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International Accreditation in the European Higher Education Area:

Findings from Review Reports & Decisions of German Speaking Quality Assurance Agencies

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Studien zum Qualitätsmanagement im Hochschulwesen, Nr. 5

Bibliographic Information of the German National Library

The German National Library lists this publication in the German National Bibliography; detailed bibliographic data is available on the Internet at http://dnb.dnb.de.

Studien zum Qualitätsmanagement im Hochschulwesen, Nr. 5

ISSN 2750-7475

Central Evaluation and Accreditation Agency Hanover (ZEvA), Hanover 2023

www.zeva.org

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1 Introduction: Motivation and Context of the Analysis[1]

In addition to their national (main) activities, quality assurance agencies in German-speaking countries have always carried out assessment procedures at higher education institutions outside Germany. These can be both institutional and programme-based procedures, which are wholly or partly based on the legal regulations and requirements of the higher education institution's home country. For example, several German agencies are authorised to carry out institutional audits at universities and universities of applied sciences in Austria in accordance with the Austrian Higher Education Quality Assurance Act.

In addition, the majority of German or German-speaking agencies offer so-called *international accreditation procedures*, which are the specific subject of this analysis. In principle, these procedures can be organised relatively freely by the agencies but are very similar in terms of the applied assessment criteria and the assessment process itself. Here too, the focus can be on the institution as a whole as well as on individual study programmes or clusters of study programmes, whereby programme accreditations clearly predominate in purely quantitative terms.

International programme accreditation is characterised by the following **core elements** across all German speaking agencies:

- In general, the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG)[2] and other related reference documents of the European Higher Education Area, in particular the *European Qualifications Framework* and the *ECTS Users' Guide,*[3] form the basis for the assessment and design of procedures. This results in a high degree of comparability and, for the most part, congruence between the various agency procedures: the method of choice is always the "informed peer review" method with the participation of external experts from academia, the student body and professional practice. The accreditation decision is usually made by an internal agency committee, whose vote may differ in whole or in part from the vote of the experts. In some cases, several internal agency bodies are involved in the decision-making process. The selected set of evaluation criteria is largely based on the standards specified in Part 1 of the ESG.

- The accreditation decision results – if decided upon positively – in the award of one (or possibly several) *agency quality seals* for a limited period of time (usually around five to seven years). Depending on the legal situation in the country, where the higher education institution is based, international accreditation can replace national programme accreditation or be recognised as an equivalent to national accreditation. As a rule, however, the main motivation for

[1] This is a translated and partly revised version of the German text A. Grube – M. Huylmans (2023). Internationale Akkreditierung im Europäischen Hochschulraum: Befunde aus Gutachten & Beschlüssen deutschsprachiger Qualitätssicherungsagenturen, Studien zum Qualitätsmanagement im Hochschulwesen Nr. 3. https://www.zeva.org/site/assets/files/1774/sqh_3_grube_huylmans_internationale_akkreditierung_im_europaischen_hochschulraum.pdf Last accessed on 31/01/2024

[2] See the ESG in the currently valid new version from 2015: https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf. Last accessed on 14/07/2023.

[3] See also: https://www.ehea.info/media.ehea.info/file/ECTS_Guide/77/4/ects-guide_en_595774.pdf. Last accessed on 14/07/2023.

higher education institutions to seek international accreditation are not so much formal legal requirements, but rather advantages with regard to their own strategic internationalisation goals, such as improved trust building to attract potential cooperation partners, increasing mobility rates among students and teaching staff or simplifying recognition decisions.

- As a rule, agencies work in a similar way to the German accreditation procedure by imposing conditions, i.e. the higher education institution can be obliged to resolve any shortcomings or violations of the accreditation standards within a certain period of time (approx. nine to twelve months). Accreditation is either granted conditionally until the violations have been resolved and is only extended to the standard period once the conditions have been fulfilled or it is granted conditionally and withdrawn in case of non-fulfilment of the respective conditions.

This thematic analysis pursues various objectives. Firstly, it is intended to help fulfil the requirement for periodic reporting on quality assurance procedures and for critical reflection on the findings obtained from these procedures, which is placed on all agencies listed in the European register (see ESG Standard 3.4). In this case, the perspective should be relatively broad and not limited to the work of ZEvA, but also extend to comparable assessment procedures of other agencies. In this way, the broadest possible information basis for deriving general findings and conclusions on international accreditation in the European Higher Education Area should be established. It is true that numerous studies have been published in the past comparing accreditation systems in European countries - including the German accreditation system. However, these are either limited to individual countries[4] or certain types of study programmes.[5] The agencies or their activities rarely play a significant role. In those studies that focus on the work of German accreditation agencies, on the other hand, the political dimension of their activities or their integration into a national accreditation system usually is they key focus.[6] To the authors' knowledge, a comparable collection of data with the aim of providing a systematic overview of the accreditation activities of German-speaking agencies in the European Higher Education Area has not yet been undertaken; in this respect, the analysis also aims to close an information gap.

The analysis basically follows an inductive approach: no hypotheses are to be formulated in advance and then validated on the basis of the data collected, but the aim is rather to first develop an overview, to examine the available data and information for patterns and trends that can be derived from them and, if necessary, to name them or make them recognisable. The analysis therefore initially follows a descriptive approach, but a causal-analytical approach will also be pursued – insofar as this is possible within the framework of the available data – or at least starting points for further considerations will be identified. Both "market" and technical/methodological aspects will be analysed. It is also of particular interest whether general conclusions about frequently occurring quality problems in individual member states or regions of the European Higher Education Area can be drawn from the data or not.

[4] See, for example, Berner – Richter 2010; Westerheijden 2001.
[5] See, for example, Frank – Kurth - Mironowicz 2012.
[6] See for example Kehm 2013; Serrano-Velarde 2008, 2014.

2 Research Question and Objective: Core Questions of the Analysis

To summarise, the authors expect the analysis to provide more detailed insights into the following key questions in particular:

- In which target countries of the European Higher Education Area are the German-speaking agencies mainly active? Can cross-agency or agency-specific focal points and trends be identified?
- Are there recognisable overarching, agency- or country-specific priorities with regard to things such as degrees and subject disciplines of the reviewed study programmes?
- Are there any differences in the agencies' assessment and decision-making practices, e.g. with regard to the type and number of proposed conditions?
- Which shortcomings (in the sense of violations of the standards according to Part 1 of the ESG) were identified most frequently? Can agency-, subject- or country-specific trends and priorities be identified?
- What conclusions can possibly be drawn regarding the status of ESG implementation in the European Higher Education Area?

3 Methods and Data

To answer these questions, the authors decided on the following approach:

Procedures from a total of eight agencies in German-speaking countries (including ZEvA itself) were included in the analysis – with the exception of the Swiss AAQ, this represents all agencies that are also based in Germany or other German-speaking countries. Although AAQ is occasionally active in Germany and Austria, it is only active in other countries in specific exceptional cases,[7] which is why it was deliberately omitted from the following analysis. On the one hand, these restrictions were made in order to limit the data basis, and on the other hand because all German-speaking agencies analysed operate in a common (national) accreditation system and are therefore based on comparable accreditation rules in the design of their procedures. As initially stated, the criteria applied are based on the ESG in all cases. The decisive factor for the selection of the agencies was therefore that they must be active in the Federal Republic of Germany. In no case, an exact transfer of the ESG and its structure into the applied criteria catalogues and the assessment structure of the respective agency took place. The accreditation procedures considered were predominantly, but not exclusively, cluster accreditation procedures, i.e. the joint assessment of different, subject-related study programmes. Almost all of the procedures related to Bachelor's, Master's or doctoral programmes, i.e. study programmes that follow the multi-tiered system according to the European Qualifications Framework. Only very

[7] See AAQ's comments on its mission: https://aaq.ch/die-aaq/auftrag/. Last accessed on 18/10/2023.

occasionally different degrees were awarded in the accredited study programmes, such as a diploma in accordance with the respective national requirements.

Only accreditation decisions from 2015 or later were taken into account – this decision was made due to the fact that this is the date of the last update of the ESG and was also based on the publication practice of the agencies. On the one hand, reports dating back even further are mostly no longer publicly accessible; on the other hand, this restriction ensures comparability of the criteria.

The authors have decided to only include accreditation procedures within the European Higher Education Area, as initiated by the declaration of the Ministerial Conference in Budapest-Vienna on 12 March 2010[8] as part of the tenth anniversary of the Bologna Process, in the analysis, although all of the agencies under consideration also implement international accreditation procedures in other regions of the world. At present, the European Higher Education Area comprises 49 full members, which mainly cover Western Europe, the Balkans, Turkey and current and former members of the Commonwealth of Independent States (CIS).[9] In addition, only international procedures were considered; procedures following the so-called specimen decree under German law were excluded. Procedures in the Federal Republic of Germany and in Austria, which, as expected, form the quantitative focus of activity for all agencies analysed, are therefore not included in the analysis. It would of course be possible to expand the geographical focus of the analysis in the future, but for the time being it was preferred to limit the analysis to Europe or the European Higher Education Area in order to initially sound out the relationship between effort and benefit or the gain in knowledge through the chosen methodological approach. Furthermore, from the authors' point of view, it also makes sense in terms of content to initially analyse the implementation and enforcement of the ESG in its core and original region separately from the non-European context.

To obtain the data for this thematic analysis, the accreditation reports published on the agencies' websites, together with the associated accreditation decisions, were consulted. A total of 907 study programmes were included in the analysis. Study programmes of a clustered procedure are each treated as a separate data set, so that the quantitative analysis was carried out at the level of the study programme and not at the level of the procedure. The following parameters were recorded in a database: Name of the reviewing agency, year of the final decision, country of residence of the respective higher education institution, name of the higher education institution, title of the study programme, assignment of the subject area, degree level of the programme, whether the review was part of a clustered procedure or not, the total number of conditions issued, the number of any additional conditions imposed by the deciding body, the respective condition texts and their assignment to one (or more) standards of the ESG.

With regard to the conditions, attention was also paid to any discrepancies between the experts' vote and the decision. In particular, additional conditions imposed by the decision-making bodies were noted separately, although these only account for a very small proportion of the total volume of all conditions (102 out of a total of over 1,800 conditions).

[8] See the Budapest-Vienna Declaration on the European Higher Education Area of 12 March 2010. https://www.edu.ro/sites/default/files/u39/Budapest-Vienna%202010.pdf. Last accessed on 12 January 2023.
[9] For a detailed list of member states, see the website of the European Higher Education Area: http://www.ehea.info/page-full_members. Last accessed on 12/01/2023.

In a next step, each identified condition was assigned to one or multiple ESG standard(s) addressed therein in accordance with Part 1 of the ESG.

The following detailed analyses were carried out after the data collection was completed:

- The number of accredited study programmes per agency and country, sorted by year and degree level of the study programmes
- The number of conditions imposed per ESG standards, categorised by agency and country in which the higher education institution is based

With regard to data collection and analysis, the following aspects should be emphasised separately:

- Some international accreditation procedures listed in the agencies' databases were deliberately excluded from the thematic analysis. These include, for example, accreditations of joint programmes with the participation of German higher education institutions, as these were generally carried out on the basis of different assessment frameworks and criteria than other international accreditation procedures. Not included as well were procedures that were based on special, subject-specific sets of criteria or that combined these with the other standard criteria.
- In most cases, the national allocation of an accreditation procedure is undisputed. Only in the case of Cyprus difficulties arise: For example, some of the procedures under consideration relate to higher education institutions that are localised in the Turkish Republic of Northern Cyprus. As this is not de jure a state recognised by the vast majority of international society, all of the procedures under consideration are assigned to the Republic of Cyprus. De facto, however, this may result in deviations that could be due to problems of comparability between the two education systems.
- Substantial deviations of the accreditation decisions from the experts' vote were comparatively rare across all of the procedures analysed. In almost all cases, the conditions proposed by the experts were included in the decision, albeit often with editorial changes. However, additional conditions that were not proposed in the expert opinion were occasionally imposed, particularly in the case of individual agencies. This is also hardly statistically significant: only a good 100 of the more than 1,800 conditions recorded were additional conditions that were formulated solely by the respective decision-making bodies. In individual cases, the accreditation reports did not allow any differentiation between the experts' vote and the resolution as it was issued by the agency’s deciding body. The reports or expert opinions did only point out shortcomings without an explicit resolution recommendation from the expert group. Therefore, it is impossible to differentiate, whether a condition was imposed by the experts or by the deciding body, meaning that this phenomenon is only comparable to a limited extent.
- For a small number of procedures, though they were listed in the respective databases, the corresponding accreditation reports were not available online and were therefore not included in the analysis. The survey for 2022 is necessarily incomplete, as the data collection took place in that year.

- A further methodological problem arose with regard to the allocation of the conditions to the individual ESG standards. It was not always possible to make a distinguished and exclusive assignment, especially as this is not explicitly stated in the accreditation reports and decisions themselves. I.e. the conditions are not formulated with explicit reference to an ESG standard. Very often, conditions can be assigned to two or even three ESG standards or touch on the quality aspects mentioned therein. In individual cases, however, the authors struggled to recognise a clear reference to the ESG. However, when reading the thematic analysis, it should always be borne in mind that the assignment to the ESG standards is based solely on the personal interpretation and decision of the authors. The categorisation scheme is discussed in more detail below at the point where the authors consider the distribution of conditions within the criteria. It should also be noted that in many cases – in which the programmes under review were part of a clustered procedure – general conditions were imposed on all programmes in the respective cluster. As no distinction was made between cluster and individual procedures in the data analysis and instead the level of the individual programme was considered, the general conditions in clustered procedures are counted individually for each programme. The authors opted for this approach because such a monitoring, albeit of a general nature, applies to every study programme in the accredited cluster. In addition, conditions were also included that were recommended by the experts but dropped by the agency's deciding body. The authors decided to do this so as not to completely drop any conditions that were formulated but remedied by the HEI before the actual decision was made. From the authors' point of view, this would have led to a significant reduction in certain formal conditions. However, it should be noted that in this way, the corrective role played by the agency's deciding body vis-à-vis the group of experts is omitted from the analysis.

- The effects of the COVID-19 pandemic, which affected a significant proportion of the period under review, may lead to a distorted picture with regard to some aspects, particularly with regard to the number of procedures per agency, year and country. It can be assumed that proceedings already underway in all agencies have been postponed considerably and were therefore not yet finalised at the time of data collection. It is therefore expected that a decline in procedures (and thus also in the number of study programmes to be accredited) will be particularly visible in 2020 and 2021. It can also be assumed that more digital assessments were carried out during this period. This change in procedure design could potentially have an impact on the nature of conditions issued.

- It quickly became apparent that the existing set of data was in some cases too small to derive statistically valid conclusions with regard to the initial questions mentioned above. This applies, for example, to the question of whether certain ESG standards are particularly frequently – or possibly even regularly – not met in individual countries. The data collected allows initial justified assumptions to be made in this regard at most, but it is not sufficiently robust to verify or falsify this assumption.

4 Results of the Data Collection

Chronological Development of the Total Number of Accredited Study Programmes

In the present analysis period from 2015–2022, the eight accreditation agencies under review assessed a total of 907 study programmes within the European Higher Education Area (EHEA) as part of individual and cluster procedures. The proportion varies greatly across the agencies (see also Fig. 1).

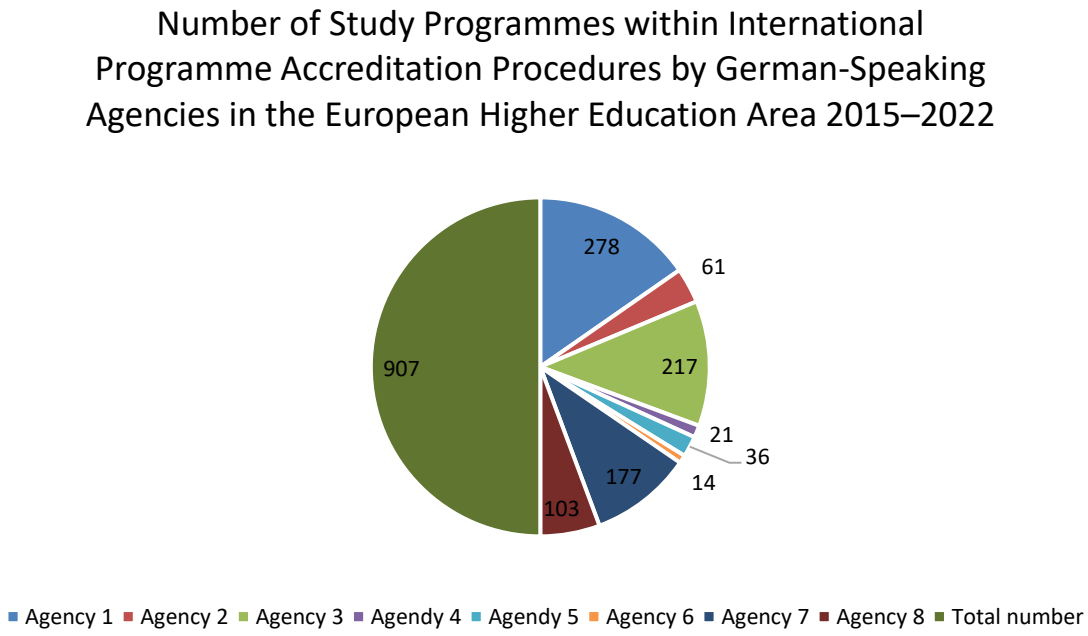
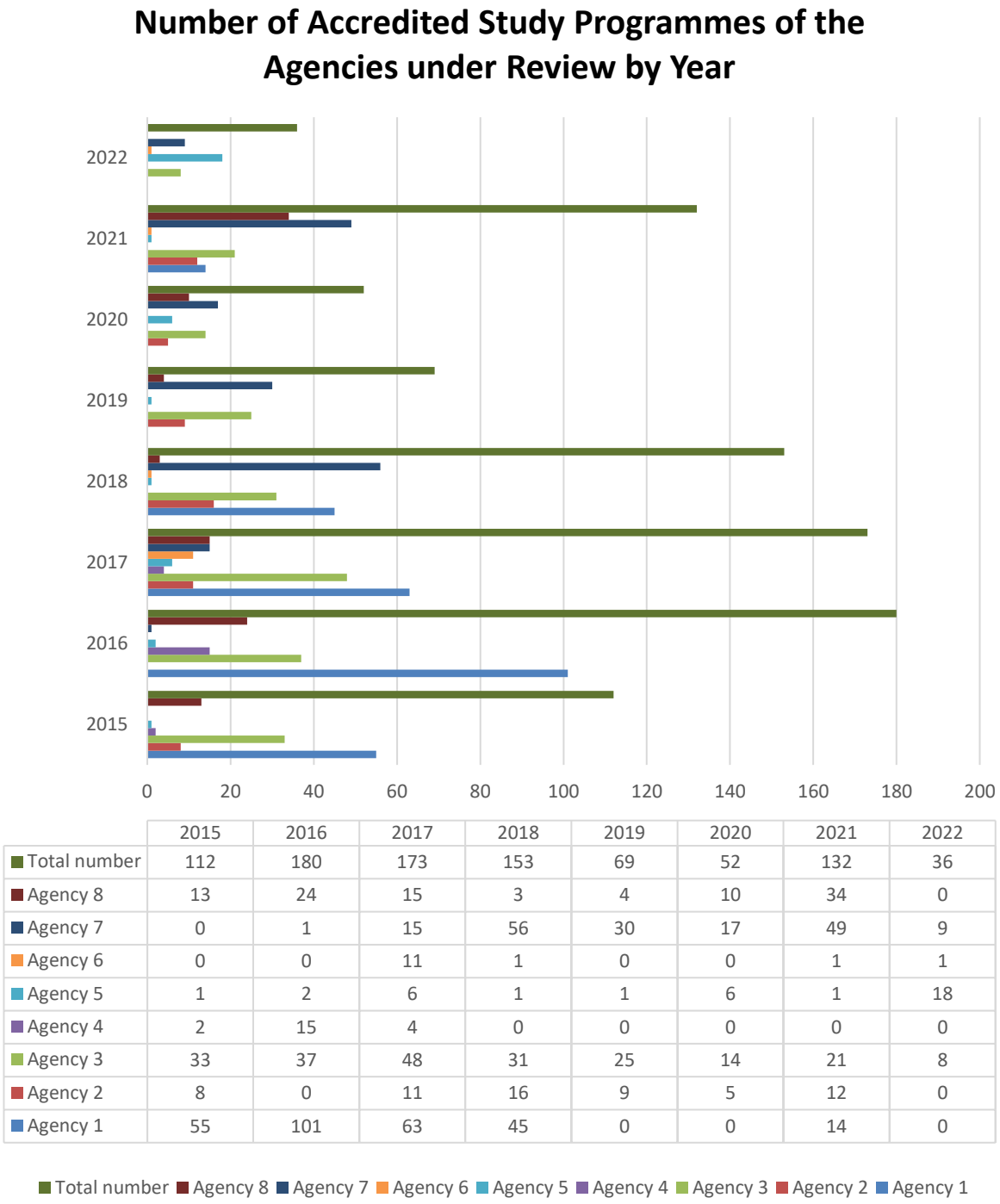


Figure 1. Total number of accredited study programmes per agency in the period under review.

Agency 6, for example, only assessed 14 study programmes within the EHEA during the period under review, which corresponds to a total share of approx. 1.54 %. Whereas agency 1 forms the largest data set with 278 assessed study programmes, which corresponds to a total share of approx. 30.65 %. The assessment activity of the agencies within the EHEA during the period analysed therefore varies considerably. From a chronological perspective, a continuous increase in the number of assessed study programmes can be seen from 2015–2018. Apparently, a maximum was reached between 2016 and 2018, which remained relatively stable during this period but declined slightly from 2018 onwards. It should also be noted that said decline in 2018 is not shared by all agencies. The number of accredited study programmes then declined significantly for the first time in 2019 to around half of the previous volume – this time affecting almost all agencies. This trend continues during the pandemic in 2020 and a significant all time low is reached, while the total number recovers significantly in 2021 (which was also still significantly characterised by the COVID-19 pandemic) but does not recover to match the maximum between 2016–2018 in purely quantitative terms. The figures for 2022 represent a low, but are not very meaningful in this sense, as the year was only considered proportionately.



	2015	2016	2017	2018	2019	2020	2021	2022
Total number	112	180	173	153	69	52	132	36
Agency 8	13	24	15	3	4	10	34	0
Agency 7	0	1	15	56	30	17	49	9
Agency 6	0	0	11	1	0	0	1	1
Agency 5	1	2	6	1	1	6	1	18
Agency 4	2	15	4	0	0	0	0	0
Agency 3	33	37	48	31	25	14	21	8
Agency 2	8	0	11	16	9	5	12	0
Agency 1	55	101	63	45	0	0	14	0

Figure 2. Number of accredited study programmes in the period under review, broken down by agency and year.

The decline in the number of study programmes 2019–2020 cannot be adequately explained by the effects of the COVID-19 pandemic and the associated restrictions on travelling, which made face-to-face assessments impossible in some cases, as at least the beginning of this trend dates back to times before the outbreak of the pandemic.

Geographical Distribution of Accredited Study Programmes within the EHEA

Finally, if we take a closer look at the geographical distribution of the reviewed study programmes, the Republic of Kazakhstan clearly stands out with a share of 451 out of 907 (approx. 49.72 %) study

programmes (see Fig. 4). As it therefore represents the quantitative focus of the agencies' activities within the EHEA, it was reasonable to suspect that a decline in the total number could correlate with a decline in the number of study programmes reviewed in this specific country. If we now look at the same distribution exclusively for the Republic of Kazakhstan (see the following table, Fig. 3), it is noticeable that such a correlation does indeed appear to exist. In contrast to the overarching trend, however, the number of reviewed study programmes in Kazakhstan did not increase significantly in 2021, but remained stable at the low pandemic level. The decline already apparent in 2018 also corelates with the data set of the Republic of Kazakhstan.

Kazakhstan	2015	2016	2017	2018	2019	2020	2021	2022	2015–2022
Total number	63	107	102	89	33	24	23	10	451
Agency 1	46	80	63	44	0	14	0	0	247
Agency 2	0	0	0	0	0	0	0	0	0
Agency 3	17	20	24	16	14	10	1	2	104
Agency 4	0	7	4	0	0	0	0	0	11
Agency 5	0	0	0	0	0	0	0	0	0
Agency 6	0	0	0	0	0	0	0	0	0
Agency 7	0	0	11	29	19	0	22	8	89
Agency 8	0	0	0	0	0	0	0	0	0

Figure 3. Number of accredited study programmes in Kazakhstan, broken down by agency and year.

It is noticeable that some other countries, such as the Russian Federation or the Republic of Turkey, also show larger numbers of cases in the mid double-digit range. In the case of the vast majority of countries, however, the number of accredited study programmes examined is in the single-digit or low double-digit range. A comparison by country therefore does not appear to make sense due to the low absolute numbers within each data set. In order to analyse the geographical focus of the accreditation activities of the agencies under review more closely anyhow, geographical regions were therefore formed: A total of 204 study programmes (approx. 22.49 %) are attributable to countries on the Balkan Peninsula, Turkey or Cyprus, 597 study programmes (approx. 65.82 %) to countries that were or are currently or formerly members of the Commonwealth of Independent States. Only 58 study programmes (approx. 6.39 %) are located in Western European countries and a further 48 study programmes (approx. 5.29 %) were accredited in Scandinavian countries (incl. Iceland) or the Baltic states (see Fig. 4). The focus of the accreditations carried out is therefore predominantly on countries of the former Soviet Union and therefore not on member states that were among the original founding members of the Bologna Process.

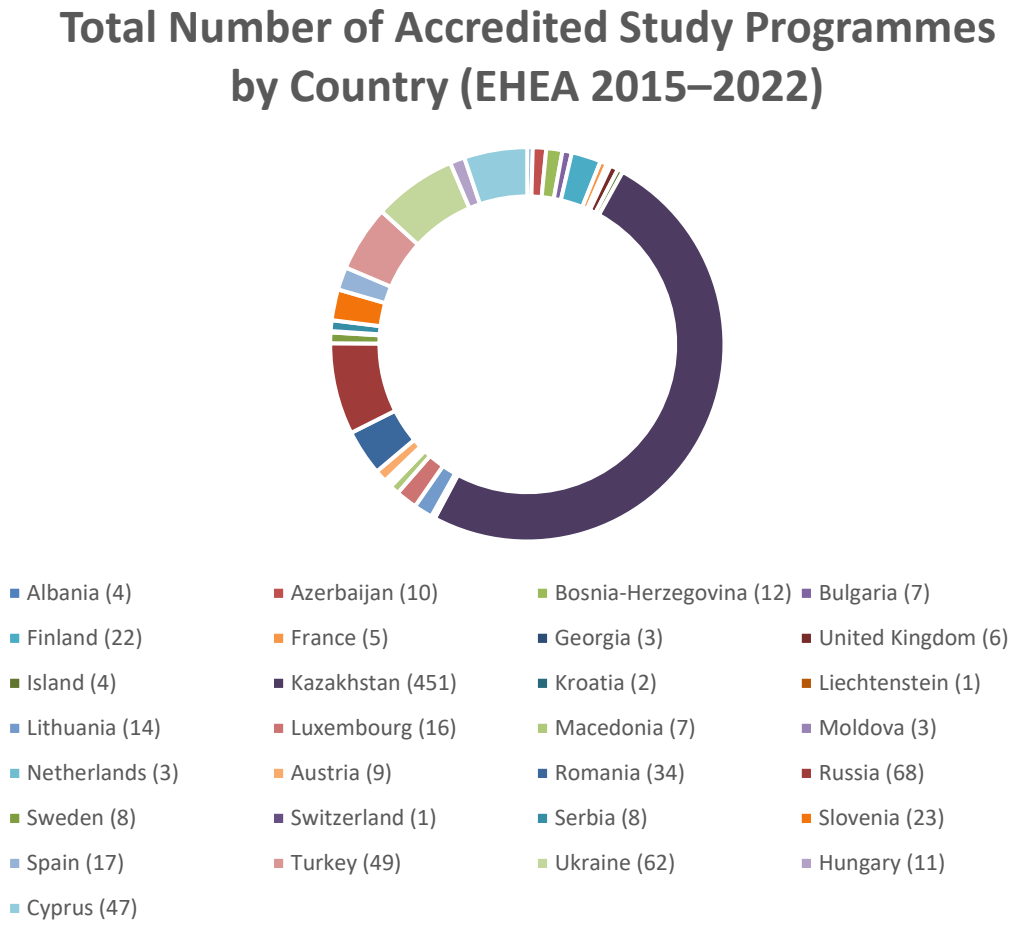


Figure 4. Number of accredited study programmes in the period under review, broken down by the country of residence of the respective higher education institution.

Furthermore, it can be stated that the activities of the agencies under review, with the exception of Kazakhstan, are distributed comparatively evenly across the respective countries, meaning that only a small number of study programmes have been accredited in individual countries. It is therefore hardly possible to identify any significant focus of activity of individual agencies in certain countries (see Fig. 4). Rather, the activities of the agencies appear to be highly dispersed. As mentioned above, the Republic of Kazakhstan is a major exception to this distribution, which is why the authors believe it makes sense to take a closer look at this phenomenon: Of the eight agencies analysed, only four were active in the Republic of Kazakhstan at all. Agency 1 is represented in the data set with 247, agency 3 with 104, agency 4 with 11 and agency 7 with 89 reviewed study programmes. Agency 1 forms a clear local focus insofar as a total of 247 out of 278 study programmes accredited by the agency were located in Kazakhstan during the period under review.

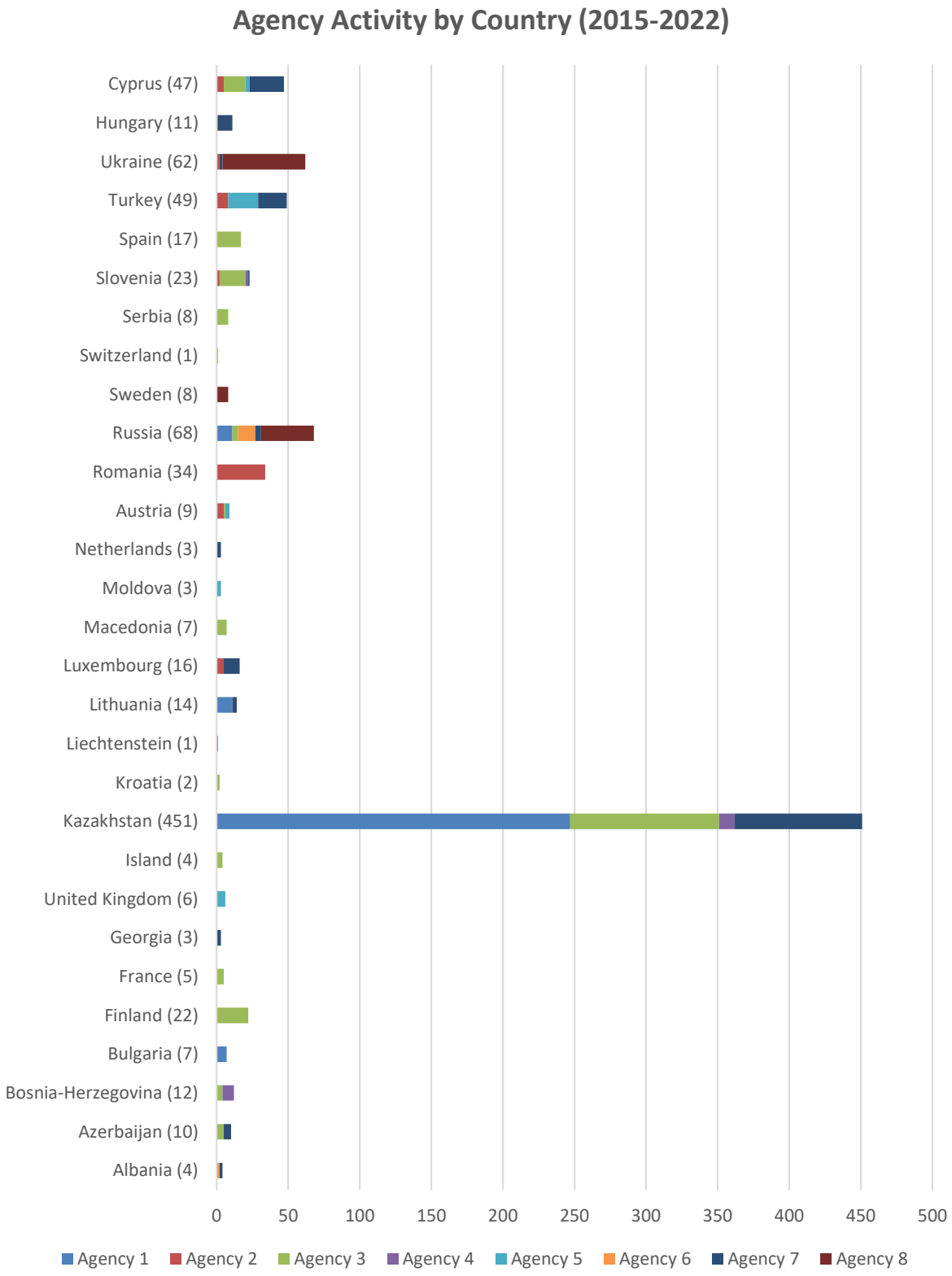


Figure 5. Number of accredited study programmes in the period under review, displayed by agency and country of domicile of the respective higher education institution.

Assignment of Accredited Study Programmes to Subject Areas and Degrees

In a further step, the types of study programmes to be accredited were considered. As mentioned at the beginning, the degree level and the associated specialisation were recorded. For this purpose, categories of subject areas were formed, and the study programmes were assigned to these. The challenge was, on the one hand, to do justice to the diversity of study programmes and, on the other hand, not to fan out the level of detail too extensively. In order to maintain clarity, subject groups were therefore summarised (see Fig. 6). An allocation to agencies is omitted, as individual agencies with subject specialisations would otherwise be identifiable. Multiple categorisations were avoided. In the case of questionable assignments, such as for example study programmes in the management of nursing professions, these were assigned to what the authors considered to be the dominant subject category (in this case, economics and social sciences). Just over a third of the study programmes can be assigned to the natural sciences and engineering. Approximately a further quarter can be attributed to business, economics and social sciences. Slightly more than a further tenth is accounted for by study programmes in political, administrative and legal sciences. The remaining share is distributed among the other subject categories.

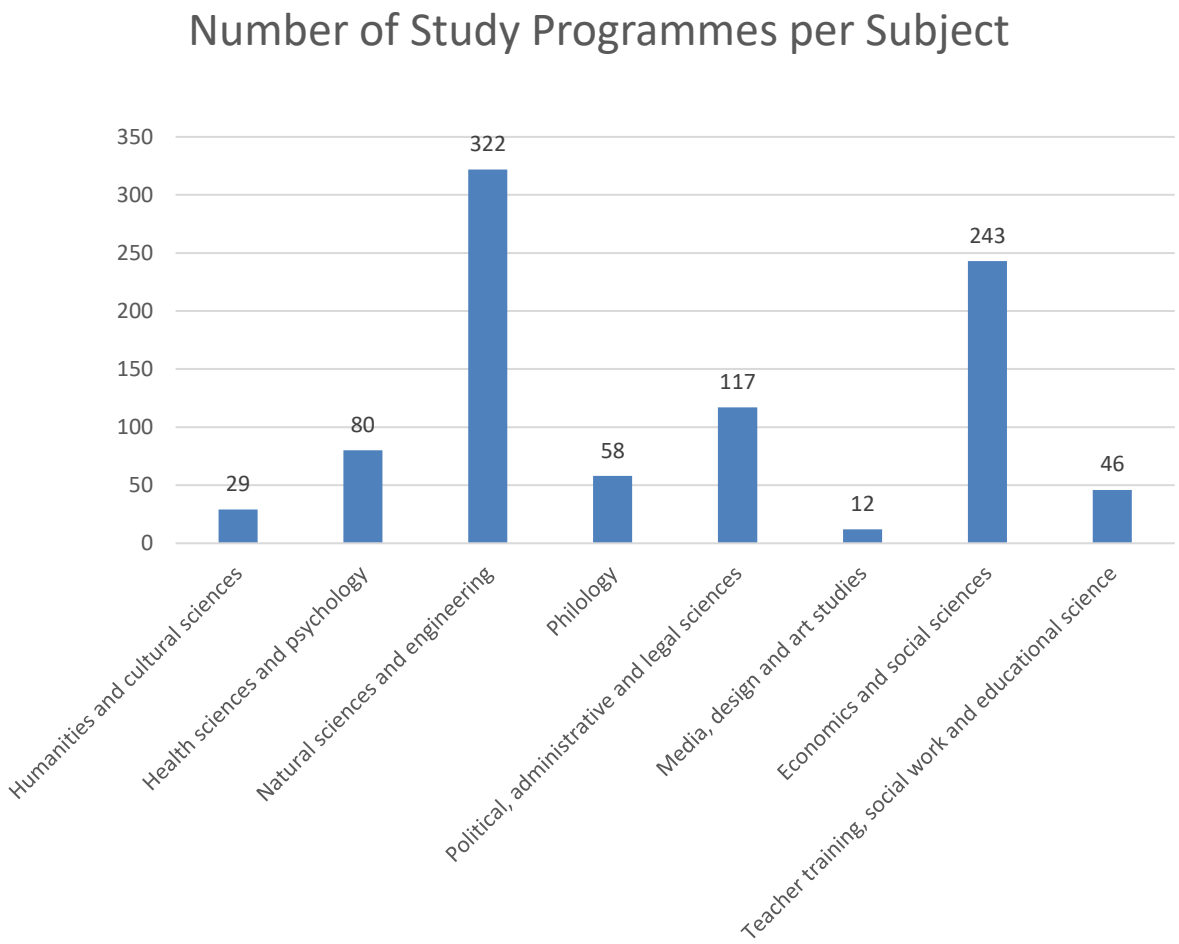


Figure 6. Number of study programmes, displayed by subject.

It is clear from the recording of degree levels that study programmes within the Bachelor's/Master's system make up the vast majority of the programmes considered in the data set, with a total of 820

out of 907 study programmes (cf. Fig. 7). Only 87 programmes are doctoral or PhD study programmes, diploma study programmes or other study programmes, with doctoral or PhD study programmes also accounting for the largest share here with 76 study programmes. Only eleven study programmes are for degrees that are rather unusual or not common in the European Higher Education Area. Agencies 1 and 3 show a relatively even distribution of Bachelor's and Master's study programmes. Agencies 2, 5 and 7 show a stronger overall focus on Bachelor's study programmes, while Master's study programmes are disproportionately represented in agency 8.
In the case of agencies 4 and 6, the case numbers are too small to allow statistical conclusions to be drawn, and the case numbers for agency 5 are also comparatively low and therefore subject to increased uncertainty.

Degrees	Number of Bachelor programmes	Number of Master's programmes	Number of doctorate/PhD programmes	Number of diploma programmes	Number of other programmes	Total number
Total number	441	379	76	4	7	907
Agency 1	125	108	44	1	0	278
Agency 2	44	13	2	0	2	61
Agency 3	102	103	7	3	2	217
Agency 4	11	10	0	0	0	21
Agency 5	29	6	1	0	0	36
Agency 6	2	10	0	0	2	14
Agency 7	98	65	14	0	0	177
Agency 8	30	64	8	0	1	103

Figure 7. Number of accredited study programmes, displayed by agency and degree.

Evaluation of the Agencies' Decision-Making Practice

Across all eight agencies, a total of 1806 conditions were issued in the review of 907 study programmes (see Fig. 9). In only one case the authors were unable to establish a meaningful link between the content of a condition and the ESG (cf. Fig. 9 category "?"). When analysing the available data, the comparability of the individual agencies' practice in terms of conditions proved to be problematic due to the very large fluctuations in the number of accreditations per agency. In order to better visualise this, the number of conditions issued was supplemented by the average number of conditions in the table below.[10] It should be noted at this point that these average values are subject to uncertainty, if the total numbers are low. In case of agencies with a very low number of reviewed study programmes

[10] The average values are calculated by dividing the respective number of conditions (e.g. per agency) by the total number of study programmes considered and are merely intended to illustrate the direct comparability of different sample sizes per agency more clearly. It should be noted that the average values presented in this way can vary greatly in their significance depending on the size of the respective sample. Whenever this is the case, this is pointed out again below.

(especially agencies 4 and 6), this can therefore lead to statistical deviations that are not necessarily meaningful. For example, the comparatively high average number of conditions in the case of agency 4 could be due to the unfortunate circumstance of individual procedures with a high number of conditions and need not be a sign of the agency's stricter decision-making practice. Conversely, the low average number of conditions in the case of agency 6 is not necessarily a sign of a less strict decision-making practice, as the data basis only includes 14 study programmes. Agency 5 also has an uncertain data set for analysis with only 36 assessed study programmes – even though the average values roughly correspond to those of the other agencies. The most interesting comparison is probably that of agencies 1 and 3, which have the largest and therefore supposedly most reliable data sets. What stands out, is that agency 1 – although it has accredited the most study programmes in absolute terms – has the lowest relative number of conditions. The agency with the second highest number of assessments, agency 3, has issued almost four times as many conditions on average. Agencies 2, 5, 7 and 8, on the other hand, establish themselves statistically in the midfield between these two extremes.

	Number of conditions recommended by experts / average number	Number of additional conditions imposed / average number	Total number of conditions issued / average number
Total number	1704 / 1,88	102 / 0,11	1806 / 1,99
Agency 1	246 / 0,88	25 / 0,09	271 / 0,97
Agency 2	110 / 1,80	0 / 0	116 / 1,90
Agency 3	761 / 3,51	66 / 0,30	827 / 3,81
Agency 4	91 / 4,33	0 / 0	91 / 4,33
Agency 5	58 / 1,61	0 / 0	58 / 1,61
Agency 6	10 / 0,71	0 / 0	10 / 0,71
Agency 7	294 / 1,66	0 / 0	294 / 1,66
Agency 8	134 / 1,30	5 / 0,05	139 / 1,35

Figure 8. Total number of conditions per agency as well as the average number of conditions proposed/issued by the panel of experts and the agency committees per agency.

102 conditions were imposed by the accreditation bodies of the respective accreditation agencies responsible for the decision-making process in addition to the conditions recommended by the experts. As the table above (Fig. 8) shows, such additional conditions only occur in the case of four agencies. For a further agency, the report structure does not allow a distinction to be made between the recommended conditions of the experts and any additional conditions imposed by the agency's committees. In this case, it is therefore not possible to say whether and, if so, how widespread additional conditions are. Ultimately, the additional conditions account for only around 5.65 % of the conditions imposed in total.

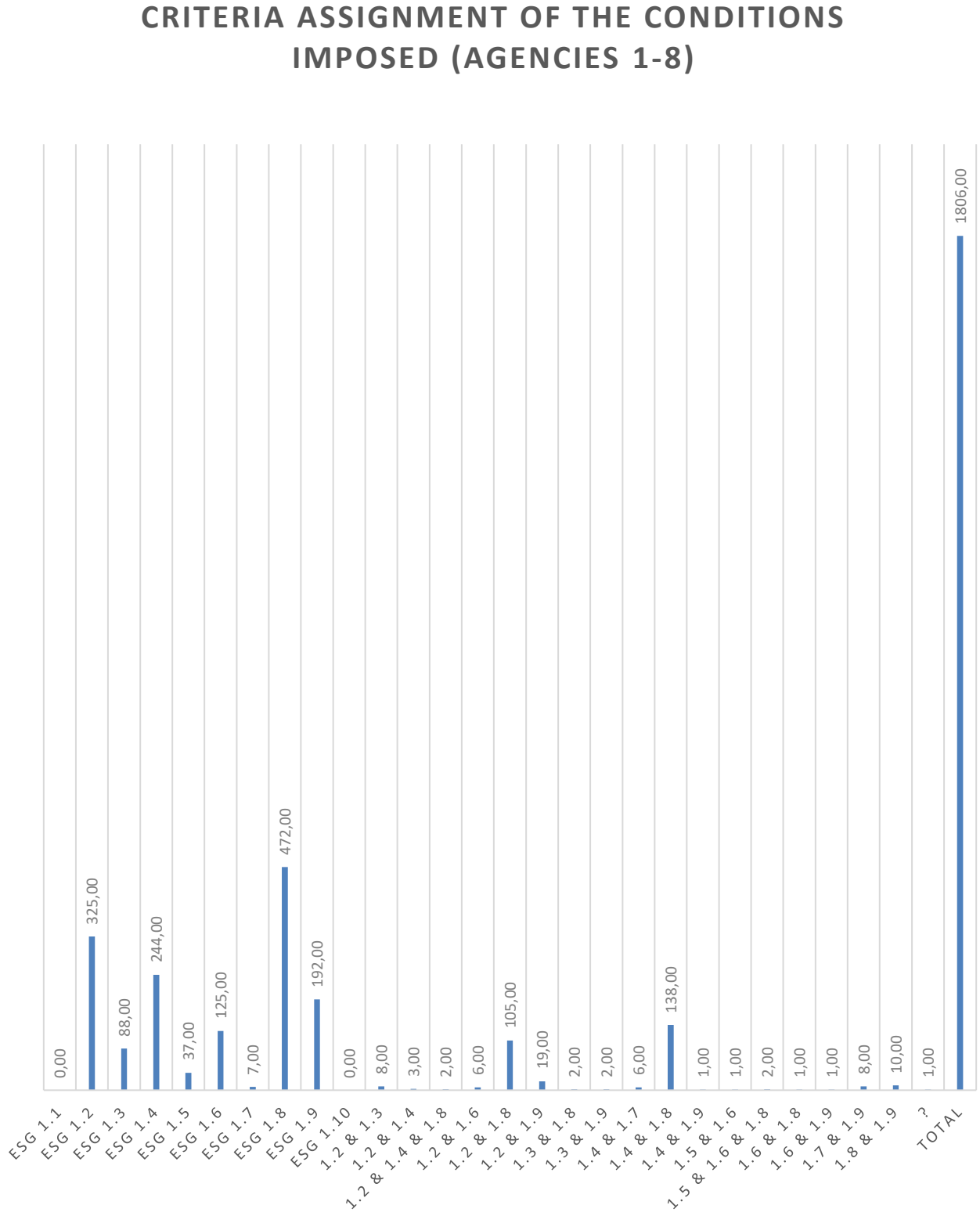


Figure 9. Absolute number of conditions for all study programmes accredited by the agencies in the period under review, displayed according to their allocation to ESG standards.

ESG Standard 1.1

Institutions should have a policy for quality assurance that is made public and forms part of their strategic management. Internal stakeholders should develop and implement this policy through appropriate structures and processes, while involving external stakeholders.[11]

Although the experts occasionally criticised the lack of a link between the institution's strategy and the respective curriculum, the resulting conditions were always formulated in such a way that the curriculum should be adapted to the strategy. The complete absence of such a strategy was not criticised in a single case. No condition could therefore be assigned to this standard.

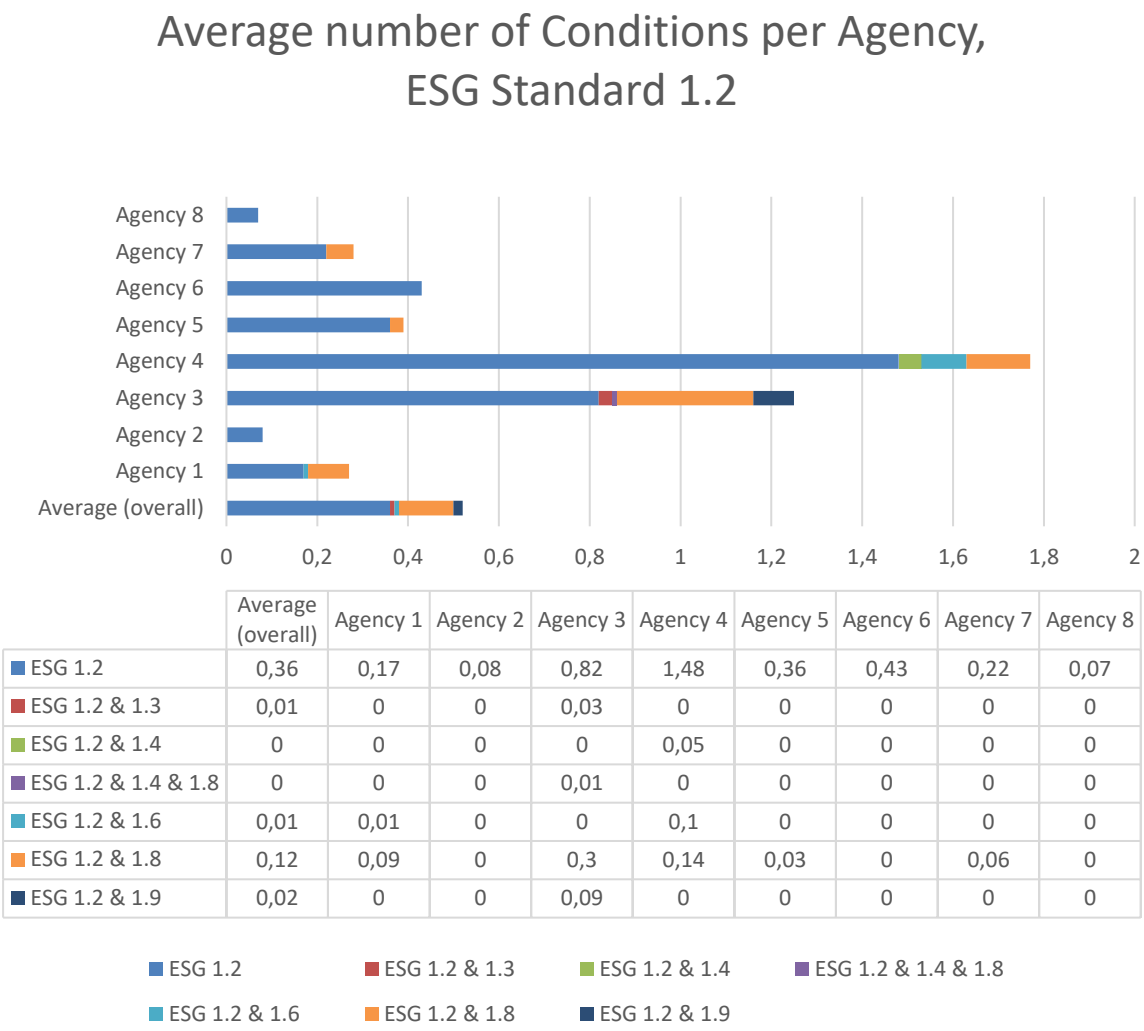
ESG Standard 1.2

Institutions should have processes for the design and approval of their programmes. The programmes should be designed so that they meet the objectives set for them, including the intended learning outcomes. The qualification resulting from a programme should be clearly specified and communicated, and refer to the correct level of the national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the European Higher Education Area.[12]

This standard accounted for a total of 468 conditions, which were either assigned exclusively assigned to standard 1.2 (in the case of 325 conditions) or to standard 1.2 in combination with other ESG criteria (see Fig. 9). The authors linked a condition to this standard if the condition text dealt either with changes in the curriculum or in the qualification objectives.

In total, an average of 0.52 conditions were issued per study programme that related to standard 1.2 of the ESG (see Fig. 10). There is a clear difference in the distribution between the agencies. On average, in the accreditations of agency 3, 1.25 and in the case of agency 4, 1.77 conditions were imposed on each study programme for this standard, meaning that the average number of conditions in the area of ESG 1.2 of these two agencies is significantly higher than the overall average. In the case of agency 4, it should be noted that the total number of accreditations within the data set is quite low, meaning that chance could significantly distort the picture of decision-making practice here. Agency 3, on the other hand, forms the second largest data set, so that it can be assumed with a comparatively high degree of certainty that compared to other agencies a larger proportion of conditions relating to the curricular design of the accredited study programmes were issued. The average number of relevant conditions per study programme of the other agencies is therefore slightly below the overall average. On average, agencies 2 and 8 issued the fewest conditions in this regard.

[11] https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf, p. 11. Last accessed on 29/01/2024.
[12] https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf, p. 11. Last accessed on 29/01/2024.



	Average (overall)	Agency 1	Agency 2	Agency 3	Agency 4	Agency 5	Agency 6	Agency 7	Agency 8
ESG 1.2	0,36	0,17	0,08	0,82	1,48	0,36	0,43	0,22	0,07
ESG 1.2 & 1.3	0,01	0	0	0,03	0	0	0	0	0
ESG 1.2 & 1.4	0	0	0	0	0,05	0	0	0	0
ESG 1.2 & 1.4 & 1.8	0	0	0	0,01	0	0	0	0	0
ESG 1.2 & 1.6	0,01	0,01	0	0	0,1	0	0	0	0
ESG 1.2 & 1.8	0,12	0,09	0	0,3	0,14	0,03	0	0,06	0
ESG 1.2 & 1.9	0,02	0	0	0,09	0	0	0	0	0

Figure 10. Distribution of the average number of conditions in standard ESG 1.2 by agency.

ESG Standard 1.3

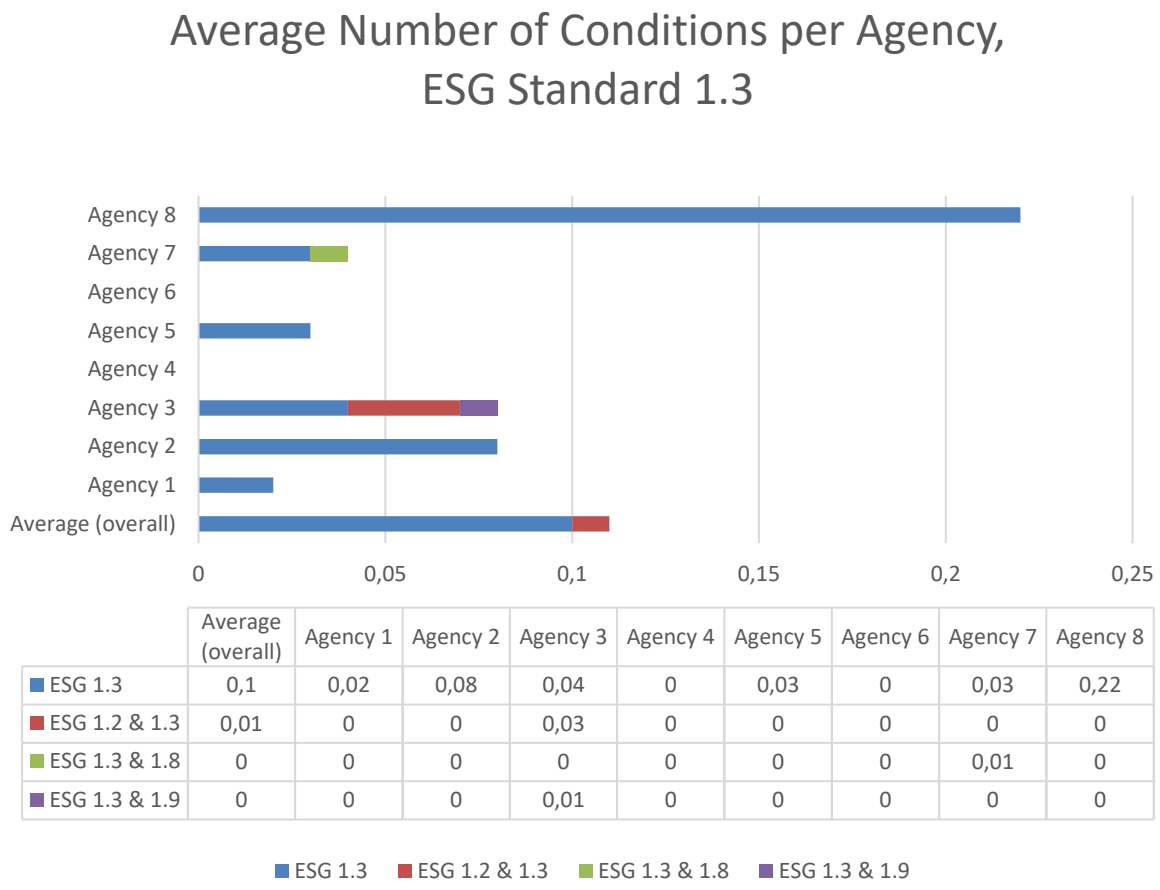
Institutions should ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach.[13]

Within all the conditions analysed, a total of 100 out of 1806 conditions could be linked to standard 1.3. Of these, 88 were allocated exclusively to this standard (see Fig. 9). The authors always chose to link to this standard if the condition either had a more student-centred approach or if the examination system was the subject of the condition.

In total, an average of 0.11 such conditions were imposed per study programme. Here again, the agencies' decision-making practices varied considerably in some cases. While no conditions were imposed at all in the case of agencies 4 and 6, an average of 0.22 conditions per study programme relating to standard 1.3 were imposed in the case of agency 8: roughly twice as often as the overall average (see Fig. 11). The deviations of agencies 4 and 6 again concern those two agencies with the smallest

[13] https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf, p. 12. Last accessed on 29/01/2024.

data sets in terms of absolute numbers, so that the present observation is not very reliable. The two agencies with the highest numbers, agency 2 and 3, on the other hand, lie close to each other with an average of 0.08 conditions per study programme. Furthermore, agencies 1, 5 and 7 are at a similarly low level with 0.02, 0.03 and 0.04 conditions per study programme respectively.



	Average (overall)	Agency 1	Agency 2	Agency 3	Agency 4	Agency 5	Agency 6	Agency 7	Agency 8
ESG 1.3	0,1	0,02	0,08	0,04	0	0,03	0	0,03	0,22
ESG 1.2 & 1.3	0,01	0	0	0,03	0	0	0	0	0
ESG 1.3 & 1.8	0	0	0	0	0	0	0	0,01	0
ESG 1.3 & 1.9	0	0	0	0,01	0	0	0	0	0

Figure 11. Distribution of the average number of conditions in standard ESG 1.3 by agency.

ESG Standard 1.4

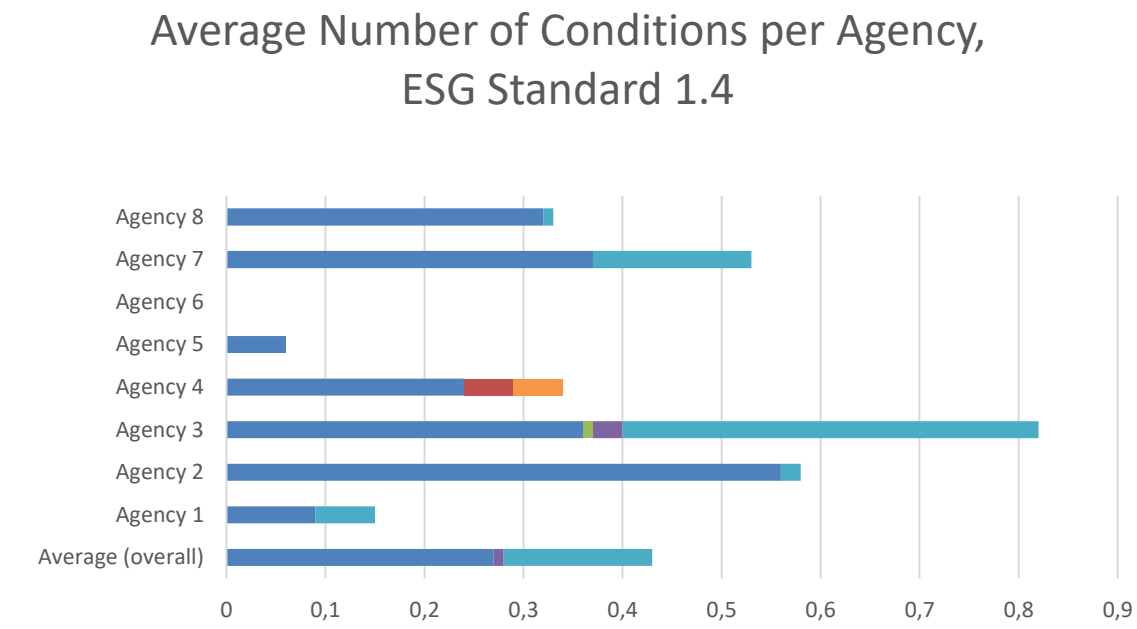
Institutions should consistently apply pre-defined and published regulations covering all phases of the student "life cycle", e.g. student admission, progression, recognition and certification.[14]

This standard accounts for a total of 394 out of 1806 conditions. Of these, the authors were able to link 244 exclusively to this standard (see Fig. 9). Conditions were always linked to standard 1.4, if documents or regulations regarding the student life cycle did not exist. These included regulations on recognition and credit transfer, binding examination regulations, but also certification documents such as the Diploma Supplement. If regulations existed but were simply not documented in writing, they were allocated to standard 1.8 instead of 1.4.

On average, 0.43 conditions per study programme were issued with reference to ESG standard 1.4. While there were no conditions in the data set of agency 6 that could be linked to ESG 1.4. Agency 5

[14] https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf, p. 13. Last accessed on 29/01/2024.

had the lowest relative value with 0.06 conditions per study programme. An average of 0.82 conditions per study programme were issued in the case of agency 3, which – as in the case of ESG 1.2 - again represents a significant deviation from the average.



	Average (overall)	Agency 1	Agency 2	Agency 3	Agency 4	Agency 5	Agency 6	Agency 7	Agency 8
ESG 1.4	0,27	0,09	0,56	0,36	0,24	0,06	0	0,37	0,32
ESG 1.2 & 1.4	0	0	0	0	0,05	0	0	0	0
ESG 1.2 & 1.4 & 1.8	0	0	0	0,01	0	0	0	0	0
ESG 1.4 & 1.7	0,01	0	0	0,03	0	0	0	0	0
ESG 1.4 & 1.8	0,15	0,06	0,02	0,42	0	0	0	0,16	0,01
ESG 1.4 & 1.9	0	0	0	0	0,05	0	0	0	0

Figure 12. Distribution of the average number of conditions in standard ESG 1.4 by agency.

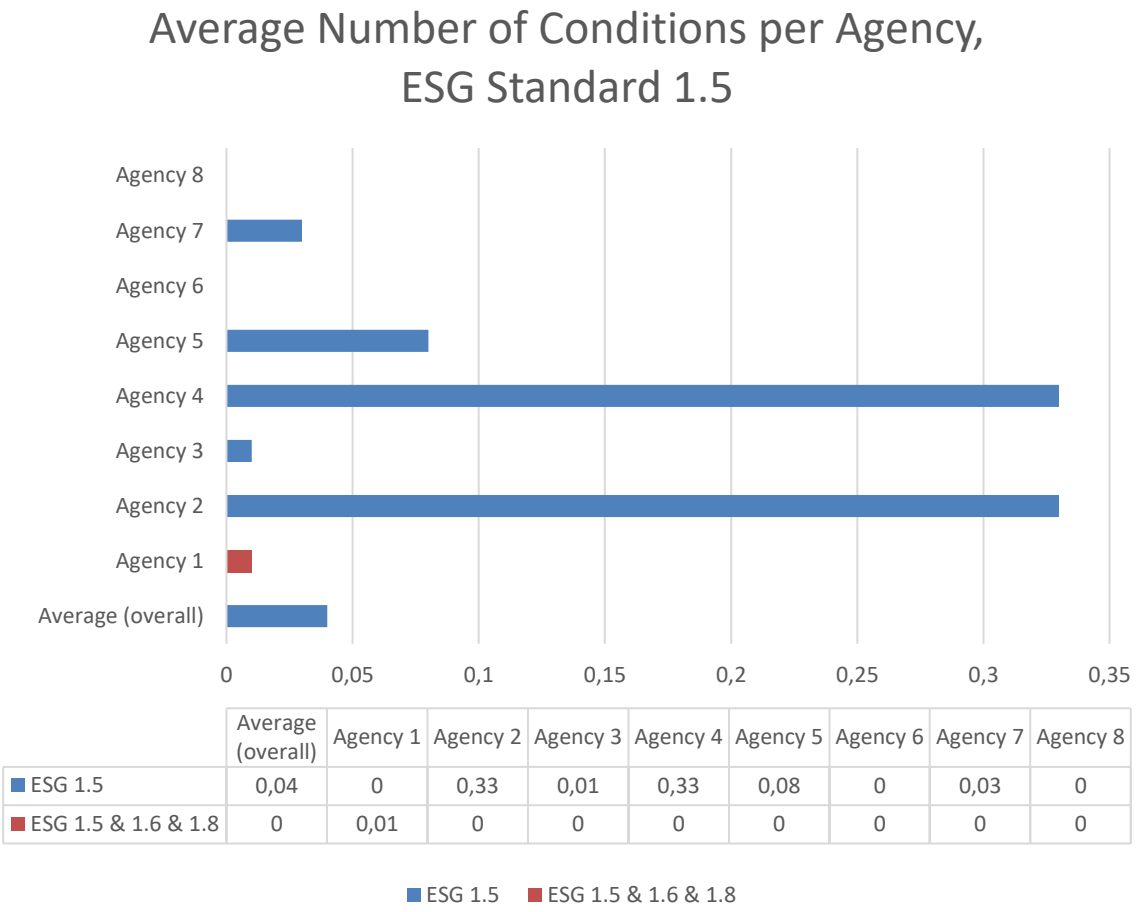
ESG Standard 1.5

Institutions should assure themselves of the competence of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff.[15]

This standard accounted for a total of only 40 conditions, which were either exclusively linked to standard 1.5 (in the case of 37 conditions) or to standard 1.5 in combination with other ESG standards (see Fig. 9). Conditions were assigned to standard 1.5 whenever a condition criticised the quantitative/qualitative staffing, the measures for selecting new staff or the lack of further and advanced training opportunities.

[15] https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf, p. 13. Last accessed on 29/01/2024.

Overall, an average of 0.04 conditions per study programme were issued that related to standard 1.5 of the ESG (see Fig. 13). Only agencies 2 and 4 show significant deviations from the rather low average value, each with an average of approx. 0.33 conditions per study programme. However, as both agencies have a low absolute number of accredited study programmes and the average value itself is also comparatively low, this is not a statistically evaluable trend.



	Average (overall)	Agency 1	Agency 2	Agency 3	Agency 4	Agency 5	Agency 6	Agency 7	Agency 8
ESG 1.5	0,04	0	0,33	0,01	0,33	0,08	0	0,03	0
ESG 1.5 & 1.6 & 1.8	0	0,01	0	0	0	0	0	0	0

Figure 13. Distribution of the average number of conditions in the ESG 1.5 standard by agency.

ESG Standard 1.6

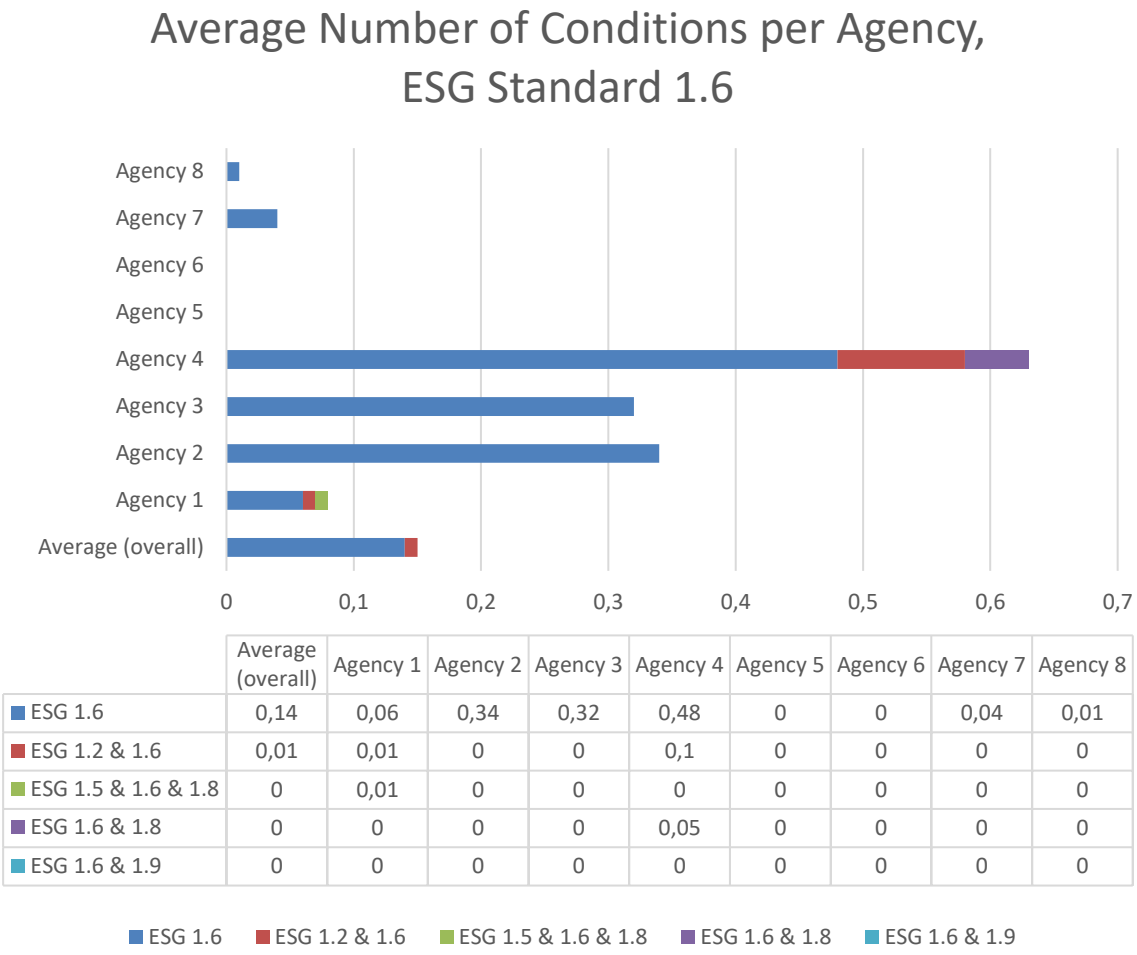
Institutions should have appropriate funding for learning and teaching activities and ensure that adequate and readily accessible learning resources and student support are provided.[16]

This standard accounted for a total of 136 conditions. 125 conditions could be exclusively linked to standard 1.6 and a further eleven to standard 1.6 in combination with other ESG standards (see Fig. 9). In analogy to the previous standard, an allocation to standard 1.6 was always made if the respective condition addressed (material) resource deficits.

In total, an average of 0.15 conditions were issued per study programme that related to standard 1.6 of the ESG (see Fig. 14). While no link at all could be established between a condition and standard 1.6 cases of the agencies 5 and 6, agency 4, with an average of 0.63 conditions, shows a supposedly higher

[16] https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf, p. 14. Last accessed on 29/01/2024.

proportion of conditions relating to standard 1.6. Once again, all three agencies with alleged anomalies are those with very low absolute numbers within the data set, meaning that chance can distort the average significantly.



	Average (overall)	Agency 1	Agency 2	Agency 3	Agency 4	Agency 5	Agency 6	Agency 7	Agency 8
ESG 1.6	0,14	0,06	0,34	0,32	0,48	0	0	0,04	0,01
ESG 1.2 & 1.6	0,01	0,01	0	0	0,1	0	0	0	0
ESG 1.5 & 1.6 & 1.8	0	0,01	0	0	0	0	0	0	0
ESG 1.6 & 1.8	0	0	0	0	0,05	0	0	0	0
ESG 1.6 & 1.9	0	0	0	0	0	0	0	0	0

Figure 14. Distribution of the average number of conditions in standard ESG 1.6 by agency.

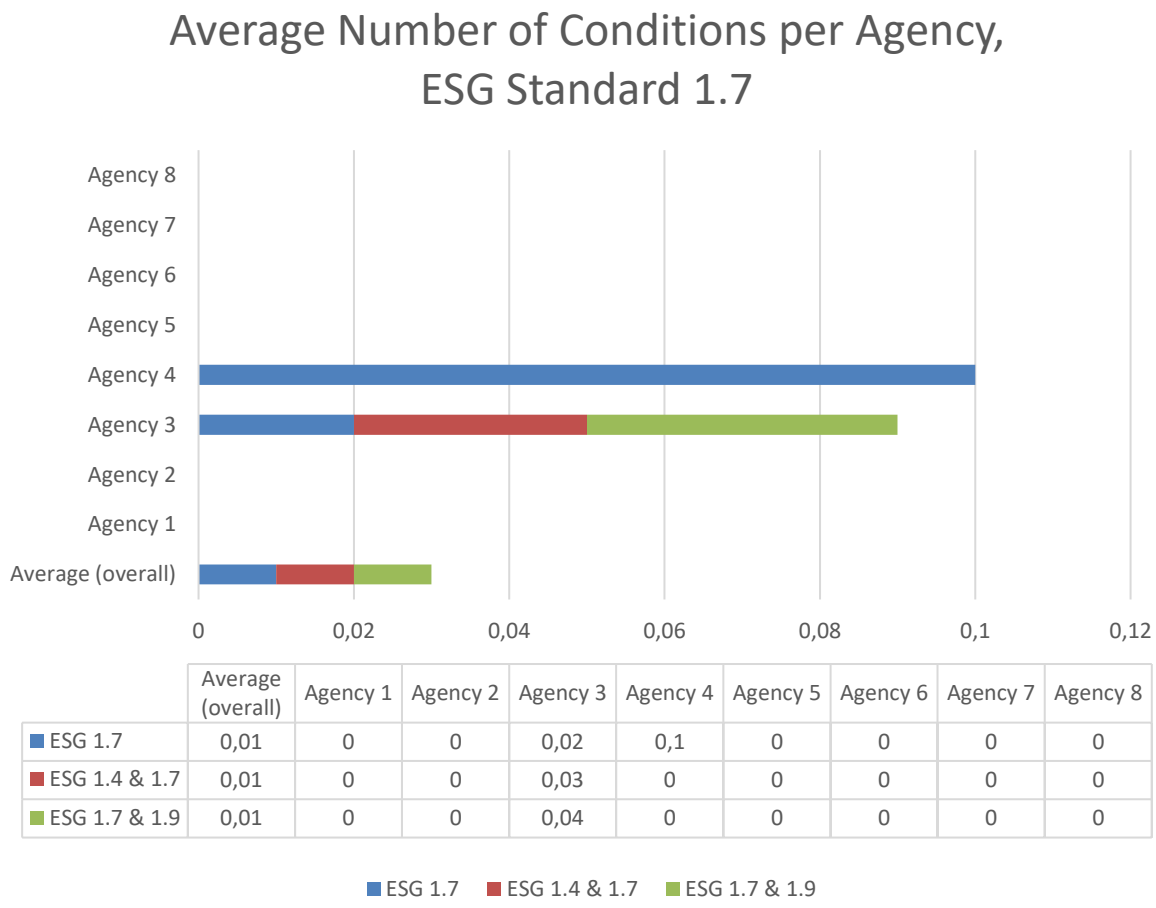
ESG Standard 1.7

Institutions should ensure that they collect, analyse and use relevant information for the effective management of their programmes and other activities.[17]

This standard accounted for a total of 21 conditions, which were either exclusively linked to standard 1.7 (in the case of seven conditions) or to standard 1.7 in combination with other ESG standards (see Fig. 9). Assignment to this standard always took place, when the text of a condition addressed, that important key figures of the study programme were not monitored or were monitored but not systematically and appropriately included in the further development of the respective study programme. In total, an average of 0.03 conditions relating to standard 1.7 of the ESG were issued per study programme (see Fig. 15). The overall very low number of cases is striking: only in the case of two agencies

[17] https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf, p. 14. Last accessed on 29/01/2024.

(agency 3 & agency 4) conditions have been imposed at all. Again, the absolute number within the data set is so low that the actual distribution seems to be of little significance.



	Average (overall)	Agency 1	Agency 2	Agency 3	Agency 4	Agency 5	Agency 6	Agency 7	Agency 8
ESG 1.7	0,01	0	0	0,02	0,1	0	0	0	0
ESG 1.4 & 1.7	0,01	0	0	0,03	0	0	0	0	0
ESG 1.7 & 1.9	0,01	0	0	0,04	0	0	0	0	0

Figure 15. Distribution of the average number of conditions in the ESG 1.7 standard by agency.

ESG Standard 1.8

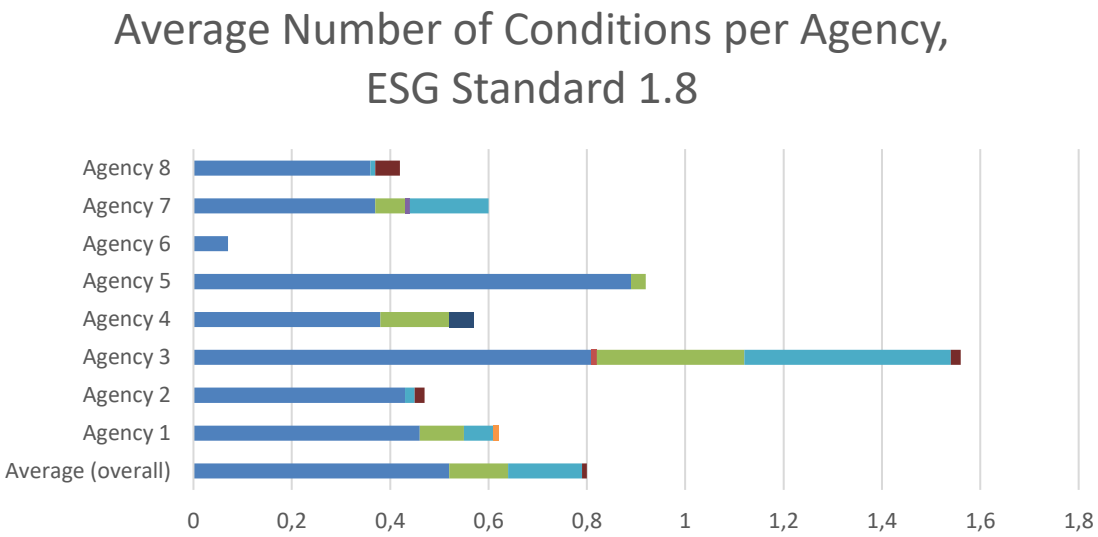
Institutions should publish information about their activities, including programmes, which is clear, accurate, objective, up-to date and readily accessible.[18]

With 472 of 1806 conditions, ESG 1.8 is the most numerous of all ESG standards. If this is supplemented by those multiple allocations that also relate to ESG 1.8, a further 260 conditions are linked to this standard, meaning that a total of 732 out of 1806 conditions somehow relate to standard 1.8 (see Fig. 9). An allocation to standard 1.8 was always made when regulations or documents existed but were not documented or were not accessible by students or prospective students. In some cases, regulations did not exist and were requested by the reviewers in a binding manner. If, in addition to this implementation, they also felt the need to explicitly anchor the corresponding documentation in the condition text, multiple assignments were made to the respective standard and standard 1.8.
This means that it is not only by far the standard, to which conditions are most frequently linked, it is also the standard that occurs most frequently in combinations (e.g. in the combinations 1.2 & 1.8 and 1.4 & 1.8), which is not surprising, however, as the lack of transparency can often still be thematically

[18] https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf, p. 15. Last accessed on 29/01/2024.

assigned either to the curriculum itself or to another sub-area, which is also underpinned by a standard.

In total, an average of 0.8 conditions were issued per study programme that related to standard 1.8 of the ESG (see Fig. 16). In the case of agency 3, most conditions were issued in this area, meaning that agency 3 had an average of 1.56 conditions per study programme that related to the transparency standard. If compared to that of the agencies, which also have a rather solid data set (agency 1: 0.62; agency 7: 0.6; agency 8: 0.42), it is noticeable that this value is significantly higher.



	Average (overall)	Agency 1	Agency 2	Agency 3	Agency 4	Agency 5	Agency 6	Agency 7	Agency 8
ESG 1.8	0,52	0,46	0,43	0,81	0,38	0,89	0,07	0,37	0,36
ESG 1.2 & 1.4 & 1.8	0	0	0	0,01	0	0	0	0	0
ESG 1.2 & 1.8	0,12	0,09	0	0,3	0,14	0,03	0	0,06	0
ESG 1.3 & 1.8	0	0	0	0	0	0	0	0,01	0
ESG 1.4 & 1.8	0,15	0,06	0,02	0,42	0	0	0	0,16	0,01
ESG 1.5 & 1.6 & 1.8	0	0,01	0	0	0	0	0	0	0
ESG 1.6 & 1.8	0	0	0	0	0,05	0	0	0	0
ESG 1.8 & 1.9	0,01	0	0,02	0,02	0	0	0	0	0,05

Figure 16. Distribution of the average number of conditions in the ESG 1.8 standard by agency.

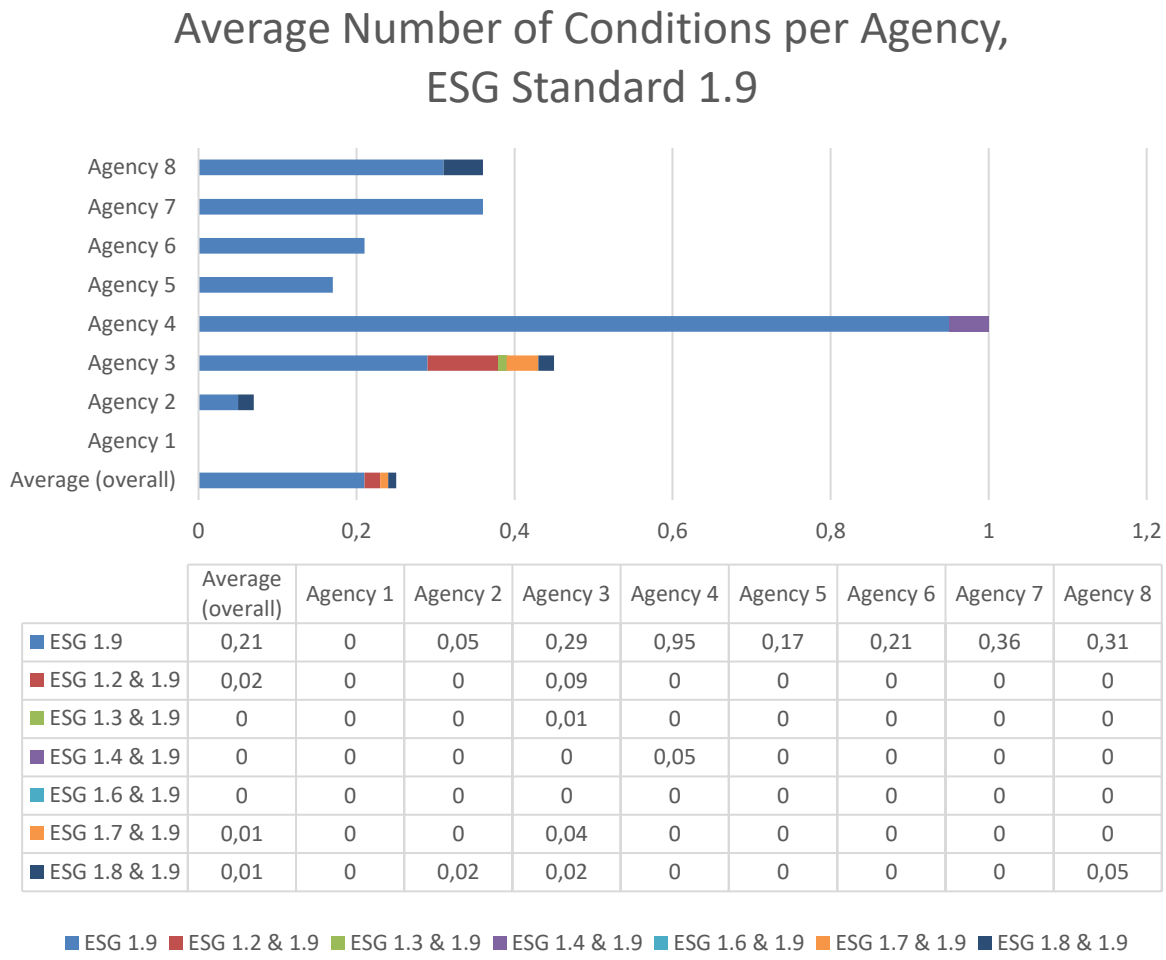
ESG Standard 1.9

Institutions should monitor and periodically review their programmes to ensure that they achieve the objectives set for them and respond to the needs of students and society. These reviews should lead to continuous improvement of the programme. Any action planned or taken as a result should be communicated to all those concerned.[19]

[19] https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf, p. 15. Last accessed on 29/01/2024.

This standard accounted for a total of 233 conditions, which were either exclusively assigned to standard 1.9 (in the case of 192 conditions) or could be linked to standard 1.9 in combination with other ESG standards (see Fig. 9). Standard 1.9 was always assigned to a condition, if it could be linked to the quality management system – this applies to the implementation of evaluations as well as the discussion of feedback of the results. The authors also assigned the lack of workload surveys to this standard. This was done because workload surveys are usually anchored in the evaluations and the condition therefore concerns the evaluations in the broader sense.

Overall, an average of 0.25 conditions per study programme were issued that related to standard 1.9 of the ESG (see Fig. 17). While most agencies are in the range of an average of 0.07 (agency 2) to 0.45 (agency 3) conditions per study programme, the figures for two agencies stand out: firstly, the data of agency 4 shows a significantly higher value with an average of one conditions per study programme and secondly, it is noticeable that in the case of agency 1, no condition could be linked to standard 1.9 at all. The former observation can be explained by a distortion within the data set, which is due to a very small number of cases from agency 4. The latter, on the other hand, is not so easy to explain, as agency 1 shows the most solid data set. It can therefore be stated that the quality management system in the procedures of agency 1 is subject to significantly fewer conditions than it is the case with other agencies under review.



	Average (overall)	Agency 1	Agency 2	Agency 3	Agency 4	Agency 5	Agency 6	Agency 7	Agency 8
ESG 1.9	0,21	0	0,05	0,29	0,95	0,17	0,21	0,36	0,31
ESG 1.2 & 1.9	0,02	0	0	0,09	0	0	0	0	0
ESG 1.3 & 1.9	0	0	0	0,01	0	0	0	0	0
ESG 1.4 & 1.9	0	0	0	0	0,05	0	0	0	0
ESG 1.6 & 1.9	0	0	0	0	0	0	0	0	0
ESG 1.7 & 1.9	0,01	0	0	0,04	0	0	0	0	0
ESG 1.8 & 1.9	0,01	0	0,02	0,02	0	0	0	0	0,05

Figure 17. Distribution of the average number of conditions in the ESG 1.9 standard by agency.

ESG Standard 1.10

Institutions should undergo external quality assurance in line with the ESG on a cyclical basis.[20]

No condition could be linked to ESG standard 1.10, which, however, is not surprising as the accreditations analysed here represent the external quality assurance that has to be carried out regularly. It was therefore to be expected that this standard would not be represented or that no condition could be assigned to this standard.

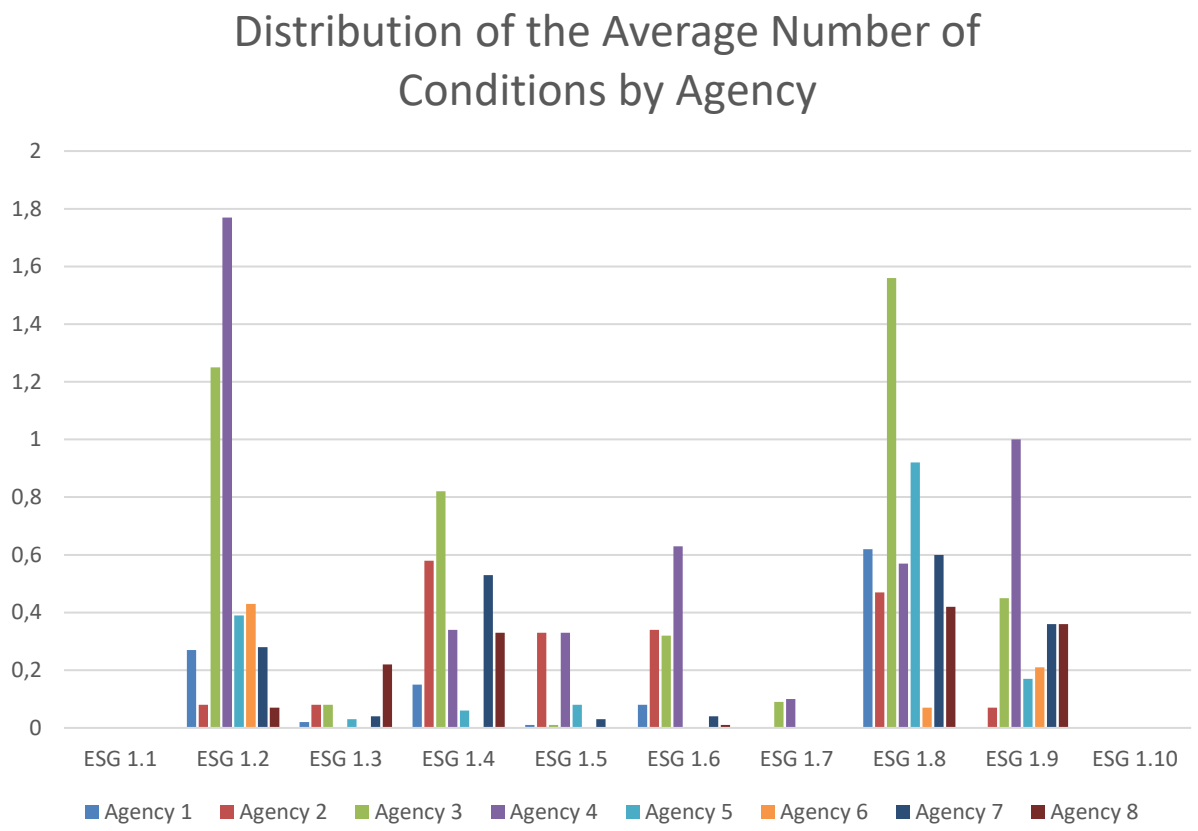


Figure 18. Distribution of the average number of conditions according to ESG standards and agencies (with multiple assignments).

If we now look at the average conditions by agency in a synopsis (see Fig. 18), it can be seen that, in addition to the deviations of individual agencies outlined above, there is also a commonality in the decision-making practice of almost all agencies: On the one hand, very often deficiencies of a more formal nature were charged and, on the other hand, the comprehensive and transparent documentation of study programme documents is of particular importance in the context of accreditation procedures.

[20] https://www.enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf, p. 15. Last accessed on 29/01/2024.

5 Interpretation and Conclusions

Development of the Total Number of Accredited Study Programmes in the Period under Review

The chronological development as described in the previous chapter is surprising in that, although the authors anticipated a significant drop in the number of reviewed study programmes during the COVID-19 pandemic, the total number of study programmes was already declining in 2019. Based on the available data, it was possible to show that this decline correlates with a decline in Kazakhstan, the country most strongly represented in quantitative terms during the analysis period. While the increase in accreditation procedures from 2015 is most likely the result of the Kazakh 2007 law "On Education", which aims to increasingly integrate Kazakh higher education institutions into the European Higher Education Area, with a certain time lag,[21] the decline from 2019 is more difficult to explain. It can be assumed that this decline is either related to a saturation of the Kazakh accreditation market or to a general market displacement or relocation of the activities of German-speaking agencies from the Kazakh market to other regions (not included in this sample). In any case, the decline does not appear to be pandemic-related, as it already began a year prior to the pandemic and, unlike the overall global trend, the number of accredited study programmes in Kazakhstan did not recover in 2021. In order to verify the theory of market saturation, a future review in an analogue procedure would be necessary. One possible indication of a market displacement rather than a shift to other markets could be the increasing establishment of Kazakh accreditation agencies and institutions within the 2010s.[22]

It is also interesting to note that although the anticipated pandemic-related decline in terms of total numbers of reviews in 2020 is clearly visible, the total number is already back to roughly the pre-pandemic level in 2021. This was surprising insofar as 2021 was still strongly characterised by travel restrictions in the European Higher Education Area. One possible reason for this development could be the agency-wide adaptation of digital assessment procedures, which were introduced and trialled in 2020, but were already established and available across the board in 2021.

Geographical Distribution of Accredited Study Programmes within the EHEA

As far as the geographical distribution of the agency activities analysed in the period under review is concerned, it can be stated that individual country foci, with the exception of Kazakhstan, are not the rule. However, there is a strong focus on countries in the Balkans and Eastern Europe/Eurasia, which are part of the former Eastern bloc and whose integration into the European Higher Education Area began later than that of the countries of Western Europe.

[21] See Kerimkulova 2014.

[22] Cf. the overview of accreditation institutions authorised in the Republic of Kazakhstan: https://enic-kazakhstan.edu.kz/en/accreditation/accredited_organizations. Last accessed on 12/01/2023.

Assignment of Accredited Study Programmes to Subject Areas and Degrees

The allocation to the subject areas suggests that reasons of visibility and reputation appear to play a role in the decision for and against international accreditation. In addition, strengthening of internationalisation and student mobility could also play a role. However, if the harmonisation of standards in order to strengthen mobility were the sole main motivation for international accreditation, it could be assumed that study programmes that have high mobility rates for subject-related reasons (such as linguistics) would be represented more frequently. With regard to the distribution of degrees within the accredited study programmes, no significant patterns could be identified, apart from the fact that these were predominantly study programmes from the Bachelor's/Master's system.

Evaluation of the Agencies' Decision-Making Practice

Finally, if looked upon the results of the data analysis with regard to the decision-making practice of individual agencies, it can be seen that the decision-making practices of agencies 1 and 3 in particular deviate significantly from the average. While the experts and agency committees of agency 1 issued significantly fewer conditions on average, the experts and committees of agency 3 issued almost twice as many conditions on average as the overall average.

The reasons for this phenomenon could be manifold: Possible explanations could lie in the governance structures of the agencies – particularly as some of the agencies analysed have additional specialist committees. However, it is also possible that there are intangible differences in the procedural organisation, such as differences in the training of experts or in the procedural management by the agency officers. In this context, the preparatory counselling of the applicant higher education institution could play a significant role, whereby certain deficiencies are already remedied before the actual review process and are therefore no longer visible.

There were also clear differences in the distribution between the agencies with regard to the subject matter of the complaints that came to light: it is particularly noticeable that agency 3 issued conditions, that could be traced back in some way to the curriculum and thus to the specific subject content much more frequently, while conditions of a more formal nature and, to a certain extent, relating to the framework of a study programme predominated at other agencies. Another very common complaint across all the agencies analysed concerned a lack of transparency or improvements in the documentation of the HEI’s processes.

From the authors' point of view, one possible reason for this prevalence of formal conditions could be the design of the procedures, as formalisms in procedures are often much easier to name and quantify. Moreover, non-compliance or compliance with these criteria can almost always be clearly discerned (unlike deficiencies in content, which often are more of a gradual nature) and comparatively easy to remedy, whereas deficiencies in the content of study programmes are often less clearly definable and identifiable and are therefore much more based on the subjective judgement of the experts. In addition, a content-related condition that forces a higher education institution to change its curriculum often represents a much more extensive intervention in a study programme, which reviewers may be more reluctant to do. On the one hand, in order not to interfere too much with the freedom of teaching, but also because the curricula in many countries are subject to specific state laws or frameworks to which the higher education institutions are bound anyway. Furthermore, the procedures and

available documents often do not allow for an in-depth assessment of content and methodology, especially in the case of less transparent written documents and information. This focus on formalities rather than subject content could therefore show that the current procedural designs of the agencies or accreditation as a whole are more likely to reach their limits in standard 1.2 of the ESG than it is the case with formalities.

Conditions relating to the examination system and staffing are also comparatively rare. Once again, this could be due to the rather gradual and difficult-to-implement nature of the criteria. Another possible explanation could be that these areas are often already heavily regulated by the respective national legislation, and therefore it is difficult or impossible to impose conditions that can be implemented. Staff-related conditions in particular are also often a question of limited financial resources and are therefore difficult or impossible for higher education institutions to fulfil. It is quite conceivable that, in view of this circumstance, experts may shy away from an overly strict assessment in order not to fundamentally question the existence of the reviewed study programmes.

In addition, in some cases it remains unclear whether the international accreditation procedures in this context only check formal compliance with the ESG or whether the underlying values are actually lived up to within the study programmes. The latter can also only be partially realised, for example in the feedback of evaluation results to the student cohorts surveyed or the implementation of workload surveys. Ultimately, however, this is no guarantee that this will lead to a real internalisation of the values behind the ESG. International accreditation currently is very much limited to checking whether processes and procedures have been implemented in accordance with the rules. The fulfilment of these regulations can only be understood in a cursory manner at best.

In conclusion, it can be stated that the data collected shows a much more diverse and diffuse overall picture than the authors initially expected. The main reason for this is that the hoped-for comparability fell short of expectations in many respects. It is virtually impossible to compare the decision-making practices of the agencies within individual countries with the available data. One solution could be to extend the period under review. However, extending the data set to include procedures prior to the revision of the ESG 2015 would make comparability even more difficult. An extension to include future procedures remains to be seen, especially as there is no guarantee that the ESG will remain unchanged in its current form.

It might be worthwhile to extend the scope of the analysis to include accreditation procedures in countries outside the EHEA. This could increase the absolute numbers in case of some agencies and thus ensure that at least the agencies themselves are more comparable with each other. However, this would not improve country-specific comparability. Instead of extending the scope of observation in terms of time or space, in the future it could be more promising to focus intensively on individual aspects in detailed analyses, e.g. a qualitative analysis of identified deficiencies in various target countries, which would allow conclusions to be drawn about the degree of implementation of individual ESG standards in these countries.

6 Literature

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This study examines the international programme accreditation procedures of German-speaking accreditation agencies in the European Higher Education Area in the period from 2015 to 2022 with a particular focus on the differences in the design of the decision-making practice of the respective agencies. In addition, a link is to be established between the conditions imposed and the ESG in order to examine whether the procedure designs used show a meaningful and comprehensible reference to these. Key quality assurance criteria will be identified within the analysed framework. The declared aim of the study is to present an initial collection of material and to address recognisable trends, such as differences in the focus of the agencies, in a descriptive manner.