartiality declaration. The strict separation of consultancy and accreditation in ac-

cordance with ESG 3.1 is a matter of course for FIBAA. For further information see section 4, 9.1 and 12).

FIBAA has adopted all rules of procedure, including those of the Appeals Committee. All legally documents are available on the FIBAA website.

### Critical Reflection

FIBAA attaches high value on compliance of all rules of procedure in site visits and committee meetings. She succeeds this because she can fall back on many long-termed committee members and experts.

A weakness seems, to adjust regularly and actually all internal documents, like assessment guides, terms and conditions, handouts for procedures, expert seminars, always on the last version.

## 9.4 ESG Standard 3.4 Thematic analysis

### Standard

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

FIBAA has expanded its publication activities in recent years. FIBAA summarises its activities annually in a FIBAA Annual Report<sup>36</sup>. This publication organ was introduced in 2018 and has so far contained reviews of the previous year, reports on the FIBAA head office in Bonn and thematic analyses. The last two thematic analyses dealt with the following issues: “Gender Equality among the Peer Review Experts: A Reflection of the German Higher Education Landscape?” and “Conditions for the Accreditation of Selected Study Programmes in Kazakhstan and Germany”, authored by Dr. Tino Shahin (former Division Specialist FIBAA Consult & Division Manager FIBAA Expert Management<sup>37</sup>) and Viktoria Tischanski (Division Manager for International Procedures).

Further on, several time a year, news are published on the FIBAA website, which provide information on general findings and events that FIBAA has encountered during its activities in external quality assurance. Currently around 2,000 people are subscribed to the newsletter. The latest issues of the newsletter are also available on the FIBAA homepage in German and English<sup>38</sup> and since 2021 they are also published in social media, e.g. LinkedIn.

In addition to these regular publications, FIBAA has also published individual articles. FIBAA has responded to the ENQA call for articles for 20th anniversary publication and submitted a paper. This paper was written by Mag.<sup>a</sup> Diane Freiberger, MBA (FIBAA Managing Director) and Dr. Tino Shahin (Di-

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<sup>36</sup> URL: <https://www.fibaa.org/fibaa/was-uns-auszeichnet/fibaa-annual-report>.

<sup>37</sup> Dr. Shahin was employed at FIBAA till December 31st, 2020.

<sup>38</sup> URL: <https://www.fibaa.org/fibaa/ueber-uns/news> (partially only in German language available).

vision Specialist FIBAA Consult & Division Manager FIBAA Expert Management) and its title is "Digital Transformation in Quality Assurance and its Impact on Communication".<sup>39</sup>

Also published is the article "Learning Outcomes: Core Issues in Higher Education" from Dr. Heinz-Ulrich Schmidt (FIBAA Special Representative and formerly FIBAA CEO) in "Quality Assurance and Accreditation in Foreign Language Education. Global Issues, Models, and Best Practices from the Middle East and Turkey", edited by Donald F. Staub (2019).

FIBAA shares its general findings of external quality assurance activities at lectures, conferences and workshops. Here is a selection of the presentations in recent years:

- Lecture for a private HEI on the topic: Applying taxonomy of learning objectives in exams (Germany, 1st July 2019)
- In cooperation with AACSB a workshop on the topic: "Quality Assurance Professionals Workshop", (Scotland, 13. April 2019)
- Two webinars on the media platform HED – Higher Education Discovery<sup>40</sup> (Russia) under the aegis of the Asia-Pacific Quality Network<sup>41</sup> (APQN), (October 10 and November 5, 2019)
- On 26 and 27 September 2019, a HRK conference of the project nexus on "Recognition and Transfer of Academic Performance in the Context of (Institutional) Accreditation" took place at the Johannes Gutenberg University Mainz.<sup>42</sup>
- German-Chinese Exchange on Internal and External Quality Assurance in Higher Education, (August 2019)
- Erasmus+ - Jean Monnet Project "EQAS": Experience exchange with university representatives, accreditation agencies and students from the Russian Federation (January, March, May, June 2019)
- In March 2019, FIBAA in cooperation with the Association of Private Universities (VPH)<sup>43</sup> conducted a workshop on the new legal basis of German Accreditation system. The workshop speakers, among them CEO of the Accreditation Council, former CEO of FIBAA, and FIBAA-Consult, presented the current status of the new accreditation system to the participants.
- Digital conference for an association of private HEI's on the topic: Programme accreditation and Appointment/Training of Peer-review Experts (2nd April 2020)
- Russian Federation: FIBAA at the international Forum of the Russian Certification Association „Russian Register“ (October 2020)
- Tajikistan: FIBAA at the international conference „International Accreditation - Factor of Education Quality Improvement“, Tajik State University (September 2020)

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<sup>39</sup> The article is published here:

[https://www.fibaa.org/fileadmin/redakteur/pdf/FIBAA\\_Consult/Projekte\\_Publikationen/Digital\\_Transformation\\_Quality\\_Assurance.pdf](https://www.fibaa.org/fileadmin/redakteur/pdf/FIBAA_Consult/Projekte_Publikationen/Digital_Transformation_Quality_Assurance.pdf)

<sup>40</sup> URL: <https://hedclub.com/en>.

<sup>41</sup> URL: <https://www.apqn.org/>.

<sup>42</sup> Representatives from universities, accreditation agencies and the Accreditation Council Foundation opened the event. Prof. Dr. Uwe Schmidt, member of the FIBAA Accreditation Commission for Institutional Procedures and head of the Centre for Quality Assurance and Development at the Johannes Gutenberg University Mainz, gave a lecture on "Accreditation as a contribution to quality development? Opportunities and risks from the perspective of University Research" and stressed that competence orientation as a currency is an important basis for recognition and transfer, that is not yet sufficiently operationalised. Former FIBAA Special Representative Dr. Heinz-Ullrich Schmidt also participated in the conference and contributed on the topic as a whole as well as on individual detailed aspects from the perspective and experience of FIBAA.

<sup>43</sup> URL: <https://private-hochschulen.net/home> (only in German language available).

- Indonesia: Online-FIBAA-Workshop “European Accreditation Practice) in cooperation with the Malikal Zentrum Institute<sup>44</sup> (September 2020)
- Indonesia: FIBAA Workshop on “FIBAA Accreditation Process and Assessment Criteria” at the Diponegoro University (December 2020)

Reference has already been made to the publication of FIBAA’s QM Manuel in section 9.6. Information on FIBAA’s publication activities can also be found in section 12.

### Critical Reflection

FIBAA tries to expand her thematic analyses in the last years. She did not always achieve this, because of a high employee turnover and personnel resources. The implementation of procedures with its high quality standards has always a high priority in the work of FIBAA and her employees.

## 9.5 ESG Standard 3.5 Resources

### Standard

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

### Finances

The FIBAA Foundation was made exempt from state tax, general municipal taxes and direct federal tax in Switzerland with effect from the 2005 tax period due to its pursuit of public-interest causes. This confirms that FIBAA’s activities are not for profit and that the interests of maintaining the organisation are secondary to the organisation’s public-interest cause. In this sense, the members of the FIBAA Foundation Council, the FACC and the FIBAA Appeals Committee are employed on a voluntary basis.

FIBAA primarily generates income (revenues) through contracts it concludes with national and international HEI’s on the implementation of accreditation or certification procedures. Contracts for consulting services are also concluded.

FIBAA covers its costs (expenses) using this income. FIBAA recoded the following revenues and expenses on its balance sheet for the years 2018 and 2019:

*Table 2: Finance status*

Year	Revenue in Euro K	Expenses in Euro K	Difference
2018	1.729	1.671	58
2019	1.534	1.481	53

<sup>44</sup> URL: <https://malikalzentrum.com/>.

This information is taken from FIBAA's annual financial statements for 2018/19.<sup>45</sup> The result for the year 2019 therefore shows a profit of 53 k EUR. Similar, the year 2018 ended with a profit of 58 k EUR. Taking into account the prior year level (2018), the profit increased in comparison to the previous year through cost reduction. The tax consultant and accountant Grass of Cologne granted FIBAA the audit certificate for both years (2018 and 2019) and revision of the accounts was provided by BDO Zurich.

Fees are set on the basis of a project cost calculation whereby the costs of the agency and of those directly involved in the accreditation procedure (experts, project managers) are taken into account. The calculations contain flat rates that cover the incurred costs (expert fees, travel expenses and accommodation for the experts, committee meetings for decisions on ongoing accreditation procedures etc.).

FIBAA's fees are regularly reviewed by the management and the internal finance area to establish whether they cover the costs incurred by FIBAA. If necessary, they are adjusted. In order to monitor this and to establish the required financial as well as staff resources, the agency drafts annual plans of expected revenues and expenses.

Annex 8 – FIBAA's annual financial statements for 2018/19

### Personnel

The staff body in FIBAA's head office in Bonn is composed as follows: FIBAA's head office is managed by a managing director (see organisation chart, in section 9.1). The managing director has the personnel responsibility for a total of 18 employees (12 FTE and six PTE).

There are five employees in total in the areas Assistance & Office, Finance & Controlling and IT (three FTE and two PTE). Many of the remaining employees work in several areas at the same time. 13 people can work as project managers, including four external project managers. For each area (PROG, INST, International, Consult) one employee (FTE) is responsible (for PROG: one FTE and one PTE, for CERT: one PTE). FIBAA Consult consists of one employee (FTE) who is also the Managing Direction.

FIBAA employees can not only attend FIBAA Consult workshops but also regularly receive training opportunities. In addition, individual training measures can be arranged. Several employees have received training in compliance, project management and English. It is a legal requirement that the works council be trained regularly at the expense of FIBAA. This also applies to occupational safety, FIBAA's fire protection and first aid assistants.

### Premises

FIBAA's head office is centrally located in Bonn and consists of two floors of a multi-storey building. It is equipped with a total of 23 offices or rooms (4th floor: 15, 3th floor: 10), two kitchens and four toilets. A large (video) conference room, two (Video) meeting rooms and a small canteen integrated into the office space. The managing director and all employees have individual offices. FIBAA has long-term

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<sup>45</sup> See Annex 8 FIBAA's annual financial statements for 2018/19 (only in German language available).

rental agreements on its office space. The space is sufficient for its current personnel. External meeting rooms are rented for meetings, if required.

### IT architecture

FIBAA uses a computer and network infrastructure. The employees at the head office have modern desktop or laptop computers where required. Laptops are selected according to specific criteria (readability on the screen, matt surface, weight, battery life) and are supplemented with external monitors and additional input devices in the office for ergonomic reasons. A current Windows operating system and an Office solution are installed as standard on the basis of a volume agreement with Microsoft. Service programmes such as virus protection, archiving tools, document management, printing services and various collaboration tools are also provided. In addition, each employee has access to a landline telephone with an extension number. FIBAA provides intranet/internet access in every room (external copper wire, 16 Mbit) via a wired gigabit Ethernet or WPA2-protected WiFi only accessible to employees.

Separate WiFi with limited internet access has been set up for guests (e.g. training participants). Employees who regularly travel as part of their work receive mobile telephones (Apple iPhones) with telephone and 3G/4G internet services. FIBAA assumes the operating and administrative costs for these in full.

The business data is accessed exclusively via FIBAA IT devices via remote access according to high security standards. All computers which are used outside the office are additionally encrypted. The databases necessary for procedure management can also be found there: project management, document workflow, correspondence, publication database and invoicing. In addition, there is extensive wiki-based technical documentation for the system administrator. A colour copier with a high-performance scanner and several network printers complement the equipment.

For all questions concerning IT, in the head office, on business trips or in telework, there is an employee as a contact person and first-level support.

For reasons of transparency, FIBAA has a modern website<sup>46</sup>, which contains all information about the procedures offered and other services. Since November 2020, the FIBAA website has been thoroughly renewed. The most important facts of the relaunch are:

- state of the art version of the CMS system Typo3 with the current security criteria for websites;
- completely new appearance with an appealing, customer-oriented interface;
- valid implementation of the General Data Protection Regulation (EU) in accordance with European law.

The English and Russian language versions are still in progress and will go live in the second quarter of 2021.

The website can be found through all common search engines. In addition, publicly accessible, password-protected tools are available for procedure evaluation (LimeSurvey), committee meetings (pass-

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<sup>46</sup> URL: <https://www.fibaa.org/> (only in German language available).

word-protected homepages) and the publication of reports. There is also a central groupware solution (project and date manager and address book). FIBAA has outsourced eMail receipt, sending and archiving to a service provider (based in Germany). The encrypted access to the email inboxes takes place via a local mail programme or password-protected online according to the General Data Protection Regulation (EU). All of these instances support teleworking, which is particularly beneficial in the pandemic.

### Critical Reflection

Due to COVID-19, the work of FIBAA changed in the last year fundamental. The employees worked predominantly in telework, site visits and committee meetings were performed online, and many processes were digitized. It was a great strength of FIBAA, that for this transition the necessary IT infrastructure had already existed for some years and was used by the employees long before COVID-19 changed the world. FIBAA had only expand the IT infrastructure, because she needed more licences and IT equipment for several simultaneous meetings and not only the project manager became experts in digital meetings.

## 9.6 ESG Standard 3.6 Internal quality assurance and professional conduct

### **Standard**

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

As mentioned in section 7, FIBAA has integrated its internal quality assurance (QA) measures in all of its work processes and areas. The main tasks include defining and updating all business processes in FIBAA's QM Manual<sup>47</sup>, systematic and regular revision of working documents, evaluation of all of FIBAA's services as well as the creation and modification of internal checklists and tutorials. The most important position for internal QA is held by the quality manager, who reports to the managing director. The following passages provide details of internal QA and its professional conduct.

### Quality management Manual (QM Manual)

In consultation with the responsible employees for each area, the quality manager compiles and reviews the QM Manual in electronic format using the software ViFlow. The current version is password protected and can be viewed online by all employees. Its use is intended for job-related tasks. The quality manager describes in proportionate detail all processes in all levels (leadership, core and support processes). It also includes templates, work instructions and additional information. All standard processes that are regularly repeated are described. The definition of these processes serves to inform the employees about the intended execution of the tasks and activities in the areas so that each pro-

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<sup>47</sup> See Annex 3 – Access QM Manual.



cess fulfils the specified quality standards and all relevant guidelines are observed. All new employees can use the QM Manual to look up which tasks they need to complete in which order and with which work steps.

### Annex 3 – Access QM Manual

## Evaluations

All FIBAA procedures are evaluated by those involved (both internal and external participants):

*Table 3: Evaluation*

Who performs the evaluation?	Who/What is evaluated?	How?	How often?
Expert	Project Managers, Office, Work Process	Digital	After decision of the F-ACC / after conclusion of the procedure
Project Managers	Experts	Digital	After decision of the F-ACC/ after conclusion of the procedure
HEIs/Continuing Education Providers	Experts, Project Managers, Office, Work Process	Digital	After decision of the F-ACC / after conclusion of the procedure
Workshop Participants (clients or experts)	Speaker, Head Office	Digital / Paper	After each workshop
Committee Members	Head Office, Division Management, Documents	Digital	Annually, in future: after every meeting

The results from the evaluations are used for the further development of the respective formats. Important aspects concerning experts, HEI's and the F-ACC are discussed in detail with all relevant stakeholders e.g. employees, committee members, clients and experts, to enhance the internal processes. The results of these discussions are taken into consideration during procedure processing and in the further development of documents. The questionnaires were reviewed during the last years with regard to their length, structure and content, redundant questions were removed and new questions relevant to QA were added in their place. The offer of online questionnaires has also been systematically expanded. This allowed for an increase in the return rates and therefore an improvement in the usefulness of the evaluations (e.g. return rate for evaluations by experts in 2017: 125, in 2018: 154, 2019: 122 and in 2020: 90). FIBAA Consult's evaluations of workshops are published online.<sup>48</sup>

The results of the evaluations are summarised in the annual quality management report and are published together with the description of the quality concept on FIBAA's homepage.<sup>49</sup> Any striking results are discussed with the responsible division managers. If changes to the process sequences result from this, these are reviewed with the respective division manager and the quality manager and are added

<sup>48</sup> URL: <https://www.fibaa.org/fibaa-consult/workshops-und-seminare/bisherige-workshops-seminare-und-tagungen/> (only in German language available).

<sup>49</sup> URL: <https://www.fibaa.org/fileadmin/redakteur/pdf/Qualitaetsmanagement/QS-Konzept.pdf> (only in German language available).

to the QM Manual accordingly. If the amendments concern procedural documents, checklists or tutorials, these are also updated accordingly, submitted to the committee for approval and announced in a suitable manner (see below). Those affected by the amendments in the processes are contacted directly and are obliged to implement the changes in the future.

### Internal checklists and tutorials as well as external manuals and templates

In consultation with FIBAA's management, the division managers create internal checklists and tutorials for the employees, external guidelines and templates for HEIs and experts as well as information for experts.<sup>50</sup> These are amended according to changes in processes, new regulations and from complaints procedures and adjustments to the procedural documents and are therefore always up to date. The internal checklists and tutorials serve to provide FIBAA employees with information and training and are issued at the beginning of the introductory training phase. The employees are obliged to use these documents. With this FIBAA aims to ensure that all its employees adhere to the standards it issues and the respective relevant rules in full in their work processes. HEIs receive all relevant manuals and templates after a contract is concluded. FIBAA experts receive these as soon as the respective expert team is appointed and approved by all instances (see below: section 10.4). The manuals and templates provide the HEI's with transparency as to how the self-evaluation report should be structured and according to which criteria the assessment is carried out.

### Assuring and enhancing the quality and integrity

FIBAA systematically revises all procedure documents as well as the QM Manual:

- If changes are made to the national and international guidelines and standards, as well as in the German accreditation system;
- If FIBAA employees suggest a need for improvement;
- During the regular review of processes as part of the plan-do-check-act control cycle.

The following regular events serve to collect information and provide a communication platform for improvement suggestions. In all formats, employees have the opportunity to report on their experiences from their projects, to present recurrent problems and to suggest process improvements:

- **Head Quarter Jour Fixe:** Once a month there is a regular fixed meeting for all employees. The Managing Direction and all employees report about actual projects discuss suggestions, challenges in work processes and current issues.
- **Subsequent improvements from the committee meetings:** Following the committee meetings, the division managers report to the project managers working in these divisions on the

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<sup>50</sup> E.G.: Programme accreditation (FIBAA seal): <https://www.fibaa.org/akkreditierung-zertifizierung/programmbezogene-verfahren/programmakkreditierung-gemaess-den-fibaa-qualitaetsanforderungen/> (→ see *Handreichungen und Vorlagen* in the accordion menu), Certification of continuing education courses: <https://www.fibaa.org/akkreditierung-zertifizierung/zertifizierung-von-weiterbildungskursen/> (→ see *Handreichungen und Vorlagen* in the accordion menu), Institutional Accreditation (FIBAA seal): <https://www.fibaa.org/akkreditierung-zertifizierung/institutionelle-verfahren/internationale-verfahren/institutional-accreditation/> (→ see *Handreichungen und Vorlagen* in the accordion menu) (only in German language available).

procedure adopted in the meeting, topics of discussion in the respective committees and other notes on experts or procedures.

- **Project manager workshops:** Division managers invite both internal and external project managers working in their division to this meeting format in order to provide information about changes in the procedures or in their work processes. Workshops are offered regularly, especially for the division of programme accreditation, so that everyone is kept up to date (in 2020 two such workshops have been held).
- **Emails:** Important changes or information from relevant institutions are also communicated in emails to the mailing lists set up for all project managers. Employees are obliged to incorporate these changes or information in their work processes.
- **Info day:** Usually, FIBAA's managing direction invites all internal and external employees to an information day once a year where employees can exchange information.
- **Situation-related discussions and workshops:** If none of the communication formats mentioned above is suitable for a topic or suggestion for improvement (because it either concerns a specific group of people or because the discussion should be held at short notice), then the format and participants are decided by those responsible according to the situation. Workshops were also held to prepare for the renewal of ENQA membership and EQAR Re-Registration.
- **Statutory meetings:** A works meeting is held on demand. Further on, every year there are trainings for the employees regarding work and fire safety.

#### Changes during the regular review of processes as part of the plan-do-check-act control cycle

The quality manager regularly reviews internal processes with regard to their currency, feasibility and orientation towards results. The focus is, above all, on the following questions:

- Is the process implemented in the form documented?
- Are the employees/roles involved indicated?
- Do additional employees/roles need to be added or removed?
- Is the process coherent?
- Can the process be streamlined?
- Does the process achieve its objective?
- Are all guidelines observed?

If the quality manager concludes that a process needs to be reviewed, he discusses this with the responsible division manager. He applies the changes to the QM Manual and provide the revised processes the division manager and, if appropriate, the Managing Direction with a draft. Then they check the draft and correct or approve it. All affected employees are informed of the results in a suitable manner.

In recent years, for example, it has been examined whether the various codes of conduct can be adjusted. In this case, FIBAA came to the conclusion that this would not be advantageous because there are different status groups with different tasks, duties and rules of conduct.

## Conclusions

The FIBAA evaluations are continuously being interpreted and improved. All processes are being under observation, if statutory provisions in the procedures changes. All important decisions and publications are subject to feedback loops, such as the FIBAA Annual Report, which is discussed with the relevant employees and the Managing Direction.

## Critical Reflection

FIBAA sees her strength in a solid knowledge management with a comprehensive documentation of all processes, many manuals for employees, experts and HEIs and, in comparison with other agencies in Germany, a high quality of the accreditation reports. It depends on her self-image to perform all procedures reliable with high quality requirements and to the satisfaction of all parties.

## 9.7 ESG Standard 3.7 Cyclical external review of agencies

### **Standard**

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

Every five years, FIBAA undergoes an external review by ENQA to renew its full membership as well as re-registration by EQAR. This application serves as the basis for the expert assessment for both procedures. There are no longer separate agreements between agencies and the GAC, but an authorisation by the GAC, which the agencies prove with the ENQA membership.

## Critical Reflection

FIBAA appreciate the 360-degree feedback, which she gets through her comprehensive evaluations of all the stakeholders and the cyclical external review. Both are significant for the enhancement of her own work, benchmarks and standards. As a quality assurance agency, a combination of an internal and external quality management is an especially important part of her self-image.

The accreditation procedures for system accreditation on behalf of the GAC, Institutional Audit Austria, Institutional Accreditation Switzerland are regulated by the respective national laws and regulations.

Table 4: Mapping grid in reference to the ESG Part 1

Activities FIBAA	Assessment Guide Programme Acc.	Assessment Guide Inst. Acc
<b>Standard ESG Part 1</b>		
1.1 Policy for quality assurance	5.1 Quality assurance and quality development with respect to contents, processes and outcomes 5.2 Instruments of quality assurance ( <i>in a broadest sense</i> )	I. Mission Statement, HEI's Profile and Strategic Objectives  II. Management Structure and Quality Management
1.2 Design and approval of programmes	1 Objectives 3.2 Structure 4.3 Cooperation & Partnership 5.1 Quality assurance and development 5.2.3 External evaluation by alumni, employers and third parties	III.2 Outline the following areas for the selected programmes and describe the relevant processes of development.  III.4 Which processes are used for the quality assessment of studies and teaching? Please describe the relevant procedures (e.g. course evaluations, Graduate analyses) and include information on regularity, responsibility, process and students' involvement. How are the results implemented?
1.3 Student-centred learning, teaching and assessment	3.1 Content 3.2 Structure 3.3 Didactical Concept 3.4 Internationality 3.5 Multidisciplinary Competences 3.6 Skills for employment 5.2.1 Evaluation by Students	III.2 Outline the following areas for the selected programmes and describe the relevant processes of development. (Didactical Concept, Examination Concept)
1.4 Student admission, progression, recognition and certification	2. Admission 3.2 Structure	III.2 Outline the following areas for the selected programmes and describe the relevant processes of development. (Admission)

		V.3 Student services VII 2 Publications /Public
1.5 Teaching staff	4.1 Faculty	VI Resources
1.6 Learning resources and student support	4.2 Programm Management 4.4 Facility &Equipment 4.5 Additional services	V. Student Services VI Resources
1.7 Information management	General Information: 0.2 Further development of the programme and implementation of recommendations from previous accreditation (if relevant) 5.2 Programme description 5.3 Information an activities during the academic year	II.4 Quality Management System II.5 Quality Management Instruments III.4 Quality assurance
1.8 Public information	5.2 Programme description 5.3 Information an activities during the academic year	VII Publication/ Public
1.9 On-going monitoring and periodic review of programmes	1.1 Objectives of the study programme 5.1 Quality assurance and quality development with respect to contents, processes and outcomes	II.4 Quality Management System II.5 Quality Management Instruments III.4 Quality assurance
1.10 Cyclical external quality assurance	General Information, 0.2 Further development of the programme and implementation of recommendations from previous accreditation (if relevant)	II.4 Quality Management System (in a broadest sense) Relevant through reaccreditation

## 10. Compliance with European Standards and Guidelines (Part 2)

### 10.1 ESG Standard 2.1 Consideration of internal quality assurance

#### **Standard**

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

The FIBAA assessment guides rise from an understanding of quality that was developed in compliance with the ESG. The structures of the assessment guides (programme or institutional accreditation and certification) are similar. The FIBAA Assessment Guide for certification is based on that for programme accreditation. All quality standards from Chapter 1 of the ESG are also reviewed in certification with regard to their fulfilment by the application in accordance with the assessment guides for certification.

While the FIBAA assessment guides are explicitly based on Chapter 1 of the ESG in programme-related procedures, these standards are reflected on the corresponding institutional level in FIBAA's assessment guides for institutional procedures. As a result, the relevant standards are not allocated and addressed individually as in programme-related procedures, but are viewed and assessed in the overall institutional context (see 9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance for detailed information to the individual procedures).

#### Critical Reflection

One strength of FIBAA, is the award of own FIBAA seals with focus on employability and international outlook, with a differentiated assessment in the reports, with a determined feedback and indications for enhancement. With the basement and background of the ESG, the focus of all procedures is always the enhancement of HEIs, their study programmes or continuing education courses, to train and prepare the students at the best for the labour market in future.

### 10.2 ESG Standard 2.2 Designing methodologies fit for purpose

#### **Standard**

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

In accordance with its foundation statute, FIBAA realises its objective “*above all through the development of suitable methods and tools which define the quality guidelines for the respective educational objectives of training courses on offer and institutions*” and thus serve to facilitate a differentiated assessment. The quality assurance procedures conducted by FIBAA pursue clear objectives, which are set out below for each procedure, and follow the relevant statutory regulations described below.

In the area of programme accreditation and certification FIBAA uses specific quality criteria to review, whether the objectives and the strategy of programmes/continuing education courses are achieved (or can be achieved). As part of this, during the procedures, the HEI receives helpful information for the further development of the quality of its programmes/continuing education courses.

In the assessment guide are listed the test areas and criteria for awarding a FIBAA seal. The accreditation and certification procedures make assessments according to the following decision bases:

- ESG;
- ECTS Users' Guide;
- Dublin Descriptors;
- MBA Guidelines<sup>51</sup>;
- Lisbon convention (in relation to crediting study and exam performance from higher education institutions);
- Framework for Qualifications of the European Higher Education Area (for programme accreditation, provided there is no applicable national qualification framework);
- European qualification framework for life-long learning (in the certification of continuing education courses);
- National regulations, if applicable.

For procedures for the award of the national seal by the GAC, the assessment criteria are defined by the GAC, who has developed several corresponding "Raster" (these go back to the Specimen Decree).<sup>52</sup> The GAC independently proves the compliance with ESG and draws attention to the compliance on its website.<sup>53</sup> The same applies to programme accreditation for joint programmes. Within the meaning of the European Approach for Quality Assurance of Joint Programmes<sup>54</sup>, accreditation results are recognised that come from EQAR-listed agencies.

FIBAA pursues the following objectives in its institutional procedures:

- The subject of the **German system accreditation** is the assessment of the internal quality assurance system of a HEI in the area of teaching and learning. Essentially, the procedure reviews whether the existing quality assurance system guarantees that the qualification objectives defined by the HEI for the programmes offered can be achieved and whether the assessment criteria defined by the corresponding "Raster" (see above) are applied in the developed programmes and further development of programmes. Following successful system accreditation, procedures that are established in accordance with the accredited system or were already subject to internal quality assurance in accordance with the guidelines of the accredited system, are accredited. In analogy to national procedures for programme accreditation, the final decision regarding the system accreditation on awarding the seal is also made here by the GAC.

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<sup>51</sup> Only in the context of programme accreditation in accordance with the FIBAA quality standards.

<sup>52</sup> URL: <https://www.akkreditierungsrat.de/de/antragstellung/antragstellung> (only in German language available).

<sup>53</sup> E.g.: <https://www.akkreditierungsrat.de/de/stiftung-akkreditierungsrat/qualitaetsmanagement/qualitaetsmanagement-der-stiftung> (only in German language available).

<sup>54</sup> Cf. [https://www.eqar.eu/fileadmin/documents/bologna/O2\\_European\\_Approach\\_QA\\_of\\_Joint\\_Programmes\\_v1\\_0.pdf](https://www.eqar.eu/fileadmin/documents/bologna/O2_European_Approach_QA_of_Joint_Programmes_v1_0.pdf).



- The **Institutional Audit Austria** aims to provide evidence that a HEI successfully assumes institutional responsibility for quality assurance and development in the areas of learning, research and organisation with the aid of a quality management system effective across the HEI. In addition, the Institutional Audit Austria is intended to support HEI's in the further development of their internal quality management system as it does not review the HEI's quality management system selectively in relation to the individual study programmes, but rather takes a holistic view and demonstrates both the strengths of the system and also areas for potential development. In the Institutional Audit Austria, the guidelines of the Austrian HS-QSG are taken into account in the AG alongside the ESG.
- The **Institutional Accreditation in Switzerland** aims to evaluate the internal quality assurance system of a HEI. It covers the areas of internal quality assurance strategy, governance, teaching, research and services, resources and internal and external communication. In Switzerland, the institutional accreditation has been a prerequisite for the right to designate since the introduction of the HEdA – if an institution wants to call itself a "university", "university of applied sciences" or "pedagogical university", an institutional accreditation is mandatory. The requirements are defined in Article 30 HEdA.
- The **Institutional Accreditation** procedure aims to provide a comprehensive review of the functional capability of the management and quality management system of a HEI and the associated processes of its various service areas. This procedure may be carried out at any HEI, regardless of their place of establishment. However, as a result of thematic overlapping with the German and Austrian national procedures, the procedure is primarily intended for HEI's in other countries.
- The aim of the **Institutional Accreditation: Strategic Management** procedure is a strategic analysis and review of various service areas in a HEI. It is primarily aimed at innovative, entrepreneurial and internationally oriented universities. The process includes a comprehensive evaluation of the institutional strategy. The evaluated areas comprehend the following: management, networks, teaching, research and dynamics. The HEI's receive feedback regarding their structures and processes beyond the status quo as well as prompts with regard to their specific development possibilities. The procedure can be conducted at HEI's that have already successfully undergone one of the institutional procedures mentioned above in the area of quality assurance and quality management (this has already been done twice). Furthermore, it can be carried out at any HEI regardless of their place of establishment.

In addition to formal requirements, the HEI's are also asked in all of FIBAA's quality assurance procedures to describe and evaluate their respective individual objectives at the level of higher education programmes or courses. All procedures stated take the principles of "fitness of purpose" and "fitness for purpose" into account.

FIBAA develops and updates the criteria in the Assessment Guides regularly on the basis of feedback from HEI's, experts and project managers as well as in the event of changes to the legal basis and, in doing so, reviews whether the procedures and methods are still appropriate. In order to ensure the interests of the various interest groups (academics, representatives of professional practice), these are involved in the preparation and further development of the Assessment Guides as part of the FACC (cf. ESG Standard 3.1). These groups discuss and adopt, if necessary, reviewed versions of FIBAA's AG. In

addition, their feedback is incorporated into FIBAA's QM as part of the evaluations (cf. ESG Standard 3.6).

### Critical Reflection

In this area, FIBAA sees good opportunities to support HEIs with their high creativity to create new study programmes and continuing education courses with the offer of a wide range of different procedures in the area of programme accreditation and the certification of continuing education courses on her long-lasting experiences in this field. HEIs develop an increasing consciousness and need to assure their quality and a corporate social responsibility.

Furthermore, it is the necessity of the academization of vocational training and the constant rising of the importance of lifelong learning and upgrading of continuing education. Therefore, a recognition and crediting of continuing education becomes also more and more important.

## 10.3 ESG Standard 2.3 Implementing processes

### **Standard**

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

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

In all of FIBAA's quality assurance procedures, quality criteria that are derived from the national and international standards are taken as a basis (cf. ESG Standard 2.2). In this respect, they are reliable and appropriate. The basic standards, like the FIBAA assessment guides derived from them, are specified in advance, published on FIBAA's website and are also made available to the HEIs without this needing to be requested.

In principle, all of FIBAA's external QA procedures consist of

- the self-evaluation report in which the HEI describes depending on the procedure itself / programmes / structure, etc., in accordance with the pre-defined and published standards and in accordance with the respective FIBAA assessment guide/"Raster" by the GAC for the procedure itself;
- the subsequent on-site visit in the peer-review procedure;
- incorporation of the HEI statement into the accreditation report;
- in procedures for awarding a FIBAA seal: the decision by the FACC on the basis of the report and the statement by the HEI; the subsequent complete publication of the report on FIBAA's website and in EQAR's Database of External Quality Assurance Results (DEQAR) (regardless of

whether it is a positive or negative decision); a consistent follow-up in the form of the review of the fulfilment of conditions and continuous monitoring based on the contractually regulated disclosure requirement of the HEI in the event of subsequent amendments. In addition, all QA procedures are limited in time and require re-accreditation, re-certification and re-evaluation after set and published time periods.

The detailed process steps for all external QA procedures are published and described in the QM Manual. Find a detailed description below:

### Institutional Accreditation

- Procedure on behalf of the GAC for awarding the **system accreditation** (in Germany):

This kind of procedure were affected by the new law for accreditation in Germany, starting at 01.01.2018. The GAC is now the decision maker regarding the accreditation and no longer the FIBAA committee. Another change is the fact that all agencies in Germany have to use the “*Raster*” as the template for the self-report.

The system accreditation is voluntary. On request of a German HEI, FIBAA assesses a self-evaluation report of the HEI, carries out two on-site visits with peer review experts and prepares an accreditation report with recommendations which is sent to the HEI. The HEI's statement is taken into account in the accreditation report. FIBAA sends the final version of the system accreditation report to the HEI. With that the procedure is finished on behalf of FIBAA.

- Procedures in the framework of **Institutional Audit Austria**:

For Austria the FIBAA offers the *Institutional Audit Austria* (certification) in accordance with the requirements of the Austrian Act on Quality Assurance in Higher Education (German abbreviation HS-QSG). As in all procedures, a self-evaluation report of the HEI, an on-site visit with peer-review experts, a draft of the report by FIBAA and a statement by the HEI are provided for the process. The assessment criteria are defined by a special Assessment Guide and the decision about the certification is made by the FACC who awards the Institutional Audit Austria seal.

- Procedures in the framework of **Institutional Accreditation (Switzerland)**:

In Switzerland FIBAA offers the *Institutional Accreditation (Switzerland)* in accordance with the requirements of the Higher Education Funding and Coordination Act (HEdA) for the acquisition of the Institutional Accreditation Seal of Swiss Accreditation Council. As in all procedures, a self-evaluation report of the HEI, an on-site visit with peer-review experts, a draft of the report by FIBAA and a statement by the HEI are provided for the process. The assessment criteria are defined by a special Assessment Guide. Here again, FIBAA of course complies with national requirements, always ensuring compliance with ESG.

- Procedures for awarding the **Institutional Accreditation** according to the FIBAA quality requirements (in Germany and worldwide):

As in all procedures, a self-evaluation report of the HEI, an on-site visit with peer-review experts, a draft of the report by FIBAA and a statement by the HEI are provided for the process. The assessment criteria are defined by a special FIBAA Assessment Guide and the decision

about the accreditation is made by the FACC who awards the *FIBAA Quality Seal*. For outstanding performance the FIBAA awards the *FIBAA Premium Seal*<sup>55</sup>.

- Procedures for awarding the **Institutional Accreditation: Strategic Management** (in Germany and worldwide):

The procedure contains a comprehensive evaluation of the institutional strategy and is completed by the decision of the FACC. The basic procedural steps correspond to the descriptions above. The assessment criteria are defined by a special FIBAA Assessment Guide. One substantial difference to the other assessment guides is that it contains a SWOT analysis (strengths, weaknesses, opportunities, threats) of each of the areas evaluated. The FIBAA committee awards the *FIBAA Quality Seal* or the *FIBAA Premium Seal*.

Table 5: (System) Accredited & Certified HEIs/Faculties

Procedure	Completed	Current
System Accreditation (rules till December, 31 <sup>st</sup> , 2017)	23	1
System Accreditation (rules since January, 1 <sup>st</sup> , 2018)	1	1
Institutional Audit Austria	3	0
Institutional Audit Switzerland	0	1
Institutional Accreditation: Strategic Management	4	0
Institutional Accreditation	3	1
Sum	<b>34</b>	<b>4</b>

On the development: FIBAA initially performed the institutional procedure **Institutional Audit** from 2010 to 2012 in accordance with FIBAA's requirements. Before the procedure **Institutional Audit Austria** was introduced as the national Austrian procedure, it was carried out at Austrian higher education institutions that wanted to subject their entire institution to a quality assessment and not just some programmes. The same applies to a Swiss higher education institution that has successfully performed the procedure. In English-speaking countries, FIBAA's programme accreditations were more interesting to many higher education institutions at the time as smaller and more manageable procedures than as costlier institutional accreditation. As FIBAA's own procedure, **Institutional Accreditation: Strategic Management** was then initially developed as a specialised procedure in which a strategy analysis regarding internationally active higher education institutions' primary areas of activity takes place (cf. ESG standard 2.2). One substantial element that it contains is a SWOT analysis (strengths, weaknesses, opportunities, threats) of each of the areas. In the meantime it has been performed at two Austrian, one Lebanese, and even at a German higher education institution. However, it is now recognisable that

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<sup>55</sup> Every assessment criterion is weighted between 1 and 4. The weighted assessment results are then added together for each of the core areas. The results of the core areas are then added together to obtain the total number of points. The FIBAA Premium Seal is awarded if in each core subject area the minimum points total stipulated by the responsible committee (60%) has been achieved and if overall the minimum points total stipulated by the responsible committee (65%) has been achieved. In this assessment 100% corresponds to the relevant arithmetic partial result/total result, if every assessment criterion is assessed with „exceeds quality requirements“.

higher education institutions are showing greater interest in classical, extensive institutional accreditations in English-speaking countries. In 2016 FIBAA therefore developed a general procedure focused on the international higher education area, namely the **Institutional Accreditation** procedure. The **Institutional Accreditation: Strategic Management** shall, however, remain in the FIBAA portfolio in the institutional area as a specialised alternative.

FIBAA has to date (as of February 28<sup>th</sup>, 2021) performed a total of 34 institutional procedures (24 system accreditations, three Institutional Audit Austria, four Institutional Accreditation: Strategic Management procedures – including in Lebanon and Austria – as well as three Institutional Audits. In total four procedures are not yet completed.

### Certification of Continuing Education Courses

Analogous to accreditation procedures, FIBAA carries out certification procedures on behalf of institutions offering continuing education courses. As in all procedures, a self-evaluation report of the institution, an on-site visit with peer-review experts, a draft of the report by FIBAA and a statement by the institution are provided for the process. The assessment criteria are defined by a special FIBAA Assessment Guide and the decision about the accreditation is made by the FACC.

FIBAA has to date performed 27 certification procedures with 40 continuing education courses predominantly in Germany; five were conducted at international institutions (Switzerland, Kazakhstan, Cyprus and Austria) and one in cooperation with institutions in Poland, Romania and the UK.

### Consulting

The consulting services of the organisational unit FIBAA Consult (CONS) are strictly separated from the other divisions. One employee is assigned to this division (Managing Director). The Executive Committee of the FIBAA Foundation Council has adopted an appropriate resolution and published it online.<sup>56</sup> The strict separation between consultancy and accreditation in accordance with ESG 3.1 is absolutely guaranteed as stated on FIBAA's website.<sup>57</sup> As the FIBAA took the separation very seriously, ENQA commented positively on the clarification provided in the follow-up report, in 2019. For further information see section 12.

The consulting services of the organisational unit CONS are not in the scope of ESG. They include SWOT analyses, the evaluation of HEI exams by external experts, presentations and workshops (on the accreditation system, for example) and the founding of private HEIs.

### Critical Reflection

FIBAA seems, that the wide range of products and her high flexibility to customers' requirements marks an important contribution for her success in the worldwide market. The steps in each procedure,

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<sup>56</sup> URL:

[https://www.fibaa.org/fileadmin/redakteur/pdf/PROG/Beschluesse\\_FIBAA\\_Kommission\\_Stiftungsrat/Anlage\\_1\\_Beschluss\\_Stiftungsrat\\_Trennung\\_Beratung\\_Pruefung\\_signed.pdf](https://www.fibaa.org/fileadmin/redakteur/pdf/PROG/Beschluesse_FIBAA_Kommission_Stiftungsrat/Anlage_1_Beschluss_Stiftungsrat_Trennung_Beratung_Pruefung_signed.pdf) (only in German language available).

<sup>57</sup> URL: <https://www.fibaa.org/en/fibaa-consult> (only in German language available).

may it be PROG, CERT or INST, are described, documented and in each procedure implemented. HEIs could trust in the same quality standards for every procedure for each HEI or study programme, because they all get the same published and accessible Assessment Guide with all underlied rules and criteria. The quality assurance in quality assurance procedures is the foundation stone for a reliable work. Only by this can be secured the high quality of reports and satisfied customers with a high core customers quota.

#### 10.4 ESG Standard 2.4 Peer-review experts

##### **Standard**

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

All external quality assurance procedures by FIBAA are conducted in peer-review procedures, i.e. with the participation of external experts including representatives of science, professional practice and the student body. In all accreditation procedures, the expert panel has the role to carry out an assessment on the basis of the relevant assessment criteria and to contribute to the preparation of the report. In selecting the experts, FIBAA Expert Management can access to a pool of about 750 experts from more than 20 countries.

In total, the FIBAA pool comprises 711 experts, 344 of whom are on probation. The following table offers a differentiated overview (Additional Expertise: double count of persons with two expertises are possible):

*Table 6: FIBAA Experts I*

Status group	#
Representatives of Universities	154
Representatives of University of Applied Science	308
Representatives of Professional Practice	159
Representatives of the Student Body	76
Additional Expertise (Dual Programmes, Distance Learning Programmes, Country Expertise)	120

Especially for institutional procedures the FIBAA Expert Pool provides the following data:

*Table 7: FIBAA Experts II*

Status group	#
Representatives of Universities	22
Representatives of University of Applied Science	92
Representatives of Professional Practice	21
Representatives of the Student Body	6
Additional Expertise (Country Expertise)	14

Experts with relevant experience in continuing education certification are appointed in certification procedures.

If expertise for a specific procedure cannot be covered directly by the FIBAA Expert Pool, new experts are recruited according to a defined model. In these cases, FIBAA's Expert Management asks (e.g. experienced experts or well-known institutions) for recommendations or starts a research within the relevant faculties at the university or publications. If a candidate is found, the appointing processes and training follows. All experts are carefully selected and regularly trained (see below).

The expert pool is dynamic, meaning new experts are regularly appointed, but others leave FIBAA's expert pool. The Division Manager Expert Management conducts requirement analyses at regular intervals and receives support from other FIBAA areas (e.g. PROG or CERT). The following passages explain in detail the process from the appointment of experts to the evaluation for their activities.

### Criteria for the Experts

The criteria for the three status groups of experts (representatives of science, professional practice and the student body) are transparent and published on the FIBAA website. The following passages contain some of the most important criteria.<sup>58</sup>

#### *Representatives of science*

In programme accreditation and certification procedures they must have sufficient academic expertise in the respective specialist core areas (in economics, social sciences, law) and, as a general rule, must have several years' experience in teaching and research in HEIs. This is demonstrated by:

- active membership in the relevant scientific community;
- good reputation and extensive knowledge in their subject area;

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<sup>58</sup> URL: <https://www.fibaa.org/gutachterwesen/gutachterbestellung/> only in German language available).

- for certification procedures: Experience in the area of continuing education.

In institutional procedures representatives of science must have academic competence and leadership experience in higher education management. Specifically, these experts should meet the following criteria:

- experience in the area of higher education management and leadership;
- experience in the area of internal quality management within higher education or
- experience in the design of programme;
- for the Institutional Accreditation: Strategic Management procedure: knowledge in the area of strategy analysis (e.g. balanced scorecard).

### *Representatives of professional practice*

In programme accreditation and certification procedures they must have managerial experience. This is understood to mean managing people, organisations, finances/budgets and processes. For legal practitioners, these criteria apply in the same way with regard to legal consultation activities in companies, in administration, in comparable organisations or in freelance work, connected to professional and personal responsibility. In institutional procedures representatives of professional practice must have experience with the introduction or the application of quality management systems in professional practice. Above all, these experts should have experience in introducing or managing quality processes.

### *Representatives of the student body*

In programme accreditation procedures they must demonstrate relevant specialist studies (e.g. in economics, social sciences or law). This is demonstrated by their enrolment at a HEI. In addition, student experts should work in university committees or should have done so in the past. These include student representative associations, committees, etc. In institutional procedures student representatives must already have experience in accreditation procedures.

### Independence and Impartiality of Experts

At the beginning of their activity as FIBAA experts, the experts fill in a standardised CV form (“*CV for Experts*”) which, like all relevant documents for experts, is available online.<sup>59</sup> Other documents to be filled in by default are the “*Appendix to the Expert’s Curriculum Vitae - Data Protection Note*” and “Code of Conduct/Confidentiality and Data Protection Declaration”. Before each specific appointment for an accreditation or certification procedure, the experts confirm by indicating on the “*Declaration of Impartiality*” and through signing it, that they have no connection to the HEI in question or to the programme / course to be assessed. This form is sent to experts when they are asked to participate in a

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<sup>59</sup> URL: <https://www.fibaa.org/gutachterwesen/dokumente/> (only in German language available).



concrete procedure. All declarations of impartiality are archived by FIBAA. Some of the questions asked in the declaration of impartiality are:

- Have you, within the past five years, received by decision of the aforementioned institution a complaint, such as a refused, rejected, denied, withdrawn or similar administrative file; or has the institution or one of its representatives filed legal proceedings against you?
- Have you, within the past five years, been involved in an employment relationship, a doctorate, a habilitation, or a recruiting or professorial appointment process at the aforementioned institution?
- Have you, within the past five years, been enrolled as a student at the aforementioned institution or were you involved in a joint research project or other intensive cooperation project with the aforementioned institution?
- Have you, within the past five years, had any consulting role in the design of the programme or (applicable to institutional procedures) quality management system, and/or a mandate in the Council/Senate/Board or Advisory Council of the institution?

Experts are obliged to inform FIBAA immediately if the HEI makes an offer of future cooperation in teaching or research during the accreditation or certification procedure.

The code of conduct, the confidentiality and data protection declaration as well as the declaration of impartiality are based on Guidelines of the *German Rectors' Conference* (see above) and *Deutsche Forschungsgemeinschaft* (DFG).

### Appointment of Experts

Experts are always (unsolicited application, advertisement) initially appointed on a probationary basis. Every month FIBAA Project Manager Expert Management compiles a list of new experts and reviews it internally with the managing director. Afterwards, the experts are registered internal appointed in the FIBAA expert pool. They can be invited for specific procedures. A final check is later carried out by the FACC, which makes an official decision on the order on the basis of the evaluations of the expert (On the question of Independence and Impartiality of experts see below).

The concrete participation in a procedure of each expert is checked through several instances: As a rule, the project manager expert management first composes an expert panel, if necessary in consultation with the division managers of PROG, CERT, INST or international. The HEI then has the opportunity to express objections against an expert or the entire expert panel. Depending on the case and the reasoning, experts may then have to be replaced. A subcommittee for the appointment of expert panels (in German "*Gutachterausschuss*") which consist of a group appointed by the FACC then reviews the entire expert panel again. An expert can only participate in a procedure if all FIBAA instances and the HEI agree with the expert panel.

### Expert Training

FIBAA offers its experts an overview of the tasks and requirements they will have to meet even before they are appointed. For the acquisition of experts from Germany, FIBAA Expert Management uses a

document with brief information.<sup>60</sup> These guidelines include details on types of procedures and tasks of the experts, code of conduct and confidentiality, impartiality, role of the expert panel, on-site visit, assessment report etc.

Of course FIBAA also offers regular personal training sessions. In digital training sessions, the respective Division Manager explains the tasks, roles and requirements of experts together with a colleague. There is always a Q&A part and the participants have the opportunity to exchange information with each other. The digital training sessions usually take about 2.5 hours and they enable all FIBAA experts to be reached worldwide. In the last two years FIBAA has regularly offered such trainings, as you can see from the following list:

- On the topic: programme accreditation according to the new German accreditation rules: Effects of the Interstate Treaty and the Specimen Decree on programme accreditation, 17 May 2018;
- On the topic: Introduction to the expert activities, 24 October 2019;
- On the topic: Introduction and refresher course, 6 February 2020;
- On the topic: Institutional accreditation according to the requirements of the GAC, 2 March 2020,

The presentations are made available to all FIBAA experts. The recording of the trainings has been initiated and a webinar has already been recorded and uploaded.

FIBAA takes several measures to ensure the training of the experts: FIBAA recommends all experts to take advantage of the training offer and to contact the expert management if there are any questions. The division manager is available daily by telephone and electronically for the experts.

At the time of the appointment the experts immediately receive access data for an internal area on the FIBAA website, where videos and presentations are available. New experts are prepared for the challenges of the expert activities in close exchange with the Expert Management. This individual preparation can take place digitally and by telephone, for example, as required. In addition, FIBAA's project managers are informed when they are working with an expert on their first project. In a template, which the project managers use in a concrete procedure to write to experts, reference is always made to the internal area of the website, where information for experts is available. The project managers are prepared for the fact that they have to support new experts. Finally, all experts will be contacted by email when a new date for a training session is set. FIBAA records in its database who has taken part in the training sessions. After a concrete accreditation or certification procedure, Expert Management contacts the experts on specific occasions (see below: Evaluation of Experts). Of course, the experts can always obtain feedback from Expert Management.

On request, the experts receive a certificate about their participation in training sessions. Numerous experts have already taken advantage of this offer.

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<sup>60</sup> URL: [https://www.fibaa.org/fileadmin/redakteur/pdf/Gutachterwesen/Gutachter\\_Dokumente/One-Page-Info-Gutachter.pdf](https://www.fibaa.org/fileadmin/redakteur/pdf/Gutachterwesen/Gutachter_Dokumente/One-Page-Info-Gutachter.pdf) (only in German language available).

## Composition of Expert Panels

As mentioned in section 6, FIBAA Expert Management can rely on four legal sources which provide information on the selection of experts: ESG 2015<sup>61</sup>, the *Leitlinien zu der Benennung von Gutachterinnen und Gutachtern und der Zusammenstellung von Gutachtergruppen für Akkreditierungsverfahren*<sup>62</sup> of the German Rector's Conference, the Interstate Treaty<sup>63</sup> and the Specimen Decree<sup>64</sup>.

The requirements are specific to each procedure and the size of the expert panel depends on the type of procedure. A "simple" procedure for programme accreditation (according to the assessment criteria of the GAC or FIBAA) consists of four experts: two representatives of science, one of professional practice and one of the student body. If it is a cluster with several programmes or an institutional accreditation, the number of experts can be higher. It is necessary that the three status groups are always represented and that the representatives of science have a simple majority in the expert panel. In a cluster, each programme must be covered by the expertise of the expert panel (for the individual requirements for the three status groups see above). FIBAA strives for diversity and an international composition of the expert panels. Among the representatives of science, there should always be at least one representative of a university and one of a university of applied science. Abroad, at least one expert must have expertise regarding the national higher education and accreditation system as well as, where necessary, the required language skills. Depending on the procedure, special expertise may be required (e.g. additional expert knowledge for dual programmes, distance learning programmes etc.). FIBAA does not appoint two experts from the same institution.

The following table gives an overview of the main criteria for the composition requirements:

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<sup>61</sup> URL: [https://enqa.eu/wp-content/uploads/2015/11/ESG\\_2015.pdf](https://enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf).

<sup>62</sup> URL: [https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-04-Lehre/02-04-01-Qualitaetssicherung/Leitlinien\\_Gutachter\\_1\\_2018\\_mit\\_Cover.pdf](https://www.hrk.de/fileadmin/redaktion/hrk/02-Dokumente/02-04-Lehre/02-04-01-Qualitaetssicherung/Leitlinien_Gutachter_1_2018_mit_Cover.pdf) (only in German language available).

<sup>63</sup> URL: [https://www.kmk.org/fileadmin/Dateien/veroeffentlichungen\\_beschluesse/2016/2016\\_12\\_08-Studienakkreditierungsstaatsvertrag-englisch.pdf](https://www.kmk.org/fileadmin/Dateien/veroeffentlichungen_beschluesse/2016/2016_12_08-Studienakkreditierungsstaatsvertrag-englisch.pdf) (only in German language available).

<sup>64</sup> URL: <https://akkreditierungsrat.de/sites/default/files/downloads/2019/Musterrechtsverordnung.pdf> (only in German language available).

Table 8: Criteria for the composition requirements

	Programme Accreditation	Certification	Institutional Procedures
<b>Representatives of Science</b>	At least one of a university and one of a university of applied science in the field of the programme	Same as Programme accreditation and preferably with experience in continuing education	At least three representatives (as a rule, one expert is declared chairman) with experience in: <ul style="list-style-type: none"> <li>• HEI management and leadership</li> <li>• Internal quality assurance systems of HEI's</li> <li>• Design of programmes</li> <li>• Knowledge in the area of strategy analysis (in institutional accreditation: strategic management)</li> </ul>
<b>Representatives of Professional Practice</b>	At least one representative: <ul style="list-style-type: none"> <li>• entrepreneurial and operational experience in the field of the programme / continuing education course</li> <li>• personnel and budget responsibility</li> </ul>		Same as programme accreditation/certification, beyond that experience in quality management
<b>Representatives of the Student Body</b>	At least one student enrolled in the programme at another HEI or completed it less than 12 months ago	Enrolled in a comparable programme and preferably with experience in continuing education	Same as programme accreditation / certification, beyond that: <ul style="list-style-type: none"> <li>• participation in bodies of their HEI</li> <li>• experience with accreditation procedures</li> </ul>
<b>Examples for additional expertise</b>	<ul style="list-style-type: none"> <li>• dual programmes</li> <li>• distance learning programmes</li> <li>• country expertise</li> </ul>		

### Evaluation of Experts

Every project manager evaluates the experts after every procedure. For this there is a standardised evaluation sheet. The evaluation results are collected and assessed by the quality manager, who forward to and discuss the results with the project manager of FIBAA's Expert Management. The assessment can be sent to the experts upon request. The purpose of the evaluation is early detection of requirements for discussion or training. If an expert is given a mark of 3<sup>65</sup> or lower on the criterion "*Knowledge of accreditation practice*" in two or more procedures, they are requested to take part in a training session before their next appointment. If an expert is given a mark of 3 or lower in the other

<sup>65</sup> Following the German school grades system, 1 is the best grade, 6 is the worst grade.

assessment criteria in two or more procedures, the project manager of Expert Management discusses those criteria with the expert and decides on measures, for example further individual training.

### Critical Reflection

FIBAA guesses, that her expert pool is an important column of her quality assurance work. Many experts support FIBAA for a long time and their satisfaction and reliability only enable a high-quality work, FIBAA suggests in every procedure. Moreover, many experts get involved in the FACC or know and appreciate FIBAA from clientside.

## 10.5 ESG Standard 2.5 Criteria for outcomes

### **Standard**

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

As mentioned above, for procedures for the award of the national seal by the GAC (programme or institutional accreditation), the assessment criteria are defined by the corresponding GAC “Raster”.<sup>66</sup> Regarding the Criteria for outcomes, the GAC independently proves its compliance with ESG.

For all procedures (for awarding the FIBAA seals) of the external quality assurance, FIBAA provides separate assessment guides, which provide a concrete framework for assessment for both HEIs and the experts. These are published on FIBAA’s homepage. The assessment guides contain all legal bases like the ESG, the EQUAL MBA Guidelines or the Dublin Descriptors and quality standards including differentiated assessment levels. They are also provided to the HEIs after conclusion of the contract. This gives HEIs a transparent, accurate and complete description of the quality criteria to be assessed for the respective QA procedure. It ensures later, when the HEI got the final report, that the recommendations from the experts and the decision of the FACC (for procedures with formal decisions) can be compared and are consistently applied. This is because the transparent definition of the quality requirements, which the experts are also obligated to follow, promotes the homogeneity of expert assessments and ensures consistency in implementation.

In FIBAA’s experience, the assessment guides as a common basis for HEIs and expert panels avoids misunderstandings and prevents individual assessments based on “received opinions”. In order to ensure that the criteria are also consistently applied by their employees in all procedures, FIBAA has taken special measures:

- At the start of their employment, the project managers are fully prepared in accordance with the introductory training plans. Here they receive all relevant documents, legal bases and procedural principles, and usually participate as observers in two review procedures (including

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<sup>66</sup> URL: <https://www.akkreditierungsrat.de/de/antragstellung/antragstellung> (only in German language available).

preparation and follow-up, and procedural communication). Then they are guided and supported by the respective divisional manager or an experienced project manager for the first two individual procedures.

- Only FIBAA staff with several years of experience may participate in institutional procedures. Before an employee supervises an institutional procedure independently, they participate as an observer in a current procedure and get involved in communication and various procedural steps. If they subsequently supervise an institutional procedure for the first time, they are then guided and supported again by the division manager.
- Each project manager has a designated division manager who is available to answer questions that may arise during an on-site visit. The draft of the accreditation or certification report is drawn up by the respective project manager of the procedure using a standardised sample accreditation / certification report. Each accreditation / certification report passes through a revision loop carried out by the respective divisional manager according to the “four-eye principle” in order to finally ensure the consistency of the review reports. The supervision of a division manager ensures that the procedural steps and structures of quality standards can be compared and are consistent.

The regular revisions of the FIBAA Assessment Guides until now have improved the reliability of achieving the objective of the procedures and have kept the quality standards up to date. The further development of the assessment guides in each of the procedures is shown in the following:

In concrete terms, the AG was revised fundamental for both GAC and FIBAA procedures in Programme Accreditation in 2014 and editorial revised in the future years, when it was necessary. In particular, redundancies were removed in the chapters, which had made their way in during the course of the previous revisions. Various information and structure elements were also addressed in the form of tables or references. As part of the revision process, newly included direct links to all legal sources, quality requirements and additional documents as well as sample templates ensure complete transparency and therefore provide a wide range of support when filling in the respective quality criteria. This revision structured the AG of the programme accreditation in a significantly more user friendly way, which also streamlines the procedures themselves.

As the differences in the quality requirements for on-site, distance learning and online study programmes have become smaller, FIBAA provides only one AG, which in this regard, especially takes into account respective didactical features. Previously an AG for distance learning study programmes and an AG for on-site study programmes were available. In the past this occasionally led to uncertainty and confusion among HEIs/other institutions and experts. Since the revised AG was introduced, which combines all formats for Bachelor and Master programmes into one, there has been transparency. It also takes into account new study formats such as blended learning, which would otherwise not have been able to be clearly assigned.

In order to further ensure the quality in the programme accreditation procedures **in accordance with FIBAA's quality standards**, the former F-AC PROG has introduced two new regulations as further development:

- 1.) On the one hand, only conditions in a maximum of seven asterisk criteria<sup>67</sup> are accepted by the committee if a positive decision should still be possible. If this number is exceeded, accreditation is denied. This regulation comes from the experience that a higher education institution/other institution is not usually able to resolve such a high number of weaknesses in the study programme to a satisfactory level within the specified nine-month deadline for the fulfilment of the condition.
- 2.) In addition, chapters 1.1 (Objective of the study programme) and 3.1.1 (Logic and consistency of the curriculum) of the AG must both be marked as "fulfilled". No conditions can be stated here. If one of these two chapters is marked as "not fulfilled", accreditation must also be denied. This regulation also results from the experience that no satisfactory level of quality can be completely achieved in a study programme, whose objective and/or implementation of curricula are not coherent and transparent. Accordingly, FIBAA's quality seal is not awarded to this study programme. So far there have been only a few procedures where these issues have been critical. It remains to be seen what impact this regulation will have in the future.
- 3.) All German procedures, which achieve GAC (with legal bases of January 1<sup>st</sup>, 2018) and FIBAA Seals, FIBAA adjusts the accreditation period to eight years, like the GAC in his decisions<sup>68</sup>.

The AG for receiving FIBAA's quality seal for **doctorate programmes** was last revised in 2013. FIBAA carried out several procedures with the accreditation of 29 study programmes in total. The AG was considered appropriate for the assessment of doctoral programmes and is in line with the ESG. However, a revise for the AG and an alignment with the AG for Bachelor and Master programmes is planned in the near future.

The AG of the GAC, the above-named "Raster"<sup>69</sup>, is standardized prescribed for all agencies, who carry out accreditation procedures for awarding the seal of the GAC, for programme as well as system accreditation (AC procedure) through himself.

The RAC in the **Institutional Audit Austria** procedure was last adopted in May 2015 in an updated version by the former FAC INST. Only editorial changes were made here. Up to now, the RAC has only been used in a completed procedure so that no significant need for change has occurred yet as a result of different experiences from higher education institutions and experts.

The RAC is currently undergoing an update since the law changed in 2020.

The *Bundesversammlung der Schweizerischen Eidgenossenschaft* has passed the law about the *Förderung der Hochschulen und die Koordination im schweizerischen Hochschulbereich (Hochschulförderungs- und -koordinationsgesetz, HFKG)* on September 30th, 2011, which came into force on January 1st, 2015. The AG of the procedure **Institutional Accreditation in Switzerland** was

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<sup>67</sup> Criteria, which are considered particularly important and are marked accordingly. If asterisk criteria are not met this automatically results in a condition, whereas non-compliance with a criteria that is not an asterisk criteria only results in a recommendation. Up until now there has been no upper limit for asterisk criteria.

<sup>68</sup> In GAC procedures, there are no possibilities for extensions, but every accreditation decision is expressed for eight years. In the former legal base, accreditation periods were five years for accreditations and 7 years for re-accreditations with a possibility of extension for one year, if a new contract for re-accreditation was concluded and the SAR with prospect on successful re-accreditation was submitted.

<sup>69</sup> All Raster are published on the website of the GAC: <https://akkreditierungsrat.de/de/antragstellung/antragstellung> (only in German language available).

subsequently adopted in 2016 through FIBAA under consideration of the defined objectives by the Swiss ministry.

The AG for **Institutional Accreditation: Strategic Management** was adopted in a revised version by the former FAC INST in July 2015. In this edition, primarily clarifications were made and the definitions of the evaluation standard were revised. This was also done based on the experience of the experts and project managers, which had been gained from the completed procedures up to that date. It was shown here that the questions had not yet been fully answered to a satisfactory level with the evaluation texts. In the revised version of the AG, the direct relationship of questions to the corresponding section in the evaluation part is now apparent.

The AG for **Institutional Accreditation** was developed by the former FAC INST in the first half of 2016 and approved in summer 2016.

In the area of **certification**, streamlining of the AGs is planned for 2021 as the criteria used up until now are strongly orientated towards the AG for FIBAA programme accreditation.

### Critical Reflection

FIBAA always tries to adjust internal documents like assessment guides, terms and conditions, handouts for procedures, expert seminars actually and regularly, but in case of restricted human resources and a variety of procedures to perform, it is still not yet possible to achieve her own demands. Furthermore, the wide range of offered seals complicate this dilemma.

## 10.6 ESG Standard 2.6 Reporting

### Standard

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

The GAC publishes the accreditation reports of procedures in which the GAC makes the final decision via the "Electronic Information and Application System" (*ELIAS*, "Elektronisches Informations- und Antragssystem").

In addition, the accreditation and certification reports of these FIBAA procedures (both nationally and internationally) are published on FIBAA's website in the respective area of business in their entirety once the procedure has been completed, regardless of whether a positive or negative decision has been made.<sup>70</sup> In consultation with the HEI, individual passages can only be removed for reasons of

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<sup>70</sup> Programme accreditations are published here: <https://www.fibaa.org/akkreditierungssuche/>, certifications of continuing education courses are published here: <https://www.fibaa.org/akkreditierung-zertifizierung/zertifizierung-von-weiterbildungskursen/> (→ see accordion menu *Zertifizierte Weiterbildungskurse*), Institutional Accreditation: <https://www.fibaa.org/akkreditierung-zertifizierung/institutionelle-verfahren/internationale-verfahren/institutional-accreditation/> (→ see accordion menu *Akkreditierte Hochschulen*), Institutional Accredita-



data protection and confidentiality. The decision of the FACC is added as a prefix to the accreditation or certification report and published together with it. Conditions (if stated), recommendations and follow-up measures are outlined in a summary at the beginning of the accreditation reports.

In the framework of procedures for awarding a FIBAA seal, FIBAA publishes the following data on its website and in cases of study programmes and institutional procedures in EQAR's Database of External Quality Assurance Results (DEQAR): decision (possibly with all the conditions and deadlines issued), period of accreditation, the whole report, the names and job titles of the responsible project manager, all the experts involved and any procedural coordinators instructed by the HEI.<sup>71</sup>

In order to ensure that all accreditation and certification reports are drafted in a clear and comprehensible manner, there are different accreditation and certification report templates for each FIBAA external quality assurance procedure. The respective template is subdivided into chapters with clear headings and categories. Each accreditation or certification report has guidelines concerning font style and size as well as the overall length of the accreditation or certification report. For the project managers, there is a manual with clear guidelines for drawing up a draft report. Furthermore, all accreditation or certification reports contain general information on the study programme/HEI/course, information on the work process of the accreditation and certification procedures (including legal bases, names of the experts etc.) and clearly distinguish between facts of the matter and assessment.

There is a so-called quality profile in each accreditation or certification report (for each chapter individually and as an overall view at the end of the accreditation or certification report), which makes the assessment of the experts visually easy to understand and demonstrates how the respective criterion was assessed by the expert panel. This ensures that all accreditation and certification reports have a clear, comparable and homogeneous structure. The fact that the first draft report is written by FIBAA's respective project manager, and is completed and authorised in subsequent stages by all of the experts involved in the procedure, makes it clear once again that consistent and common criteria are used when drawing up a report.

### Critical Reflection

Every Report in the scope of the ESG is at least published on FIBAA's Website as soon as possible, depending on the type of procedure, also in DEQAR. So, students and all interested stakeholders could inform about the quality of programmes, continuing education courses or HEIs. Because of the consistent structure of the quality reports with recommendations and the quality profile at the end of each FIBAA report, it is easy to compare different programmes or HEIs.

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tion: Strategic Management are published here: <https://www.fibaa.org/akkreditierung-zertifizierung/institutionelle-verfahren/internationale-verfahren/institutional-accreditation-strategic-management/> (→ see accordion menu *Akkreditierte Hochschulen*) (only in German language available).

<sup>71</sup> Exception: FIBAA do not publish reports of certifications of continuing education courses in DEQAR, because this is not intended.

## 10.7 ESG Standard 2.7 Complaints and appeals

### **Standard**

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

It is always possible to lodge a complaint against FIBAA to express dissatisfaction about the conduct of the process or those carrying it out. In individual cases it has happened, for example, that a HEI was dissatisfied with the behaviour of an expert. This expert was then no longer appointed at the HEI and in serious cases was even dismissed from the FIBAA expert pool. This possibility of lodging a complaint against FIBAA is made clear to all HEIs by FIBAA's management at the beginning of each procedure. FIBAA considers itself a partner of the HEIs and is always available to them through all communication channels in order to find an amicable solution. FIBAA makes this clear at every opportunity. Higher Education Institutions, which have complaints, against the procedure, can write an email to [info@fibaa.org](mailto:info@fibaa.org). Higher Education Institutions, which are not in agreement with a decision by the FAC PROG, can appeal against the latter. More detailed informations on the appeal procedure are published on the webpage<sup>72</sup> and in the „General terms and conditions“ under §12<sup>73</sup>

As mentioned in section 9.1, HEI's may also raise appeals against decisions taken in the context of procedures for awarding the FIBAA seal (For appeals against decisions taken by the GAC, the HEI's contact the GAC directly). HEI's, which do not agree with a decision of the FACC or with individually stated conditions, may lodge an appeal with FIBAA for the respective accreditation or certification procedure. This appeal must be lodged within a one month period after written notification of the decision and must be justified in writing in each case. After the appeal has been received by the FIBAA Head Office, following renewed referral by the expert panel, it is forwarded to the FACC for a decision to be made.

If this does not remedy the appeal, the procedure is presented to the FIBAA Appeals Committee for review and a statement. The FIBAA Appeals Committee clarifies the matter and gives the FACC a reasoned recommendation for a final decision. After consideration by the FIBAA Appeals Committee, the FACC makes a reconsidered and final decision. If the appeal is not remedied, the HEI concerned may take legal action against this. This, however, only applies to HEIs in the federal state of North Rhine-Westphalia, since the agency acts here as a loaning agency.

Information on the possibility of appeal procedures is laid down in FIBAA's General Terms and Conditions, which can also be found online.<sup>74</sup> In addition, information on the complaints process and the description of the complaints procedure can be found on FIBAA's website under the menu item "Proce-

<sup>72</sup> URL: <https://www.en-fibaa.org/en/procedures-at-programme-level/prog-according-to-fibaa-quality-standards/procedural-steps/>.  
[https://www.en-fibaa.org/fileadmin/user\\_upload/Beschwerdeverfahren\\_EN.pdf](https://www.en-fibaa.org/fileadmin/user_upload/Beschwerdeverfahren_EN.pdf).

<sup>73</sup> URL: [https://www.fibaa.org/fileadmin/redakteur/pdf/AGBs/AGB\\_STAND\\_21\\_04\\_03/2021\\_01\\_28\\_AGB\\_FIBAA\\_PROG\\_FIBAA.pdf](https://www.fibaa.org/fileadmin/redakteur/pdf/AGBs/AGB_STAND_21_04_03/2021_01_28_AGB_FIBAA_PROG_FIBAA.pdf).

<sup>74</sup> URL: <https://www.fibaa.org/agbs/> (only in German language available).

dural steps".<sup>75</sup> The members of the FIBAA Appeals Committee are also listed there. The FIBAA Appeals Committee consists of four members, who are made up of two representatives of science, one of professional practice and one of the student body.

Since 2017, a total of 11 submitted complaints procedures have been processed:

Table 9: Complaints Procedures 2017-2021<sup>76</sup>

		Decision of the responsible committee	
Year	Submitted Complaints	Remedied	Rejected and referred to the FIBAA Appeals Committee
2017	5	3	2
2018	2	1	1
2019	4	1	3
2020	0	0	0
2021	0	0	0
<b>Total</b>	<b>11</b>	<b>5</b>	<b>6</b>

### Critical Reflection

FIBAA appreciate the high consciousness and necessity of HEIs to assure the quality of their study programmes and courses with high demands and takes criticism seriously. But of the over 100 procedures carried out every year, only insignificant few HEIs perceive their opportunity to insert complaints or appeals, what speaks for FIBAA's reliable work.

## 11. Information and opinions of stakeholders

The results of the evaluations of experts and HEIs of the last years show a great satisfaction with the cooperation with FIBAA.

HEIs appreciate the professional and service-oriented service of the FIBAA team and the flexibility in the performing of the procedures. The support of the project managers and the documents for the creation of the self documentation is great and helpful. Team and service are the main reasons, why HEIs choose FIBAA as a reliable quality assurance partner for its services again and again.

<sup>75</sup> URL: [https://www.fibaa.org/fileadmin/redakteur/user\\_upload\\_import/Beschwerdeverfahren.pdf](https://www.fibaa.org/fileadmin/redakteur/user_upload_import/Beschwerdeverfahren.pdf) (only in German language available).

<sup>76</sup> Record day: February 28th, 2021.

Experts are often multiple years active for FIBAA and work for HEIs, which are long-termed regular customers. The cooperation with FIBAA is described as fruitful, sustainable, enriching and with much fun. The network in the higher education increases constantly and is the base for a trusted assessment on an eye level.

For more information see the quality reports of the last years.<sup>77</sup>

## 12. Recommendations and main findings from previous review(s) and agency's resulting follow-up (for second and subsequent reviews only)

In 2016, FIBAA underwent an external review, coordinated by the GAC. At its meeting of 4 May 2017, the Board of ENQA agreed that FIBAA met the necessary requirements for reconfirmation of ENQA Membership for five years from that date. The ENQA Board concluded that FIBAA is in substantial compliance with the ESG. At the same time, areas for development were found, which related to the following aspects and were taken into account by FIBAA in the further development:

- ESG 3.1 – Recommendation to intensify internal strategy debates: FIBAA integrated two activities into the Work Process to develop its strategy and to enhance her processes and work (Working group for internal strategy debates and FIBAA Strategy Circle).
- ESG 3.1 – Recommendation for a clearer separation between consultancy and accreditation: The Executive Committee of the FIBAA Foundation Council has adopted an appropriate resolution and published it immediately online. On 17.01.2017, the FIBAA Board of Trustees adopted "Principles for the Separation of Auditing and Consulting in Audit Procedures under the ESG". The essential paragraphs include the clear distinction between auditing and consulting in order to ensure the impartiality and objectivity of the reviewers and FIBAA in every review procedure. To ensure this separation and to ensure impartiality, FIBAA stipulates that an assignment to conduct a quality assurance procedure is neither carried out in parallel with a consultation nor promptly after a previous consultation.
- ESG 3.3 – Recommendation to adopt the rules of procedures for the FIBAA Accreditation Committee for Institutional Procedures (FAC INST) and the Appeals Committee: FIBAA has adopted all documents, which were available in draft form before.
- ESG 3.4 – Recommendation to increase the number of analytical publications: FIBAA has published thematic analyses in the FIBAA Annual Report 2018. FIBAA has also responded to the ENQA call for articles for 20th anniversary publication and submitted a paper. This paper was written by Mag.<sup>a</sup> Diane Freiberger, MBA (FIBAA Managing Director) and Dr. Tino Shahin (Division Specialist FIBAA Consult & Division Manager FIBAA Expert Management) and its title is "Digital Transformation in Quality Assurance and its Impact on Communication". A decision regarding the publication is still awaited.
- ESG 3.6 – Recommendation on adopting the QM by the relevant agency committees: The Executive Committee of FIBAA Foundation Council has adopted the QM Concept and the quality management report. FIBAA has also determined that all important decisions and publications are subject to feedback loops.

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<sup>77</sup> <https://www.fibaa.org/fibaa/was-uns-auszeichnet/unser-qualitaetsmanagement/> (only in German language available).

- ESG 3.6 – Recommendation to adjust the different codes of conduct for committee members and expert groups if necessary: FIBAA has appreciated this recommendation, but comes to the conclusion, that there are different status groups with different tasks, duties and rules of conduct. Because the GAC has confirmed compliance with ESG, FIBAA continues to refrain from an adjustment of the different codes of conduct.
- ESG 2.5 – Recommendation to adopt the rules of appointment and publish the weighting of criteria for awarding the premium seal: FIBAA has published the rules of appointment in 2017 and further information about the criteria for awarding the premium seal.
- ESG 2.6 – Recommendation to review the process for database entries: FIBAA publishes all decisions made in programme and system accreditation procedures, including the review reports, online on the FIBAA website. FIBAA also systematically contributes to EQAR's Database of External Quality Assurance Results (DEQAR). Decisions which are taken in Germany by the GAC will be published on the Database and Content Management System "ELIAS" owned by the GAC.
- ESG 2.7: Recommendation to make explicit reference on its homepage to the option of issuing complaints about the course of the procedure: The complaint procedure has been revised. Information on procedural steps can be found on the FIBAA website.

In 2019 the ENQA board approved the FIBAA follow-up report took note of the progress that has been made. The FIBAA follow-up report had at the same time explained the changes in the German accreditation system that have come into force since 2018. These changes were also the subject of a Substantive Change Report that had been prepared for EQAR in 2019. EQAR concluded: "The main change lies in the fact that – for accreditation in Germany – FIBAA no longer takes accreditation decisions itself, but prepares an accreditation report on the basis of which the GAC takes a decision; the way in which FIBAA carries out these assessments remains largely similar to the pre-2018 system." The Register Committee considered the Substantive Change Report of 27/05/2019 in response to its request of 29/4/2019 and thanked FIBAA for responding to the specific questions raised in its request. FIBAA aims to continue to work closely with ENQA and EQAR in the further development of the agency and gives high priority to compliance with ESG.

## 13. SWOT analysis

### Strengths

- Own FIBAA seals with focus on employability and international outlook with a differentiated assessment in the reports with a determined feedback and indications for enhancement
- New Seal in the field of digitalisation: „excellent in digital education“
- Service-oriented customer support at any time
- High flexibility to customers requirements
- Quality of the reports
- Transition on the legal base of the GAC of January 1st, 2018
- Transition to digital on-site visits in case of COVID-19
- Closeness to trade and employers' associations in Germany, Austria and Switzerland
- High core customers quota
- High share of long-term experts
- International reputation
- Solid knowledge management (e.g. internal quality management and documentation)
- Close contact to the headquarter and employees of the GAC

### Opportunities

- In Germany: market penetration in the case of system accreditation and assessment of new scientific departments in the case of the legal base of January 1st, 2018 of GAC
- Digitalisation in the higher education area in due of COVID-19
- Academization of vocational training
- High creativity of (especially private, state recognized) HEIs to create new study programmes and continuing education courses
- High consciousness and need of HEIs to assure the quality of their study programmes and continuing education courses
- Consciousness of Corporate Social Responsibility of HEIs
- Importance of lifelong learning and upgrading of continuing education
- Recognition and crediting of continuing education
- Permeability
- Possibilities of double degrees and different kinds of study possibilities (full time, part time, digital, job accompanying, distance learning, and so on)
- Acceptance of digital on-site visits and meetings and constant development of video conference tool

### Weaknesses

- Disadvantages of the legal form of a Swiss foundation: no base finances, thereby more expensive than other agencies, tax disadvantage, no access to European projects and subsidies
- High Employee turnover and personnel resources
- No guarantee for recognition of accredited study programmes of third countries in Europe)
- Handed focus on Management, Social and Legal study programmes, especially at Technical and comprehensive Universities
- Regular and necessary adjustments of internal documents like assessment guides, terms and conditions, handouts for procedures, expert seminars
- Internal data bases
- Expertise of the FIBAA Committee FACC in new scientific fields

### Threats

- In Germany: Market shrinkage in the case of programme accreditation, Extension of the accreditation periods through the GAC on 8 years (formerly: 5 / 7 years), high entry barriers in the accreditation market, but same procedure for all agencies (no advantage with USPs), all German agencies work with digital on-site visits
- No clear development of the travel market (calculable costs, cost risks)
- Third countries: Inestimable changes of the political, economical and socio-cultural frameworks
- Short-term demand of international accreditation because of subsidies, but no sustainable strategies for internationalisation

## 14. Current challenges and areas for future development

Nowadays, businesses have to adapt regularly to new rules and frameworks. FIBAA sees actual need to make changes in the following fields:

- Implementation of a modern, online database application with a high usability, specific requirements and integration of all FIBAA divisions in the year 2021.
- After the restructuring of the three FIBAA committees FAC PROG, FAC INST and FCC CERT in one whole committee, the FACC, at the beginning of 2021, FIBAA has to find out, which expertise in the FACC is missing and should be expanded. After this, FIBAA will identify appropriate persons, especially women from Austria and Switzerland or other countries outside of Germany, which were already active for FIBAA, e.g. as an expert or as a stakeholder.
- Digitalisation in teaching and learning are getting more and more important, not only in connection with COVID-19. HEIs develop so many kinds of study types, e.g. blended learning models, online or hybrid programmes, because they are under a high competitive pressure. So they have a need to highlight their programmes, continuing education courses or even the whole institution. And so, FIBAA wants to complete the full circle with the new FIBAA seal “digital in education”<sup>78</sup>. This new seal proves the quality of the strategy of the digitalisation in the case of teaching and learning, personnel resources, technics, didactic layout and the quality assurance of digital programmes. With this, FIBAA wants to establish a new USP, which is compatible with (national) seals for programme or institutional accreditation and could be carrying out together with other quality assurance procedures. Thereby, FIBAA generates a real added value for HEIs and students in an actual matter, also for the German higher education area with market shrinkage in the case of programme accreditation.

With regard to all considerations, FIBAA will always monitor the actual situation in Germany and Europe to adopt its strategy in due course for the future.

### I. Annexes

Enclose the most crucial documentation (within reason, not more than ten annexes) you consider may support the analysis of the report as well as a recent analysis of feedback received from stakeholders and any cases of complaints, if applicable.

- Annex 1 – Admission of the GAC
- Annex 2 – Rules of procedure of FACC
- Annex 3 – Access to the Quality Management Manual of FIBAA
- Annex 4 – Concept paper of the FIBAA Seal “excellent in digital education”
- Annex 5 – Strategy paper for the restructuring of the FIBAA committees
- Annex 6 – Statute of the Executive Committee of FIBAA Foundation Council
- Annex 7 – List of employees (as of February 28<sup>th</sup>, 2021)
- Annex 8 – FIBAA’s annual financial statements for 2018/19

(all annexes are only in German language available)

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<sup>78</sup> URL: <https://www.fibaa.org/digital-education/> (Only in German language available).

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## IV. List of abbreviations

Abbreviation	Explanation
RAC	Requirement and assessment catalogue
GAC	German Accreditation Council
AoS	Assessment on-site
CEENQA	Central and Eastern European Network of Quality Assurance Agencies in Higher Education
DAAD	German Academic Exchange Service [ <i>Deutscher Akademischer Austauschdienst</i> ]
dghd	German Society for Higher Education Didactics [ <i>Deutsche Gesellschaft für Hochschuldidaktik</i> ]
ECA	European Consortium for Accreditation
ENQA	European Association for Quality in Higher Education
ESG	European Standards and Guidelines for Quality Assurance in the European Higher Education Area
EQUAL	European Quality Link
EQAR	European Quality Assurance Register
EUA	European University Association
FACC	FIBAA Accreditation and Certification Committee [ <i>FIBAA-Akkreditierungs- und Zertifizierungskommission</i> ] (since 01.01.2021)
FAC INST	FIBAA Accreditation Committee for Institutional Procedures [ <i>FIBAA-Akkreditierungskommission für institutionelle Verfahren</i> ] (till 31.12.2020)
FAC PROG	FIBAA Accreditation Committee for Programmes [ <i>FIBAA-Akkreditierungskommission für Programmakkreditierung</i> ] (till 31.12.2020)
FCC CERT	FIBAA Certification Committee for Continuing Education Courses (till 31.12.2020)
AG	Question and Assessment Guide for evaluations according to individual objectives by FIBAA Consult
AG EVAL	Question and Assessment Guide
AG PhD	Question and Assessment Guide for obtaining the FIBAA quality seal for doctoral programmes
AG PROG	Question and Assessment Guide for programme accreditation
AG PROG AC	Question and Assessment Guide for programme accreditation in accordance with the requirements of the German Accreditation Council
AG PROG FIBAA	Question and Assessment Guide for programme accreditation in accord-

	ance with FIBAA's quality requirements
AG CERT	Question and Assessment Guide for certification
FIBA	Foundation for International Business Administration
FIBAA	Foundation for International Business Administration Accreditation
HEI	Higher Education Institution
HEdA	Higher Education Funding and Coordination Act (Switzerland)
HRK	German Rectors' Conference [ <i>Hochschulrektorenkonferenz</i> ]
HS-QSG	Austrian Act on Quality Assurance in Higher Education [ <i>Österreichisches Hochschul-Qualitätssicherungsgesetz</i> ]
INST	Institutional procedures
INQA/AHE	International Network for Quality Assurance Agencies in Higher Education
ISO	International Organization for Standardization
KMK	Standing Conference of the Ministers of Education and Cultural Affairs of the Länder [ <i>Kultusministerkonferenz</i> ]
MBA	Master of Business Administration
NVAO	Accreditation Organisation of the Netherlands and Flanders [ <i>Nederlands Vlaamse Accreditatie Organisatie</i> ]
PROG	Programme accreditation
PTE	Part time equivalents
SAR	Self Assessment Report
QM	Quality management or Quality Manager
QMS	Quality management system
QM Manual	Quality management Manual
TQM	Total quality management
FTE	Full time equivalents
CERT	Certification of Continuing Education Courses