

**Approval of the Application
by the Evaluation Agency Baden-Württemberg (evalag)
for Renewal of Inclusion on the Register**

Register Committee

Ref. RC15/A19

Ver. 1.0

Date 2015-06-05

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Application of:	9/10/2014
Agency registered since:	25/05/2010
External review report of:	15 August 2014
Review coordinated by:	German Accreditation Council (GAC)
Review panel members:	Andrea Schenker-Wicki (chair), Mark Frederiks, Volker Linneweber, Marcel Sauerbier, Detlev Stawarz / secretarial support by Agnes Leinweber (GAC staff)
Decision of:	4/5 June 2015
Registration until:	31 August 2019
Absented themselves from decision-making:	none

1. The application adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee considered the external review report of 15 August 2014 on the compliance of evalag with the European Standards and Guidelines (ESG¹).
3. The Register Committee sought and received clarification from evalag (letter of 9/1/2015) as well as the chair of the review panel (letter of 16/1/2015).
4. On the basis of the above-mentioned documentation the Register Committee was unable to conclude that evalag continues to substantially comply with the ESG and, therefore, invited the agency to make additional representation on the reasons for a possible rejection of its application.
5. evalag made additional representation on 5/3/2015. The Register Committee considered the application taking into account the representation.

¹ The application was made before adoption of the 2015 version of the ESG. It has therefore been considered on the basis of the 2005 version of the ESG, and all references refer to that version.

Analysis:

6. In considering evalag's compliance with the ESG, the Register Committee only took into account programme and system accreditation in Germany, programme and institutional accreditation abroad, audits, as well as evaluations of higher education institutions, study programmes or other organisational units.

Consultancy services (that are not evaluations or audits), further training offers as well as the administration of grants or awards are not activities within the scope of the ESG and, thus, not pertinent to evalag's registration.

7. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

Procedures used in evaluations (ESG Part 2, 3.1, 3.7)

8. The Register Committee noted that the evalag evaluation principles (Annex 2_4 of evalag's self-documentation) are rather generic and present evaluations as a strongly customised exercise.

9. Based on the comments made by the review panel in various places the Committee concluded that evaluations carried out by evalag do not always include all elements required by Part 2 of the ESG. It was clear that not all evaluations include, for instance, an analysis of ESG Part 1 (see ESG 2.1), the participation of students in expert groups (see ESG 2.4), the publication of the full report (see ESG 2.5), a systematic follow-up (see ESG 2.6) and the principle of periodic reviews (see ESG 2.7).

10. With its additional representation evalag submitted an updated version of the "Basic Principles for the Conception and Organisation of Evaluation Procedures", which provide that the ESG are "mandatory for all evaluation projects in the areas of teaching and learning".

11. The Register Committee noted that an analysis of ESG Part 1, the inclusion of at least one student in the expert group and the publication of the full report are now obligatory for all evaluations concerning the areas of teaching and learning.

12. The Register Committee considered that these changes clarify that evalag carries out all those evaluation projects that are within the scope of the ESG in line with the ESG.

13. The Register Committee also underlined that the 2015 version of the ESG specifies that the ESG cover "quality assurance related to learning and teaching in higher education, including the learning environment and relevant links to research and innovation" (p. 5). evalag is thus advised to take into account the changed scope of the ESG.

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ESG 2.1: Use of internal quality assurance procedures

14. The review panel found that evalag's national and international accreditation procedures stress the importance of and focus on functioning internal quality assurance systems in HEIs.

15. The Register Committee noted that no detailed mapping of evalag's procedure and criteria against Part 1 of the ESG was provided. Based on the documentation submitted with evalag's additional representation the Register Committee was, however, able to identify that the standards of ESG Part 1 are covered in evalag's accreditation criteria.

16. The Register Committee considers it important that the next external review of evalag analyses in greater detail how the standards of ESG Part 1 have been reflected in evalag's evaluations and accreditations. The issue has therefore been flagged.

ESG 2.2: Development of external quality assurance processes

17. The review panel noted that the Foundation Council, as the body which decides on evalag's procedures, does not include students, and that there were no other ways in which students are involved in the development of evalag's procedures for international accreditation and evaluation.

18. The Committee noted the panel's recommendation to involve students in the development of these procedures.

ESG 2.5: Reporting

19. The need for more extensive publication of accreditation and evaluation reports was flagged when evalag was admitted to the Register.

20. The Register Committee noted that evalag published full reports for national and international accreditations, but only after a positive decision. As expressed in the review report, according to the ESG also negative decisions and corresponding reports should be published.

21. The Register Committee received clarification from evalag (letter of 9/1/15) that full reports are published for system accreditations.

22. The Register Committee further received clarification from evalag (letter of 9/1/15) that full reports were not published for certain evaluations that "include sensitive topics, if this is required by the principal". However, the fact that these evaluations are neither obligatory nor regular procedures, but voluntary, does not mean that they do not have to comply with the ESG. The standard applies to all evaluations within the scope of the ESG, no matter whether they are obligatory or voluntary.

23. The Register Committee noted that evalag clarified (in its revised documents submitted with its additional representation) that it will

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henceforth publish full reports for all evaluations within the scope of the ESG, as well as for international accreditations with a negative decision.

24. The Register Committee concluded that the flag has been addressed, except for the publication of negative national accreditation decisions. The Committee thus found that evalag only partially complies with the standard and the matter therefore remained flagged.

25. The Register Committee recognises that the rules of the German Accreditation Council (GAC) are not within evalag's own control and considered this constraint within its overall judgement. evalag is, however, encouraged to promote the publication of negative decisions and reports in its relations with the GAC.

ESG 2.8: System-wide analyses

26. The review panel stated that, while evalag publishes annual business reports and participates in a number of research projects together with partners, a "systematic analysis of the agency's procedures does not take place.

27. The Register Committee did not consider the ad-hoc character of evalag's international procedures and evaluations a valid reason to exclude them from such summary reports. Even though the title of the standard refers to a "system", the standard as such refers to "general findings of their reviews, evaluations, assessments etc.". There is no obvious reason why the general findings of evaluations with an ad-hoc character could not be analysed.

28. In its additional representation evalag set out that it was finalising its plan for conducting such analyses.

29. The Register Committee welcomed that evalag has begun to address the issue. Given that the plans have yet to be finalised and implemented, the Committee concluded that – as it stands – evalag only partially complies with the standard. The issue has thus been flagged.

ESG 3.4: Resources

30. The sufficient staffing of the (then new) accreditation unit of evalag was flagged when the agency was admitted to the Register.

31. The panel report demonstrated that evalag has adequate resources, human and financial, in general. The report further set out that the department for accreditation remained small, but was staffed adequately in relation to its workload.

32. The Register Committee therefore considered that the flag has been addressed.

ESG 3.6: Independence

33. The possible influence of the Accreditation Committee on the evalag expert teams' findings was flagged when evalag was admitted to the Register.

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34. The Register Committee noted that the review report did not specifically address that issue under this standard. The Committee, however, noted that the review report confirms that the reports published by evalag separate clearly between the expert report and recommendation, and the final decision by the Accreditation Committee (see under ESG 2.5).

35. The Committee therefore considered that the flag has been addressed.

36. The Register Committee also noted that evalag has substantial activities as consultancy work. The Committee received clarification from the review panel chair, explaining that the panel has analysed how evalag separates its consultancy and accreditation work, and excludes potential conflicts of interest.

ESG 3.7: External quality assurance criteria and processes

37. The Register Committee noted that both evalag and the review panel use the term “self-documentation”, rather than “self-assessment” or “self-evaluation”.

38. The Committee underlined that the ESG specifically require a self-assessment or equivalent procedure, which goes beyond a mere self-documentation and requires an element of self-reflection by the subject of the procedure.

39. In its additional representation evalag explained that all self-documentation reports included a self-assessment dimension, and that it would clarify its terminology to that effect.

40. The Register Committee further noted the review panel’s recommendation that evalag “appoint organisations for decision-making and organisations for analysis of complaints which are independent of each other, and rule out parallel memberships” (p. 59). This issue has been flagged.

ESG 3.8: Accountability procedures

41. The Register Committee noted the recommendation by the review panel that evalag revise its Quality Management Hand Book to link it more clearly to its actual practice of internal quality assurance.

Conclusion:

42. **Based on the external review report and evalag’s additional representation, following the considerations above, the Register Committee concluded that evalag continues to comply substantially with the ESG and, therefore, renewed its inclusion on the Register. evalag’s renewed inclusion shall be valid until 31/08/2019².**

² Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

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43. The following issues have been flagged for particular attention when considering a potential application for renewal of inclusion. evalag is expected to address these issues specifically in its next self-evaluation report, setting out whether the issue has been resolved or indicating what progress has been made. evalag is further responsible for informing the coordinator of the next external review and the review panel of the need to address these issues in the external review report.

ESG 2.1: Addressing ESG Part 1 in evaluations and accreditations

It should be addressed in detail whether all standards of Part 1 of the ESG are consistently addressed in evalag's accreditations and evaluations.

ESG 2.5: Publication of reports for negative decisions

It should receive attention whether evalag has moved to publish reports where the accreditation decision was negative.

ESG 2.8: Coverage of system-wide analyses

It should be addressed whether evalag produced analyses of the general findings of all reviews carried out by the agency.

ESG 3.7: Independence of the bodies in charge of appeals

It should receive attention how evalag has followed up the recommendation to separate the bodies in charge of appeals from the bodies deciding on accreditation, and to rule out parallel memberships.

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