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für akkreditierung
und qualitätssicherung

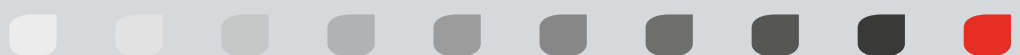
agence suisse
d'accréditation et
d'assurance qualité

agenzia svizzera di
accreditamento e
garanzia della qualità

swiss agency of
accreditation and
quality assurance

Targeted Review According to the ESG Self-Assessment Report

June 2025



Swiss Agency of Accreditation and Quality Assurance (AAQ)

Targeted Review

(Renewal of ENQA membership and EQAR registration)







Self-Assessment Report adopted by the Steering Group in June 2025

June 2025

Foreword

To fully understand this Self-Assessment Report in context, it should be read in conjunction with the documentation from the previous review. [Annexes 1 to 6](#) therefore include the 2020 Self-Assessment Report, the 2021 External Review Report, the AAQ's Position Statement and Complaint, as well as ENQA's and EQAR's Decisions.

To facilitate reading, references to information provided during the previous review is systematically indicated at the beginning of each section. In addition, content related to specific activities is colour-coded as follows:

-
-  Institutional and Programme Accreditations under HEdA are marked in red.
 -  Programme Accreditation under HEdA and HPA is indicated in orange.
 -  Programme Accreditation under HEdA and MPA appears in dark yellow.
 -  System Accreditation is shown in dark grey.
 -  Quality Audit is indicated in light grey.
 -  Evaluation procedures appear in light red.
-

Descriptions referring to AAQ and its overall activities are presented without colour coding.

Most supporting evidence is accessible via web links embedded in the text. Abbreviations, links, and the AAQ's public documents and guidelines are listed at the end of the report. Annexes are referenced in the text using square brackets and are also listed at the end of the report. As AAQ operates in four languages, not all documents are available in English. Where necessary, translations are provided using DeepL Pro. However, AAQ has chosen not to translate legal texts or documents that do not originate from the Agency and that lack an official English version, as their content falls outside its mandate.

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Introduction

Following two full reviews in 2016 and 2021, this Targeted Review is the first of its kind for the Swiss Agency of Accreditation and Quality Assurance (AAQ) – formerly the Center of Accreditation and Quality Assurance (OAQ) – and constitutes the fifth review since the Agency's establishment in 2006. AAQ welcomes the opportunity to engage in this format, which differs from previous approaches and provides a framework for reporting on changes that have occurred since the last full review. The Targeted Review comes at a pivotal moment, as the Agency has recently concluded an internal reorganisation in response to the findings of the first external evaluation of the Federal Act on Funding and Coordination of the Swiss Higher Education Sector (Higher Education Act – HEdA), carried out in 2022.

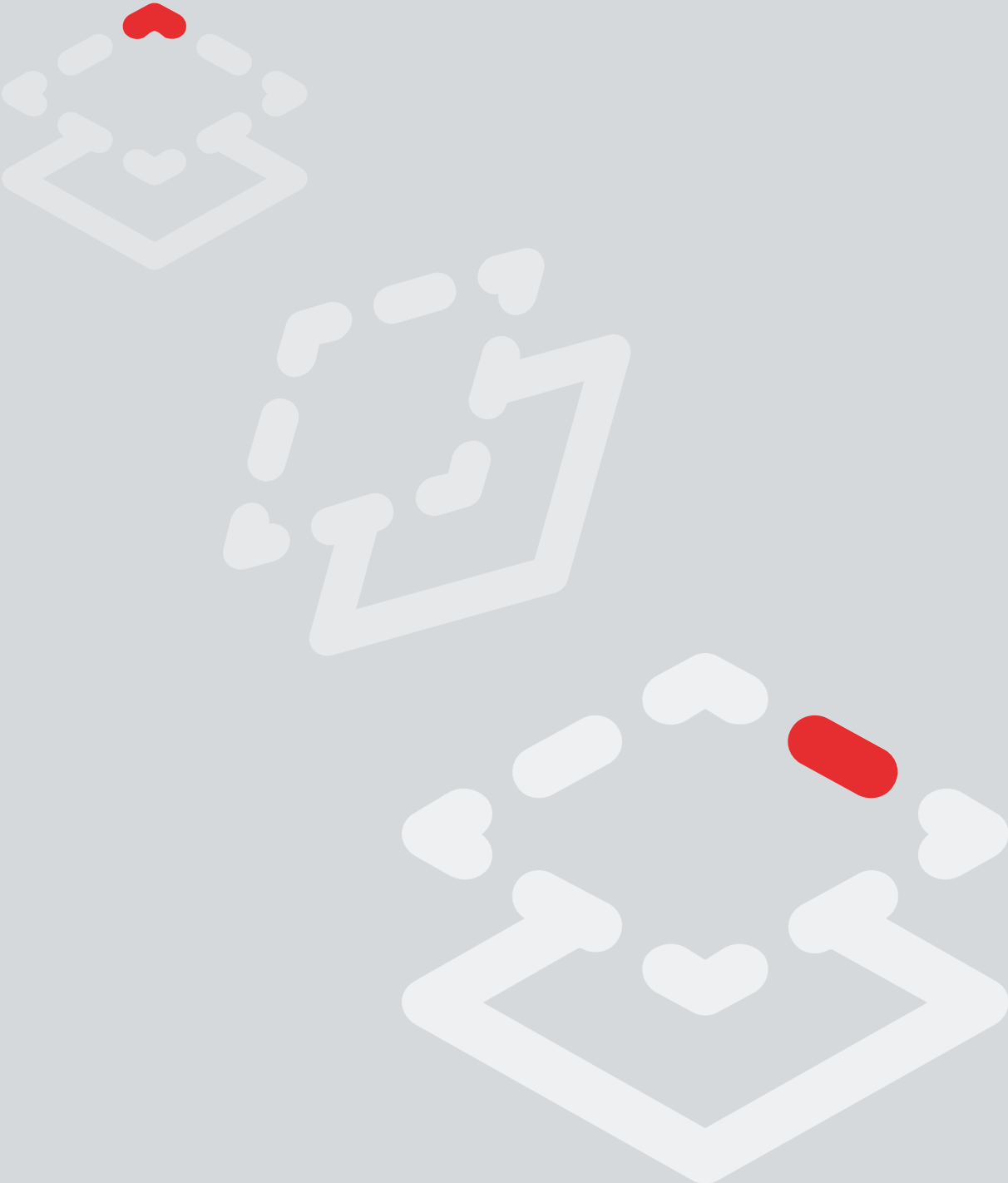
While the Agency's structure has been revised, its core mission and activities remain consistent and diverse: AAQ continues to implement accreditation procedures for institutions and programmes under HEdA. In addition, it conducts procedures for the accreditation of basic medical training (under HEdA and Medical Professions Act – MPA) and for professional training in the health sector (under HEdA and Health Professions Act – HPA). Beyond these responsibilities, AAQ also coordinates accreditation procedures on behalf of third parties, including Programme Accreditations in postgraduate medical and psychological training (all outside the scope of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), as they are not subject to HEdA), different kinds of evaluations, certifications of internal quality management systems through Quality Audits in Austria and System Accreditations in Germany. Several of these accreditation formats have evolved over time, as outlined in Section 1.3.3 of this report.

Through its work, AAQ continues to fulfil its role as a key external partner for Higher Education Institutions (HEIs), contributing actively to the advancement of a culture of quality. Over the years, the Agency's internal quality assurance (QA) processes have helped to clarify and reinforce its core values, both within the organisation and in its external engagements. Today, AAQ is more committed than ever to advancing quality in higher education, while upholding the autonomy of its partner institutions and respecting their diversity and linguistic context.

The AAQ's commitment to continuous improvement is equally reflected within the Agency, particularly through the intention to develop its thematic analyses. With the aim of strengthening its role as a key thought partner in the field of quality assurance in higher education, the Agency has selected ESG 3.4 as the Standard for Enhancement of this Targeted Review. AAQ looks forward to benefiting from the experts' insight, including guidance, shared experiences and examples of good practice. After all, can quality truly improve without regularly questioning one's own practices and learning from peers?

This question serves as a central thread throughout this Self-Assessment Report (SAR), which reflects the AAQ's ongoing commitment to critically examining its processes and engaging with its partners to remain in step with developments in the higher education landscape. The report opens with a description of the methodology used to prepare the self-assessment, followed by an overview of the broader context in which the Agency operates and the implications of this environment for its activities. It then turns to the focus areas of the Targeted Review, with particular emphasis on thematic analysis. The report finally concludes with a SWOT analysis (of strengths, weaknesses, opportunities, and threats), offering a comprehensive view of the AAQ's current positioning and the challenges and opportunities it faces going forward.

PART I – Background



1.1 Development of the Self-Assessment Report

The Self-Assessment Report presented herein is an important part of the AAQ's quality assurance. It has been designed in alignment with the guidelines of the European Association for Quality Assurance in Higher Education (ENQA), and it provides an overview of facts and analyses from recent years. As such, it does not provide a comprehensive description of the AAQ's overall functioning or of the Swiss Higher Education Area (SHEA) – these aspects are detailed in [Annex 1](#), with precise references to them indicated at the beginning of each chapter of this SAR – but instead concentrates on the major developments that have occurred since the last full review. Some of these changes have taken place in the higher education landscape surrounding the AAQ (see Section 1.2), while others have occurred within the Agency itself (see Section 1.3).

The Self-Assessment Report also demonstrates the Agency's compliance with ESG 2.1 ("Consideration of Internal Quality Assurance") and addresses the improvements made in areas identified during the previous review. Additionally, the SAR examines compliance with ESG 2.2 ("Designing Methodologies Fit for Purpose"), ESG 2.4 ("Peer-Review Experts") and ESG 2.6 ("Reporting"). Given the structural changes within the Agency, the Self-Assessment Report also assesses the AAQ's adherence to ESG 3.3 ("Independence"). The standard selected for enhancement is ESG 3.4 ("Thematic Analysis").

To ensure that the report meets the expectations of the review process, AAQ participated in the "Seminar for Agencies Preparing for a Review", organised by ENQA in Madrid in March 2025.

Assessment Stages

AAQ began planning its Targeted Review in November 2024. While the objectives of this review align with those of a full ESG review – namely, the renewal of membership in the European Association for Quality Assurance in Higher Education and continued registration in the European Quality Assurance Register for Higher Education (EQAR) – AAQ is also seeking to gain valuable insight from an external perspective on its thematic analyses. This external perspective is intended to ensure that the AAQ's thematic analyses are aligned with evolving standards and contribute to best practices in the field.

AAQ officially registered for the procedure in January 2025. The timeline was structured around the expiry date of the AAQ's current registration in EQAR, set for 30 April 2026, and includes the following key milestones:

- Agreement on Terms of Reference: April 2025.
- Self-Assessment Report: June 2025.
- Expert site visit: October 2025.
- Statement on the External Review Report: January 2026.
- Decision of EQAR: Spring 2026.
- Decision of ENQA: Summer 2026.

Involvement of the AAQ Team and the Steering Group

To carry out its self-assessment, AAQ established a working group comprising two staff members – who are project managers: one responsible for international relations, and the other for internal quality assurance and thematic analysis.

The working group began by gathering the necessary information to initiate the self-assessment process and to ensure access to the relevant internal data. This involved identifying all significant developments in the Agency's activities since the previous review. The entire AAQ team contributed to this effort: both format-specific and cross-functional managers were tasked with identifying the key elements to be included in the report.

While drafting the SAR, members of the working group maintained regular contact with colleagues who could provide accurate, up-to-date information on the topics to be described and evaluated. The draft SAR was subsequently shared with the entire team, allowing for the identification of any factual inaccuracies and the re-evaluation of assessments where necessary.

The team met on two occasions to discuss the content of the report. The first meeting provided an opportunity for an initial discussion on the overall report, while the second focussed specifically on the elements related to the standard selected for enhancement. During this session, the SWOT analysis – along with areas for improvement and future prospects – was presented and discussed collectively.

AAQ also established a Steering Group composed of the AAQ's Director and one member of the Swiss Accreditation Council (SAC), Maria Kelo. This group met twice during the internal evaluation process and formally approved the SAR for submission to ENQA.

1.2 Changes in the Higher Education and Quality Assurance System

The changes referred to in this Section have occurred in recent years within the Swiss Higher Education Area. As such, they form part of a broader context that extends beyond AAQ itself.

Legal Framework

A description of higher education in the context of the federal Swiss system, of its different entities, and their respective roles can be found in Section 3 of the 2020 Self-Assessment Report [Annex 1, pp. 6-9].

In Switzerland, the higher education landscape is governed at the federal level by the Higher Education Act. This law regulates the higher education system as a whole and applies to the different types of Higher Education Institutions defined within it – Universities, Universities of Applied Sciences, and Universities of Teacher Education. Between 2021 and the present day, two major changes have occurred as a result of this law. While these changes are not directly related to the operation of AAQ, due to the division of tasks related to quality assurance [Annex 1, pp. 6-9], it is important to take note of those changes.

The first change concerns appeals against accreditation decisions issued by the Swiss Accreditation Council. It does not affect the appeal procedure applicable to AAQ, which remains governed by the Organisation Regulations of the Appeals Commission (OReg-AC) and has not changed since the last review. Until 2021, Article 65 of the HEdA stipulated that such decisions were not subject to appeal. Following a joint initiative by SAC and AAQ, this provision was amended; since 1 March 2021, Higher Education Institutions have had the right to appeal SAC decisions before the Federal

Administrative Court (FAC) within 30 days of notification. The FAC reviews the legality of decisions taken by federal authorities and agencies and, in this context, also examines appeals against SAC decisions. Since the amendment, three institutions have exercised this right, with one case being subsequently appealed to the Federal Supreme Court.

Judgments of the Federal Administrative Court:

<u>B-388/2022</u>	17 August 2023
<u>B-2340/2022</u>	17 October 2023
<u>B-5968/2023</u>	30 July 2024

Judgment of the Federal Supreme Court:

<u>2C-548/2023</u>	15 November 2024
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The second change concerns the conclusion of the transitional period introduced in 2015. Article 75, paragraph 3 of the HEdA established an eight-year transition period following the law's entry into force on 1 January 2015, during which Higher Education Institutions were expected to undergo Institutional Accreditation. This transitional period for Institutional Accreditation ended on 31 December 2022. As of 1 January 2023, any institution wishing to use the designations "University", "University of Applied Sciences", or "University of Teacher Education" must be accredited in accordance with HEdA (Article 29). By the end of 2022, the number of accredited institutions composing the Swiss Higher Education Area had thus changed since 2014.

	31 December 2014	31 December 2022	31 December 2024
	Recognised	Accredited	Accredited
Universities	12	12	12
University Institutes	6	8	8
Universities of Applied Sciences	8	10	12
University of Applied Sciences Institutes	2	5	5
Universities of Teacher Education	15	18	18

Revision of Accreditation Standards

The quality standards used in Institutional Accreditation were published in May 2015, as an annex to the [Ordinance of the Higher Education Council on Accreditation within the Higher Education Sector](#) (HEdA Accreditation Ordinance). These standards complement the accreditation requirements and the procedural steps outlined in the HEdA and the HEdA Accreditation Ordinance. Between 2015 and 2022, they were applied in the accreditation of over fifty institutions.

At the conclusion of the transitional period, the Swiss Accreditation Council conducted a comprehensive assessment, based on all accreditation procedures carried out to date, and supplemented by consultations with relevant stakeholders. SAC concluded that the Institutional Accreditation procedure is fit for purpose – as all public Higher Education Institutions were able to obtain Institutional Accreditation. However, the

assessment also identified areas for improvement. Specifically, two challenges were identified:

- HEIs invest considerable resources in preparing their Self-Assessment Report.
- Institutional Accreditation, in some cases, is subject to a substantial number of conditions.

SAC identified the underlying cause of both issues as the specific formulation of the quality standards. In the 2015 version, each standard typically includes multiple criteria. Additionally, the standards do not focus on the organisation, activities, and facilities of the Higher Education Institutions, but instead on their quality assurance systems. This results in a degree of ambiguity, leaving HEIs uncertain about how to best interpret and respond to the standards. Consequently, institutions often engage in lengthy and resource-intensive self-assessment processes. For key criteria, such as research or academic staff qualifications, the lack of clarity in the standards can lead to ambiguous assessments, ultimately resulting in decisions that include conditions.

By the end of 2023, the Swiss Accreditation Council concluded that adjusting the formulation of the quality standards could improve their clarity, thereby facilitating better interpretation and more consistent application. As a result, SAC anticipated greater efficiency and reduced effort for Higher Education Institutions, as well as more consistent decision-making within the Swiss Accreditation Council itself. On 8 December 2023, SAC decided to collaborate with AAQ to develop a preliminary draft of the revised quality standards. It is important to emphasise that AAQ has no formal authority over the standards; its involvement in their reformulation was significant, but purely advisory.

Throughout 2024, SAC worked on a draft revision of the standards' wording. On 18 October 2024, the Swiss Accreditation Council held a workshop with quality managers from various HEIs – including private ones – to discuss the draft. Following this consultation, SAC revised the draft and formally adopted the revised standards on 13 December 2024, with the intention of submitting them to the Swiss Conference of Higher Education Institutions (SCHEI) for consideration. The revised standards will come into effect no sooner than 2026.

As in 2015, Article 30 of the HEdA provides the legal basis for the 2024 draft. While the Swiss Accreditation Council has not altered the criteria established in the 2015 version, it has reorganised the standards into three main categories, making a departure from the previous five-category structure:

- University organisation, management, governance, and quality management.
- Teaching, research, and services.
- Personnel, finances, and infrastructure.

The revised structure follows a logical progression: it begins with institutional structures, progresses to the core functions of HEIs and concludes with their broader operational conditions. The previous “Communication” Domain has been integrated into the relevant standards. The “Quality Assurance Strategy” and “Governance” Domains have been merged into the overarching “Institutional Organisation” category, creating a more unified framework. As a result, the core activities of HEIs – “Teaching, Research, and Services” – will now receive greater emphasis and consideration in the assessment process.

In addition, the Swiss Accreditation Council has restructured the 2015 standards according to the principle of having one quality criterion per standard. For instance, in the 2015 version, Standard 3.1 assessed whether a Higher Education Institution upheld academic freedom; provided teaching, research, and services appropriate to its institutional type; and employed qualified academic staff – all within a single standard. In the revised version, these elements are now assessed individually through five separate standards. As a result, the previous 18 standards have now been expanded to 23 [Annex 7]. A comparison between the 2015 and 2024 versions [Annex 8] highlights the changes made to each new standard in comparison to the 2015 ones.

At its meeting on 21 March 2025, the Swiss Accreditation Council adopted the draft of the new standards for submission to the Swiss Conference of Higher Education Institutions.

New Periods of Validity for Accreditation Cycles

According to Article 19 of the HEEdA Accreditation Ordinance, the validity period of accreditation is seven years. This provision defines not only the latest date by which an HEI must renew its accreditation, but also the deadline by which any conditions attached to the accreditation must be fulfilled.

The typical timeframe for an accreditation procedure is approximately eighteen months, starting with submission to the Agency and concluding with a decision issued by the Swiss Accreditation Council. Since SAC must first determine whether accreditation can be granted in accordance with Article 4 of the HEEdA Accreditation Ordinance, Higher Education Institutions are advised to submit their renewal applications at least 24 months before the accreditation expires.

Before initiating the renewal process, it is essential that all previously imposed conditions have been fully and satisfactorily fulfilled. The verification of the fulfilment of conditions may be carried out in one of three ways: through a documentary review (so-called “sur dossier”) by the Agency, a “sur dossier” review by external experts or as part of an on-site visit conducted by a group of experts.

Distinguishing between the validity periods of the initial accreditation and Reaccreditation could help streamline the renewal process, while also enhancing consistency and clarifying expectations for initial accreditation. In this context, the Swiss Accreditation Council has proposed reducing the validity period for initial accreditation to five years and extending the validity period of Reaccreditation to eight years.

For initial accreditation, this change would reduce the timeframe for fulfilling conditions to a maximum of 1.5 years, whereas institutions currently have up to 3.5 years, depending on the terms set by SAC. Empirical evidence suggests that this approach is effective in addressing deficiencies related to formal requirements. However, shortcomings in areas such as research or academic staffing typically require a longer timeframe to resolve. Reducing the accreditation period would likely lead to fewer accreditations being granted with conditions, allowing for earlier and more consistent decision-making.

On 26 May 2025, the Swiss Conference of Higher Education Institutions formally took note of the proposed changes to the HEEdA Accreditation Ordinance and launched a stakeholder consultation process. Based on the feedback received, the SCHEI is expected to adopt the changes in February 2026, with their potential entry into force coming in July 2026.

1.3 Changes in the Agency

The Agency has undertaken additional developments that are not directly connected to the changes within the Swiss Higher Education Area. These are outlined in this section.

1.3.1 AAQ Organisation and Structure

AAQ Reorganisation

In 2022, the State Secretariat for Education, Research and Innovation (SERI) commissioned a study to evaluate the structures, processes, and impact of the bodies established under Article 69 of the Higher Education Act. The resulting [SERI Report](#) (available only in German), which examined the organisational structure of the Agency and its relationship with the Swiss Accreditation Council, concluded that:

The structure of SAC and AAQ and the resulting interdependence are not appropriate. It currently leads to a confusion of operational and strategic tasks and to market distortions, with AAQ having an advantage over the other accreditation agencies due to its proximity to SAC. ([SERI Report](#), p. 10)

In response to this finding, SAC commissioned a follow-up study [[Annexes 9 and 9'](#)] on the organisational development of its Office. This second study identified two potential models to address the structural issues raised in the 2022 evaluation:

- An integration model, in which SAC Office would be fully incorporated into AAQ and reports to the AAQ Director.
- A separation model, in which the Office would be completely independent from AAQ and report directly to the SAC President. (Res Publica Report [[Annex 9'](#), pp. 16-22])

At its meeting on 8 December 2023, the Swiss Accreditation Council opted for the integration model and decided to fully incorporate its Office into AAQ.

Following this decision, a joint project team developed eight measures to support the integration of the SAC Office [[Annex 10](#)]. These measures were formally adopted by SAC in September 2024. The most significant of them is the establishment of a new management and operational framework for AAQ, set out in the Agency's newly adopted Internal Regulations [[Annexes 11 and 11'](#)].

As part of the revised organisational structure, a new unit – “Accreditation and Quality Assurance” – has been created. It is led by a newly created management position responsible for overseeing all external quality assurance procedures. The Head of this unit also serves as Deputy Director of the Agency. The primary rationale behind the creation of this position was to provide a structural solution for integrating the SAC Office while safeguarding the independence of the accreditation procedures.

As a result, the AAQ's organisational chart has been revised as follows:



The general principles of the new organisational structure, including the appointment of the Head of Accreditation and Quality Assurance were approved by the Swiss Accreditation Council and took effect in February 2025. The detailed internal regulations were developed with input from the Agency's team, through a process partly moderated by an external consultant, between January and May 2025. The internal regulations entered into force in June 2025.

Strategy

In line with the periodicity of federal funding cycles for higher education ([BFI-Botschaft 2025-2028](#), available only in German, French, and Italian), AAQ has traditionally developed its strategy on a four-year cycle. A review of the AAQ's activities reveals that, while the organisation has indeed formulated new strategic plans every four years, it has not yet established a systematic reporting process to accompany these strategic plans.

Rather than developing a new strategy for 2025-2028, AAQ has decided to adopt a rolling strategic planning approach. This new approach will enhance agility, with the strategy being revised annually and adapted as needed. The updated process includes a strategic report on the previous year, an evaluation of the need for adjustments to the strategy and the implementation plan for the following year. This process is aligned with the budgeting cycle, which begins with the Swiss Accreditation Council's review of the draft budget at its September meeting.

For 2025, the Agency opted to extend of its previous [strategy](#), building on the principles and objectives already established. These continue to support its development and enable the Agency to effectively fulfil its mandate [[Annex 12](#)].

The AAQ's strategic direction is guided by four core principles:

- AAQ promotes quality assurance and development at Higher Education Institutions through innovative and goal-orientated methods.
- AAQ sees itself as an external partner in quality assurance and development.
- AAQ respects the autonomy of HEIs, the diversity of disciplines and institutions, and cultural and linguistic diversity.
- AAQ is independent, works with internationally recognised methods, uses a broad network to implement its mission and has many years of expertise. (Strategy, p. 1)

These principles are underpinned by four corresponding objectives:

- AAQ strengthens its position as an independent and agile agency in Switzerland and abroad. It has a clear profile in all areas of activity.
- AAQ acts as a sustainable organisation. It accesses internal and external knowledge and continuously reflects on its actions.
- AAQ pursues active and transparent communication.
- AAQ cultivates a cooperative working culture and promotes the further development of its employees. (Strategy, pp. 1-2)

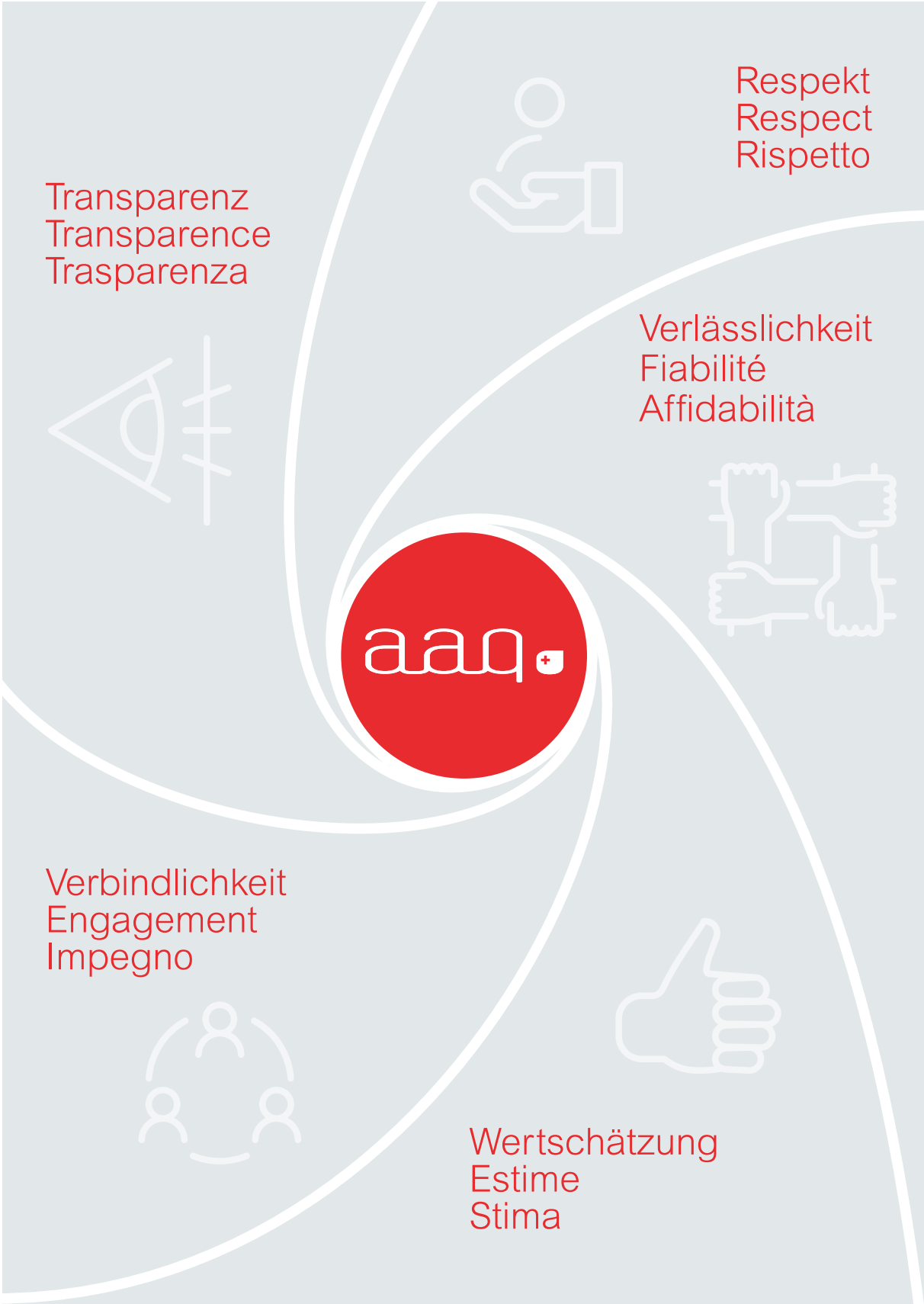
New Values

To reflect on its identity and ensure that its core values remain aligned with its vision and mission, AAQ conducted a series of internal workshops between 2022 and 2023. These sessions led to several improvements, some of which have since been integrated into the Agency's internal quality principles (see next section). The workshops also provided the opportunity for team members to collaboratively articulate a shared vision for the Agency. AAQ has defined its vision as follows:

AAQ is an independent agency, firmly anchored in the European Higher Education Area (EHEA). It is committed to promoting academic freedom and scientific integrity, stakeholder participation in decision-making processes, and the creation and exchange of advanced and innovative knowledge.

AAQ supports Higher Education Institutions in fulfilling their core missions and fostering active, participatory citizenship while advancing objectives related to sustainable development, equal opportunities, and digitalization. (Strategy, p. 1)

Building on this vision, AAQ has developed a set of shared principles, defined as its fundamental values. *Transparency, respect, reliability, commitment* and *esteem* were identified as key terms that express the Agency's identity and aspirations. In August 2024, these values were visually represented in a poster displayed within the Agency's offices, serving as a daily reminder of the principles and spirit that guide its work.



Transparenz
Transparence
Trasparenza



Respekt
Respect
Rispetto

Verlässlichkeit
Fiabilité
Affidabilità



Verbindlichkeit
Engagement
Impegno



Wertschätzung
Estime
Stima

Internal Quality Assurance

A description of the AAQ's internal quality assurance system can be found in Section 7 of the 2020 Self-Assessment Report [Annex 1, pp. 19-21].

The overarching principles of internal quality have remained unchanged since 2020, with AAQ continuing to operate under the Quality Document established in 2015. However, the Agency's recent reorganisation is expected to impact internal processes. As a result, AAQ plans to review its quality and internal communication principles in autumn-/winter 2025, once the new structure has been fully implemented and is functioning effectively.

That said, several adjustments to internal quality practices have been made since the last full review. Notably, AAQ has incorporated insights from the internal workshops held between 2022 and 2023. One key development has been the reintroduction of thematic sessions – dedicated team meetings focussed on specific topics – and aimed at fostering knowledge-sharing, improving internal communication and reinforcing team cohesion. Several of these sessions took place in 2024, including one that featured a presentation of international good practices based on an exchange with another agency. These thematic sessions played an important role in re-establishing a sense of connection within the AAQ team, particularly after the more fragmented working conditions experienced during the pandemic.

These workshops have shaped a more dynamic and adaptable vision of internal quality at AAQ – one that aims to improve day-to-day operations and respond to the evolving needs of the team. In this context, AAQ introduced a system of micro-projects designed to address the specific internal needs. Several projects have been undertaken, particularly to support the drafting of documents produced by the Agency. These include a Guide for Language Secretaries [Annex 13], new tools for the annual report [Annexes 14 and 14'], and Quality Guidelines for External Evaluation Reports [Annex 15].

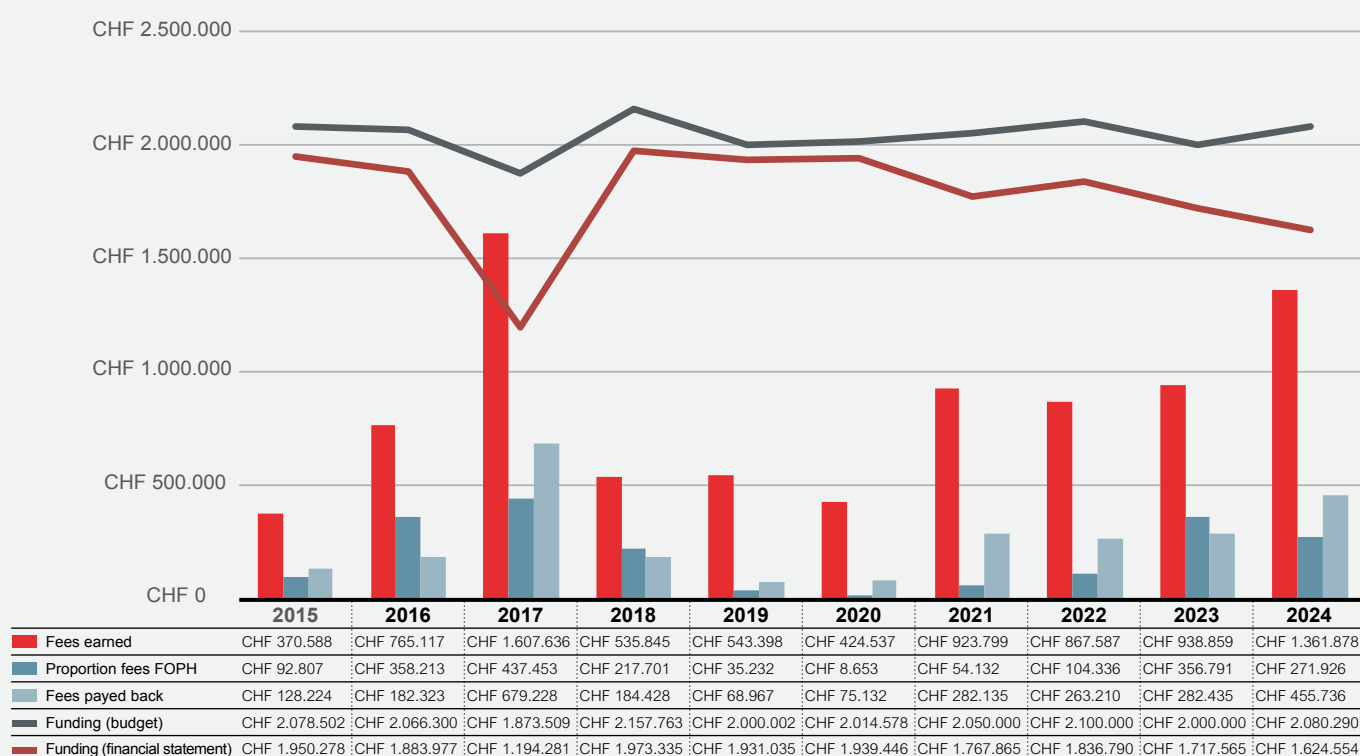
1.3.2 AAQ Funding

AAQ receives approximately CHF 2 million in public funding annually, with equal contributions from the Confederation and the cantons. In addition to this core funding, the Agency generates revenue through fees collected in accordance with the Ordinance of the Swiss Accreditation Council on the Fees for Accreditation Procedures and Services on behalf of Third Parties (SAC Fees Ordinance – FeeO-SAC). This additional income fluctuates depending on the number and type of accreditation and quality assurance procedures carried out each year. The figures presented below reflect contracts completed in the respective years.

Fluctuations in fee-based revenue reflect year-to-year variation in the AAQ's level of activity. In years when the Agency conducts fewer procedures on behalf of third parties – most of which are commissioned by the Federal Office of Public Health (FOPH) – income from procedural fees decreases. In such cases, the core funding provided by the federal government and the cantons is adjusted accordingly, as the Agency is a non-profit organisation. AAQ returns any budget surplus to the Confederation and the cantons at the end of each financial year. However, to manage unforeseen fluctuations, the Agency maintains an operating reserve of CHF 200,000, authorised for a four-year period (currently valid through 2028).

In accordance with Article 2, paragraph 3 of the Organisational Regulations of the Swiss Accreditation Council (OReg-SAC) and Article 5 of the Organisational Regulations of the Swiss Agency for Accreditation and Quality Assurance (OReg-AAQ), AAQ is responsible for managing the operations of the SAC Office, for which it receives an annual allocation of CHF 240,000 from the SAC's budget.

AAQ publishes its financial statements every year in its Annual Report [Annexes 16 to 19].



1.3.3 AAQ Functions, Activities, Procedures

A description of the AAQ's external evaluation activities can be found in Section 6 of the 2020 Self-Assessment Report [Annex 1, pp. 12-18].

The accreditation activities carried out by the Agency [Annex 20] remain unchanged since the last full review. AAQ continues to carry out HEdA accreditations (both institutional and programme-based), System Accreditations in Germany, Quality Audits in Austria, Programme Accreditations under HEdA and MPA, as well as under HEdA and HPA – in addition to Evaluations. All these procedures continue to adhere to the same rules as before. However, AAQ has made some minor adjustments to most of its processes, including updates to its guides and modifications to report templates. These improvements, which are specific to each format, are detailed later in this section. Some of these changes directly address recommendations made by the expert group during the last full review. The relevant standards and recommendations to which they relate will be explicitly indicated in the following sections of the report.

However, one change applies to all formats. To enhance the readability of its reports, the Agency has decided to no longer include the full text of SAC decisions at the beginning of its reports. Instead, these decisions are now referenced via a link to the SAC's website. This adjustment facilitates a clearer distinction between the SAC's decision and the External Evaluation Report, thereby reinforcing the independence of the Agency.

Institutional Accreditation

The Institutional Accreditation procedure assesses the internal quality assurance system within a Higher Education Institution. Since the implementation of the HEdA, Institutional Accreditation has become a mandatory requirement for institutions wishing to use specific designations in Switzerland. As such, any institution intending to be recognised as a "University", "University of Applied Sciences" or "University of Teacher Education" must undergo Institutional Accreditation.

Institutional Accreditation remains central to the AAQ's procedural activities and has undergone several changes between 2021 and 2025. Following a peak in procedures in 2021 – some of which were conducted remotely due to COVID-19 – 2022 marked the end of the transitional period, and 2023 saw the first Reaccreditation procedures.

Reaccreditation

The year 2022 marked the end of the so-called transitional period before institutional accreditation became obligatory: in 2023 the first HEIs applied for Reaccreditation. The HEdA does not distinguish between Initial Accreditation and Reaccreditation. The legal framework and legal requirements for Reaccreditation remain identical, i.e. the procedure is the same. But for any HEI it is a different experience as it builds upon previous accreditation processes.

From the outset, the Agency has therefore actively pursued opportunities to streamline the procedure when it leads to reaccreditation within the leeway given to them by the law. To this end, AAQ has engaged in consultations with institutional representatives, external experts, and both national and international partners. Input was also gathered via a dedicated Sounding Board. In addition, the biennial AAQ Institutional Accreditation Day – an event designed to foster dialogue and knowledge-sharing about Institutional Accreditation – provided a valuable platform for collecting recommendations from participants in 2022. This fully participatory process directly addressed the experts' recommendations made during the previous review to strengthen stakeholders' involvement in the AAQ's activities and to integrate external perspectives (ESG 2.2 and 3.1).

Following these consultations, AAQ had to strike a balance between legal requirements – which stipulate that the main stages of Reaccreditation must reflect those of the initial accreditation – and the desire for enhancement. Consequently, the Reaccreditation process continues to include all core elements of the first Institutional Accreditation: a preliminary visit and an on-site visit – both conducted by a group of experts –, a recommendation issued by AAQ, a position statement from the Higher Education Institution, and a final decision by the Swiss Accreditation Council. Within this established framework, however, AAQ has made use of the available procedural flexibility to introduce a few adjustments.

The conceptual focus of the Reaccreditation has evolved, placing greater emphasis on quality *development* and enabling a more comprehensive consideration of institutional developments between accreditation cycles. A dedicated section of the Self-Assessment Report now addresses the improvements made since the first accreditation and outlines the evolution of the institution's internal quality assurance system. This addition allows AAQ to monitor institutional progress over time – whether following initial accreditation or in response to conditions imposed during the process. The revised procedure is aligned with the recommendation issued during the AAQ's last full review (ESG 2.3), in which the expert group encouraged the Agency to introduce regular follow-up mechanisms for monitoring the development of accredited institutions.

The Reaccreditation places particular emphasis on preserving institutional resources and promoting open dialogue. To streamline the process, the on-site visit lasts two days, with most interviews being conducted as round-table discussions. This approach enables a focus on transversal themes and adopts a flexible format, allowing the process to better reflect the specific characteristics of each Higher Education Institution. Both the institution and the expert group have the opportunity to select a specific "focus topic", which enables a deeper exploration of particular areas and promotes active engagement with the process. AAQ requires a clear explanation for the chosen topic to ensure that it contributes meaningfully to the institution's development. By supporting the ongoing monitoring of accredited institutions, the Reaccreditation facilitates effective follow-up and thus aligns with the recommendations made by the experts during the last full review (ESG 2.3). Additionally, the Reaccreditation includes an "Open Slot" meeting – a dedicated session open to all members of the Higher Education Institution who wish to engage with the accreditation process.

These minor adjustments have been communicated to the AAQ's partners through an [Interim Evaluation of Reaccreditation](#). Since March 2023, AAQ has also updated its tools, validated by SAC, to promote clear and transparent communication throughout the procedure. As part of a sustainable approach, all documents relating to the procedure are now produced and made available only in digital format. To enhance the readability of the documents associated with the procedure, the Accreditation [Report \[Annex 21\]](#) compiles the institution's Self-Assessment Report, the experts' Evaluation, the HEI's Position Statement and includes the Agency's Accreditation Proposal. Additionally, the procedural [Guide](#) has been revised to place greater emphasis on the follow-up process – referred to as the “verification of the fulfilment of conditions” – as recommended by the experts during the last full review (ESG 2.3). It is also worth noting that AAQ proposed to the Swiss Conference of Higher Education Institutions that the existing follow-up procedure be better incorporated in the HEdA Accreditation Ordinance – a suggestion that was adopted in November 2020 and is now reflected in Article 15a.

Programme Accreditation under HEdA

Programme Accreditation under HEdA is a voluntary process available to Higher Education Institutions that have already obtained Institutional Accreditation. Its purpose is to assess Bachelor's, Master's and postgraduate programmes against the Programme Accreditation standards set out in HEdA.

Since the last full review, one minor change has been introduced in this format. In 2020, a revision of the SAC Fees Ordinance came into effect, altering the cost structure of Programme Accreditation (see Article 3, paragraphs 2 and 3). Whereas public institutions were previously required to cover only direct costs, the amended Ordinance now stipulates that both direct and indirect costs must be borne by all applying institutions.

AAQ therefore revised its Programme Accreditation [Guide \[Annex 22\]](#) in 2021. The Agency has taken this opportunity to place greater emphasis on the follow-up procedure in its Guide, as recommended by the experts during the last full review (ESG 2.3).

As Institutional Accreditation processes were still underway in the years following the introduction of HEdA, no Programme Accreditation procedures were initiated until 2022, when the first such procedure was launched.

Programme Accreditation under HEdA and MPA

In Switzerland, study programmes in human medicine, dentistry, veterinary medicine, pharmacy, and chiropractic must be accredited in accordance with the requirements of both the Higher Education Act and the Medical Professions Act. As a result, the applicable quality standards therefore combine the requirements of these two legal frameworks.

Since the last full review, AAQ has slightly adapted its tools in this format. In particular, the procedure [Guide](#) was updated to reflect changes introduced by the 2020 SAC Fees Ordinance, which impacted the cost structure of Programme Accreditation. This revision is included in the latest version of the Guide, validated by the SAC and the management of the Federal Office of Public Health in 2023.

As with previous editions, the Guide also includes a detailed description of the follow-up procedure, in line with ESG 2.3.

The Agency has also adopted a consolidated reporting format, combining all stages of the procedure in a single document. The Self-Assessment Report, the expert group's Evaluation Report, the study programme Position Statement and the Agency's Accreditation Proposal are now presented as part of one unified Report. This consolidated format increases the visibility of the Agency's role throughout the process and streamlines the report's production.

In 2023, AAQ was also officially recognised by the World Federation for Medical Education (WFME). This recognition ensures that Swiss medical graduates whose education has been accredited by AAQ are eligible for recognition in the United States and can engage in research there. This form of international recognition reinforces the AAQ's engagement with stakeholders and responds to the recommendation made by experts during the last full review (ESG 3.1).

Programme Accreditation under HEdA and HPA

Study programmes leading to a federally recognised health profession in Switzerland are subject to accreditation under the Higher Education Act and the Health Profession Act.

The Health Profession Act and its implementing ordinances came into force on 1 February 2020. The Act set out a transitional period of seven years during which existing programmes must obtain accreditation (Article 34, paragraph 4). In 2019, during the development of the accreditation standards – led by the Federal Office of Public Health – AAQ was consulted and contributed recommendations. Based on this involvement, the Agency subsequently developed a procedural Guide [Annex 23], aligned with both HEdA and HPA.

The current version of the Guide, originally published in 2020, is consistent with the SAC Fees Ordinance; it was updated in 2024 to reflect new provisions concerning the publication of accreditation decisions by the Swiss Accreditation Council. The updated Guide also includes a description of the follow-up procedure (ESG 2.3).

System Accreditation

The System Accreditation procedure assesses the internal quality assurance system of a Higher Education Institution in Germany, specifically in relation to teaching. As an approved agency in Germany, AAQ ensures that all the structures and processes relevant to teaching and learning comply with the criteria established by the German Accreditation Council (GAC).

In 2018, the German federal states (*Länder*) adopted a new Treaty – the *Studienakkreditierungsstaatsvertrag* – to create a unified accreditation system and ensure its consistent organisation across all sixteen federal states. To support harmonised implementation, the *Länder* agreed to align their legislation with a Specimen Decree (*Musterrechtsverordnung* – MRVO). Between 2021 and 2024, the stakeholders in the accreditation system were invited by the Standing Conference of the Ministers of Education and Cultural Affairs (*Kultusministerkonferenz*) to share their perspectives on the MRVO as part of the legally required evaluation.

As an agency operating in Germany, AAQ contributed to the joint statement submitted by all accreditation agencies authorised in the country. The feedback revealed significant areas for improvement and led to concrete amendments to 26 sections of the MRVO. These included both clarifications – intended to improve the readability and precision of existing provisions – and more substantial revisions, such as the expansion of the “European Approach” to quality assurance to cover international double and multiple degree programmes.

Throughout this process, AAQ has maintained transparent, regular communication with its partners regarding the status and progress of the evaluation procedure. The effective implementation of the revised ordinance will depend, in part, on clear communication with the HEIs to ensure that the changes are fully understood.

In relation to notifying EQAR through a Substantive Change Report (SCR), a nationwide solution is currently under development to avoid the need for each accreditation agency to submit separate reports. Preliminary discussions with EQAR suggest that the German Accreditation Council (GAC) will submit an initial SCR, which AAQ will be able to reference.

The Agency is currently in the process of updating its tools, including a revised version of its procedural [Guide \[Annex 24\]](#). However, this document will not be published until all amended Decrees of the *Länder* have officially come into effect, which is expected no earlier than 1 August 2025.

Quality Audit

Quality Audits are procedures designed to assess the internal quality assurance systems within Austrian Higher Education Institutions.

In recent years, the Austrian government has expanded Article 22 (“Audit and Certification”) of the [Higher Education Quality Assurance Act \(Hochschul-Qualitätssicherungsgesetz – HS-QSG\)](#). The expansion included Audit Areas 6 and 7 in 2022, and Audit Area 8 in 2024.

AAQ has incorporated these legal changes into the existing audit areas in its [Guide \[Annex 25\]](#), and the relevant standards have been revised accordingly. Audit Areas 7 and 8 – concerning the structures and procedures for allocating ECTS credits within programmes, as well as the assurance of integrity in study, teaching, and research – have been integrated into Standard 2.1. The amendment to Audit Area 6, which pertains to recognised universities of teacher education, has been integrated into Domain 1. This restructuring allows AAQ to strike a balance between the requirements of Austrian law, its own standards and the European Standards and Guidelines (see the analysis under ESG 2.1 below).

AAQ intends to engage with its partners to discuss and further refine the adjustments resulting from both the HS-QSG and the Guide in general. This participatory approach reflects the recommendation made by the experts during the previous review to strengthen stakeholder involvement in the AAQ’s activities and to ensure the inclusion of an external perspective (ESG 3.1). A full revision of the Guide is scheduled between autumn 2025 and spring 2026. As early as 2022, AAQ had already revised the Guide to address another recommendation from the last review – namely, to place greater emphasis on the follow-up procedure (ESG 2.3).

Evaluation

Evaluations are procedures designed to assess study programmes and institutions against a defined set of standards. These evaluations are conducted on a voluntary basis and do not result in a formal accreditation decision by a federal authority. Each procedure is tailored to the specific needs of the applicant institution.

The general processes and tools for the Evaluation format have remained largely unchanged since the last full review. AAQ continues to apply the general [guidelines](#) issued in June 2020, which outline both the procedural framework and the follow-up process. However, at the end of 2024, AAQ has revised its [Guide](#) for awarding the EUR-ACE® label and integrated these changes into the [Guide](#) for procedures accompanied by AAQ, originally drafted in March 2022.

The new Guide, titled Award of the EUR-ACE® Label in Switzerland, has been made available to the AAQ's partners. It was developed in response to the evaluation conducted by the European Network for Accreditation of Engineering Education (ENAE) in 2023. In its decision to authorise AAQ to award the EUR-ACE® label, ENAE requested that the Agency revise its Evaluation instruments to place greater emphasis on the Programme Outcomes (POs) and Learning Outcomes (LOs) required by the label, and to highlight their importance in expert training.

In response, AAQ updated its guidelines and expert training to reflect these external expectations [[Annex 26](#)]. This also aligns the recommendation made by the experts during the previous ENQA review to strengthen the external perspective in the Agency's work (ESG 3.1) – a recommendation that has been fully implemented in this context.

The revised Guide now explicitly states that AAQ may only decide to award the EUR-ACE® label if the experts are able to verify that the required Learning Outcomes have been effectively achieved. To support this, AAQ has raised its expectations for programmes applying for the label. In addition to submitting a Self-Assessment Report demonstrating compliance with the EUR-ACE® requirements, programmes must also provide concrete evidence from various learning methods used – such as practical work, projects completed during the semester, diploma theses, various competitions, or Summer Schools. This enables experts to assess the fulfilment of Programme Outcomes in greater detail. Experts receive targeted training on these expectations approximately one month prior to the site visit.

ENAE approved the changes made by AAQ in 2024, and the updated guides have been validated by the Swiss Accreditation Council. These revised tools are now fully operational.

PART II – Focus Areas



2.1 ESG Part 3: Quality Assurance Agencies

2.1.1 Follow-up on Substantive Change Report: ESG 3.3 (Independence)

The analysis of ESG 3.3 can be found in Section 10 of the 2020 Self-Assessment Report [Annex 1, pp. 25-27], and in the 2021 ENQA Agency Review Report [Annex 2, pp. 17-20].

Organisational Independence

The legal framework governing the AAQ's operations has remained unchanged since the last full review. The Agency and the Swiss Accreditation Council continue to operate independently of each other, although SAC remains, by law, the supervisory body of AAQ with a clearly defined mandate, as outlined in the Higher Education Act (Section 4, Article 22). SAC appoints the AAQ's Director, approves the strategy and adopts the annual budget and financial reports for submission to the Swiss Conference of Higher Education Institutions.

Beyond this, AAQ maintains operational independence: the Director possesses all the necessary authority as the employer of their team and enjoys full autonomy in structuring the Agency and managing its procedures.

Structural Independence

The recent structural changes within AAQ, which prompted the submission of a Substantive Change Report [Annex 27] in early 2025, were implemented to further strengthen the independence of both the Swiss Accreditation Council and the Agency. The Director continues to oversee the Agency's organisational and personnel matters, and provides strategic direction. The SAC Office reports directly to the Director. On the procedural side, the new role of Head of Accreditation and Quality Assurance Procedures has been established, taking on direct responsibility for all external quality assurance procedures, thus relieving the Director of this task. These distinctions are intended to prevent any potential overlap between strategic and operational functions, as illustrated in the organisational chart.

The SAC Office operates in accordance with a Performance Agreement, which clearly defines roles and has been formalised since 2015 in Article 2a of OReg-SAC. This agreement has also recently been adapted. AAQ has further outlined the duties of the Head of the SAC Office in its rules of procedure, along with those of other roles [Annexes 11 and 11'].

Independence of Formal Outcomes

In addition to these structural changes, which clarify the roles of AAQ and SAC and which mitigate any potential conflicts of interest, the Agency has decided to no longer publish SAC decisions in its reports. Instead, these decisions will be referenced through a web link. This small but important adjustment ensures that the work of both bodies can be easily distinguished from an external perspective.

Further Developments

AAQ is confident that the current model of Office integration will ensure the Agency's continued independence in the coming years. The new Head of SAC Office assumed her position in May 2025.

2.1.2 Standard for Enhancement: ESG 3.4 (Thematic Analysis)

Thematic Analyses at AAQ

As the sole national agency, AAQ holds a unique and privileged position within the Swiss Higher Education Area. This strategic role enables the Agency to foster productive interactions with key stakeholders – including the Swiss Accreditation Council, swissuniversities (swu), SERI and the Higher Education Institutions. It also grants AAQ a distinctive role as a central actor in shaping innovative approaches to quality assurance.

For many years, AAQ has actively contributed to the development of the higher education sector through the publication of various analyses and reports focussed on quality assurance. The Agency encourages stakeholders' engagement by collaborating with other institutions or specialised groups, and by producing reports that reflect a notable diversity – in topics, formats and languages – echoing Switzerland's identity.

In its implementation of ESG 3.4, AAQ frequently exceeds the standard expectations. While the Agency meets the standard's core objective – drawing on data gathered through the Agency's external quality assurance activities and contributing to broader reflections on quality within higher education – it also goes further. AAQ publishes reports with a broader perspective, aimed at enhancing its processes and, in some instances, even questioning its own internal quality assurance activities. In doing so, AAQ adopts a holistic approach that integrates both internal and external quality assurance.

Types of Projects

Since its establishment, AAQ has regularly made thematic analyses [Annex 28] available on its [website](#). These analyses primarily take the form of qualitative interpretations. The publications generally fall into two main categories: synthesis reports and transversal analyses.

Synthesis reports and analyses related to accreditation formats

The Agency regularly publishes synthesis reports for each of its accreditation formats. These documents present the main findings from a given accreditation cycle and serve as valuable tools for communicating with various stakeholders – particularly governmental authorities that have mandated AAQ to carry out the accreditation process (such as for MPA, and HPA procedures, or procedures that fall under the [Swiss Federal Act on Psychological Professions](#) (Psychology Professions Act – PPA). In this context, some of the thematic analyses extend beyond the scope of the ESG, such as the two synthesis reports from the [MPA \[Annex 29\]](#) and [PPA \[Annex 30\]](#) accreditation cycles.

These reports also form an integral part of the Agency's internal quality assurance system. They provide reflections on the methodological aspects of each cycle, include feedback from all stakeholders involved and offer recommendations for methodological improvement. Conclusions are drawn from multiple sources, most notably the feedback questionnaires completed by all parties participating in the external quality assurance procedures.

The most recent synthesis report focusses on the accreditation of medical education programmes under HEEdA and MPA frameworks. Entitled [Synthesis and Thematic Analysis: Accreditation of Medical Education 2018-2023 \[Annex 31\]](#), this report

provides a summary of the latest accreditations cycle conducted in this field. Additional reports are scheduled for publication in the near future.

Within the scope of the ESG, AAQ is set to release a report on its Institutional Accreditation format under HEdA, which is currently in draft. Furthermore, the evaluation cycle for the EUR-ACE® label, part of the Evaluation format, will conclude this year, and a corresponding thematic analysis is planned for 2026.

Transversal analyses on specific topics

AAQ also regularly publishes transversal analyses on topics relevant to quality in higher education. These studies are based on a range of sources and cover a variety of themes – sometimes focussing on a particular topic, other times examining processes or outcomes through a transversal lens. They may be conducted in collaboration with partner organisations or outsourced to third parties. Most of these studies are completed within one to two years.

These analyses draw on various resources, including Self-Assessment Reports, External Evaluation and Follow-Up Reports and, in some cases, additional materials such as recorded interviews, as in the study conducted by ZHAW entitled Discussions in External Quality Assurance Procedures: Understanding & Optimising [Annex 32].

The most recent publications include the following:

- How Swiss Higher Education Institutions Contribute to Achieving Equal Opportunities, 2025 [Annex 33]. This comparative analysis, commissioned by HES-SO, is based on case studies from approximately fifty institutions. Its objective is to identify trends, strengths and limitations of existing equality, diversity and inclusion mechanisms, drawing on data related to Standard 2.5 from Institutional Accreditation procedures.
- Recommendations in Accreditation Procedures, 2021. This analysis explores the intent of recommendations formulated in expert reports. It aims to provide an overview and interpretation of the recommendations issued.
- Internal Quality Assurance and Development of Accreditation Agencies: Which Methods for Collecting and Using Feedback are Effective, 2020 [Annex 34]. This study investigates feedback from the Agency, institutions, and experts, focussing on three key areas: the communication of data collection efforts, the use of collected data, and the observed effects of that usage.

Potential for Enhancement

The analysis of ESG 3.4 can be found in the 2021 ENQA Agency Review Report [Annex 2, pp. 20-21].

During the previous review, the expert group determined that AAQ fully complied with ESG 3.4. Nevertheless, it suggested that AAQ ensure the completion of end-of-cycle analyses for all accreditation formats, adopt a more systematic approach to topic selection and improve the dissemination of results to relevant stakeholders. AAQ has taken these suggestions under consideration and will soon integrate them into a broader development plan for its thematic analysis.

Strategy and Planning

As part of its efforts to enhance its contribution to innovative thinking on quality in higher education, AAQ established a Thematic Analysis unit in 2023. The recent reorganisation has provided an opportunity to redefine the unit's responsibilities and tasks.

This unit is now responsible for developing tools to support the production of thematic analyses and for implementing a multi-year development and monitoring plan. This plan will help improve the coordination and scheduling of analyses, prioritising topics based on available resources. In the long term, the plan is expected to support the integration of new tools – such as Artificial Intelligence (AI) – and to improve communication with stakeholders, in terms of both understanding their expectations and disseminating results.

These key areas of interest, along with the specific challenges they present, are what AAQ aims to discuss together with the experts as part of this Targeted Review, in order to define the most appropriate and effective development strategy, based on available resources.

Prioritising Topics

To date, the thematic analyses conducted by AAQ have not followed a defined prioritisation order but have been produced more opportunistically. As a result, a diverse range of topics has been published on the Agency's website, reflecting both the interests of its stakeholders and the availability of its staff.

AAQ now recognises the importance of establishing a clear prioritisation strategy that will enable it to identify specific topics to address as priorities in its thematic analyses. This approach will allow the Agency to optimise its collaborations with partners, while directing its resources in a focussed, efficient manner for its own development. A strategic prioritisation will also strengthen the AAQ's position as a leading body for analysis and a trusted source of information on national accreditations, while reinforcing its role as an influential player on the international stage. However, the challenge lies in striking a balance between the preferences of the AAQ's partners and the Agency's strategic objectives when selecting topics.

Defining Resources

Until now, the production of thematic analyses has been contingent on the availability of the Agency's resources, both human and financial, which has sometimes limited their output. The team's capacity to dedicate time to these projects has often been constrained by other activities.

A clear strategy will allow AAQ to allocate the specific resources for the development of its thematic analysis, which have been earmarked in the budget for the first time in 2017. The Agency intends to better anticipate the timing of its synthesis reports, which can be scheduled in advance, in order to ensure that sufficient resources are available. The Agency will also try to allocate resources to other types of analyses, such as those it commissions to external bodies.

AAQ also intends to explore the potential of Artificial Intelligence to support its work. The use of AI could enhance the analytical work of the team and help mitigate potential resource shortages during peak periods, such as when external evaluation activities are at their busiest. Over the coming years, AAQ will work to develop a policy on Artificial Intelligence, including its integration into the Agency's processes.

Production

AAQ regularly produces thematic analyses that involve not only the Agency's project managers, but also a range of partners and external organisations. Given the diversity of these stakeholders, AAQ must ensure that the studies it produces are not solely driven by the partner interests but also align with the Agency's strategic objectives. To this end, it is essential for AAQ to take measures to safeguard the independence and impartiality of the analyses it produces.

To fully benefit from the diversity and richness of its analytical work, it would be worthwhile for AAQ to explore new formats – such as comparative case studies or targeted thematic analyses – that could broaden its expertise and enhance the impact of its outputs. This approach would also support the development of more critical and in-depth analytical studies.

In this context, AAQ could also leverage its international presence more effectively. While the Agency is already active in international networks and regularly participates in events organised by various interest groups, increasing its visibility could further strengthen its ties with the international research community. This, in turn, could open the door to new partnerships and enable the Agency to more closely integrate its international engagements with its Thematic Analysis activities.

Data Policy

AAQ draws on various types of data, primarily originating from Higher Education Institutions and Programmes. However, as some of this information may be sensitive or confidential, the Agency must now carefully consider how such data is accessed, used, and published. Regarding data protection, AAQ is required to comply with the [Federal Act on Data Protection](#) (Data Protection Act – FADP), which entered into force in September 2023.

To ensure responsible and transparent use of the data collected through its external quality assurance activities, AAQ acknowledges the need to establish a new data policy. This policy will define clear guidelines and safeguards, enabling the Agency to use the data appropriately while ensuring that it remains freely usable within the scope of its mandate.

Communication of Results

AAQ primarily communicates its results via its website. The Agency intends to enhance the visibility of its publications and make the page dedicated to thematic analysis more engaging and user-friendly. The redesign of the Thematic Analysis webpage is not expected before mid-2026.

Following the expert suggestion made during the last review, AAQ has already taken steps to improve its communication by ensuring a more systematic dissemination of outcomes. As a result, communication efforts have been strengthened, and new publications are now also announced through AAQ News – a periodic communication tool of the Agency.

AAQ also participates in international events, where it occasionally presents the results of its analyses. Strengthening its international presence will allow the Agency to expand its network and reach a broader audience. At the national level, AAQ already shares its results systematically with its key stakeholders. For example, the institutional Reaccreditation process included an Interim Evaluation Report and exchanges with swissuniversities.

However, one of the key challenges the Agency continues to face in terms of dissemination is Switzerland's linguistic diversity. Most of the AAQ's reports are published in only one national language, which can hinder the broader circulation and accessibility of the information.

As outlined in this section, the mission of the Thematic Analysis unit is to revitalise the production of thematic analyses at AAQ and to create a framework that supports their effective development. One of its initial tasks will be to set up a multi-year development plan that considers not only the resources available, but also the Agency's strategic priorities and the interests of its partners.

AAQ is keen to discuss these various interrelated factors with the expert group and welcomes any advice or examples of good practice the experts may be able to share.

2.2 ESG Part 2: External Quality Assurance

2.2.1 ESG 2.1 (Consideration of Internal Quality Assurance)

The analysis of ESG 2.1 can be found in Section 10 of the 2020 Self-Assessment Report [Annex 1, pp. 32-35], and in the 2021 ENQA Agency Review Report [Annex 2, pp. 27-29]. The quality standards used in the different formats are published in the corresponding guidelines (see the links on pp. 48-49 of this report).

The criteria and processes for the AAQ's quality assurance activities remain largely unchanged since the last full review. Within the Swiss higher education landscape, external assessments have always been based on the principle of institutional responsibility for quality assurance, and this approach remains in place today. Consequently, Swiss Higher Education Institutions are not subject to programme-level accreditation, except for study programmes leading to regulated professions. At the legal level, the Ordinance of the Higher Education Council on the Coordination of Teaching at Swiss Higher Education Institutions (available only in German, French and Italian) regulates the main aspects of the Bologna Declaration. Along with the Higher Education Act – which incorporate the ESG (Article 32) – this ordinance forms the legal foundation for the AAQ's accreditation tools and processes in Switzerland. All of these are fully aligned with the ESG.

During the last full review, the experts provided the following analysis:

The panel confirms that AAQ aims at supporting institutions to meet internal quality assurance criteria through the accreditation procedures themselves with a focus on the HEI's quality assurance system efficiency and how it applies to a particular programme. The Guides provided as well as the regular organisation of events on topics linked to the different ESGs are a clear and efficient way to ensure that HEIs have the correct tools to develop their internal quality assurance system (ENQA Agency Review Report [Annex 2, p. 28]).

However, the experts noted that, although AAQ substantially complied with ESG 2.1, there were "some irregularities with regards to ESG 1.2 and ESG 1.3" (ENQA Agency Review Report [Annex 2, p. 28]) in the context of Institutional Accreditation and Quality

Audits. Accordingly, the group of experts recommended that AAQ explicitly integrate these ESGs into the standards for these two formats and ensure that both ESGs are systematically assessed.

As demonstrated in the mappings of the standards [[Annexes 35 to 39](#)], the AAQ's quality assurance activities cover all standards of the Part I of the ESG. These mappings for System Accreditation and all formats based on the 2015 HEdA standards remain unchanged. A new mapping reflecting the revised 2024 HEdA standards has been added, and the mapping for Quality Audit has been updated to incorporate the legal changes introduced by the Austrian government.

Institutional Accreditation

The ESG is an integral part of the AAQ's procedures, appearing not only within the standards, but also in the instruments used by the groups of experts during accreditation. In fact, the various ESG standards are embedded throughout the HEdA standards, with a particular emphasis on Standard 3.3, which states that "The quality assurance system shall ensure that principles and objectives linked to the European Higher Education Area are taken into consideration". The AAQ's [Explanations of Quality Standards](#) clearly shows that Part I of the ESG is taken into account by both institutions and experts ([Explanations](#), pp.12-13). This document complements the Guide to Institutional Accreditation and makes extensive reference to the equivalence between the HEdA quality standards and the ESG. It thus enables both experts and institutions to establish clear connections between the Swiss accreditation framework and the expectations of the European Higher Education Area.

With regard to ESG 1.2 and 1.3 specifically, these standards are addressed through multiple provisions within the HEdA framework – most notably Standards 3.1, 3.2 and 3.3 under Domain 3 "Teaching, Research and Services".

Standard 3.1 requires each Higher Education Institution to deliver teaching activities in line with "its type, specific features and objectives". To evaluate this, experts primarily refer to the Ordinance on the Coordination of Education and on the Qualifications Framework for the Swiss Higher Education Area (nqf.ch-HS – available only in [German](#) and [French](#)). Adopted in 2021 by the rectors of the various types of Swiss HEIs, this framework supports the implementation of Bologna reform goals across all institutional types. It notably incorporates the Dublin Descriptors for the first three cycles of study, ensuring that programmes align with the standards of the European Higher Education Area.

Standard 3.3, as mentioned above, reinforces these expectations by requiring institutions to "implement the principles and objectives both underpin the EHEA" ([Explanations](#), p. 12).

ESG 1.3 is further supported through Standard 3.2, which focusses on the regular evaluation of teaching. One of the key elements assessed by experts during the accreditation process is "the active participation of students in the creation of learning processes ('student-centred learning, teaching and assessment')" ([Explanations](#), p. 12).

As demonstrated by the [External Evaluation Reports](#) published on the AAQ's website, the groups of experts consistently evaluate the requirements set out in the ESG – ESG 1.2 and 1.3 being no exception.

Revision of Standards

AAQ carefully considered the experts' recommendation to integrate ESG 1.2 and 1.3 during the revision of the HEdA accreditation standards. However, it is important to clarify that, under Swiss law, AAQ does not have the legal authority to amend these standards. As noted above, this responsibility lies with the Swiss Conference of Higher Education Institutions (HEdA, Article 12, paragraph 3, letter a, item 2). As such, the recent reformulation of the standards was undertaken by the Swiss Accreditation Council, not AAQ, as stipulated in the Higher Education Act.

AAQ was invited to contribute to the process, and the Agency recommended that ESG 1.2 and 1.3 be more explicitly integrated into the updated standards. In their newly revised version – currently awaiting validation by the SCHEI – these ESGs are now clearly addressed. In particular, the first two standards in Domain 4 “Teaching” have been explicitly aligned with ESG 1.2 and 1.3:

4.1 The Higher Education Institution shall offer teaching in accordance with its type of Higher Education Institution. It shall set objectives for teaching and shall monitor the achievement of these objectives.

4.2 The Higher Education Institution shall structure its study programmes and degrees in accordance with its type of Higher Education Institution. It shall define and publish the qualifications acquired as part of the degree programmes. (HEdA 2024 Standards [[Annex 7](#), p. 1])

Through its involvement, AAQ aims to ensure that the recommendation made by the experts is duly considered. It should be noted, however, that the revised standards have not yet been approved by the Swiss Conference of Higher Education Institutions and will not come into effect before 2026.

Programme Accreditation under HEdA

The information provided in the last full review remains applicable today. As stated in the previous Self-Assessment Report, Programme Accreditations are based on the same HEdA standards, thereby benefiting from the [Explanations of Quality Standards](#) and alignment with the ESG.

Programme Accreditation under HEdA and HPA

The information provided in the last full review remains valid. In addition to the HEdA standards, this accreditation format also utilises a discipline-specific set of standards.

Programme Accreditation under HEdA and MPA

The same applies to this accreditation type, with the information from the last full review remaining fully relevant today.

System Accreditation

Since the new version of the MRVO will not come into effect before August 2025, the Guide and information provided in the Self-Assessment Report from the last full review remains valid. It is important to emphasise that none of the accreditation agencies authorised by the German Accreditation Council to conduct System Accreditations in Germany have any authority over the legal framework or the quality criteria applied.

Quality Audit

In its 2023 revision of the Guide, AAQ incorporated changes resulting from Austrian legislation. It emphasised the alignment between the Austrian legal requirements, the HEdA standards and the European Standards and Guidelines:

Audit Areas according to HS-QSG	AAQ quality standards	ESG
1	1.1, 1.2, 1.3, 1.4	1.1, 1.7, 1.0
2	2.1, 2.2 3.1, 3.2 4.1, 4.2, 4.3	1.2, 1.3, 1.4, 1.6, 1.9
3	2.3 3.1, 3.3 4.4	
4	1.4 5.1, 5.2, 5.3	1.4, 1.5, 1.8
5	2.1, 2.2	
6*	Audit Area 1	1.1
7**	2.1	1.2
8	2.1	1.1

*Generally not applicable for universities

**According to §14 para. 2 UG 2002

This visual repartition facilitates a clearer integration of ESG 1.2 and 1.3, as recommended by the experts during the last full review. In particular, the modification made to *Prüfbereich 7* – which concerns the appropriate allocation of ECTS credits within the curricula – is now explicitly linked to ESG 1.2. Other components of this ESG are embedded throughout the AAQ standards, particularly those related to teaching ("*II. Studium und Lehre*"). Standards 2.1 and 2.2 allow for a detailed examination of the curriculum development (including student participation) and teaching evaluation, with a particular focus on the objectives.

As mentioned earlier, AAQ plans to further refine its tools more specifically between autumn 2025 and spring 2026. The Agency intends to strengthen the integration of ESG 1.3, which, although currently included, may not yet receive sufficient emphasis. However, as noted in the previous Self-Assessment Report, the AAQ's partners have shown some reluctance to the development of the AAQ standards, which they already consider to be particularly demanding.

Evaluation

The indications provided during the last full review remain fully applicable today. The AAQ's tailored procedures continue to make comprehensive use of the ESG, as outlined in the introductory sections of the Evaluation Guide.

Further Developments

AAQ has long been committed to sharing its expertise on the ESG with its stakeholders. The Agency intends to maintain its efforts to raise awareness among its various partners, particularly concerning the alignment between HEdA standards and the ESG. The presentation of the revised standards will serve as an opportunity for the Agency to reaffirm the strong connection between the Swiss higher education landscape and the European Higher Education Area, underscoring their shared approach to quality assurance.

Regarding Quality Audit, AAQ will engage in consultations with its partners to ensure that the guidelines are adapted as effectively as possible. The Agency will pay particular attention to the relevance of recent legal changes and will seek to strengthen the integration of ESG 1.3 within its Guide.

ESG Part 1	HEdA 2024 Standards	Institutional accreditation (HEdA 2015)	Programme accreditation (HEdA 2015 subject to institutional accreditation)	Quality audit (HS-QSG)
Standard 1.1	Standards 2.3, 3.1, 4.4	Standards 1.1, 1.2, 1.3, 2.3, 5.1	Standards 4.1, 4.4	Standards 1.1, 1.3, 2.1, 5.1, 5.2
Standard 1.2	Standards 2.3, 4.1, 4.2	Standards 3.1, 3.3, 5.2	Standards 1.1, 1.2, 2.1, 2.2	Standards 1.4, 2.1, 5.1, 5.3
Standard 1.3	Standard 4.1, 4.4	Standard 3.2	Standard 2.3	Standard 2.2
Standard 1.4	Standard 4.3	Standard 3.4	Standard 2.3	Standards 5.1, 5.3
Standard 1.5	Standard 7.1, 7.2, 7.4	Standards 4.2, 4.3	Standard 3.3	Standards 4.1, 4.2, 4.3
Standard 1.6	Standard 8.1, 9.1	Standard 4.1	Standard 3.2	Standard 1.4
Standard 1.7	Standards 1.1, 3.1, 4.1	Standard 2.2	Standard 4.2	Standard 1.4
Standard 1.8	Standards 2.3, 4.2, 4.3	Standard 5.2	Inst. Standard 5.2	Standard 5.3
Standard 1.9	Standard 4.1, 4.4	Standards 3.2, 5.1	Standards 2.2, 3.1, 4.1	Standards 2.1, 5.2
Standard 1.10	Standard 3.3	Standard 1.4	Inst. Standard 1.4	Standard 1.3

2.2.2 Follow-Up on Recommendations: ESG 2.2 (Designing Methodologies Fit for Purpose)

The analysis of ESG 2.2 can be found in Section 10 of the 2020 Self-Assessment Report [Annex 1, pp. 36-38], and in the 2021 ENQA Agency Review Report [Annex 2, pp. 29-31].

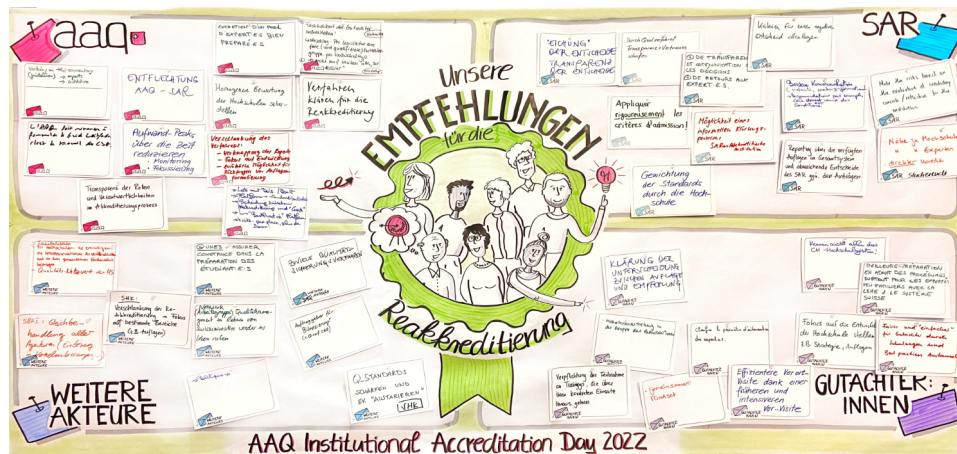
AAQ has long been committed to the continuous improvement of its accreditation tools through internal quality assurance processes that respond to evolving needs. For instance, it conducts regular quality surveys across all its procedures – sent to institutions or programmes, as well as experts – to monitor and enhance its processes while integrating stakeholder feedback. In this way, the Agency continuously adapts its methodologies, as demonstrated in Section 1.3.3 of this report (see examples from the Quality Audit, System Accreditation, Programme Accreditation under HEdA and MPA and Evaluation).

During the last full review, the experts concluded that AAQ was substantially compliant with ESG 2.2. While they acknowledged the AAQ's stable relations with the Swiss Accreditation Council and political authorities, they noted that the involvement of representatives from the professional sector could be more effectively integrated into accreditation procedures. More broadly, they recommended that “stakeholders’ involvement in general should be reinforced to ensure that methodologies are fit for purpose” (ENQA Agency Review Report [Annex 2, p. 31]). The experts stressed the importance of enhancing collaboration with stakeholders and to ensure the inclusion of quality-orientated content within the AAQ's procedures. These observations were translated into recommendations, which AAQ has actively addressed in the development of its activities.

To this end, the Agency drew on the findings of its 2020 Thematic Analysis [Annex 34] examining the role of feedback in fostering continuous quality improvement. This study confirmed that stakeholder input has significantly contributed to enhancing the AAQ's procedures. It also underscored the growing importance of participatory forums – such as expert meetings, discussions with HEI representatives, and the AAQ Days. Consequently, the Agency has systematically integrated these elements into its review process.

The Institutional Accreditation renewal procedure is a prime example of how AAQ has implemented the three recommendations from the last full review – particularly regarding stakeholder involvement. To support this process, AAQ established a Sounding Board and organised meetings specially dedicated to the Institutional Accreditation procedure. Fourteen members were selected to represent a broad range of stakeholders, including both national and international perspectives. In line with the experts' recommendation, the group included not only representatives from Higher Education Institutions (such as vice-rectors and quality managers), but also student representatives (from the Swiss Student Union) and professionals (from various accreditation agencies and educational development managers). This inclusive approach allowed AAQ to gather a wide variety of perspectives. [Annexes 40 and 40'].

In addition, the Agency used its 2022 Institutional Accreditation Day as an opportunity to collect further feedback [Annexes 41 and 41']. A participatory workshop was held during the event, where attendees were invited to suggest ways to improve the procedure by answering the question: "How can Institutional Accreditation be improved?" The feedback was summarised in a visual poster, which was subsequently published on the AAQ's website:



The suggestions for adaptation were largely in line with the AAQ's own observations, and they were then distilled into four key objectives:

1. Streamline and simplify the task for HEIs and experts.
2. Integrate quality development and transversal themes.
3. Increase transparency.
4. Consider sustainability aspects.

As a result, the procedure now includes several quality-orientated content elements that reflects stakeholder expectations. The standards are approached through transversal themes, and the focus topics provide institutions and experts with opportunities to explore specific aspects of quality development in greater depth. An "Open Slot" also allows any member of the institution to share their perspective – ensuring broader participation in the accreditation process.

This example demonstrates that AAQ has fully addressed the recommendations made by the experts during the last full review. In keeping with its commitment to continuous improvement, the Agency actively continues to gather regular feedback on its procedures, allowing for ongoing evaluation and refinement. Following the first five procedures, AAQ compiled the findings in an interim evaluation report. The results revealed that certain elements – such as the organisation of round-table discussions and the overall stakeholder involvement – were well received, while the "Open Slot" feature was met with more critical feedback. These results were shared with the AAQ's team at the end of 2024 and presented to the Swiss Accreditation Council and participating Higher Education Institutions in 2025. They were also published on the AAQ's website to reach a wider audience. This communication strategy reflects the AAQ's commitment to keeping stakeholders informed about the impact of their feedback (ESG 3.6).

AAQ also acknowledges that part of the third recommendation of the experts – “As already mentioned by the 2016 review panel AAQ and SAC should increase the professional world involvement at all levels” (ENQA Agency Review Report [Annex 2, p. 31]) – can only be partially realised. This is due to the fact that the Swiss Accreditation Council operates independently and holds its own legal autonomy. AAQ does not have any authority over SAC and can only forward the experts’ recommendations, which it has done.

Further Developments

The broad stakeholder involvement in reflecting on the Institutional Accreditation renewal procedure has provided AAQ with valuable external insights. The success of the participatory workshop has encouraged the Agency to adopt a similar approach in other formats. For instance, AAQ plans to organise a participatory workshop to review its Quality Audit guidelines. This event will be open to stakeholders involved in quality assurance in Austria, including representatives from Austrian universities that have already undergone a Quality Audit. This consultation will enable the Agency to collect relevant feedback, helping to ensure that its tools remain well adapted and fit for purpose.

2.2.3 Follow-Up on Recommendations: ESG 2.4 (Peer-Review Experts)

The analysis of ESG 2.4 can be found in Section 10 of the 2020 Self-Assessment Report [Annex 1, pp. 41-43], and in the 2021 ENQA Agency Review Report, [Annex 2, pp. 34-37]. Please also consider the AAQ Complaint to ENQA [Annex 3], and ENQA’s Board Letter Decision on Complaint [Annex 4].

Since its first quality assurance procedure in 2005, AAQ has consistently included students in all of its expert groups, in accordance with the requirements of its accreditation formats based on the ESG. While the number of experts involved in each accreditation format varies between three and five, one member is always a student, as outlined in the corresponding guidelines. To recruit student experts, AAQ collaborates with the Swiss Student Union [Annexes 42 and 42']. The Union connects interested students with AAQ, which then provides them with specific training tailored to the role they will fulfil for the Agency [Annexes 43 and 43']. Each student expert performs the same duties as all other members of the expert group, under the same working conditions and with the same remuneration, as stipulated in the SAC Fees Ordinance (Section 3, Article 6).

During the last review, the expert group concluded that the Agency was substantially compliant with ESG 2.4. This judgment was based on an unfortunate misunderstanding regarding the nature of certain AAQ procedures. Specifically, the experts included in their assessment accreditation formats that do not fall within the scope of the ESGs:

The panel recommends AAQ to include a student member for all programme evaluation procedures, including for continuing education programmes. As mentioned by the panel in 2016, AAQ and SAC together with their partners should try to find ways and means by which the student perspective could be included in this procedure. (ENQA Agency Review Report [Annex 2, p. 37])

Given the specific nature of these continuing education programmes, AAQ submitted a request to ENQA for a review of the experts' judgement. The ENQA Board upheld the Agency's position and revised the recommendation as follows: "The agency should invest its efforts and continue to include a perspective represented by participants of non-degree programmes (i.e. of programmes that fall within the scope of the ESG) in the evaluation panels for these programmes". (ENQA's Board Letter Decision on Complaint [Annex 4, p. 1]).

AAQ would like to clarify that continuing education programmes in Switzerland – such as Certificate of Advanced Studies, Diploma of Advanced Studies, and Master of Advanced Studie – are designed specifically for professionals already active in the workforce. These programmes are not aimed at traditional students but rather at enhancing the skills and knowledge of individuals engaged in professional practice. For these programmes, AAQ ensures that a participant's perspective – serving as the functional equivalent of a student perspective is represented – as specified in the Evaluation Guide (p. 6).

Regarding the recommendation made by the expert groups in 2016 and 2021 – although it concerned procedures that do not fall under the scope of the ESG, as reaffirmed in the Terms of Reference [Annex 44] for the current review –, AAQ has taken steps to integrate a "student equivalent" voice into its evaluation procedures for continuing education programmes under the MPA framework. However, in the case of procedures governed by the Psychology Professions Act, the Federal Office of Public Health – which defines the procedural rules – has opted not to include student representation. Since AAQ does not have decision-making authority over these regulations, it cannot modify the rules in this regard.

Further Developments

AAQ will continue to include both students and professionals from the working world in its procedures. The Agency will also ensure that expert training is updated to reflect revisions across the different evaluation formats, thereby guaranteeing that experts remain well-informed and able to carry out their roles effectively and consistently. As part of this effort, AAQ is currently revising its training materials for experts involved in awarding the EUR-ACE® label. The first updated training session is scheduled for late June 2025.

2.2.4 Follow-Up on Recommendations: ESG 2.6 (Reporting)

The analysis of ESG 2.6 can be found in Section 10 of the 2020 Self-Assessment Report [Annex 1, pp. 45-47,] and in the 2021 ENQA Agency Review Report [Annex 2, pp. 39-41]. Please also consider the AAQ Complaint to ENQA [Annex 3], and ENQA's Board Letter Decision on Complaint [Annex 4].

For over twenty years, the Agency has consistently published all its accreditation reports (External Evaluations and Follow-Up Reports), making them freely accessible to interested parties via the AAQ's website. Until recently, AAQ also published the decisions made by the Swiss Accreditation Council alongside these reports, as the Agency itself does not make accreditation decisions. To further emphasise the independence of the two bodies, the Agency now only publishes links to the SAC's decision.

During the last full review, the experts concluded that AAQ was substantially compliant with ESG 2.6 and made two recommendations:

- As already mentioned by the review panel in 2016, the present panel also recommends AAQ to publish negative reports.
- The panel recommends AAQ to alert the regulatory bodies on the existing risk that HEIs can decide not to authorise the publication of the External Evaluation Report because of no legal notice for this. In the meantime, the Agency should anticipate this risk with a process to apply if a HEI takes this type of decision. (ENQA Agency Review Report [[Annex 2](#), p. 41])

AAQ contested the first recommendation, as it stemmed from a misunderstanding of the Agency's situation: AAQ had never faced a negative accreditation decision, as institutions typically preferred to withdraw their applications. The ENQA Board upheld the Agency's complaint, and the first recommendation was withdrawn. The second recommendation was changed into a suggestion for further improvement by the ENQA Board and reworded as follows:

The panel suggests that AAQ alerts the regulatory bodies on the existing risk that HEIs can decide not to authorise the publication of the External Evaluation Report because of no legal notice for this. In the meantime, the Agency should continue anticipating this risk with a process to apply if an HEI takes this type of decision. (ENQA's Board Letter Decision on Complaint [[Annex 4](#), pp. 1-2])

The Board also reviewed the assessment of the standard and reclassified AAQ as fully compliant with ESG 2.6.

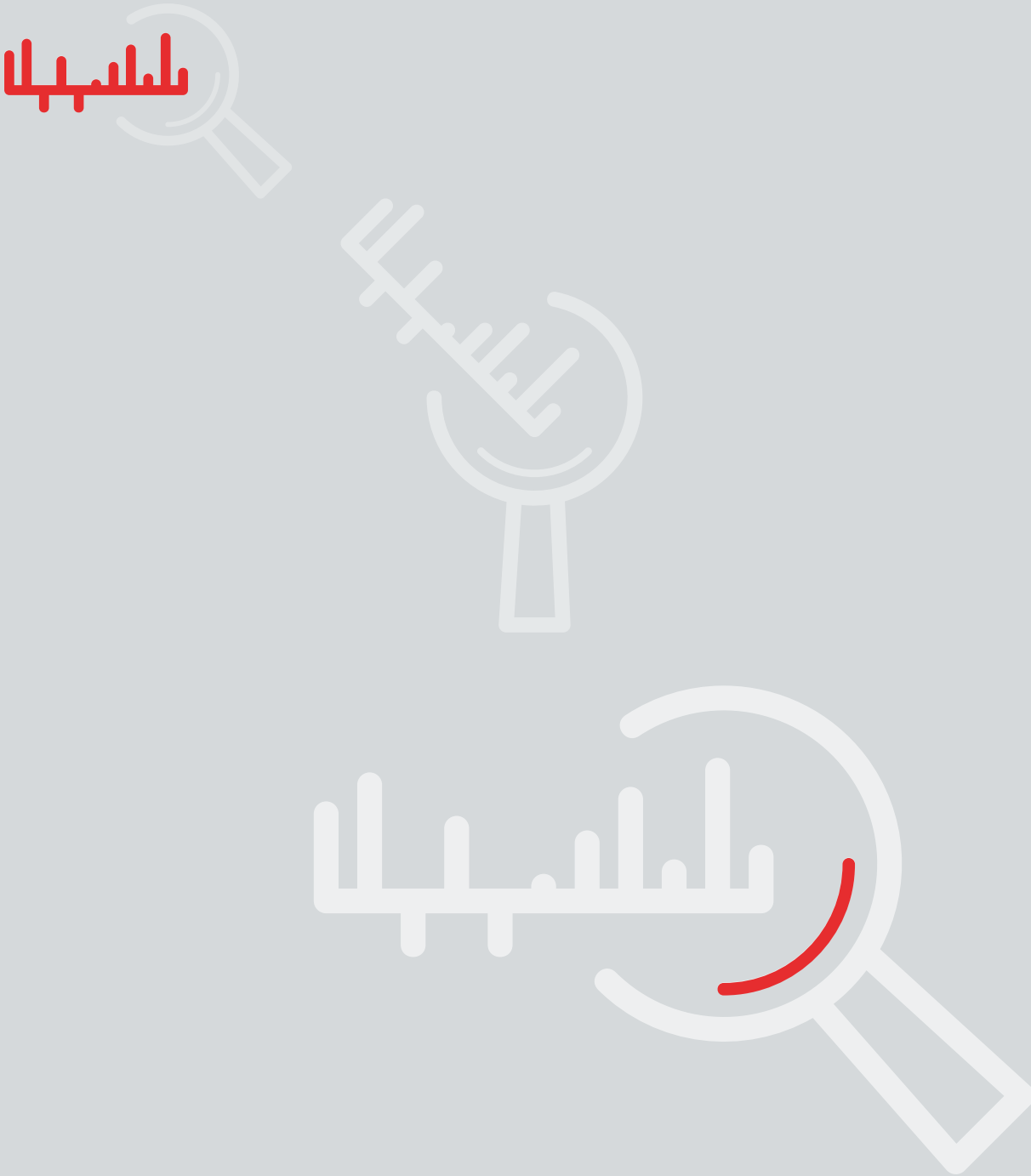
Since the last review, AAQ has engaged the State Secretariat for Education, Research and Innovation to clarify that there is no explicit legal basis for the publication of reports. SERI examined the issue and informed AAQ that Article 32 of HEdA explicitly refers to international standards. Consequently, contrary to the AAQ's previous understanding and what was stated in its 2020 Self-Assessment Report, there is indeed a legal basis for referring to the ESG. As a result, Switzerland does not need to introduce a new legal provision specifically dedicated to the publication of reports.

To ensure that its partners fully understand this last step of the procedure, AAQ addresses the publication of reports during the opening session of its procedures and includes a relevant clause in its contracts. In addition, AAQ has engaged with swissuniversities, which supports the publication of accreditation reports.

Further Developments

AAQ will continue to publish the External Evaluation Reports for all completed procedures, whether the decision of the Swiss Accreditation Council is positive or negative. The Agency will maintain its communication on this matter through the contract and during the opening session of its procedures.

PART III – SWOT Analysis



This section provides an analysis of the AAQ's organisational strengths, weaknesses, opportunities, and threats. Based on this analysis, key strategic considerations are outlined to guide the future development of the Agency and to ensure its continued relevance and effectiveness in the Swiss and European Higher Education Areas.

Strengths

- Employees with many years of experience in higher education and/or quality assurance provide sound expertise and excellent knowledge of external QA in Switzerland.
- Work in four languages (German, French, Italian and English) strengthens the AAQ's multi-perspectivity and the respect for the autonomy of HEIs.
- Integration in the EHEA.
- Maintaining direct, open communication and a high level of quality awareness in all activities.
- Usage of the meetings for knowledge transfer and opportunities to attend individual continuing education courses.

Opportunities

- Good employment conditions lead to low turnover in the team and strong motivation.
- The basic funding from the Confederation and the cantons provides a financial basis (AAQ is not dependent on fees).
- Full independence in designing the methodologies.
- Unique standing in the Swiss Higher Education Area as public law agency.
- Association with all the positive aspects of "Swissness".
- Wide level of trust in AAQ among all stakeholders.

Weaknesses

- While AAQ reflects on its work, its limited resources prevent it from thoroughly developing its methodologies and translating its findings into publications and presentations.
- The AAQ team is not balanced in terms of gender.
- The Agency cannot always respond quickly to challenges from global trends such as digitalization and Artificial Intelligence.

Threats

- The broad range of different formats and the four languages require considerable resources to keep the methodologies up-to-date.
- The planification of cycles of QA procedures (e.g. postgraduate medical training) is determined by external factors (peaks).
- The AAQ's legal status as an "independent entity of public law" denies it access to services from the government such as IT, HR and legal services and keeps it from building reserves.
- Federal HR-laws increase the costs for AAQ salaries, while the government is simultaneously implementing austerity measures.
- Uniform fees for all agencies may lead to HEIs choosing other agencies.

Strengths

AAQ is built on a solid foundation of professional expertise and institutional credibility. Its staff bring many years of experience in higher education and quality assurance, particularly within the Swiss context. This internal knowledge base is further strengthened by the Agency's multilingual operations – covering German, French, Italian, and English – which enables it to maintain a broad perspective and deep respect for the institutional autonomy of Higher Education Institutions.

The Agency's integration in the European Higher Education Area positions it within a broader framework of recognised quality standards. Internally, it promotes open communication, a strong culture of quality, and continuous learning through regular knowledge exchange and opportunities for continuing education.

Opportunities

AAQ benefits from stable employment conditions that lead to high team motivation and low turnover. Its funding model – based on public contributions from the Confederation and the cantons – provides financial stability and reduces the AAQ's dependence on client-based income. This enables a high degree of independence in the development of the Agency's methodologies.

As a public law agency and due to its special relation with the Accreditation Council AAQ has formally a unique standing within the Swiss Higher Education Area and earned a wide level of trust both from public and private HEI and other stakeholders. Together with the international reputation associated with "Swissness" this supports the credibility and visibility of its work.

Weaknesses

Despite a strong internal commitment to quality and reflection, the AAQ's limited resources restrict its capacity to further develop and systematise its methodologies, and to share its findings more widely through publications and conferences. This constrains both its impact and its visibility, particularly at the international level.

AAQ is not always able to respond as swiftly as it would like to broader systemic changes – particularly those linked to digitalisation and Artificial Intelligence. These limitations could potentially impact its relevance in the medium to long term if not proactively addressed.

Finally, AAQ recognises that the composition of its team is not yet balanced in terms of gender.

Threats

Operationally, maintaining and updating methodologies across multiple formats and languages is resource-intensive. Moreover, external factors – such as the planification of quality assurance cycles, particularly in specialised fields like postgraduate medical training – can lead to workload peaks. The AAQ's legal status as an "independent entity of public law" limits access to federal support services (e.g. IT, HR or legal) and excludes it building financial reserves. Rising salary costs, driven by federal HR policies, combined with public-sector austerity measures, create additional financial pressure. Furthermore, the introduction of uniform pricing model across agencies may reduce the AAQ's competitive advantage, especially if HEIs begin to favour alternative providers based on methodological considerations alone.

Strategic Implications

Based on the above analysis, AAQ identifies several strategic priorities:

Capacity Development

Securing additional resources – either through targeted project funding, strategic partnerships or efficiency gains – is essential to deepen methodological development and enhance dissemination activities.

.....

Digital Responsiveness

AAQ aims to improve its organisational agility and capacity to address digital transformation trends, including Artificial Intelligence and online education models, by investing in staff development and strategic foresight.

.....

Equality and Representation

Gender balance will be a continued area of focus in future recruitment and internal development policies.

.....

Operational Sustainability

Given the constraints associated with the AAQ’s legal status, the Agency will explore alternative support arrangements and risk mitigation strategies. Where appropriate, AAQ is also prepared to engage in dialogue with policymakers about structural adaptations.

.....

Strategic Positioning and Communication

The Agency intends to better leverage its strengths – particularly its multilingualism and public mandate – through enhanced communication strategies and stakeholder engagement, both nationally and internationally.

.....

This SWOT analysis depicts a strong, capable organisation with a clear sense of purpose and valuable positioning in the higher education sector. However, to maintain and strengthen the AAQ’s role, it is imperative that the Agency addresses internal capacity limitations, improves strategic agility and ensures its long-term operational resilience through proactive and adaptive strategies.

PART IV – Conclusions



Over the past five years, AAQ has demonstrated a strong capacity to evolve in response to changes in its institutional, legal, and academic environment. This adaptability reflects the Agency's ongoing commitment to fostering a robust quality culture in the Swiss Higher Education Area and beyond.

The internal reorganisation of AAQ, including the creation of the position of Head of Accreditation and Quality Assurance, has reinforced its operational autonomy from the Swiss Accreditation Council. This independence is further reflected in its reporting practices, as the Agency no longer includes SAC Decisions in its reports, underlining its commitment to transparency and accountability.

The AAQ's procedures have matured, notably through integrating the Reaccreditation process into the Institutional Accreditation format. By maintaining open and continuous dialogue with its partners, the Agency has developed approaches that encourage constructive engagement with Higher Education Institutions and support the enhancement of their internal quality assurance systems. Initiatives such as the "Open Slot Meet & Greet" have provided inclusive platforms for dialogue, encouraging wider participation across the higher education community.

In response to evolving legal frameworks in Austria and Germany, AAQ has adapted its formats for Quality Audit and System Accreditation. These adjustments underline its capacity to develop flexible and fit for purpose methodologies. Furthermore, its active role in the reformulation of Institutional Accreditation standards confirms the high regard in which its expertise is held.

These developments have not only strengthened the AAQ's operational capacities but have also deepened its expertise in the field of higher education. The Agency has solidified its position within the Swiss Higher Education Area and is increasingly recognised as a key partner in the European quality assurance community. Through the further development of its Thematic Analysis unit, the Agency aims to support knowledge exchange and foster dialogue within the national and international community.

This Self-Assessment Report captures the ongoing transformation of AAQ and the factors shaping its current identity. Looking ahead, the Agency is committed to leveraging its agility to support continuous development, always guided by its core values: *transparency, respect, reliability, commitment and esteem.*

Abbreviations and Links

List of Abbreviations

<u>AAQ</u> ↗	Swiss Agency of Accreditation and Quality Assurance
AI	Artificial Intelligence
EHEA	European Higher Education Area
<u>ENAE</u> ↗	European Network for Accreditation of Engineering Education
<u>ENQA</u> ↗	European Association for Quality Assurance in Higher Education
<u>EQAR</u> ↗	European Quality Assurance Register for Higher Education
ESG	European Standards and Guidelines for Quality Assurance in the EHEA
FAC	Federal Administrative Court
<u>FOPH</u> ↗	Federal Office of Public Health
<u>GAC</u>	German Accreditation Council
HEI	Higher Education Institution
LO	Learning Outcomes
OAQ	Center of Accreditation and Quality Assurance
PO	Programme Outcomes
QA	Quality Assurance
<u>SAC</u> ↗	Swiss Accreditation Council
SAR	Self-Assessment Report
SCR	Substantive Change Report
<u>SERI</u> ↗	State Secretariat for Education, Research and Innovation
SHEA	Swiss Higher Education Area
SCHEI	Swiss Conference of Higher Education Institutions
<u>SSU</u> ↗	Swiss Student Union
SWOT	Strengths Weaknesses Opportunities Threats
<u>swu</u> ↗	swissuniversities – Umbrella association of Swiss Higher Education Institutions
<u>WFME</u> ↗	World Federation for Medical Education

Legal Texts

BFI-Botschaft	Message on the Promotion of Education, Research and Innovation in the Period 2025-2028 (only in German, French and Italian) ↗ For the message, click here .
FADP	Federal Act on Data Protection (Data Protection Act) ↗ For the law, click here .
Higher Education Act – HEdA	Federal Act on Funding and Coordination of the Swiss Higher Education Sector ↗ For the law, click here .

HEdA Accreditation Ordinance	Ordinance of the Higher Education Council on Accreditation within the Higher Education Sector ↗ For the ordinance, click here .
HPA	Health Professions Act – Bundesgesetz über die Gesundheitsberufe (only in German, French and Italian) ↗ For the law, click here .
HS-QSG	Higher Education Quality Assurance Act – <i>Hochschul-Qualitätssicherungsgesetz</i> (only in German) ↗ For the law, click here .
MPA	Medical Professions Act – <i>Bundesgesetz über die universitären Medizinalberufe</i> (only in German, French and Italian) ↗ For the law, click here .
MRVO	Specimen Decree – <i>Musterrechtsverordnung</i> (only in German) ↗ For the ordinance, click here . ↗ For the changes made, click here .
nqf.ch-HS	Qualifications Framework for the Swiss Higher Education Area (only in German and French) ↗ For the framework in German, click here . ↗ For the framework in French, click here .
OReg-AAQ	Organisational Regulations of the Swiss Agency of Accreditation and Quality Assurance ↗ For the regulations, click here .
OReg-AC	Organisational Regulations of the Appeals Commission ↗ For the regulations, click here .
OReg-SAC	Organisational Regulations of the Swiss Accreditation Council ↗ For the regulations, click here .
PPA	Psychology Professions Act – <i>Bundesgesetz über die Psychologieberufe</i> (only in German, French and Italian) ↗ For the law, click here .
SAC Fees Ordinance – FeeO-SAC	Ordinance of the Swiss Accreditation Council on the Fees for Accreditation Procedures and Services on behalf of Third Parties ↗ For the ordinance, click here . ↗ For the changes made, click here (only in German, French and Italian)
Studienakkreditierungsstaatsvertrag	State Treaty on the Organisation of a Joint Accreditation System for Quality Assurance in Studies and Teaching at German Higher Education Institutions – Staatsvertrag über die Organisation eines gemeinsamen Akkreditierungssystems zur Qualitätssicherung in Studium und Lehre an deutschen Hochschulen (only in German) ↗ For the law, click here .
Verordnung des Hochschulrates über die Koordination der Lehre an den Schweizer Hochschulen	Ordinance of the Higher Education Council on the Coordination of Teaching at Swiss Higher Education Institutions (only in German, French and Italian) ↗ For the law, click here .

AAQ Documents and Guidelines

AAQ Documents

Annual Reports	<p>Example of an Institutional Accreditation Report (new version)</p> <p>↗ For the reports, click here.</p> <p>→For a DeepL translation of the last four financial reports, see Annexes 16 to 19.</p>
Institutional Accreditation Report	<p>Example of an Institutional Accreditation Report (new version)</p> <p>↗ For the report, click here.</p> <p>→For a DeepL translation of the example, see Annex 21.</p>
Interim Evaluation of Reaccreditation	<p>Interim Report on the first Reaccreditation procedures</p> <p>↗ For the report, click here.</p>
MPA Accreditation Report	<p>Example of an MPA Accreditation Report (new version)</p> <p>↗ For the example, click here.</p>
Quality Document	<p>Components for internal quality development and assurance</p> <p>↗ For the document, click here.</p>
Strategy	<p>Mission, vision, principles and strategic objectives</p> <p>↗ For the strategy, click here.</p>
Thematic Analysis	<p>All thematic analyses published by AAQ</p> <p>↗ For the webpage, click here.</p>

AAQ Guidelines

Institutional Accreditation	<p>Guidelines for accreditation and Reaccreditation</p> <p>↗ For the guide, click here.</p> <p>Explanations of Quality Standards (2015 HEdA)</p> <p>↗ For the explanations, click here.</p>
Programme Accreditation under HEdA	<p>Guidelines for Programme Accreditation under HEdA (only in German and Italian)</p> <p>↗ For the guide, click here.</p> <p>→For a DeepL translation of the guide, see Annex 22.</p>
Programme Accreditation under HEdA and HPA	<p>Guidelines for Programme Accreditation under HEdA and HPA (only in German, French and Italian)</p> <p>↗ For the guide, click here.</p> <p>→For a DeepL translation of the guide, see Annex 23.</p>
Programme Accreditation under HEdA and MPA	<p>Guidelines for Programme Accreditation under HEdA and MPA</p> <p>↗ For the guide, click here.</p>
System Accreditation	<p>Guidelines for System Accreditation (only in German)</p> <p>↗ For the guide click here.</p> <p>→For a DeepL translation of the guide, see Annex 24.</p>
Quality Audit	<p>Guidelines for Quality Audit (only in German)</p> <p>↗ For the guide click here.</p> <p>→For a DeepL translation of the guide, see Annex 25.</p>

Evaluation	General guidelines for Evaluation ↗ For the guide, click here .
	Guidelines for internal higher education evaluation for the awarding of quality labels ↗ For the guide to accompaniment, click here .
	Guidelines for awarding the EUR-ACE® Label ↗ For the guide, click here .
All formats	Guidelines for all QA activities (the language depends on the procedure) ↗ For the different guidelines, click here .
	Reports of all QA activities (the language depends on the procedure) ↗ For the different guidelines, click here .

Other Document

SERI Report	Evaluation of the structures, processes and effectiveness of the bodies in accordance with the Federal Act on Funding and Coordination of the Swiss Higher Education Sector (only in German) ↗ For the report, click here .
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Annexes

Documents from the last review (2020-2021)

- 1: [AAQ Self-Assessment Report](#)
- 2: [ENQA Agency Review Report](#)
- 3: [AAQ Complaint to ENQA](#)
- 4: [ENQA's Board Letter Decision on Complaint](#)
- 5: [ENQA's Board Letter Membership Reconfirmed](#)
- 6: [EQAR Approval Decision](#)

PART I – Background

Changes in the Higher Education and Quality Assurance System

- 7: [HEdA 2024 Standards](#)
- 8: [Synopsis of Standards](#)

Changes in the Agency

AAQ Organisation and Structure

- 9: [Res Publica Report DE](#)
- 9: [Res Publica Report EN DeepL](#)
- 10: [Organisational Development SAR Office](#)
- 11: [AAQ Internal Regulations DE](#)
- 11: [AAQ Internal Regulations EN DeepL](#)
- 12: [Implementation Plan 2021-2024](#)
- 13: [Guide for Language Secretaries](#)
- 14: [Vade mecum Annual Report DE](#)
- 14: [Vade mecum Annual Report EN DeepL](#)
- 15: [Quality Guidelines for External Evaluation Reports](#)

AAQ Funding

- 16: [2021 Financial Report EN DeepL](#)
- 17: [2022 Financial Report EN DeepL](#)
- 18: [2023 Financial Report EN DeepL](#)
- 19: [2024 Financial Report EN DeepL](#)

AAQ Functions, activities, procedures

- 20: [List of Procedures](#)
- 21: [BFH Institutional Accreditation Report EN DeepL](#)
- 22: [Programme Accreditation under HEdA Guide EN DeepL](#)
- 23: [Programme Accreditation under HEdA and HPA Guide EN DeepL](#)
- 24: [System Accreditation Guide EN DeepL](#)
- 25: [Quality Audit Guide EN DeepL](#)
- 26: [AAQ Report on Compliance](#)

PART II – Focus Areas

ESG Part 3

ESG 3.3

27: [EQAR Decision on AAQ Substantive Change Report](#)

Standard for Enhancement – ESG 3.4

28: [List of Thematic Analyses](#)

29: [2018 Synthesis Report MPA EN DeepL](#)

30: [2019 Synthesis Report PPA EN DeepL](#)

31: [2025 Synthesis Report HEdA and MPA EN DeepL](#)

32: [2017 Thematic Analysis ZHAW EN DeepL](#)

33: [2025 Thematic Analysis HES-SO EN DeepL](#)

34: [2020 Thematic Analysis EN DeepL](#)

ESG Part 2

ESG 2.1

35: [Institutional Accreditation and ESG 1 – 2015 Standards Mapping](#)

36: [Institutional Accreditation and ESG 1 – 2024 Standards Mapping](#)

37: [Programme Accreditation and ESG 1 – 2015 Standards Mapping](#)

38: [System Accreditation and ESG 1 – 2018 Standards Mapping](#)

39: [Quality Audit and ESG 1 – 2025 Standards Mapping](#)

ESG 2.2

40: [Minutes of Reaccreditation Sounding Board DE](#)

40: [Minutes of Reaccreditation Sounding Board EN DeepL](#)

41: [Programme for 2022 AAQ Day DE](#)

41: [Programme for 2022 AAQ Day EN DeepL](#)

ESG 2.4

42: [Application Form SSU DE](#)

42: [Application Form SSU EN DeepL](#)

43: [Training for Student Experts FR](#)

43: [Training for Student Experts EN DeepL](#)

44: [Terms of Reference](#)

ESG 2.6

No annexes

AAQ
Effingerstrasse 15
Postfach
CH-3001 Bern

www.aaq.ch

