ENQA TARGETED REVIEW

FOUNDATION FOR INTERNATIONAL BUSINESS ADMINISTRATION ACCREDITATION (FIBAA)

TATJANA VOLKOVA, FIONA CROZIER, SOPHIE GUILLET, DAMON MOHEBBI

14 OCTOBER 2026

ENQA TARGETED REVIEW **2026**

enqa.

European Association for Quality Assurance in Higher Education

CONTENTS

CONTENTS I

EXECUTIVE SUMMARY 3

INTRODUCTION 6

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS 6

BACKGROUND OF THE REVIEW 6

SCOPE OF THE REVIEW 6

MAIN FINDINGS OF THE 2021 REVIEW 8

REVIEW PROCESS 10

CHANGES WITHIN THE AGENCY 11

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM 11

FIBAA'S ORGANISATION/STRUCTURE 12

FIBAA'S FUNDING 13

FIBAA'S FUNCTIONS, ACTIVITIES, PROCEDURES 13

FINDINGS: COMPLIANCE OF FIBAA WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG) WITHIN THE SCOPE OF THE REVIEW 15

ESG PART 3: QUALITY ASSURANCE AGENCIES 15

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE 15

ESG 3.4 THEMATIC ANALYSIS 19

ESG PART 2: EXTERNAL QUALITY ASSURANCE 22

1. THE EUROPEAN APPROACH FOR QUALITY ASSURANCE OF JOINT PROGRAMMES 23

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE 23

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE 28

ESG 2.3 IMPLEMENTING PROCESSES 29

ESG 2.4 PEER-REVIEW EXPERTS 31

ESG 2.5 CRITERIA FOR OUTCOMES 33

ESG 2.6 REPORTING 34

ESG 2.7 COMPLAINTS AND APPEALS 35

2. ADDITIONAL MATTERS FOR EVALUATION FOLLOWING THE TOR 36

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE 36

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE 39

ESG 2.4 PEER-REVIEW EXPERTS 42
ESG 2.6 REPORTING 45
ESG 2.7 COMPLAINTS AND APPEALS 47
ENHANCEMENT AREAS 49
ESG 3.5 RESOURCES 49
ADDITIONAL OBSERVATIONS 52
GENERAL OBSERVATIONS 52
CONCLUSION 53
SUMMARY OF COMMENDATIONS 53
OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS 53
SUGGESTIONS FOR FURTHER IMPROVEMENT 54
ANNEXES 55
ANNEX 1: PROGRAMME OF THE SITE VISIT 55
ANNEX 2: MAPPING OF ALL FIBAA'S ACTIVITIES AGAINST ESG 2.1 (EXCLUDING THE EUROPEAN APPROACH) 63
ANNEX 3: TERMS OF REFERENCE OF THE REVIEW 82
ANNEX 3: GLOSSARY 91
ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW 92
DOCUMENTS PROVIDED BY FIBAA 92
OTHER SOURCES USED BY THE REVIEW PANEL 92

This work is licensed under Attribution-NonCommercial 4.0 International.
To view a copy of this license, visit http://creativecommons.org/licenses/by-nc/4.0/

EXECUTIVE SUMMARY

This report analyses the compliance of Foundation for International Business Administration Accreditation, (FIBAA) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external targeted review conducted in 2025/26 from September 2025 until the finalisation of the review report in July 2026, following the methodology described in the *Guidelines for ENQA Agency Reviews* (December 2025). A site visit took place at the agency's premises in Bonn from 11th-13th May 2026. FIBAA has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2002 and is applying for renewal of ENQA membership. It has been registered on the European Quality Assurance Register (EQAR) since 2008 and is also applying for renewal of EQAR registration.

FIBAA is a European, internationally oriented agency for quality assurance and quality development in higher education. The non-profit organization has its head office in Bonn, Germany, and is registered in Zurich, Switzerland. Its vision states that: *"FIBAA is a global driving force and a recognized pioneer in quality assurance for higher and continuing education. We think boldly, act with foresight, and pursue innovative yet realistic solutions".*

FIBAA's mission states that: *"FIBAA is a European quality assurance agency with global reach. We stand for transparent, comparable, and high-quality standards in higher education and continuing education.*

We are a reliable partner for students, higher education institutions, and economy. Through our commitment, we continuously ensure quality and foster employability.

We act on the basis of strong values – guided by openness, fairness, and tolerance. For us, equal opportunity is more than a principle: it is both an attitude and a guiding standard of action. Together with our partners, we actively oppose all forms of discrimination".

FIBAA's key activities can be summarised as:

i) Programme accreditation: this offers procedures that are in accordance with the rules of the German Accreditation Council (GAC) and those that are outside the GAC area of competence to attain the FIBAA quality seal, including a seal for Excellence in Digital Education.

ii) Institutional accreditation: this offers procedures that are in accordance with the rules of the German Accreditation Council (GAC); those that are outside the GAC area of competence to attain the FIBAA quality seal; two specific procedures for FIBAA's quality seal in strategic management and digital education and separate processes that are in accordance with a) the Austrian Act on Quality Assurance in Higher Education and b) the Federal Act on Funding and Coordination of the Swiss Higher Education Sector.

iii) Certification of Continuing Education courses, including microcredentials.

iv) The European Approach for Quality Assurance of Joint Programmes.

v) Consultancy services.

Based on the Terms of Reference (see annex 3), the review covered aspects of the activities in i)-iii). As a new activity since the last review, it covered iv) in full.

The ESG addressed in this targeted review are:

- ESG 3.1 Activities, Policy and Processes for Quality Assurance and ESG 3.4 Thematic Analysis (both of which received judgments of partial compliance in the last ENQA review in 2021).

- ESG 2.1 Consideration of internal quality assurance (all reviews and substantive change in two activities)
- ESG 2.1-2.7 for the European Approach for Quality Assurance of Joint Programmes (new activity)
- ESG 2.2 Designing methodologies fit for purpose (substantive change for two activities)
- ESG 2.4 Peer-review experts (partial compliance in the last ENQA review and substantive change in two activities)
- ESG 2.6 Reporting (on a specific matter at the request of EQAR)
- ESG 2.7 Complaints and Appeals (partial compliance in the last ENQA review).

The panel considered the evidence provided in the self-assessment report (SAR), additional evidence requested by the panel and provided by the agency (full list in Annex 4), and supplementary information from the site visit, which included meetings with a wide range of participants. The panel analysed and discussed the evidence and concluded that FIBAA complies with the ESG as presented in the table below. Since the last ENQA review, the agency has made good progress on ESG 2.7 and 3.1, and some progress on ESG 2.4 and 3.4, which were previously found partially compliant in the last EQAR Register Committee decision on the renewal of FIBAA's inclusion on the Register.

The agency's choice of ESG 3.5 Resources as its enhancement standard reflects both the emphasis that is now being placed on the strategic planning process at the agency and also its desire to maximise the opportunities that its resourcing provides as well as to respond to the challenges that it faces currently and in the future. The workshop, which was the panel's chosen means of approaching the enhancement standard in order to facilitate discussion, confirmed the strong collegial approach that had become evident to the panel throughout the site visit and also a desire to learn from external experience from both the panel, and other external quality assurance agencies (EQAAs). The workshop provided opportunity for discussion, questions and answers as well as a presentation which incorporated practice from other EQAAs that could be useful to FIBAA in its future deliberations.

Summary of agency's compliance with the ESG (Parts 2 and 3) (excluding European Approach)

ESG	Compliance according to the targeted review[1]	Compliance transferred from the last full review[2]
2.1	Partially compliant	N/A
2.2	Compliant	N/A
2.3	N/A	Substantially compliant → compliant
2.4	Compliant	N/A
2.5	N/A	Fully compliant → compliant
2.6	Compliant	N/A

[1] Compliance refers to the focus areas that were evalauted in depth and are part of the Terms of Reference, i.e., standards that were only partially compliant with the ESG during the last full review, ESG Part 2 for newly introduced or changed QA activities of the agency, ESG 2.1 for all QA activities and any standard affected by substantive changes since the last full review. If any of the standards of Part 2 of the ESG are covered due to the newly introduced or changed QA activities, a remark "for new or changed QA activites only" is added in brackets to the compliance assessment.

[2] Compliance refers to the last EQAR Register Committee decision for renewal of inclusion on the Register, or in case when an agency is not renewing its registration in EQAR, compliance refers to the last ENQA Agency Review report and should its judgement differ from that of the panel, the judgement of the ENQA Board, as stipulated in the membership decision letter by the ENQA Board. Compliance refers to the QA activities of the agency that were reviewed during the previous full review.

2.7	Compliant	N/A
3.1	Compliant	N/A
3.2	N/A	Fully compliant → compliant
3.3	N/A	Fully compliant → compliant
3.4	Partially compliant	N/A
3.5	N/A	Substantially compliant → compliant
3.6	N/A	Fully compliant → compliant
3.7	N/A	Fully compliant → compliant

Summary of agency's compliance with the ESG (Parts 2 and 3) (European Approach)

ESG	**Compliance according to the targeted review[3]**	**Compliance transferred from the last full review[4]**
2.1	Partially compliant	N/A
2.2	Compliant	N/A
2.3	Partially compliant	N/A
2.4	Compliant	N/A
2.5	Compliant	N/A
2.6	Compliant	N/A
2.7	Compliant	N/A
3.1	N/A	N/A
3.2	N/A	N/A
3.3	N/A	N/A
3.4	N/A	N/A
3.5	N/A	N/A
3.6	N/A	N/A
3.7	N/A	N/A

The panel found FIBAA to be compliant with the ESG in respect of its operation of the European Approach to Quality Assurance of Joint Programmes.

[3] Compliance refers to the focus areas that were evaluated in depth and are part of the Terms of Reference, i.e., standards that were only partially compliant with the ESG during the last full review, ESG Part 2 for newly introduced or changed QA activities of the agency, ESG 2.1 for all QA activities and any standard affected by substantive changes since the last full review. If any of the standards of Part 2 of the ESG are covered due to the newly introduced or changed QA activities, a remark "for new or changed QA activities only" is added in brackets to the compliance assessment.

[4] Compliance refers to the last EQAR Register Committee decision for renewal of inclusion on the Register, or in case when an agency is not renewing its registration in EQAR, compliance refers to the last ENQA Agency Review report and should its judgement differ from that of the panel, the judgement of the ENQA Board, as stipulated in the membership decision letter by the ENQA Board. Compliance refers to the QA activities of the agency that were reviewed during the previous full review.

INTRODUCTION

This report analyses the compliance of Foundation for International Business Administration Accreditation, (FIBAA) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in 2025/26 from September 2025 until the finalisation of the review report in July 2026, and should be read together with the external review report of the agency's last full review against the ESG conducted in 2021. (https://www.enqa.eu/wp-content/uploads/FIBAA-external-review-report.pdf). FIBAA has been a member of ENQA since 2002 and is applying for renewal of ENQA membership. It has been registered on EQAR since 2008 and is also applying for renewal of EQAR registration.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

Registration on EQAR is the official instrument established by the European Higher Education Area (EHEA) for demonstrating an agency's ESG compliance. An external review is a prerequisite for registration.

As FIBAA has undergone four successful reviews against the ESG Parts 2 and 3 (three of which were conducted by the GAC and the most recent of which in 2021 was conducted by ENQA), it is eligible and has opted for a targeted review. The purpose of a targeted review is to ensure the agency's compliance with the ESG by covering standards that were found partially compliant during the agency's last renewal of registration in EQAR and on standards that could have been affected by substantive changes[5] during the past five years while at the same time further strengthening the enhancement part of the review.

SCOPE OF THE REVIEW

FIBAA is carrying out the following activities within the scope of the ESG (activities marked with * are discussed in the last Substantive Change Report Decision of FIBAA):

(1) Programme Accreditation:

- Programme accreditation in accordance with the rules of the German Accreditation Council (GAC) (awarding the GAC's seal)
- Programme accreditation outside the competence area of the GAC (to obtain FIBAA's quality seal for programmes, including accreditation of Bachelor's, Master's study programmes and doctoral/PhD programmes) *
- Programme Accreditation: Excellence in Digital Education in accordance with the FIBAA quality standards (to receive the FIBAA Seal Excellence in Digital Education).

(2) Institutional Accreditation:

System accreditation in accordance with the rules of the GAC (to obtain the GAC's seal)

[5] e.g. organisational changes, the launch of new external QA activities.

- Institutional Audit Austria ("certification") in accordance with the rules of the Austrian Act on Quality Assurance in Higher Education (HS-QSG) (to obtain the FIBAA quality seal Institutional Audit Austria)
- Institutional Accreditation according to the Federal Act on Funding and Coordination of the Swiss Higher Education Sector (HFKG)
- Institutional Accreditation in accordance with the FIBAA quality standards (to obtain the FIBAA quality seal 'Institutional Accreditation')
- Institutional Accreditation: Strategic Management in accordance with the FIBAA's quality standards (to receive the FIBAA quality seal Institutional Accreditation: Strategic Management)
- Institutional Accreditation: Excellence in Digital Education in accordance with the FIBAA quality standards (to receive the FIBAA Seal Excellence in Digital Education).

(3) Certification of Continuing Education Courses:

- In accordance with the FIBAA quality standards, FIBAA certifies further education courses which do not lead to an academic degree but are offered at HEI level. They lead to the award of the FIBAA quality seal for further education courses. *

(4) European Approach for Quality Assurance of Joint programmes.

The following activities are outside the scope of the ESG:

The organizational unit FIBAA Consult offers a broad portfolio of consulting services. These activities are deemed to fall outside the scope of the ESG and are separated from FIBAA's external quality assurance activities. This matter is further discussed under standard ESG 3.1.

This review evaluates the extent to which FIBAA continues to fulfil the requirements of the ESG. The targeted review aims to place more focus on those parts that require attention and provide sufficient information to support the agency's application to EQAR. The review will be further used as part of the agency's renewal of membership in ENQA.

The focus areas of the review are listed in the Terms of Reference (ToR) of the review as follows:

A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision:

a. ESG 2.4 due to lack of mandatory training for experts, unequal preparation of the English-speaking experts and the limited involvement of international experts in FIBAA's expert pool;

b. ESG 2.7 due to the limited scope and the rudimentary nature of the appeals' procedure;

c. ESG 3.1 due to the shortcomings of involving students in FIBAA's governance structures, the lack of a comprehensive Strategic Plan and a clear separation of its consultancy and external quality assurance (EQA) procedures;

d. ESG 3.4 due to the limited work regarding the thematic analysis.

B) Standards 2.1 to 2.7 for the following activities:

a. European Approach for Quality Assurance of Joint programmes

C) Standards affected by other types of substantive changes:

a. ESG 2.1 regarding whether all of the standards of the Part 1 of the ESG are effectively covered in the (updated) procedures Programme accreditation outside the competence area of the GAC (to obtain FIBAA's quality seal for programmes) and FIBAA Quality Seal for Certified Continuing Education Courses/Micro-Credentials;

b. ESG 2.2 regarding whether the stakeholders were consulted appropriately and whether the methodologies are fit for purpose in the (updated) procedures Programme accreditation outside the competence area of the GAC (to obtain FIBAA's quality seal for programmes) and FIBAA Quality Seal for Certified Continuing Education Courses/Micro-Credentials;

c. ESG 2.4 regarding whether the panel experts receive appropriate training on the (updated) procedures Programme accreditation outside the competence area of the GAC (to obtain FIBAA's quality seal for programmes) and FIBAA Quality Seal for Certified Continuing Education Courses/Micro-Credentials.

D) ESG 2.1 Consideration of internal quality assurance;

E) Selected enhancement area: ESG 3.5

F) Other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any), including:

a. ESG 2.6 – regarding the redaction of the reports prior to their publication on FIBAA's website.

MAIN FINDINGS OF THE 2021 REVIEW

In the 2021 ENQA review, FIBAA was found fully compliant with the ESG standards 3.2, 3.3, 3.6, 3.7, 2.1, 2.2, 2.5 and 2.6. Additionally, while the panel found FIBAA to be substantially compliant with the ESG 3.1, 3.5, 2.3, 2.4 &2.7 and partially compliant with ESG 3.4, the EQAR committee deemed that the agency was only partially compliant with ESG 2.4, 2.7 and 3.1.

The panel commended FIBAA for the following:

ESG 3.6 The digital QM Manual that includes all processes at all levels is an ambitious and commendable tool, especially for the introduction of new employees but also for the internal quality assurance of an agency in general.

ESG 2.2 The involvement of stakeholders in the development of the agency's methodologies, particularly the process of developing the new seal in Digital Education and the seal in Strategic Management.

ESG 2.5 The approach taken to the development of methodologies which includes stakeholder involvement in the development and revision of criteria.

The panel made the following recommendations:

ESG 3.1 (underlined by the EQAR committee)

FIBAA is recommended to further develop its strategic planning process to ensure that it considers the medium to long term future of the agency as well as the shorter term. The development of a formal strategy for managing risk is also encouraged as part of the development of the strategic planning process.

The agency is recommended to include a student member on the Foundation Council.

ESG 3.4

The panel recommends that FIBAA reconsider its interpretation of ESG 3.4 and continues, as suggested in the review of 2017, to increase the number of analytical publications, and cover fields of activity beyond programme and system accreditations.

ESG 3.5

In line with the recommendation on ESG 3.1, to establish a clear alignment between the strategic vision of the agency and the planning of actions with the allocation of human and financial resources.

ESG 2.3

FIBAA should implement a consistent follow-up for recommendations as part of the current accreditation process rather than use recommendations as a starting point for the next review cycle.

ESG 2.4 (underlined by the EQAR committee)

The agency is recommended to require from all experts to attend at least some core training which is face-to-face, if possible, before becoming a member of the review panel. This is to ensure that they at least understand the ESG on which FIBAA bases its own criteria, FIBAA's decision-making processes and relation to the criteria and FIBAA review methods.

ESG 2.7 (underlined by the EQAR committee)

The agency is recommended to ensure that the wording of the process for complaints and appeals is accurate and clear in both German and English. At the same, it should ensure that the process as described on the website is up to date, for example regarding the merger of the three accreditation committees into one.

Finally, the panel made the following suggestions for further development:

ESG 3.1 The panel suggests FIBAA to consider broadening the externality of its stakeholder involvement to include, for example, members of committees from outside of FIBAA's circle of 'customers.' This would provide the input and challenge of a more 'critical friend' which would benefit the agency.

ESG 3.4 The panel suggests a more structured approach in identifying, planning and carrying out thematic analysis.

ESG 2.1 The panel suggests that FIBAA ensures the functionality of web-links with consistent information about the Bologna Process and the ESG on its website and in the introductory section of all its Assessment Guides.

ESG 2.4 The panel suggests that FIBAA asks students if there is any specific briefing that it could offer to them in addition to the core training before they start work as an expert.

The panel suggests that FIBAA facilitates a network for its student reviewers to allow them to connect and learn from each other.

The panel suggests FIBAA to encourage its student reviewers to connect to the established student networks, such as The German Student Experts Pool, to stimulate learning and interaction between student reviewers.

ESG 2.6 FIBAA could make the link to the GAC reports clearer and more easily accessible.

ESG 2.7 The panel suggests that FIBAA looks at the guidelines to this standard in order to provide clarification to all of its stakeholders over what is a matter of process (complaint) and what is to do with a decision (appeal).

REVIEW PROCESS

The 2026 external targeted review of FIBAA was conducted in line with the process described in the *Guidelines for ENQA Targeted Reviews*, the EQAR Procedures for Applications, and in accordance with the timeline set out in the Terms of Reference. The panel for the targeted review of FIBAA was appointed by ENQA and composed of the following members:

- Tatjana Volkova (Chair), Chair of the Studies Quality Commission, Professor of University of Latvia School of Business and Finance, Latvia (EUA nominee);
- Fiona Crozier (Secretary), Independent consultant, United Kingdom (ENQA nominee);
- Sophie Guillet, Head of the cooperation unit, European and International Affairs Department) at the High Council for the Evaluation of Research and Higher Education (Hcéres), France (ENQA nominee);
- Damon Mohebbi, doctoral student at the University of Oxford, United Kingdom (ESU nominee, Member of the European Students' Union Quality Assurance Student Experts Pool.

Goran Dakovic, Head of Agency Reviews at ENQA, acted as the review coordinator.

FIBAA produced a SAR that provided the basis for the review panel's work. Panel members received the SAR on February 2nd, 2026, and immediately began to evaluate its contents according to the provisions of the ToR. The panel's introductory meeting with the ENQA coordinator and EQAR's representative (who joined in only at the beginning of the meeting) took place online, on January 29th, 2026, with the panel's work continuing via email. The panel met again twice on 23rd February and 27th March 2026 for discussion. On 28th April 2026, the panel held a detailed preparation meeting which was followed by the clarification meeting with the agency's resource person, to clarify the overall higher education (HE) and quality assurance (QA) context of the agency and prepare for the approach to the self- selected ESG standard for enhancement.

The site visit took place in Bonn from 11th-13th May 2026, with a panel pre-meeting on 10th May 2026. The panel met with the agency staff, management, members of its board and other committees, experts, and representatives of HEIs, government, student and other organisations. The meetings included a workshop with FIBAA staff on the enhancement topic.

After final discussions at the site visit, the panel produced this final report based on the evidence it saw in the SAR, additional information and documents and the site visit. The panel discussed and responded to detailed comments that arose as part of the report-writing process in order to reach final agreement on the outcomes of the review and the report. Also, as part of the report writing process, the panel provided an opportunity for FIBAA to comment on the factual accuracy of the draft report.

The review panel is very grateful to FIBAA and its management and staff for the supportive and open attitude throughout the review, which contributed significantly to the work of the panel.

Self-assessment report

In the SAR, FIBAA explained that the self-evaluation process started in May 2025 with an exchange between ENQA and FIBAA which set out the focus areas for the targeted review. In June 2025 the Managing Director and the Division Manager for Quality Management (QM) reviewed the quality management (QM) process for the development of the SAR and appointed a steering group to carry out the task.

The steering group consisted of: the Managing Director, the Division Manager for Quality Management (Deputy Managing Director), and the Division Manager for Communications and Marketing. At the first meeting of the steering group, a schedule for the process was drawn up which included steering group meetings, the engagement of stakeholders in the co-creation of the SAR, workshops with the entire staff, and deadlines for the drafts of the SAR and its revisions as well as other organisational matters. Responsibility for individual tasks were clearly defined and distributed among the steering group members

FIBAA employees, i.e. Division Managers, (senior) project managers and support employees were involved in the SAR process through the Asana project management platform and through regular internal meetings in which the steering group informed staff about the challenges ahead. This led to the preparation of a SWOT analysis, which was included in the SAR.

Following the initial draft of the SAR, a second draft was submitted for external review to selected members of the FIBAA Accreditation and Certification Commission (F-ACC) and the Foundation Board. The draft SAR was thus reviewed by university representatives as well as employers and student representatives. Following feedback from these external experts, the Division Manager for Communications and Marketing prepared the third draft of the SAR, which underwent final review by the steering group and became the final version submitted to ENQA and EQAR.

In the course of preparing the SAR, FIBAA also reviewed and updated its website to ensure consistency of its content such as weblinks across all site languages.

The panel found the SAR to be clear and concise. However, although it offered some views on challenges faced, it was not deeply self-reflective. The panel made full use of the online advance meeting to clarify certain matters and also made several requests for further information, all of which were met promptly and fully.

Site visit

The site visit took place at FIBAA's premises from 11th-13th May 2026 with a panel pre-meeting held on 10th May 2026. The panel met with a range of internal and external stakeholders (see Annex 1: Programme for the site visit) and found all interactions and interviews to be open, honest and helpful. It was evident to the panel that the agency viewed the site visit as a means for improvement, even in advance of receiving the report.

CHANGES WITHIN THE AGENCY

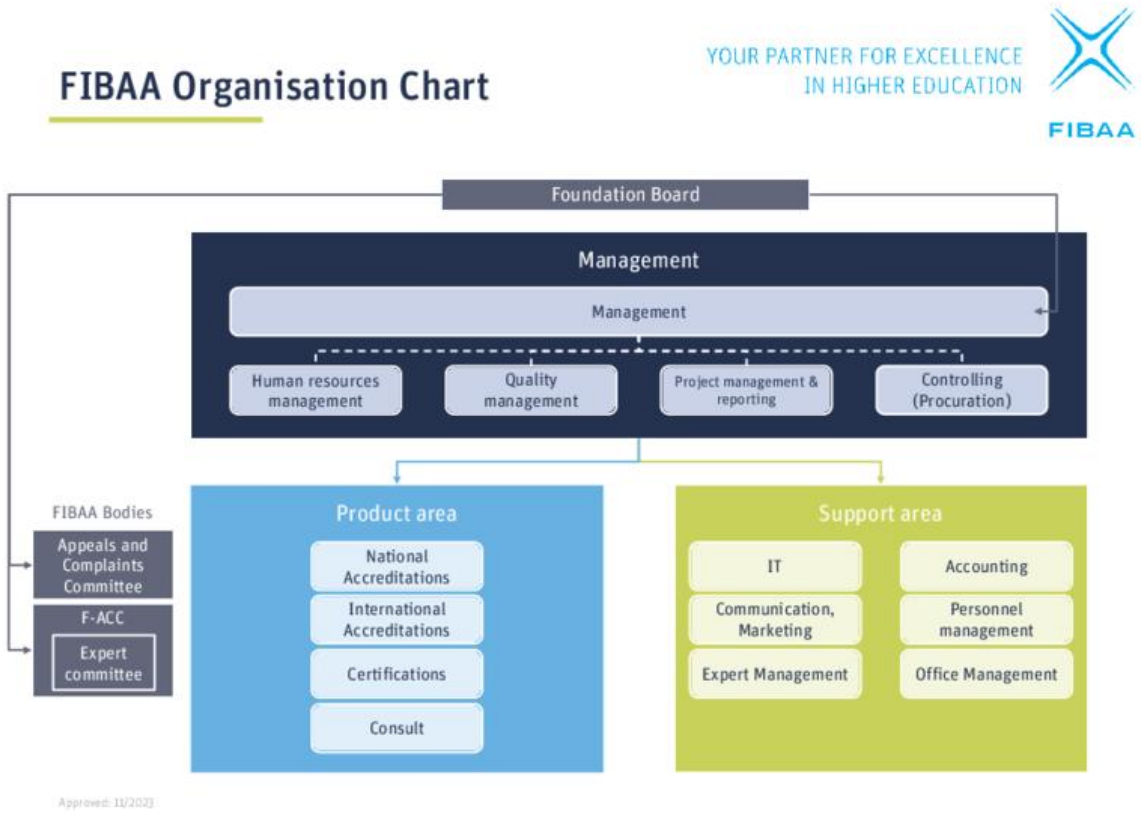
HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM

Two changes to the higher education and quality assurance systems in which FIBAA predominantly operates are mentioned in the SAR. Both of these changes have led to a decrease in the number of applications for the FIBAA programme accreditation processes: the first change (which results in a national GAC decision) is a result of structural changes in the German national accreditation system where, under the new framework, those higher education institutions (HEIs) that have achieved "system accreditation," which is an institutional review focusing on the internal quality management system, are authorized to reaccredit their programmes internally, without the involvement of an external accreditation agency.

The second change points to regulatory changes in Indonesia which mean that, whereas previously, FIBAA, as a full member of ENQA, was recognized as an international accreditation agency by the Ministry of Education and Culture of Indonesia (now the Ministry of Education, Culture, Research,

and Technology), due to legislative changes in May 2024, the agency was removed from the list of recognized accreditation agencies without prior communication of the reasons for this decision. In June 2024, FIBAA submitted a new proposal to the Ministry and to National Accreditation Agency for Higher Education (BAN-PT) in accordance with the requirements set out in the updated legislation. It has actively followed up on this proposal, but no clear update has been received. To date, no formal decision has yet been issued or communicated to FIBAA.

FIBAA'S ORGANISATION/STRUCTURE



FIBAA Organisation Chart. Source: FIBAA website (https://www.fibaa.org/en/fibaa/about-us/our-structure-and-bodies/)

Although the organisation chart is slightly different to the one in the 2021 ENQA external review report, in fact only one major change has been made to the organisation - the establishment of a new organisational unit in 2023: the Project Management and Reporting Division. The purpose of this new unit is to support the implementation of the FIBAA Strategy 2030, drive related projects, and provide reporting for management analysis. The main task of this division is to design and continuously enhance project management processes, leveraging Asana as a central software tool for project management. It also supports follow-up analyses, facilitates ongoing improvements, and provides reports designed to support management decisions.

It should also be noted that what was the FIBAA Appeals Committee is now the Appeals and Complaints Committee (A&CC). In addition, there are now student representatives on F-ACC.

All other aspects of FIBAA's organisation and structure including the location of its premises, its governance and its pool of experts remain unchanged since the ENQA review report of 2021 (p.10-15).

FIBAA'S FUNDING

FIBAA's funding has not changed since the 2021 ENQA external review report. FIBAA is a non-profit organisation, founded in 1994 and registered in Switzerland with headquarters in Bonn, Germany. As an organisation founded in Switzerland, the legal situation of FIBAA does not entitle it to state funding in Germany, which is its primary market. The agency's main source of revenue is through contracts with German and international HEIs, for whom FIBAA performs accreditation, certification, evaluation or consulting activities. The historic trend shows that FIBAA operated with positive annual results from 2021 to 2024 while expanding revenue and personnel capacity. 2025 constitutes an exceptional revenue downturn year. In 2025 the total revenue was 1.874 000 Euros below the 2024 level when total revenues were 3 048 000 euros. The fees for FIBAA activities are based on flat rates covering expert fees, travel expenses, accommodation of experts, committee meetings and costs for FIBAA staff and premises.

FIBAA'S FUNCTIONS, ACTIVITIES, PROCEDURES

One of the key changes to the work of the agency was the development and implementation of the FIBAA Strategy 2030 which was formally approved in May 2022, with implementation starting in September of that year. The Strategy consists of 8 corporate goals which are further broken down into 23 strategic directions. This development was accompanied by the introduction of Asana as a software tool for all employees to ensure transparency and structured tracking of the corporate goals alongside the projects on which staff are working. Annual team objectives are set for each strategic direction which ensures that these objectives are in line with the overall strategic framework.

Alongside Asana, FIBAA is also implementing a Customer Relationship Management (CRM) tool: JACOP® (Joint Accreditation and Certification Online Platform) as part of its strategic objective (Strategic Goal 6: Customer Journey / Excellence in Administration) to further enhance its market position and operational excellence. The SAR states that the goal of JACOP® is to," introduce a cross-divisional CRM system that overcomes existing limitations, streamlines workflows, and delivers added value to both FIBAA's internal teams and its external partners." JACOP has two main functions: as a backend system for the internal management of FIBAA's operations and as a frontend interface that facilitates seamless interaction and service delivery for clients in the form of an online application and monitoring system.

JACOP operates as a single, central system platform, which, according to the SAR, " … makes FIBAA's processes faster, more transparent, and less prone to error". It also allows stakeholders to track their own progress in any particular procedure.

Other changes within the agency since the last review include:

- Active development of FIBAA's products portfolio. Although the structure of the key business areas remains unchanged (programme accreditation, institutional procedures, certification of continuing education courses and micro-credentials and consulting), there has been rising interest in seals such as the FIBAA Quality Seal "Excellence in Digital Education®", introduced in 2022 and a corresponding decrease in interest in programme accreditations as previously explained. These changes have led to FIBAA broadening its subject base beyond

programmes in business and management, economics, law, and social science and also expanding its global reach.

- Since August 2024, FIBAA has offered evaluation of joint programmes in accordance with the European Approach for Quality Assurance of Joint Programmes, following a request from a German University for evaluation of the consortium in which it is a partner. The assessment guides are publicly available and disseminated to FIBAA's clients and experts; to date, two reports from this process have been published on FIBAA's website.
- Updated Assessment Guides (programme level). In March 2025, FIBAA introduced updated Assessment Guides for the accreditation of Bachelor's, Master's, and Doctoral programmes. In particular these now include the integration of artificial intelligence into teaching, research, and administration; closer alignment with United Nations (UN) Sustainable Development Goal (SDG) 4 (inclusive and equitable quality education); and a stronger emphasis on employability, future and soft skills, global career readiness, and internationalization. The total number of criteria has been reduced with an accompanying reduction in the number of conditions required for successful accreditation. In addition, FIBAA now offers an optional, voluntary follow-up procedure as part of the current accreditation process.
- Updated Assessment Guide for the certification of continuing education courses and micro-credentials, March 2025. The revised guide expands the assessment criteria to cover the use of artificial intelligence, digital learning platforms, and the integration of principles from SDG 4 (inclusive and equitable education). It also places greater emphasis on skills-based, modular learning and future-oriented competencies. In addition, from this date, micro credentials can be certified under the FIBAA framework as coherent offerings in terms of objectives, target groups, and content.
- FIBAA plans to review, update, and relaunch the Assessment Guide for certification with the FIBAA Quality Seal Excellence in Digital Education® in the first half of 2026, building on its recent experience of awarding this certification to 12 higher education institutions. The substantive change report in this regard was sent to EQAR during the period of this review, with EQAR's (positive) response being provided to the panel during the site visit.
- Significant growth in the number of institutional accreditation procedures. Following significant growth in applications for such procedures over the last five years (particularly internationally) FIBAA plans to update the Assessment Guide for institutional accreditation in 2026. The revision will follow a similar process to the recent programme accreditation update.
- Reconsideration of the follow-up procedure. FIBAA reconsidered its follow-up procedure in 2024 and holds to the following principles: The follow-up is an optional and voluntary element within the accreditation process and is available to HEIs that received recommendations during programme or institutional accreditation to allow them the opportunity to obtain feedback on their responses to these recommendations. The follow-up procedure assesses the effectiveness of the measures taken by the institution to address the recommendations and the evidence they can provide to demonstrate improvement. The follow-up process is a short, written procedure where the experts involved in the initial accreditation are invited to review the HEI's report and provide feedback on the improvements achieved.

In February 2026, the panel was informed that the Managing Director, Mag. Diane Freiberger, had stepped down from the position and would be replaced by Mr. Jubin Hadadi-Popp, M.A. and Dr Nina Rotermund as co-directors for the interim period during which the review site visit would take place. During the site visit, the panel learned that this interim arrangement would be permanent; this was confirmed by the Foundation Board.

FINDINGS: COMPLIANCE OF FIBAA WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG) WITHIN THE SCOPE OF THE REVIEW

ESG PART 3: QUALITY ASSURANCE AGENCIES

NB: for ESG 3.2, 3.3, 3.5. 3.6 and 3.7, compliance is transferred from the previous report in 2021. The panel found no outstanding matters on which to report.

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

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

2021 review recommendations

- FIBAA is recommended to further develop its strategic planning process to ensure that it considers the medium to long term future of the agency as well as the shorter term. The development of a formal strategy for managing risk is also encouraged as part of the development of the strategic planning process.
- The agency is recommended to include a student member of the Foundation Council.

The EQAR Register Committee decision for renewal of inclusion on the Register states: "Considering the shortcomings of involving students in FIBAA's governance and the lack of a comprehensive Strategic Plan and the separation of consultancy and external QA procedures, the Committee cannot follow the panel's conclusion of (substantial) compliance but finds that FIBAA complies only partially with standard 3.1."

Evidence

In response to recent recommendations and suggestions for improvement from the ENQA and EQAR review panels, FIBAA highlighted various developments in its SAR as well as emphasising some clarifications:

a) Strategic Planning for the Medium and Long Term:

The FIBAA Strategy 2030 sets long-term objectives (6–8 years), which are supported by 23 medium-term operational goals. These are reviewed annually by the Management Team and Division Managers. Short-term goals are defined yearly through division-level objectives approved by the Managing Director. All goals are developed with clearly defined performance indicators and the goals and related milestones and projects are tracked in Asana, with the Project Management and Reporting Division ensuring transparency and oversight. Goals are tracked by division and project managers with responsibility for this task. Various activities including the Division Managers' Jour Fixe, Team Jour Fixe, internal division meetings, and recurring quality management sessions with division managers ensure that the strategic analysis, planning and controlling process at FIBAA

involves both management and staff. These meetings aim to review the current state of implementation, reflect on progress against defined objectives, and identify specific operational measures to enhance performance and quality outcomes.

As well as the establishment of a system for setting and monitoring strategic goals and objectives, FIBAA notes that the implementation of the project management platform Asana has notably enhanced the quality and coordination of both external quality assurance activities and internal support projects. The next major milestone will be the launch of the CRM system, JACOP® in 2027. This is expected to further strengthen the quality, efficiency, and transparency of FIBAA's operations, for both internal teams and external stakeholders.

With regard to the Risk Management Strategy, in 2024, FIBAA developed and implemented a comprehensive risk matrix as part of its strategic management framework. The identified risks are linked to FIBAA's strategic goals, ensuring that risk assessment is directly aligned with the agency's long-term objectives. The FIBAA Foundation Council formally approved the risk matrix and provided input for its refinement. It is envisaged that a full risk analysis will be conducted annually, with the results presented to the Foundation Council for review and potential action. FIBAA believes that this will ensure proactive, transparent, and strategic handling of risks and support long-term stability and continuous improvement.

The panel was provided with the FIBAA strategy 2030 and the corresponding risk matrix as annexes to the SAR. In addition, it saw screenshots of Asana in advance of the site visit and, during the visit, it was provided with an in-depth demonstration of Asana and the corresponding operational database, ViFlow.

The panel requested and was provided with the FIBAA Operational Plan in German, which mainly sets out financial checkpoints for the Foundation Board.

b) Student Representation in Governance:

As per FIBAA's follow-up report to the 2021 ENQA Agency Review dated 13 October 2023, the SAR stressed that FIBAA is a foundation established under Swiss law by the business associations of Germany, Austria, and Switzerland. Therefore, the Foundation Council is composed solely of representatives from these founding organizations and is responsible for ensuring effective management and financial stability. It is not possible for FIBAA to change the regulations for membership under Swiss law. This was explained to the panel during the 2026 site visit by the President of the Foundation Board.

On the other hand, the FIBAA Accreditation and Certification Committee (F-ACC), which deals with quality assurance matters, including accreditation, evaluation and certification, includes 3 student representatives. All F-ACC representatives are appointed by the FIBAA Foundation Board. There is clear delineation of the roles of the F-ACC and the Foundation Council which, the agency believes ensures meaningful student involvement in its quality assurance processes. This view was reinforced during the site visit.

c) Conflicts of Interest Arising from Consultancy Activities:

The SAR repeats the evidence that was provided for the 2021 External ENQA review by highlighting its approach to complying with the requirements outlined in Annex 2 of the EQAR Policy on the Use and Interpretation of the ESG, i.e. that the FIBAA Foundation Council adopted the Principles for the Separation of Auditing and Consulting in Audit Procedures under the ESG2 on 17 January 2017. This document was provided to the panel as an annex to the SAR and is binding.

To prevent any potential conflict of interest, FIBAA strictly prohibits the simultaneous or immediate sequential provision of consultancy and external quality assurance services for the same institution. The agency communicates on its website that its consulting services are separate from its quality assurance activities and therefore not subject to the ESG: The FIBAA website (https://www.fibaa.org/en/fibaa-consult/) states, *"FIBAA Consult always respects the clear separation between consultancy services and accreditation or certification procedures in order to ensure the impartiality and objectivity in review processes. The consulting services of FIBAA are not in the scope of Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). Here (link) is the corresponding resolution adopted by the FIBAA Foundation Council.*

If we call in experts we ensure their impartiality and instruct them on our code of conduct, confidentiality, privacy and security policy."

During the site visit, the panel confirmed this understanding with both internal and external stakeholders and found no confusion around the matter.

Analysis

a) Strategic plan:

In the FIBAA Strategy 2030, the panel could see clear development and improvement in strategic planning by the agency since its last review in 2021. The panel's understanding of the strategic planning process set out under the evidence above was enhanced and confirmed during the site visit. It was informed that the 23 strategic directions are set and cannot be changed. In line with its stated functions on the FIBAA website, ("the FIBAA Foundation Board…defines and represents the common interests of the founders and decides on the economic and strategic baselines of FIBAA's work") the Foundation Board representative confirmed that the Board receives an annual report updating it on the status of the Strategy and there is a discussion as to how far goals are being met and what challenges may have arisen in terms of meeting goals and objectives.

At the level of agency staff, the panel was informed that there is a bottom-up approach to the development of the strategy: division managers set out their annual goals and the approach they wish to take to achieve these goals; the goals are then agreed in discussion with the management of the agency, presented to the Foundation Board and it is that body that takes the final decision for the annual goals for the following year, thus closing the planning loop. The goals are then added to Asana. According to the staff the panel met during the site visit, the transition to the current leadership was smooth and has clearly impacted on the significant progress made in development of the strategic plan and its implementation and operationalisation.

Having seen a demonstration of Asana, the panel understands how all staff could refer to both strategic and operational goals easily as part of the project planning for their day-to-day work. Indeed, the panel was informed of ongoing improvements in terms of actioning and monitoring strategic goals and objectives as staff, having received training, continue to improve on inputting the relevant data to the organised portfolios for each project. Managers can see an overview of progress, as well as the workload of employees through these portfolios. The leadership of the agency described Asana as, "bringing together the strategic and the operational layers" and stressed that the work to improve Asana's function and the data inputting is ongoing.

The panel concurs with the agency that the strategic planning process that has now been implemented and the development of the FIBAA Strategy 2030 is much improved and appreciated the efforts made in this regard. It also noted the digitisation, digitalisation and digital transformation of the agency with clear benefits engendered by the successful implementation of tools such as Asana, JACOP® and Viflow. These have positively impacted on the strategic and operational management and day to day work of FIBAA and its staff.

However, the panel noted that what are referred to as 'strategic goals' by FIBAA could be more accurately described as aims - at the moment the goals are not supported by SMART objectives, i.e. goals should be specific, measurable, attainable, relevant and time-bound. It also noted that, whilst there is a clear reporting line regarding the monitoring of the Strategy to the Foundation Board, nonetheless, the agency does not have any kind of expert advice on its strategic planning function. The panel is of the view that such an external advisory body could provide FIBAA with ongoing support in terms of its future strategic endeavours and goal setting and could also incorporate important external stakeholders (such as international colleagues and students) to assist the agency in what are key strategic areas of development.

b) Student representation in governance:

In line with the information that it received in advance of the site visit, the panel was able to confirm that students are now represented on the F-ACC. It met with two of the three student representatives from that body who elaborated on their involvement in the committee. Both students believe that their views are listened to, that their contributions are valued and that they are treated equally with other members of the F-ACC. The students who met with the panel confirmed that they had been involved in the development of various processes and policies such as the Appeals and Complaints process and that they take on the same workload in terms of intensive reading in preparation for F-ACC meetings.

However, as previously stated, Swiss law requires that only representatives of the founding bodies of FIBAA are entitled to sit on the Foundation Board. The panel understands the legal position but is of the view that this could be mitigated. For example, an invitation to attend the Foundation Board meeting as observers when there are matters under discussion that are pertinent to students is one possibility. Otherwise, a potential link between the recommendation around a strategic external advisory body, as mentioned above, with student representation might present opportunities for students to participate in the annual reporting on the FIBAA Strategy 2030 to the Foundation Board.

In addition, the panel heard several comments that indicated that there is still some work to be done with some stakeholders in terms of fostering a culture of appreciation of student involvement in the work of the agency. These comments were specifically in regard to a belief that, whilst students could be involved in operational matters, their input would not be of value in strategic matters. The panel suggests that FIBAA looks at other external quality assurance agencies to see how they involve students positively and beneficially at all levels of governance and takes steps to strengthen understanding of the value of student involvement across all stakeholders.

c) Conflicts of interest arising from consultancy services:

As previously stated, during the site visit, the panel confirmed the understanding of the clear separation of consultancy initiatives from the core work of the agency with both internal and external stakeholders and found no confusion around the matter. Both internal staff and external stakeholders knew about and understood the binding nature of the *'Principles for the Separation of Auditing and Consulting in Audit Procedures*' (2017) and were aware of the statement on the website on conflict of interest and impartiality.

During the site visit, the panel clarified that all staff can carry out both accreditation procedures *and* consultancy activities but not at the same institution. Although the consultancy work was described at the site visit as "niche", the panel is of the view that, although, in practice, there is a clear separation in terms of the operation of accreditation and consultancy services. Nonetheless FIBAA could further strengthen this separation by creating a separate legal division under FIBAA specifically for consultancy activities to improve the clarity of the provision of different kinds of services. This is also an international practice that Quality assurance certification/accreditation agencies, e.g. for ISO, don't

offer consultancy. The international standard that governs certification bodies (CB) ISO/IEC 17021-1 explicitly addresses this issue: The standard requires certification bodies to be impartial and independent.

Panel commendations

The panel commends FIBAA for:

1. The significant amount of work undertaken since 2021 to successfully develop and implement the FIBAA Strategy 2030;
2. The smooth transition of senior management to the positions of joint Managing Directors and the positive impact that this has had on the agency's activities;
3. The digitisation, digitalisation and digital transformation that is embedded in Asana, JACOP® and Viflow.

Panel suggestions for further improvement

The panel suggests that:

1. FIBAA considers including a strategic advisory body as part of its governance structure and finds a means of inviting students to the meetings of the Foundation Board.
2. FIBAA carries out some research into how other EQAAs involve students in their governance structure and takes steps to strengthen understanding of the value of student involvement across all stakeholders.
3. FIBAA considers the establishment of a separate legal division under FIBAA specifically for consultancy activities.

Panel conclusion: compliant

ESG 3.4 THEMATIC ANALYSIS

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

2021 review recommendation

- The agency should continue to increase the number of analytical publications in the future and also cover fields of activity beyond programme and system accreditation.

In addition, the conclusion from the last EQAR Register Committee decision for renewal of inclusion on the Register states, "Considering the limited work in producing thematic analysis, the Committee concurs with the panel's conclusion that FIBAA complies only partially with ESG 3.4."

Evidence

The FIBAA SAR acknowledges that, over the last 30 years, it has gathered information and experience through the multiple accreditation and certification procedures that it has carried out and that this information is valuable for the higher education sector and quality assurance community.

In the FIBAA Strategy 2030, thematic analyses now fall under FIBAA's Strategic Goal 5: Reputation, which aims to strengthen FIBAA's profile as a trusted quality assurance agency in academia and

industry. Following the 2021 review recommendation, FIBAA conducted an internal management review in 2025 to evaluate its current procedures and outcomes relating to thematic analysis. Drawing on ENQA's Occasional Paper 28 on Thematic Analysis, it benchmarked its approach against European standards and best practices following which several improvements were introduced:

- Integration into FIBAA Strategy: A dedicated measure was added under Goal 5, to enable structured planning, execution, and monitoring of thematic analyses.
- Quality Assurance Policy: The new QA Policy (launched in 2025) includes a dedicated section outlining objectives, decision-making processes, resource planning, implementation, dissemination, and follow-up activities related to thematic analyses.
- Clear Responsibilities and Resourcing: responsibility for thematic analyses is assigned to the division managers in National Accreditation, International Accreditation, and Certification. Topic-specific working groups may also be formed.
- Project Management in Asana: An annual Asana project portfolio was established to manage each analysis from planning through dissemination and follow-up.
- Internal Training: A dedicated training session was held to inform all division managers of the new procedures.

All thematic analyses are published on the FIBAA website under Publications & Thematic Analyses. (https://www.fibaa.org/en/home/knowledge-hub/#c9088)

FIBAA conducts several types of thematic analyses. The first type is based on quality assurance reports; the SAR highlighted an example of this in the Policy Brief for the Committee for Quality Assurance in Science and Higher Education in Kazakhstan, which provides an analysis of recommendations derived from accreditation procedures in the country.

The second type of thematic analysis focuses on specific topics of relevance to the higher education sector. Again, the SAR provided an example in the study Transforming Higher Education – Quality Assurance for Digital Education and Micro-Credentials, which was presented at the DGWF Annual Conference 2024 (German Association for University Continuing and Distance Education).

Further dissemination activities include targeted publications via FIBAA's social media channels, newsletters, and thematic workshops or seminars. Depending on the topic, findings may also be shared through presentations or papers at relevant industry conferences and events.

As a result of this systematic approach, each of three product-related divisions will publish at least two thematic analyses per year. Since the introduction of its new strategic approach in 2025, FIBAA believes that it has increased both the quality and quantity of its thematic analyses and that thematic analysis has been elevated to a strategic priority for the Management Team and division heads.

Analysis

The panel discussed the topic of thematic analyses at several meetings during the site visit, including with staff and also external stakeholders such as institutional representatives that had experience of undertaking a FIBAA accreditation process. It was clear that progress has been made in this area and staff were able to corroborate the SAR's claim that a review of FIBAA's recent approach had been undertaken, changes made to the process and that staff had availed of both a workshop on the topic during which they exchanged practice with other EQAAs. The ENQA report on Thematic Analysis (https://www.enqa.eu/wp-content/uploads/ESG-2015-ENQA-Thematic-Analysis-final.pdf) had also been studied to find further examples of good practice. As a result, staff who spoke to the panel felt well-prepared to carry out work in this area.

In addition, the panel saw evidence through the development of the FIBAA Strategy 2030 and Asana, that the work on thematic analyses is now part of the strategic planning of the agency, with a bottom up approach to suggesting topics, decisions taken on the topics that will add most value and those areas chosen being added to Asana and monitored in the same way as other projects and workload. Thematic analysis is now a heading in the FIBAA Quality Assurance Policy. It was clear to the panel from what it read and the information it was provided with at the site visit, that thematic analysis is now an integrated part of the agency's work and that there is an interest in and willingness to carry forward the work. Indeed, data is already being collected for one of the next topics which is around FIBAA's work in Vietnam and there is discussion around a particular topic that will be of interest to the German higher education sector, the Examination Concept which deals with how decisions will be made by the GAC and which will impact on how the agency conducts its national procedures.

However, the panel had several reservations about the number and nature of reports produced so far. At the time of the receipt of the SAR, only two reports had been produced and the panel noted that one of these was, in fact, destined for the attention of an internal committee rather than being commissioned as a thematic report for the benefit of the higher education sector. This does not mean that it lacks value for the sector but given that only two reports had been produced (three by the time of the site visit), and one of these was directed primarily at a different audience, in the view of the panel, more effort will need to be made to ensure that the target of at least two thematic analyses per year is met.

In addition, the panel found it somewhat difficult to locate the thematic analyses on the FIBAA website. It is also difficult to see how those publications under the heading of Thematic Analysis differ from those under the heading of Publications. For example, the three reports currently listed under Thematic Analysis are:

- Using AI for quality assurance processes in higher education – opportunities and perceptions in transformation. Mehreen Irfan Ali. Master Thesis based on a qualitative case study was conducted at the accreditation agency FIBAA. March 2026
- Transforming Higher Education – Quality Assurance for Digital Education and Micro-Credentials, DGWF Annual Conference 2024 (German Association for University Continuing and Distance Education)
- Policy Brief for Committee for Quality Assurance in Science and Higher Education (Kazakhstan) (October 2024)

The first two of these are based on a case study and a conference paper. This does not differ significantly from the reports grouped under the heading of 'Publications.' The target audience of the third report is the Committee for Quality Assurance in Science and Higher Education in Kazakhstan by answering 11 questions sent by the Committee on 28 August 2024. Those representatives from institutions, including representatives from Kazakhstan, that spoke to the panel were not aware of the thematic analysis reports, saying that they were aware of procedural information on the website.

The panel is therefore of the view that FIBAA should increase its efforts to facilitate understanding and application of the concept of thematic analysis, bearing in mind that the standard requires agencies to describe and analyse general findings from their external quality assurance activities.

It should, therefore, a) reconsider what constitutes a thematic analysis, and b) ensure that the work on thematic analysis is visible on the website.

Panel recommendation

The panel recommends that:

1. FIBAA clarifies the focus of a thematic analysis to ensure that it meets the exact requirements of standard 3.4 and that the resulting reports are visible on the agency's website and disseminated to stakeholders.

Panel suggestion

The panel suggests that:

4. FIBAA further adds to the clarity of its website by ensuring that all documentation is clearly indicated in separate sections (Thematic Reports and other Publications) and easily located (see also ESG 2.7).

Panel conclusion: partially compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

In line with the ToR for the 2026 review of FIBAA, this section of the report is structured as follows:

The first section will discuss ESG 2.1-2.7 in relation to FIBAA's new activity since 2021, i.e. the European Approach for Quality Assurance of Joint Programme (the European Approach).

The second section will discuss other items in the ToR as follows:

Standard 2.1: general commentary on this standard across all FIBAA's activities that are in the scope of the ESG.

Standard 2.1: specific discussion on whether all the standards of Part 1of the ESG are effectively covered in the updated procedures for a) Programme Accreditation outside the competence area of the GAC and b) the FIBAA Quality Seal for Certified Continuing Education Courses/Micro-credentials (substantial change).

NB: in relation to the mapping grids for ESG 2.1, a separate mapping grid is provided for the discussion of the European Approach for Quality Assurance of Joint Programmes. This mapping grid is included in the body of the report for that discussion.

A generic mapping grid for all activities has been included at annex 2. This includes the mapping for a) Programme Accreditation outside the competence area of the GAC and b) the FIBAA Quality Seal for Certified Continuing Education Courses/Micro-credentials.

Standard 2.2 will discuss whether stakeholders were consulted appropriately and whether methodologies are fit for purpose in the updated procedures for a) Programme Accreditation outside the competence area of the GAC and b) the FIBAA Quality Seal for Certified Continuing Education Courses/Micro-credentials (substantial change).

Standard 2.4 will discuss firstly, whether the panel experts receive appropriate training on the updated procedures for a) Programme Accreditation outside the competence area of the GAC and b) the FIBAA Quality Seal for Certified Continuing Education Courses/Micro-credentials (substantial change) and secondly, changes to the provision of mandatory training for experts, unequal preparation of the English-speaking experts and the limited involvement of international experts in FIBAA's expert pool (partial compliance in 2021 in relation to all of FIBAA's EQA activities).

Standard 2.6 will discuss the redaction of reports prior to their publication on FIBAA's website (EQAR request).

Standard 2.7 will discuss the scope and nature of the appeals procedure (partial compliance in 2021 in relation to all FIBAA's EQA activities).

NB: In the case of standards 2.3 and 2.5, compliance has been transferred from the 2021 review. In the case of ESG 2.3, the panel comments on FIBAA's interpretation of follow-up, which has not changed in the intervening time, in the Additional Observations section of this report.

1. The European Approach for Quality Assurance of Joint Programmes

ESG 2.1 Consideration of internal quality assurance

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

Evidence

FIBAA has offered external quality assurance of joint programmes in accordance with the European Approach for Quality Assurance of Joint Programmes (the European Approach) since August 2024. To date it has completed three processes which have resulted in two reports. The SAR stresses that FIBAA's approach and procedure are in line with the process adopted by the Ministers of the European Higher Education Area (EHEA) in May 2015 as part of the Yerevan Communiqué. FIBAA adheres to the definition of a joint programme as set out in the European Approach; i.e. that it is "an integrated curriculum offered jointly by HEIs from EHEA countries" and such programmes lead to either double/multiple degrees or a joint degree. The joint degree is a single qualification awarded collaboratively by the partner institutions.

FIBAA's Assessment Guide for the European Approach for Quality Assurance of Joint Programmes was published in August 2024. A mapping grid in reference to the ESG Part 1 was provided as Annex 5 to the SAR. FIBAA states that it carries out reviews of joint programmes strictly as defined in the European Approach, using both the assessment criteria (standards) and evaluation procedure agreed upon in 2014 by the EHEA ministers.

The panel's analysis of the FIBAA mapping grid against part 1 of the ESG for the European Approach is presented in the table below:

ESG	**European Approach**	**FIBAA Assessment guide analysis**	**Panel Comments**
1.1 Policy for quality assurance Institutions should have a policy for quality assurance that is made public and forms part of their strategic management. Internal stakeholders should develop and implement this policy through appropriate structures and processes, while involving external	9. Quality Assurance	9.1 Quality Assurance in terms of Contents, Processes and Results	Standard 9 on quality assurance has been divided into two criteria "quality assurance in terms of contents, processes and results" and "stakeholder involvement"

ESG	European Approach	FIBAA Assessment guide analysis	Panel Comments
stakeholders.		9.2 Stakeholder involvement	This is problematic given that the European Approach must be applied as it is, without any additional criteria.
1.2 Design and approval of programmes Institutions *should have processes for the design and approval of their programmes.* The programmes should be designed so that they meet the objectives set for them, including the intended learning outcomes. The qualification resulting from a programme should be clearly specified and communicated, and refer to the correct level of the national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the European Higher Education Area.	2. Learning outcomes 1. Study programmes	1. Eligibility 1.1 Status 1.2 Joint design and delivery 1.4 Added value 2. Learning outcomes 3. Study programme 5. Learning, teaching and assessment	Aligned with the ESG and the European Approach.
1.3 Student-centred learning, teaching **and assessment** Institutions should ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach.	5. Learning, teaching and assessment	2. Learning outcomes 3. Study programme 3.1 Curriculum 3.2 Credits 3.3. Workload 5 Teaching, learning and assessment 5.1 Learning and teaching 5.2 Assessment of students 6. Student support and	Aligned with the ESG and the European Approach.

ESG	European Approach	FIBAA Assessment guide analysis	Panel Comments
		services 9. Quality assurance	
1.4 Student admission, progression, **recognition and certification** Institutions should consistently apply pre-defined and published regulations covering all phases of the student "life cycle", e.g. student admission, progression, recognition and certification.	4. Admission and recognition	4. Admission and recognition 4.1 Admission conditions and procedures 4.2 Recognition	Standard 4 "admission and recognition" is supposed to be divided into two criteria (4.1 Admission & 4.2 Recognition") but FIBAA renamed 4.1 "Admission, conditions and procedures"
1.5 Teaching staff Institutions should assure themselves of the competence of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff.	7. Resources	1.2 Joint design and delivery 7. Resources 7.1. Staff	Aligned with the ESG and the European Approach.
1.**6 Learning resources and student** Support Institutions should have appropriate funding for learning and teaching activities and ensure that adequate and readily accessible learning resources and student support are provided.	6. Student support 7. Ressources	6. Student support and services 7. Resources 7.1 Staff 7.2 Facilities	Standard 6 of the European Approach, "student support" has been renamed "student support and services"
1.7 Information management Institutions should ensure that they collect, analyse and use relevant	9. Quality Assurance	1. Eligibility 1.1 Status 1.2 Joint design	Aligned with the ESG and the European Approach.

ESG	European Approach	FIBAA Assessment guide analysis	Panel Comments
information for the effective management of their programmes and other activities.		and delivery 1.4 Added value 2. Learning outcomes 3. Study programme 5. Learning, teaching and assessment 8. Transparency and documentation 9.2 Stakeholder involvement	
1.8 Public information Institutions should publish information about their activities, including programmes, which is clear, accurate, objective, up-to-date and readily accessible.	8. Transparency and documentation	8. Transparency and documentation	Aligned with the ESG and the European Approach.
1.9 **On-going monitoring and periodic** **review of programmes** Institutions should monitor and periodically review their programmes to ensure that they achieve the objectives set for them and respond to the needs of students and society. These reviews should lead to continuous improvement of the programme. Any action planned or taken as a result should be communicated to all those concerned.	9. Quality Assurance	9.1 Quality Assurance in terms of Contents, Processes and Results 9.2 Stakeholder involvement	Standard 9 on quality assurance has been divided into two criteria "quality assurance in terms of contents, processes and results" and "stakeholder involvement" This is problematic given that the European Approach must be applied as it is, without any additional criteria.

ESG	European Approach	FIBAA Assessment guide analysis	Panel Comments
1.10 Cyclical external quality assurance Institutions should undergo external quality assurance in line with the ESG on a cyclical basis.	Section C of the European Approach (subsection 9. Periodicity)	9.2 Stakeholder involvement (Subsection 9. Periodicity, p.28)	Aligned with the ESG and the European Approach.

In addition, Standard 1 of the European Approach on Eligibility is supposed to have only three criteria. FIBAA has added a fourth one "added value". This is problematic given that the European Approach must be applied as it is set out, without any additional criteria. When asked about these additions during the site visit, FIBAA answered that it was to seek better alignment with their other assessment guides.

Analysis

The evidence seen by the panel demonstrated that FIBAA's consideration of internal quality assurance (IQA) within the European Approach is aligned with the spirit of the ESG, nevertheless, it has added criteria to the ones that were agreed with by the EHEA ministers. They therefore go beyond what EHEA ministers approved in the Yerevan Communiqué in 2015 which stated that all agencies were required to apply the same standards and methodology to facilitate implementation of a single procedure that would be recognised in all countries: "The present European Approach for Quality Assurance of Joint Programmes has been developed to ease external quality assurance of these programmes. In particular, it will dismantle an important obstacle to the development of joint programmes by setting standards for these programmes that are based on the agreed tools of the EHEA, without applying additional national criteria" (European Approach, p.1)".

At the site visit, FIBAA management and staff explained that they had added the extra criteria to align the Assessment Guide more closely to FIBAA's own approach to ESG 2.1 in its other Assessment Guides. The panel also spoke to representatives from the GAC who confirmed that there is no national requirement for any additional criteria in the case of this particular process.

Although, in general, FIBAA complies with ESG 2.1, it is not in complete alignment with the European Approach. The panel believes that additional criteria may hinder the smooth implementation and recognition of the procedure in different EHEA countries and recommends that, in order to fully comply with standard 2.1 in this process, FIBAA must apply the standards for the European Approach as they are described in the procedure agreed by the EHEA ministers in 2015, without adding additional criteria in the Assessment Guide (See also 2.3).

Panel recommendation

The panel recommends that:

2. FIBAA should apply the standards of the European Approach as they are described in the procedure agreed by the EHEA ministers in 2015, without adding additional criteria in the Assessment Guide.

Panel conclusion: compliant (for the European Approach for Quality Assurance of Joint Programmes as a new activity)

ESG 2.2 Designing methodologies fit for purpose

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

Evidence

The panel was provided with the FIBAA Assessment Guide for the European Approach. The Guide has been published on the agency's website and covers all the standards and procedures of the European Approach. It is supplemented with the additional standards as mentioned in ESG 2.1 and with guiding questions. FIBAA also added specific information to be taken into account in four EHEA countries (Cyprus, France, Germany and Italy), with the hope of facilitating the implementation of the European Approach and making it fit for purpose in these countries. Nonetheless, as stated previously, the panel's meeting with the GAC clarified that no additional national criteria are needed to comply with German law.

The first version of the Assessment Guide was presented to all the project managers in an internal workshop organised in July 2025 and the feedback they provided was used to update it. However, the panel did not find evidence that external stakeholders have been consulted to design or update the Assessment Guide for the European Approach.

Analysis

The review panel found the guiding questions in the Assessment Guide for the European Approach that are intended to support the self-assessment process for HEIs to be very relevant and to further ensure the fitness for purpose of the procedure. However, the country information provided is not always accurate and should be checked with national agencies and/or ministries. For example, it is said that in Italy, "the European Approach is not available to higher education institutions", which contradicts the information provided on national implementation of the European Approach by EQAR (https://www.eqar.eu/kb/joint-programmes/national-implementation/). As for France, standards 1 and 2 of FIBAA's Assessment Guide requires that "when a French partner institution is involved, the following standards must be considered and evaluated additionally: Research-based training and Preparation for professional integration". This is only the case for very specific types of diploma and does not apply to the vast majority of programmes.

Given that the European Approach stipulates that no additional national criteria should be checked, the panel recommends FIBAA to be careful with making such a country list and potential requirements public, especially if the additional criteria have not been officially checked with national authorities and if only a handful of countries are mentioned. Additionally, FIBAA could clarify the outcomes of the procedure, particularly with regard to its links with the other national accreditation bodies involved in the consortium delivering the joint programme, which can officially recognise FIBAA's accreditation decisions based on its external evaluation reports.

As the European Approach for Quality Assurance of Joint Programmes comprises an agreed set of standards and procedures at the EHEA level, FIBAA's scope for designing the methodology is limited to clearly presenting information relating to the European Approach and how FIBAA implements the agreed procedure in the Assessment Guide. However, when designing the Guide, FIBAA did not

consult external stakeholders such as peer review experts, consortia running joint programmes and other EHEA EQA agencies.

Panel commendation

The panel commends FIBAA for:

4. Its proactivity in seeking to benefit and learn from events such as the conference: *A Decade of the European Approach – Reflections and Future Directions.*

Panel recommendations

The panel recommends that:

3. FIBAA consults its external stakeholders when updating the Assessment Guide for the European Approach for Quality Assurance of Joint Programmes.

Panel suggestion for further improvement

The panel suggests that:

5. FIBAA reaches out to the agencies of the countries involved in the joint programmes at the beginning of the procedure to inform them and enquire about the accreditation process in their country.

Panel conclusion: compliant (for the European Approach for Quality Assurance of Joint Programmes as a new activity)

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

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

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

Evidence

FIBAA's first request to coordinate and implement a European Approach procedure was in 2024. The SAR briefly described the procedure undertaken and the panel was provided with the FIBAA Assessment Guide for the European Approach which provides detailed information. The Guide is published online and details the way FIBAA coordinates the procedure. It also provides a template for the self-assessment report that the consortium should submit. The external assessment includes either an on-site or online visit by the expert panel to meet the stakeholders of the joint programme. The panel is made up of at least four experts. The experts are then required to contribute to an external assessment report under FIBAA's coordination. The external reports do not include a list of the interviews carried out during the site visit but the Assessment Guide explains that the visit "will include discussions with representatives of all cooperating institutions and in particular the management of the institutions and the programme, the staff, the students, and other relevant stakeholders, such as alumni and the professional field". The consortium running the

joint programme has the opportunity to comment on a draft version of the report and request correction of factual errors, if needed.

As with other international procedures, the European Approach report is sent to the F-ACC. If the report sets conditions for the accreditation of joint programmes, FIBAA applies the same process as for its other external quality assurance procedures. This means that joint programmes have nine months to fulfil the conditions. None of the joint programmes assessed thus far by FIBAA had conditions. If the report only includes recommendations, FIBAA conducts follow-up procedures on a voluntary basis to check the implementation of these recommendations. As the two European Approach procedures were conducted in 2025, it was not possible, at the time of the site visit, to ascertain whether the consortia had requested such a procedure.

Analysis

The panel saw and heard sufficient evidence to confirm that, in relation to the European Approach, FIBAA implements all steps of ESG 2.3 properly. It met with a representative from one of the European Approach procedures who was able to outline the process that their institution had taken and who found the FIBAA staff involved in the process to be helpful and professional in their support. They also found the information on the process to be clear and informative.

However, the panel believes that FIBAA could make a stronger link to ESG 2.3 which requires agencies to have "reliable procedures". As already stated in the section above on 2.1, the panel believes that additional criteria may hinder the smooth implementation and recognition of the procedure in different EHEA countries. When it comes to the European Approach, it is not only the ESG Part 1 that the agency should comply with, but also section B of the European Approach for Joint Programmes. By definition, the European Approach is compliant with ESG Part 1 but for the procedure to be implemented according to the text approved by the EHEA ministers, all standards of section B must be applied as such, without any additions as this could create issues of recognition in other countries which is not in the spirit of the European Approach.

As regards the follow-up, the European Approach says, "The agency should agree with the cooperating institutions a follow-up procedure to assess the fulfilment of conditions – if applicable – and/or to evaluate the follow-up actions on recommendations – if applicable" (p.6). FIBAA clearly informs the joint programmes in advance of the mandatory follow-up if conditions are set and of the voluntary follow-up process for joint programmes that only have recommendations. This was confirmed with the higher education institutions met during the on-site visit.

While the agency has published a dedicated Assessment Guide for the European Approach on its website, the panel believes that, for completeness, details of the follow-up procedure should also be included in that document to ensure clarity, transparency and to incentivise joint programmes to undertake the process even if voluntary. The Guide could also usefully clarify the timeline and format of the follow-up report, as well the role of the experts in the procedure.

In addition, the panel believes that a list of the interviews conducted during the on-site or online visit could be included in the assessment report to make the procedure clearer and more transparent. Such a list does not need to include the names of the persons met - only their position and the institution/organisation they represent.

Panel recommendation

The panel recommends that:

4. FIBAA clarifies the timeline and format of the follow-up procedures related to the European Approach for Quality Assurance of Joint Programmes and makes them public.

Panel suggestions for further improvement

The panel suggests that:

6. FIBAA includes a list of the interviews conducted during the on-site or online visit for European Approach procedures in order to make the process clearer and more transparent.

Panel conclusion: Partially compliant (for the European Approach for Quality Assurance of Joint Programmes as a new activity)

ESG 2.4 PEER-REVIEW EXPERTS

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

Evidence

The dedicated Assessment Guide for the European Approach sets out information about the recruitment of experts for the process and states that FIBAA tries to, "...combine expertise in the relevant subject(s) or discipline(s), including:

- Experts with prominent subject-/discipline-specific expertise;
- Expert(s) with experience in quality assurance in higher education;
- Expert(s) with international experience/expertise;
- Experts with knowledge of at least some of the countries in which the joint programme is offered.

[...] The panel should include members from at least two countries involved in the consortium providing the programme. The panel should include at least one student."

Both of the European Approach procedures conducted by FIBAA to date have included a student. In addition, one of the two procedures carried out included an international expert (from Lebanon) with whom the panel met during the site visit.

The panel for the external assessment of the joint programme is composed by FIBAA's Expert Manager, whose specific role is to manage the composition of the agency's panels for all its external quality assurance procedures. She carries out this work after discussion with the project manager in charge of the procedure and validation by the Division Manager for International Accreditation Procedures (in the case of the European Approach). In addition, FIBAA's Expert Committee, which is an independent body, checks that the panel is relevant for the procedure and that there is no conflict of interest.

As explained in the SAR, as FIBAA continues to expand its international work, English has become the primary language for communication and training materials. Training sessions are conducted online to enable experts from diverse countries to participate. In addition to the generic training sessions, FIBAA's experts participating in a European Approach are prepared for this specific type of review through a mandatory preliminary meeting at which the methodology and standards of the European Approach are explained.

Analysis

The peer experts who met with the panel included two people who had participated in a European Approach procedure. They confirmed that their selection process was thorough and involved sending a CV with a covering letter stating suitability for the role and their envisaged contribution to the process. The selection process involves multiple staff at FIBAA, including the Expert Committee, an independent body, which ensures that there is no conflict of interest. The FIBAA staff who met with the panel during the site visit confirmed that the Expert Committee's role is one of providing assurance; it is not active in forming the expert panels, instead focusing on judging their suitability in relation to conflicts of interest. It therefore does not delay the appointment process.

The panel met with FIBAA's Expert Manager during the site visit and believes that her focused management of the process of forming experts panels following their selection and recruitment provides FIBAA with a secure base on which to build the external peer review aspect of its procedures, including the European Approach. The focus ensures that the panels meet expectations and also, in the case of any expert needing to drop out, a knowledgeable base from which to act quickly to find a replacement.

As mentioned in its Assessment Guide, FIBAA includes a student expert in its European Approach procedures, as well as experts coming from at least two countries represented in the joint programme. However, the panel noted that the Assessment Guide does not mention the participation of a labour-market expert. While this did not prevent FIBAA from recruiting such experts for the three European Approach procedures it carried out, it would be good practice to mention their participation in the Assessment Guide for the sake of transparency and consistency.

The experts confirmed that the use of English and the online format of the training sessions had encouraged them to participate in training on the European Approach procedure which requires experts from at least two countries involved in the consortium delivering the joint programme to participate. They found the training provided to be clear and helpful in preparing them for their role and also appreciated the mandatory briefing that set out the expectations and detail of the European Approach procedure.

The experts that the panel met during the site visit also corroborated the view of many of the other stakeholders that the FIBAA staff with whom they worked were serious, professional, knowledgeable and helpful in the support of the expert panel and of institutions. They believe that the procedures they undertook were well-organised and beneficial to both the expert panel and the programmes involved.

Panel commendations

The panel commends FIBAA for:

5. The role of Experts Manager in ensuring a focused and knowledgeable resource from which to select and recruit experts and to form appropriate expert panels.
6. The high stakeholder satisfaction in relation to the supportive approach that FIBAA staff offer to expert panels and their help in ensuring smooth and professionally managed procedures.

Panel suggestion for further improvement

The panel suggests that:

7. FIBAA revises its Assessment Guide for European Approach procedures to mention the participation of labour-market experts, as required by the European Approach methodology. This would reinforce the transparency of the procedure for the evaluated joint programmes and would ensure that all procedures are implemented in a consistent manner.

Panel conclusion: compliant (for the European Approach for Quality Assurance of Joint Programmes as a new activity)

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

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

Evidence

FIBAA's Assessment Guide for the European Approach for Quality Assurance of Joint Programmes is published on the agency's website and sets out the criteria for outcomes for the procedure. In the introduction, FIBAA explains that it "carries out accreditation for joint programmes ". The guide includes a "quality profile" section which describes the three quality levels ('Excellent', 'Meets the standard', 'Fails to meet the standard') applied to assess the joint programme and to determine its formal outcome. In July 2025, FIBAA's Division for International Accreditation Procedures and Division for National Accreditation Procedures jointly organised a workshop to present the Assessment Guide for the European Approach to its project managers to ensure that they apply the criteria consistently. However, given that FIBAA has conducted a limited number of European Approach procedures, only two staff members have coordinated such a procedure so far.

The role of the F-ACC has not changed since the previous ENQA review report on the agency in 2021 (https://www.enqa.eu/wp-content/uploads/FIBAA-external-review-report.pdf p. 8, 23 & 38-41). Its role in the European Approach procedures is not described in the Assessment Guide but the vice-president of the F-ACC that the review panel met during the on-site visit confirmed that the committee has received clear guidelines on what the European Approach is, how it should be implemented and F-ACC's decision-making role in relation to its outcomes. In line with the other external quality assurance procedures carried out by FIBAA, the F-ACC is responsible for ensuring the consistency of the decisions made as it reviews all European Approach reports.

Analysis

The panel was able to verify through the evidence that it received (including reports) and discussions during the site visit that the criteria and the three "quality levels" leading to a formal outcome following a European Approach procedure are made public and have been applied consistently in the three reviews of joint programmes carried out by the agency to date. The evidence points to clear dissemination of information to staff, F-ACC and to institutions undergoing the procedure, as was confirmed by institutional representatives during the site visit.

However, in the view of the panel and as further detailed in ESG 2.6, the form that the outcome takes needs to be clarified: FIBAA cannot grant a joint programme accreditation that immediately applies to all countries involved in that programme. FIBAA's formal outcome should be an external review report of a joint programme and an "accreditation proposal" (or equivalent) that should be sent to all countries represented in the joint programme so that national authorities officially recognise the accreditation. The role of the F-ACC should also be described clearly in the Assessment Guide to ensure transparency of the procedure and make sure it is clearly understood by all stakeholders.

Although FIBAA complies with ESG 2.5 in its other activities, it does not fully align in relation to the European Approach.

Panel suggestion for further improvement

The panel suggests that:

8. FIBAA clarifies the role of the F-ACC in decisions related to the European Approach for Quality Assurance of Joint Programmes in the Assessment Guide and to rename its official outcome "accreditation proposal". This document should be sent to the national authorities of the countries represented in the joint programme.

Panel conclusion: compliant (only for the European Approach for Quality Assurance of Joint Programmes as a new activity)

ESG 2.6 REPORTING

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

Evidence

As context, both the standards and procedure of the European Approach have been approved by the EHEA ministers in 2015 and should be applied consistently by all agencies.

The reports following the two European Approach procedures are publicly accessible on FIBAA's website. One of the reports contains an evaluation of two distinct joint programmes coordinated by the same higher education institution based in Austria. The other is a report on a single joint programme. The review panel therefore believes that FIBAA has coordinated three European Approach procedures. In particular, these three procedures were *ex ante* assessment and led to "concept accreditations". This was mentioned in the three reports.

The reports provide context for the review, including a short description of all the higher education institutions involved in the joint programme. They also briefly present the procedure and the experts who carried it out before presenting the key outputs of the review in a summary, including the recommendations for the joint programmes. The reports then analyse each standard relying on evidence and formulating recommendations or appraising the joint programme for its good practice. Each standard is assessed according to a three-level scale ('Excellent", 'Meets the standard', 'Fails to meet the standard'). A synthesis table giving an overview of the quality profile of the joint programme for each standard is included at the beginning of the report.

Analysis

The reports for European Approach procedures are published on FIBAA's website and accessible, which contributes to the alignment with standards 2.6. However, the formal decisions stemming from these reports are not clear. First and as a reminder, both the standards and procedure of the European Approach have been approved by the EHEA ministers in 2015. Offering the FIBAA Quality Seal for Programmes is therefore confusing given that the European Approach standards and methodology shall be applied consistently by all agencies. The European Approach is an EHEA

procedure, not a FIBAA one and should therefore not lead to a FIBAA Quality Seal. Second, FIBAA may not have the power to accredit the joint programmes in all countries as accreditation decisions or official recognition often remains the power of national authorities of the countries involved in the consortium. The European Approach states that "Dependent on the national legal framework, the external quality assurance decision should come into force or be recognised in all countries where the programme is offered, as agreed in the Bucharest Communiqué" (p.2). The "decision of the FIBAA Accreditation and Certification Committee" should rather be an "accreditation proposal" that is sent to all national authorities in charge of accreditation in the countries involved in the consortium.

Given that one of the reports contains an evaluation of two distinct joint programmes coordinated by the same higher education institution, for better clarity, the panel would recommend FIBAA to write one report per joint programme, rather than merging two reviews into a single report, even when it is the same coordinating institution. This would also facilitate reporting on DEQAR.

Finally, in the SAR, FIBAA claims that the reports are published on EQAR's Database of EQA Results (DEQAR) but the panel is not able to verify this. The European Approach for Quality Assurance of Joint Programmes does not appear under the list of "Activities within the scope of the ESG" conducted by FIBAA. The panel understands that, for a new activity to appear on DEQAR, agencies must submit a "substantive change report" that is then reviewed by the EQAR Register Committee.

The review panel concludes that the reports published by FIBAA for the European Approach for Quality Assurance of Joint Programmes comply with the principles of standard 2.6.

Panel conclusion: compliant (only for the European Approach for Quality Assurance of Joint Programmes as a new activity)

ESG 2.7 COMPLAINTS AND APPEALS

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

Evidence

Since the previous review in 2021, FIBAA has updated its Appeals and Complaints procedure and published it on its website. The document clearly distinguishes complaints from appeals, the first being applicable to the external quality assurance process while the latter can be lodged against a decision issued by the F-ACC. The higher education institutions that the review panel met during the site visit knew they had the possibility to lodge an appeal, but none had needed to do so. The timeline and contact person for each procedure are detailed in the documented procedure.

The document also explains that it applies only to FIBAA's formal decision and that appeals against decisions taken by the German Accreditation Council, the Austrian or Swiss authorities should be lodged against the relevant national accreditation body of these two countries where FIBAA is authorised to operate. However, nothing is mentioned in relation to the specificities of the European Approach for Quality Assurance of Joint Programmes where decisions can be taken by other national authorities based on FIBAA's external assessment report.

The outcomes of all appeals are made available to F-ACC.

Analysis

The appeals and complaints procedure, that is publicly available on FIBAA's website, is supposed to be applicable to all procedures carried out by the agency. However, the panel noted that it does not fully account for the specificities of the European Approach. Indeed, given that other national authorities take an accreditation decision for the joint programme that is based on FIBAA's assessment report, the appeal on the accreditation decision might, in some cases, be lodged against a foreign national authority rather than against FIBAA. This should be clarified in the appeals and complaints procedure to ensure transparency, clarity and to protect FIBAA in the case that another country does not follow its accreditation proposal.

Panel suggestion

The panel suggests that:

9. The specificities of the European Approach should be taken into account in FIBAA's appeals and complaints procedure in order to better clarify the role of the agency in relation to other national authorities.

Panel conclusion: compliant (only for the European Approach for Quality Assurance of Joint Programmes as a new activity)

2. ADDITIONAL MATTERS FOR EVALUATION FOLLOWING THE TOR

Each topic will be introduced under a clear heading in each standard.

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

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

Evidence

General commentary on ESG 2.1 in relation to FIBAA's activities within the scope of the ESG

In its SAR, FIBAA explained that its Assessment Guides stem from an understanding of quality that was developed in compliance with the ESG; thus, all of the Assessment Guides are explicitly based on Part 1 of the ESG and explicitly reference the ESG in their introductory sections, including direct hyperlinks. In addition, the introductory pages for each process on FIBAA's website provide an overview of the Bologna Process and its key tools. Country-specific Assessment Guides (e.g., for Austria and Switzerland) and the corresponding web pages also include links to relevant national information and regulations.

FIBAA also provided a mapping grid demonstrating how standard 2.1 is translated into its Assessment Guides for its various activities within the scope of the ESG. The mapping grid specifically mapped each Guide against the ten standards in Part 1 of the ESG. This mapping grid is replicated in Annex 2 of this report along with an additional column which provides the reader with the review panel's comments.

Each review panel member was assigned one or two FIBAA procedures and scrutinised that or those Assessment Guide(s) for that or those process(es) against the mapping grid.

NB: specific comments on Programme Accreditation outside the competence area of the GAC and the Certification of Continuing Education/Microcredentials can be found in the following sections.

Analysis

The review panel discussed the process for revising Assessment Guides with FIBAA staff and was told that the usual procedure is to bring together internal and external feedback on the procedures from expert panel members and also HEIs. The agency holds workshops at which criteria and how formal conditions should be set are discussed. The final approval for the revised Assessment Guide is made by the F-ACC. The panel raised the matter of the revision of Assessment Guides with external stakeholders such as experts, institutional representatives, external F-ACC members and employer representatives. Whilst all could confirm that various means were offered to inform them about new Assessment Guides, evidence that any had been involved in their update was limited.

In general, the review panel found broad alignment between the Assessment Guides and the spirit of ESG 2.1. In particular, for those activities leading to accreditation or certification at programme level, the Guides require detailed information on teaching and learning not just of the specific discipline in question but also other aspects of the student learning experience such as assessment, feedback, plagiarism, acquisition of foreign languages and labour market skills and ethics to name some examples. However, specifically under 1.3 the panel found little direct indication that there is an expectation that students are, "...encouraged to take an active role in creating the learning process…"

The panel also found some general gaps in ESG 1.1 (no specific reference to a QA policy); ESG 1.2 (no specific reference to approval of programmes); ESG 1.7 which, in some cases did not refer at all to Information Management and in others did not have any reference to data such as intake, progression and completion; ESG 1.8 (some gaps in requiring published information) and ESG 1.9 (some gaps in mentioning monitoring and periodic review processes specifically).

In relation to ESG 1.10, the review panel had not been able to find specific reference to cyclical external review in the Assessment Guides. However, following discussion with FIBAA staff and management, it was guided to the application forms for the various accreditation procedures which require the applicant to state all previous accreditation procedures undertaken, whether by FIBAA or another entity. In addition, a representative from a university outside Germany told the panel that one of the reasons that his institution had chosen to seek accreditation from FIBAA was that it offered a more cyclical approach to the accreditation process.

FIBAA's claim in its SAR that, "FIBAA further assists HEIs…through clear procedural guidance, additional guidelines and checklists, targeted trainings, and direct support from dedicated project managers" was strongly corroborated during the site visit. It was clear to the panel from its discussions with representatives from both national and international higher education institutions that they highly appreciated the knowledgeable support that they received from FIBAA staff. All were clear about the criteria that were used in the procedure that they undertook, found the website and the Assessment Guides to provide clear information and spoke positively about their experience of the whole process.

ESG 2.1 in relation to Programme Accreditation outside the competence area of the GAC (updated procedures leading to substantial change)

NB: The General Commentary on ESG 2.1 is also relevant in this section.

Evidence

As stated in the SAR, FIBAA's long- and medium-term objectives are embedded in its Strategy 2030, particularly in Goal 2: Accreditation. This goal sets out FIBAA's aim to intensify the expansion of programme accreditations in selected international target markets, leading to a reduction in its involvement in system accreditation, and an aim of ensuring 60% of of its total revenue through programme accreditation.

The panel was provided with the updated Assessment Guides for Programme Accreditation (Bachelor & Masters and Doctoral) outside the competence area of the GAC. It also spoke to FIBAA staff, reviewers and institutional representatives (national and international) that had undergone a programme accreditation.

In the case of both Assessment Guides (for Bachelor & Masters and Doctoral Programmes), updates were designed to cover the impact of recent developments such as the emergence of artificial intelligence as a tool for teaching, assessment, and scientific research, as well as the increasing importance of inclusive, equitable, quality education and lifelong learning opportunities for all (SDG 4, Quality Education).

Analysis

In general, the comments made in the general commentary on ESG 2.1 above apply to the mapping for Programme Accreditation outside the competence area of the GAC.

Although the panel found both Assessment Guides to now include relevant additions which strongly root the evaluation in today's challenges, nonetheless it noted some gaps, particularly in 1.2, 1.3, 1.5, 1.7 and, in the case of the Assessment Guide for Doctoral programmes, 1.8 (see mapping grid at Annex 2 for further detail).

The panel is of the view that some further work to ensure that its Assessment Guides meet the detail of the standards of the ESG, as well as the spirit is necessary.

ESG 2.1 in relation to Certification of Continuing Education/Microcredential Courses (updated procedures leading to substantial change)

NB: The General Commentary on ESG 2.1 is also relevant in this section.

Evidence

According to the SAR, and similar to the statement regarding FIBAA's strategic Goal 2: Accreditation, Goal 3: Certification aims at expanding the Certification product line, with the aim of generating 20% of its total revenue from this area.

The panel was provided with the updated Assessment Guide for the Certification of Continuing Education Courses/Microcredentials and also spoke to FIBAA staff and reviewers who worked with this procedure. It did not meet any institutional representatives that had experience of the certification process. The updated Assessment Guide explains that FIBAA's proximity to the business world and its focus on internationality (where applicable) and employability of graduates, allows it to conduct the certification process competently and transparently as well as supporting "sustainable quality development at HEIs, Continuing Education Institutions and other providers of continuing education".

The updated Assessment Guide provides hyperlinks to the ESG, the ECTS Users' Guide, the European Qualification Framework (EQF) and now, in addition the UN SDG 4. These reference points form the basis of the assessment standards for certification.

Analysis

Overall, the comments made in the general commentary on ESG 2.1 above apply to the mapping for the Certification of Continuing Education Courses/Microcredentials.

Although the panel found the Assessment Guide to be relevant to the evaluation of such courses, nonetheless, it noted some gaps, particularly in 1.3 (lack of student co-creation in the design of the learning process and assessment) and 1.7 (the Assessment Guide leans heavily toward the *publication* of information rather than holistic internal information management. (See mapping grid at Annex 2 for further detail).

The panel is of the view that some further work to ensure that the Assessment Guide meets the detail of the standards of the ESG, as well as the spirit is necessary.

Panel commendations

The panel commends FIBAA for:

7. The knowledge, professionalism and support provided by its staff to those undergoing any of its accreditation procedures and to the reviewers that are involved in the processes.

Panel recommendations

The panel recommends that:

5. FIBAA revisits its Assessment Guides to ensure that they all consistently cover the detail contained in the standards of Part 1of the ESG, particularly in 1.3 (lack of student co-creation in the design of the learning process and assessment) and 1.7 (the Assessment Guide leans heavily toward the publication of information rather than holistic internal information management. FIBAA should also consider the comments made in the general commentary on ESG 2.1.

Panel conclusion: partially compliant

ESG 2.2 Designing methodologies fit for purpose

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

Substantive change: whether stakeholders were consulted appropriately and whether methodologies are fit for purpose in the updated procedures for a) Programme Accreditation outside the competence area of the GAC and b) the FIBAA Quality Seal for Certified Continuing Education Courses/Micro-credentials.

NB: All comments in this section apply equally to a) Programme Accreditation outside the competence area of the GAC and b) the FIBAA Quality Seal for Certified Continuing Education Courses/Micro-credentials.

Evidence

The SAR explains that the review of FIBAA Assessment Guides is a regular, systematic process conducted every three to four years in line with FIBAA's internal quality assurance requirements. With regard to the Assessment Guides for the accreditation of Bachelor's & Master's and Doctoral

programmes, the previous editions were published in November 2022. Rapid developments in the educational landscape — including artificial intelligence, sustainability, and internationalization — highlighted the need for a comprehensive review of the guidelines in 2024-25.

An internal taskforce, composed of the Division Managers for International Accreditation Procedures and three highly experienced Project Managers, was established to initiate the review of the Assessment Guides.

A taskforce including selected members of the F-ACC reviewed the Assessment Guide prior to its publication and FIBAA project managers provided feedback. In a dedicated workshop in September 2024, the project managers contributed to the editing process to help ensure that it was clear and easy to understand. The initial draft of the revised Assessment Guides placed an increased emphasis on employability, future and soft skills, and global career readiness. A workshop held during a staff exchange with representatives of the Kosovan Accreditation Agency provided input from an international perspective.

The revised Assessment Guides were also shared with FIBAA's external experts to ensure transparency and gather further input. The final version was subsequently approved by the F-ACC on November 27, 2024.

In relation to the FIBAA Quality Seal for Certified Continuing Education Courses/Micro-credentials, the SAR explains that the updated Assessment Guide was launched in March 2025. The revised guide expands the assessment criteria to cover the use of artificial intelligence, digital learning platforms, and the integration of principles from the UN SD Goal 4 (inclusive and equitable education). It places greater emphasis on skills-based, modular learning and future-oriented competencies. From now on, microcredentials can be certified under the FIBAA framework as coherent offerings in terms of objectives, target groups, and content.

During the site visit, the panel was informed by FIBAA senior staff that initiation of the revision of the Assessment Guides came from reflection on the latest trends in higher education which they discussed with colleagues from other EQAAs. A strategic decision was taken to ensure that the Guides remained up to date which required a more explicit focus on or introduction of certain topics.

Analysis

The panel spoke to an impressive group of external stakeholders from industry, including Deutsche Bahn, and from student representative bodies. The student representatives reported that they had been involved in the further development of the Appeals and Complaints policy. However, whilst these stakeholders confirmed the existence of various fora through which they are informed of FIBAA's work and at which they can discuss trends, none had been involved in the revision of the Assessment Guides. The panel is of the view that this group could provide valuable input into the revision of Assessment Guides (and, indeed, to the development and revision of procedures in general). The group was supportive of the work of FIBAA, and some representatives had worked with the agency for many years and indicated good will and willingness to be involved further in FIBAA's work.

In addition, whilst the panel was informed by all external stakeholders about the successful mechanisms (including targeted webinars and the website) by which they are informed about the work of FIBAA, including revisions to Assessment Guides, it only spoke to one interviewee, an expert peer reviewer, who had recently been invited to participate the forthcoming revision of an Assessment Guide. All other interviewees informed the panel that, whilst they felt fully informed about the development and revision of the Guides, they had not been involved in or consulted about this work.

However, despite being unable to meet any representatives of stakeholder consultation groups, the panel was informed by FIBAA staff and management that a variety of approaches is taken to consult stakeholders. For example, for the revision of the Assessment Guides for Programme Accreditation of Bachelor's, Master's and Doctoral/PhD Programmes, FIBAA followed a structured, multi-stage consultation process to involve external stakeholders, including a survey of external experts and representatives of higher education institutions to collect feedback and suggestions for improving the Assessment Guides. The results of this survey were incorporated into the initial draft of the revised guides. A dedicated working group comprising external stakeholders was then established to conduct a detailed review of the draft, and its comments and recommendations were taken into account in finalising the revised Assessment Guides.

For the Assessment Guide for the Certification of Continuing Education Courses, this approach was adapted to reflect the specific characteristics of this certification area. Since the number of clients is comparatively small and highly diverse, no survey was conducted, but FIBAA systematically analysed and incorporated feedback collected during certification procedures. In addition, a dedicated external working group reviewed the draft Assessment Guide.

In relation to the matter of stakeholder consultation, the panel noted that the meeting with F-ACC representatives and that with external stakeholders both demonstrated that the two people who spoke most positively about the matter had worked with the agency for around 20 years. Whilst this may or may not be appropriate for a member of a forum related to industry, the panel is of the view that it is not appropriate for a member of F-ACC to have such a lengthy term of membership of the committee. The panel noted that Rules of Procedure for F-ACC are appropriate in this regard although they lack clarity around the possibility of additional terms of service. In the view of the panel, FIBAA could usefully reconsider its Terms of Reference for all committees to clarify such information.

The panel also discussed how the revised Assessment Guides continue to offer institutions an accreditation procedure that is fit for purpose. All institutional interviewees agreed that the revised Guides had led to improved procedures with updated focus on relevant topics. In particular, those representatives from international universities emphasised FIBAA's strong ties with national authorities, thus ensuring that their processes are recognised in each country and appropriately adapted to the local context. The panel was also informed that FIBAA now includes a 'country expert' in its overseas accreditation panels thanks to their partnerships with local agencies and authorities. This is much appreciated by the institutions who believe that this inclusion has a positive impact on the work of the panel.

The panel also noted the appreciation of institutional and peer reviewers in particular of the variety of webinars both targeted and on EQA and IQA in general to which they were invited and which are provided free of charge by FIBAA. The panel sought further information on this initiative, which was mentioned in the SAR, and was informed that this was the role of the FIBAA Quality Lab, "…which serves as a platform for organizing webinars and facilitating the exchange of experiences among HEIs". The intention is to provide support and information to all HEIs on FIBAA's various procedures through webinar with Q&A format. Some of this support might be tailored and offered through the Quality Lab whilst other topics might be dealt with through stand-alone workshops. The panel applies the commendations and recommendations in this section to all of FIBAA's activities.

Panel commendations

The panel commends:

8. The wide range of free webinars and seminars that are available to all stakeholders, including those offered through the FIBAA Quality Lab.

9. The impressive group of enthusiastic external stakeholders from industry and from the student representative bodies who are willing to work with the agency and recognise the importance of recruiting graduates from quality assured programmes.
10. The efforts made by FIBAA in its international procedures to ensure fitness for purpose by working with relevant national agencies and also for including an in-country expert on international expert panels.

Panel recommendation

The panel recommends that:

6. FIBAA reconsiders its approach to not seeking feedback from students on the Assessment Guide for the Certification of Continuing Education Courses. Those taking these courses are, indeed, students, regardless of whether they form part of a "traditional student cohort."

Panel suggestion for further improvement

The panel suggests that:

10. FIBAA ensures that Terms of Reference for all committees are clarified to include information about whether or not more than one term of service is permitted and the rules regarding such terms and that Terms of Reference are then consistently applied.

Panel conclusion: compliant

ESG 2.4 PEER-REVIEW EXPERTS

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

2021 review recommendation

The agency is recommended to require that all experts attend at least some core training which is face-to-face, if possible, before becoming a member of a review panel. This is to ensure that they at least understand the ESG on which FIBAA bases its own criteria, FIBAA's decision-making processes and the relationship between the criteria and FIBAA's review methods.

In addition, the conclusion from the last EQAR Register Committee decision for renewal of inclusion on the Register states, "Considering the above-mentioned shortcomings, the Register Committee cannot follow the panel's conclusion on (substantially) compliant but finds that FIBAA complies only partially with ESG 2.4."

Terms of Reference

2.1 A) ESG 2.4 due to lack of mandatory training for experts, unequal preparation of the English-speaking experts and the limited involvement of international experts in FIBAA's expert pool (partial compliance).

2.1 C) ESG 2.4 regarding whether the panel experts receive appropriate training on the (updated) procedures Programme accreditation outside the competence area of the GAC (to obtain FIBAA's quality seal for programmes) and FIBAA Quality Seal for Certified Continuing Education Courses/Micro-Credentials (substantive change).

NB: the information provided under ESG 2.4 for the new activity (the European Approach) is also relevant here.

All information provided in this section is relevant to the 2021 review recommendation, comments by EQAR and the substantive changes.

Evidence

The SAR states that by 2025, FIBAA's expert pool has grown to over 1,200 professionals, reflecting the organization's expanding scope of accreditation, including internationally. The expert pool comprises professionals from over 30 countries and includes country-specific experts from outside Europe, as well as academics, practitioners, and student representatives from more than ten European countries. While the core of the expert pool remains from the DACH region (Germany, Austria, and Switzerland), the proportion of non-German-speaking experts has grown significantly- from 5% to 15% over the past five years. FIBAA states that it follows rigorous criteria in the selection and appointment of its experts to ensure appropriate competencies and professional experience.

According to the SAR, to promote greater rotation and renewal within its expert pool, FIBAA has introduced an internal regulation limiting each expert's participation to a maximum of three accreditation or certification procedures per year. Exceptions may be granted in cases requiring short-notice substitutions. Since the implementation of this policy, the average number of new experts per panel has increased, thus contributing to a broader inclusion of fresh perspectives.

In order to ensure the accessibility of its workshops, seminars, and training sessions for its expert pool, FIBAA offers these online due to the large number and international distribution of the recruited experts. Regular onboarding and refresher sessions are offered, as well as specialized thematic sessions to ensure that its experts remain up to date with the latest regulatory developments and assessment standards. FIBAA will also offer personal consultations and individual to experts as necessary.

The training sessions are conducted in the language of the respective procedures: training provided by the National Accreditation Division, as well as onboarding for German procedures, are conducted in German. All other training, workshops and seminars etc. are delivered in English to reflect and support FIBAA's international profile.

The SAR is open about FIBAA's recognition that participation in its training activities is currently voluntary, with no formal obligation for experts to take part. However, if a need for training among experts is noted, either by FIBAA staff or through feedback from the other experts or the institution, that expert will be informed of the next training date. FIBAA's experience has shown that experts are highly motivated to engage in training opportunities, particularly in the lead-up to an accreditation or certification procedure.

In response to the 2021 ENQA review recommendation, FIBAA has implemented several structured measures to ensure that experts are thoroughly prepared for their role on review panels:

- Comprehensive onboarding: Every new expert receives detailed written information and personalised support through emails, phone calls, digital meetings or face-to-face meetings from the Expert Management Division.
- Dedicated project manager support: Once an expert panel is approved, the assigned project manager becomes the primary point of contact for each expert. For those participating in their first procedure, the project manager also acts as a personal coach. With knowledge of

each panel member's experience, the project manager ensures targeted communication to inform, train, and prepare each expert for their specific role.

- Mandatory pre-procedure briefing: One to two weeks prior to each accreditation or certification procedure, the project manager conducts a mandatory 1-to-1,5-hour digital meeting with the expert panel. This session is designed to review the upcoming process and ensure that all members are fully aware of their roles and responsibilities, including all documentation for the procedure.

FIBAA primarily recruits its student experts through the *Studentischer Akkreditierungspool* (German Student Accreditation Pool). To support the ongoing development of student reviewers, FIBAA provides annual financial contributions to help fund the training seminars that are organised by the German Student Accreditation Pool. FIBAA also regularly participates in these seminars and welcomes representatives from the Pool to contribute to its own webinars.

In 2024, FIBAA produced a four-minute educational video, published on YouTube, aimed at informing prospective experts about the various peer reviewer roles (student, professional practice, academia, country-specific experts), the core quality standards, and the responsibilities involved. This video explains the work of the experts in detail and serves as a helpful resource that can be referred to at any time, whether for preparation, refresher training, or clarification of individual aspects. Additionally, three short videos explain the roles of experts from academia, professional practice and students.

On the information pages for a) Programme Accreditation outside the competence are of the GAC and b) the FIBAA Quality Seal for the Certification of Continuing Education Courses/Microcrendentials, information is provided about the recruitment of experts for the processes as follows:

"The F-ACC elects two university representatives, one practice representative and one student from among its members to the FIBAA Expert Committee".

In addition, the panel learned that, for procedures carried out internationally, a local expert is also recruited to the panel.

The Expert Committee is composed by FIBAA's Expert Manager, whose specific role is to manage the composition of the agency's panels for all its external quality assurance procedures. She carries out this work after discussion with the project manager in charge of the procedure and validation by the Division Manager for International Accreditation Procedures (in the case of procedures carried out outside Germany). In addition, FIBAA's Expert Committee, which is an independent body, checks that the panel is relevant for the procedure and that there is no conflict of interest.

Analysis

The peer experts who met with the panel included two international reviewers (from Poland and Lebanon), one professional practice representative and a student expert. They confirmed that their selection process was thorough and involved sending a CV with a covering letter stating suitability for the role and their envisaged contribution to the process. The process involves multiple staff at FIBAA, including the Expert Committee, an independent body, which ensures that there is no conflict of interest. The FIBAA staff who met with the panel during the site visit confirmed that the Expert Committee's role is one of providing assurance; it is not active in forming the expert panels, instead focusing on judging their suitability in relation to conflicts of interest. It therefore does not delay the appointment process.

The panel discussed the voluntary nature of the training for experts with the senior management of FIBAA and also with the expert panel representatives. In fact, according to the experts, their

perception of the training is that it is mandatory in that, if an expert has not attended the generic onboarding training, FIBAA staff will organise an individual training session for or will extend the mandatory preliminary meeting to cover aspects that are usually presented in the onboarding. The experts also confirmed that the use of English and the online format of the training sessions had encouraged them to participate in training specific to the process that they were undertaking. In particular, the panel noted that intercultural communication was one specific training that was offered for those experts who would be working on an international procedure.

All those who met with the panel strongly felt that they had been well-prepared - generically and specifically for the process(es) that they had been involved in. They spoke highly of the support that was provided to them by the Project Manager and by FIBAA throughout the process and corroborated the view of many of the other stakeholders that met with the panel that the FIBAA staff with whom they worked were serious, professional, knowledgeable and helpful in the support of the expert panel and of institutions. They believe that the procedures they undertook were well-organised and beneficial to both the expert panel and the programmes involved.

The panel was persuaded by what it heard from both FIBAA staff and the experts that it met that, in fact, all experts must undertake necessary training in some form or another. However, it does not believe that it is impossible, especially using an online format, to offer several repeat sessions of the generic training for experts that are mandatory. It believes that this would be a better use of FIBAA time and resources than to offer such support individually if necessary. It is also important for experts to be trained in key aspects of procedures such as decision-making and using criteria as part of a larger group rather than individually as this is the kind of work that will be done as an expert panel, not as an individual. A training session allows for debate and discussion around challenges in such areas, which an individual briefing session will not. In addition, the mandatory meeting is only 1 to 1.5 hours long. To use some of this time to bring some members of the panel up to speed is not efficient, particularly if other members have attended the training.

Panel commendation

The panel commends FIBAA for:

11. The increased involvement of international experts in its procedures.

Panel recommendation

The panel recommends that:

7. FIBAA reconsiders how it organises its training to ensure that all active experts are trained in the most efficient and beneficial way possible in the key tasks of the role such as interpretation of assessment criteria and decision-making as a panel.

Panel conclusion: compliant

ESG 2.6 REPORTING

Standard:

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

Terms of Reference:

This section deals with section 2.1 F) a. of the ToR regarding ESG 2.6 and focuses on the redaction of the reports prior to their publication on FIBAA's website.

Evidence

The SAR explains that, as a rule, for those procedures which are not in the competence area of the GAC, FIBAA contacts HEIs and other educational providers to ask about data protection concerns before publishing the accreditation or certification report. This has led, in some cases following the certification of continuing education courses and in international accreditation procedures, to the redaction of the content of the reports. The redacted sections are agreed between the provider and the agency case by case, after the report is concluded and the decision has been made. In those specific cases, information was redacted for one of the following reasons:

- Material/information prohibited from disclosing as a public company under U.S. securities laws;
- Proprietary information about internal processes or strategic information not publicly known;
- Confidential personal information.

In addition to the information provided in the SAR, the panel was able to view several redacted reports and also to discuss the matter with FIBAA staff and with the GAC.

Analysis

The panel noted that, as a general rule, FIBAA publishes full reports for all procedures within the competence area of the GAC and for procedures carried out in Austria and Switzerland. It was explained to the panel during the site visit that for procedures that lead to a FIBAA seal, in order to ensure that strategically important or sensitively commercial information is not compromised, the report is sent to the institution so that it can indicate where redaction of this kind is needed. The same applies to material/information prohibited from disclosing as a public company under U.S. securities laws and confidential personal information.

The panel was able to access all reports on the FIBAA website. In particular, it noted one report for the FIBAA Digital Education seal which was significantly redacted. FIBAA leadership stressed that this example is an exception to the rule and reminded the panel that the institution can only redact description, it cannot redact the analysis. It also pointed out that this example is from a voluntary certification procedure, not an accreditation procedure. In all cases, F-ACC receives the whole, unredacted report in order to make its decision.

The panel also followed up the matter of material/information which is prohibited from disclosure due to the regulations around a public company under U.S. securities laws. GAC representatives informed the panel that it had advised FIBAA to critically examine the impact of these laws but did not wish to close down the idea of a European agency working in the United States of America.

Overall, having looked at a broad sample of the reports published on FIBAA's website, the panel concurs with the agency's view that heavily redacted reports are the exception to the rule and that, in general, FIBAA complies with the spirit of ESG 2.6. It was reassured that only the descriptive section(s) of the report can be redacted and that F-ACC receives the entire report on which to base its decision. The panel believes that it would be useful for FIBAA to formally document the principles for and parameters within which any redaction of reports can happen. This would include the process for considering and agreeing any redaction This would provide further transparency for all those involved.

Panel suggestion for further improvement

11. The panel suggests that FIBAA formally document the principles for and parameters within which any redaction of reports can happen, as well as the process for considering and agreeing any redaction. This includes the distinction between procedures that are outside the competence of the GAC, requirements of any national agencies in whose jurisdiction FIBAA works internationally and the voluntary or mandatory nature of the procedure.

Panel conclusion: compliant

ESG 2.7 COMPLAINTS AND APPEALS

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

2021 review recommendation

The agency is recommended to ensure that the wording of the process for complaints and appeals is accurate and clear in both German and English. At the same, it should ensure that the process as described on the website is up to date, for example regarding the merger of the three accreditation committees into one.

Evidence

The SAR highlighted the process by which the new policy was developed and also FIBAA's appreciation of both the recommendation made in its last ENQA review and the comments made by EQAR in its registration decision in 2022 in assisting the agency to improve its Appeals and Complaints procedure.

Work began in September 2023, with a revision of the rules of procedure of the FIBAA Appeals Committee: the wording of the provisions regarding appeals against decisions and complaints about procedures was clarified, and the body itself was renamed the FIBAA Appeals and Complaints Committee (A&CC). At the same time, all information and documents relating to the appeals and complaints procedure were updated and made available on the FIBAA website. In 2025, FIBAA decided to further strengthen this framework by developing a dedicated Appeals and Complaints Procedure as a stand-alone document. The document was prepared by a working group which comprised the Managing Director and the Division Managers for Quality Management, National and International Procedures, Certification, and Marketing, together with their deputies. The document now provides clear information on:

- the distinction between an appeal and a complaint,
- the issues that may be raised under each procedure,
- the formal requirements for lodging a complaint or an appeal,
- a step-by-step description of the procedures,
- the expected timelines for both processes,
- the rules for publication of appeal outcomes, and
- the follow-up measures for continuous quality improvement.

This new Appeals and Complaints Procedure was formally approved by the Managing Director in October 2025 and published on the FIBAA website[6]. During the site visit, the panel met with a member of the A&CC in its meeting with F-ACC members who said that there is an advantage to being a member of both committees as the general knowledge gained in the former can be used to advantage in the latter

At the same time, the terms and conditions and the accompanying documents to the Appeals and Complaints Procedure for HEIs were updated to maintain coherence and accuracy. Since 2022, a total of four submitted appeals and complaints procedures have been processed. In two cases, the appeals were rejected after review and two were upheld.

Analysis

Having read the published Appeals and Complaints procedure, the panel is of the view that it responds to both the recommendation of the ENQA review 2021 and the comments made by EQAR in 2022. It was informed by FIBAA staff that the process is included in Viflow, which visualises the procedural steps for staff but which is not public. Institutional representatives who spoke with the panel at the site visit were aware of the policy but had not needed to use it.

The panel accepts the clarity and publication of the procedure but suggests that it is a further example of a point made earlier in this report in relation to FIBAA's website (see also ESG 3.4). The panel was provided with significant evidence throughout the site visit that stakeholders such as institutions and peer reviewers found the website very easy to navigate in terms of finding information to do with accreditation and certification criteria and procedures. However, the panel found some other documentation such as the Appeals and Complaints procedure harder to locate without using the search function.

The panel spoke to one member of the A&CC in its meeting with F-ACC members who said that there is an advantage to being a member of both F-ACC and the A&CC as the general knowledge gained in the former can be used to advantage in the latter. In discussion with FIBAA management, it became clear that this was a misunderstanding and that there is no possibility of an appeal that has been lodged against a decision that was taken by F-ACC, being considered by a member of that body who was also a member of the A&CC.

Panel suggestions for further improvement

The panel suggests that:

12. FIBAA further adds to the clarity of its website by ensuring that all documentation is clearly indicated and easily located.
13. FIBAA ensures that all members of its committees are aware of and briefed about the policies and committee structures with which they work.

Panel conclusion: compliant

[6] https://www.fibaa.org/fileadmin/redakteur/pdf/Beschwerdeverfahren/Appeals_and_Complaints_Procedure_Sep25.pdf

ENHANCEMENT AREAS

ESG 3.5 RESOURCES

Introduction

FIBAA provided a briefing note setting out its reasons for selecting ESG 3.5 (Resources) as its enhancement standard and also provided information in the SAR under 3.5 that the agency was during the last full review assessed as substantially compliant, rather than fully compliant. The review panel 2021 recommended FIBAA "to establish a clear alignment between the strategic vision of the agency and the planning of actions with the allocation of human and financial resources" and the agency was motivated to improve in this area. Over the past five years, FIBAA has implemented a number of measures aligned with its Strategy 2030 and now welcomed the opportunity to learn further from the 2026 review panel about good practice in this area at other EQAAs as well as from discussion with the panel.

FIBAA's main objectives for the enhancement session were to develop a clear alignment between the strategic vision of the agency and the action that is needed in the area of human and financial resources. The agency was also interested in discussing staff development to further develop expertise in the light of advancing digitalisation, to strengthen customer relationship management, and to enhance managerial accounting, whilst operating within the human and financial resources available.

In conclusion, FIBAA's leading discussion question was, "To what extent do FIBAA's vision, strategy, and their implementation ensure the availability of adequate and appropriate human and financial resources to fulfil its mandate?"

Workshop and discussions

The panel agreed that it was useful and timely to bring together a discussion around resources with reflection on the FIBAA Strategy 2030 and its goals, including the agency's SWOT analysis. It took, as a starting point, the need to reflect further on the formulation of some of the goals in the Strategy 2030, so as to reinforce the impact of the goals on resources required to achieve them and vice versa.

The panel therefore devised a workshop for the participants from the agency. The Chair took the lead in explaining the task to agency staff:

Participants were divided into three groups and were given a choice between two strategic goals (i.e. between goals 1 and 2; 3 and 4 and 5 and 6). A series of questions to prompt discussion was provided for each strategic goal. An example is provided below (this is an extract from the handout that was created for the participants):

Group discussion on the questions assigned for the groups (30 min):

For the first group: please choose one goal from Strategic goals 1 and 2 below and provide its critical analysis. Please focus on the required resource situation regarding this goal.

Strategic goal 1. Strategic positioning – by 2030: FIBAA holds a leading position in the core market and a recognised position in the other markets in selected product lines, industries and regions.

- In your opinion, are development goals clearly formulated and well communicated among internal and external stakeholders?
- How would you know that the goal is achieved, e.g. having a leading position in the core market? Which indicators would be helpful in this regard?

- How would you know that the agency has a recognised position in the other markets? Which indicators would be helpful in this regard?
- What kind of resources (financial, infrastructure, personnel, etc.) are needed to achieve it? Are resources sufficient to achieve this goal or not? Please justify your point of view.

OR

Strategic goal 2 Accreditation – by 2028 "FIBAA pushes the expansion of the programme accreditations in selected international target markets, reduces its involvement in the system accreditation and achieves a 60% share of its total turnover with programme accreditation".

- In your opinion, are development goals clearly formulated and well communicated among internal and external stakeholders?
- What is a gap in comparison with the current status for the achievement of 60% of total turnover?
- Do you know which target markets the programme accreditation FIBAA product offer is planned for?
- Which resources (financial, infrastructure, personnel, etc.) are required to achieve it? Are resources sufficient to achieve this goal? Please justify your point of view. (E.g., which new competencies of staff, experts and other stakeholders are needed to achieve it? What investments are needed to achieve the goal? Etc.)

The panel employed the Padlet tool to capture the thoughts of each group as they wrote and feedback was then shared by each of the three groups on the strategic goal that they had decided to address. The outcomes of the Padlet exercise were also shared with the agency as one of the outcomes of the workshop.

Outcomes

In its preparation for the enhancement session, the panel had discussed its own views on the link between FIBAA's Strategy 2030 and the resources available to it, especially with regard to specific strategic goals. Responses from the Padlet indicated alignment with some of the panel's private discussions, particularly around:

- Ensuring that strategic goals are formulated not only in the form of strategic intent but are based on SMART (goals must be specific, measurable, attainable, relevant, time bound) principles, including relevant key performance indicators (KPIs) thus allowing the measurement of progress and the identification of the existing gap and resources required to achieve it; ;
- Ensuring a strategic approach in HR and financial management in all stages of resource management (planning, organising, motivating and controlling).;
- Improving awareness about the diverse resources (in broader terms) required to achieve the strategic goals set - e.g. what do we understand by personnel resources (staffing levels, competence and qualifications, expert pool, renewal, strategic leadership, etc.) This could also include further training of the staff in order to expand FIBAA's activities to other markets - project managers could become "brand ambassadors."
- Assessing the adequacy of resources in the context of the scope of the agency work and future aspirations following proportionality principle;
- Developing operational, tactical and strategic plans and revisiting them regularly to operationalise the implementation of goals and ensure that all kind of necessary resources are allocated for the activities needed in relation to goals set;]
- Delivering regular environment analysis for identifying a new opportunity for attracting necessary resources and identifying challenges in relation to fulfilment of goals set due to the

lack of different kind of necessary resources (human resources, financial resources, time resources, IT resources, etc.);
- Analysing systematically the implementation of plans and provision of necessary resources to deliver it;
- The necessity for multiannual financial planning;
- Developing resource management as a strategic capability of the agency.

The group sessions, the feedback and ensuing discussions raised these matters amongst others.

The session ended with a shared presentation by the Chair and panel members in which some of the key learning points around any linking of strategic goals and resources were highlighted. Practice from a diverse range of EQAAs was also presented, with input from each member of the panel. This was followed by further questions from FIBAA staff and discussion.

The panel was pleased to note that group discussions were lively, questions to the panel were forthcoming and that participants were engaged and positive throughout the session.

ADDITIONAL OBSERVATIONS

GENERAL OBSERVATIONS

Whilst none of the comments below change the panel's judgments, nonetheless, the panel discussed privately several commendations and suggestions that did not necessarily fit into the areas in focus for the review. It therefore takes this opportunity to offer these comments to the agency.

The panel noted the obvious collegial atmosphere amongst FIBAA staff during the site visit. It was informed during the course of one interview with staff, that there was a high level of support for each other and a flexibility that ensured that in a medical, family or other emergency, cover and support would be willingly offered. This observation was reinforced by the way that participants approached the enhancement workshop, demonstrating an openness to group work and feedback throughout the session.

The panel also wished to confirm to the agency that much of what it heard from external stakeholders, in addition to the supportive comments included in this report, highlighted the high regard in which its Continuing Education and Digital Education seals are held, with one interviewee referring to FIBAA as "market leaders" in these areas.

In terms of suggestions, the panel wishes to highlight the following areas as ones outside the remit of the ToR but which it believes will lead to improvements for FIBAA, should the agency wish to consider them:

1. The panel notes that, for all of FIBAA's procedures, the approach to follow-up is that it is compulsory for outcomes that contain conditions. For those that have recommendations, follow-up is voluntary and if not undertaken sooner, will form part of the reaccreditation process. This is the same position as that of the agency at the time of the last review. Whilst the panel accepts that follow-up is offered for all outcomes as part of a procedure, nonetheless, the spirit of ESG 2.3 in terms of a consistent follow-up is not quite aligned with the FIBAA approach. The panel suggests that FIBAA considers how follow-up might be more consistently operationalised to the benefit of both the agency and the institution or programme.
2. In its discussion with representatives from the F-ACC, the panel was informed that, whilst that committee's relationship with FIBAA is overwhelmingly positive, nonetheless, members would appreciate a summary report for each procedure and also, in the case of international procedures, a country information sheet. The panel suggests that FIBAA discuss this with F-ACC.
3. The panel noted in the reports on procedures that it read, that the expert panel's decision in each case is, "is/is not accredited." Given that it is the F-ACC that takes the final decision on accreditation, the panel suggests that the wording be amended to indicate that the expert panel formulates an accreditation proposal and that the decision-making body (F-ACC) confirms or denies accreditation.
4. The panel suggests that FIBAA adds a glossary of terms to its website for clarity and transparency.

The panel offers these comments in the spirit of improvement of FIBAA's activities for the benefit of internal and external stakeholders.

CONCLUSION

SUMMARY OF COMMENDATIONS

1. The significant amount of work undertaken since 2021 to successfully develop and implement the FIBAA Strategy 2030.
2. The smooth transition of senior management to the positions of joint Managing Directors and the positive impact that this has had on the agency's strategic planning process.
3. The digitisation, digitalisation and digital transformation that is embedded in Asana, JACOP® and Viflow.
4. The proactivity in seeking to benefit and learn from events such as the conference: *A Decade of the European Approach – Reflections and Future Directions.*
5. The role of Experts Manager in ensuring a focused and knowledgeable resource from which to select and recruit experts and to form appropriate expert panels.
6. The high stakeholder satisfaction in relation to the supportive approach that FIBAA staff offer to expert panels and their help in ensuring smooth and professionally managed procedures.
7. The knowledge, professionalism and support provided by its staff to those undergoing any of its accreditation procedures and to the reviewers that are involved in the processes.
8. The wide range of free webinars and seminars that are available to all stakeholders, including those offered through the FIBAA Quality Lab.
9. The impressive group of enthusiastic external stakeholders from industry and from the student representative bodies who are willing to work with the agency and recognise the importance of recruiting graduates from quality assured programmes.
10. The efforts made by FIBAA in its international procedures to ensure fitness for purpose by working with relevant national agencies and also for including an in-country expert on international expert panels.
11. The increased involvement of international experts in its procedures.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, FIBAA is in compliance with the ESG.

The panel recommends that:

1. FIBAA clarifies the focus of a thematic analysis to ensure that it meets the exact requirements of standard 3.4 and that the resulting reports are visible on the agency's website.
2. FIBAA should apply the standards of the European Approach as they are described in the procedure agreed by the EHEA ministers in 2015, without adding additional criteria in the Assessment Guide.
3. FIBAA consults its external stakeholders when updating the Assessment Guide for the European Approach for Quality Assurance of Joint Programmes.
4. FIBAA clarifies the timeline and format of the follow-up procedures related to the European Approach for Quality Assurance of Joint Programmes and makes them public.
5. FIBAA revisits its Assessment Guides to ensure that they all consistently cover the detail contained in the standards of Part 1of the ESG, particularly in 1.3 (lack of student co-creation in the design of the learning process and assessment) and 1.7 (the Assessment Guide leans heavily toward the publication of information rather than holistic internal information management. FIBAA should also consider the comments made in the general commentary on ESG 2.1.

6. FIBAA reconsiders its approach to not seeking feedback from students on the Assessment Guide for the Certification of Continuing Education Courses. Those taking these courses are, indeed, students, regardless of whether they form part of a "traditional student cohort."
7. FIBAA reconsiders how it organises its training to ensure that all active experts are trained in the most efficient and beneficial way possible in the key tasks of the role such as interpretation of assessment criteria and decision-making as a panel.

SUGGESTIONS FOR FURTHER IMPROVEMENT

The panel suggests that:

1. FIBAA considers including a strategic advisory body as part of its governance structure and finds a means of inviting students to the meetings of the Foundation Board.
2. FIBAA carries out some research into how other EQAAs involve students in their governance structure and takes steps to strengthen understanding of the value of student involvement across all stakeholders.
3. FIBAA considers the establishment of a separate legal division under FIBAA specifically for consultancy activities.
4. FIBAA further adds to the clarity of its website by ensuring that all documentation is clearly indicated in separate sections (Thematic Reports and other Publications) and easily located (see also ESG 2.7).
5. FIBAA reaches out to the agencies of the countries involved in the joint programmes at the beginning of the procedure to inform them and enquire about the accreditation process in their country.
6. FIBAA includes a list of the interviews conducted during the on-site or online visit for European Approach procedures in order to make the process clearer and more transparent.
7. FIBAA revises its Assessment Guide for European Approach procedures to mention the participation of labour-market experts, as required by the European Approach methodology. This would reinforce the transparency of the procedure for the evaluated joint programmes and would ensure that all procedures are implemented in a consistent manner.
8. FIBAA clarifies the role of the F-ACC in decisions related to the European Approach for Quality Assurance of Joint Programmes in the Assessment Guide and to rename its official outcome "accreditation proposal". This document should be sent to the national authorities of the countries represented in the joint programme.
9. The specificities of the European Approach should be taken into account in FIBAA's appeals and complaints procedure in order to better clarify the role of the agency in relation to other national authorities.
10. FIBAA ensures that Terms of Reference for all committees are clarified to include information about whether or not more than one term of service is permitted and the rules regarding such terms and that Terms of Reference are then consistently applied.
11. FIBAA formally documents the principles for and parameters within which any redaction of reports can happen, as well as the process for considering and agreeing any redaction. This includes the distinction between procedures that are outside the competence of the GAC, requirements of any national agencies in whose jurisdiction FIBAA works internationally and the voluntary or mandatory nature of the procedure.
12. FIBAA further adds to the clarity of its website by ensuring that all documentation is clearly indicated and easily located.
13. FIBAA ensures that all members of its committees are aware of and briefed about the policies and committee structures with which they work.

ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
1	120 min	Review panel's kick-off meeting and preparations for site visit	Professor Tatjana Volkova (Chair) Ms Fiona Crozier (Secretary) Ms Sophie Guillet (Panel member) Mr Damon Mohebbi (Panel member)
2	90 min	An online clarifications meeting with the agency's resource person to clarify the agency's changes since the last full review against the ESG and to understand the background and motive of the agency's choice of the self-selected ESG standard for enhancement (next to the overall HE and QA context of the agency)	Managing directors Division Manager for Quality Management
10.05.2026 – Day 0 (pre-visit)			
3	17.00	Review panel's pre-visit meeting and preparations for day 1	
11.05.2026 – Day 1			
	08.30	Review panel's private meeting	
5	09.00	Meeting with the CEO and the Chair of the Board (or equivalent)	Managing directors (2) President of FIBAA Foundation Board

	09.45	Review panel's private discussion	
6	10.00	Meeting with representatives from the FIBAA Senior Management Team	Division Manager for International Accreditations Division Manager for National Accreditations Division Manager for National Accreditations Division Manager for Certifications Deputy Division Manager for Certifications Division Manager for Quality Management
	10.45	Review panel's private discussion	
7	11.00	Meeting with ministry representatives and a representative from the German Accreditation Council (GAC)	Managing Director, GAC Deputy Head of Department for Alternative Procedures, GAC
	11.30	Private panel meeting	

8	11.45	Meeting with FIBAA key staff of the agency/staff in charge of external QA activities	Senior Project Manager (international programme accreditation procedures) Senior Project Manager (national programme and system accreditation procedures) Project Manager (international programme accreditation procedures) Project Manager (national programme accreditation procedures) Extern Project Manager (international institutional and programme accreditation procedures) Project Manager (international programme accreditation procedures) Expert Management
	12.45	Lunch (panel only)	Asana demonstration
9	14.00	Meeting with department/key body of the agency: **F-ACC**	Vice-Presidents F-ACC (2)
	14.45	Review panel's private discussion	
10	15.00	Meeting with department/key body of the agency 2: further F-ACC, including student member, Expert Committee, Appeals & Complaints Committee)	F-ACC member (academia) F-ACC and Expert Committee member F-ACC and Appeals and Complaints Committee member F-ACC Student member F-ACC Student member
	15.45	Review panel's private discussion	

11	16.00	Meeting with stakeholders, such as employers, students, local community	Representative of Deutsche Bahn AG Former employee of Bayer AG Representative of KASAP (German student accreditation pool) Student (national and international programme procedures, institutional procedures)
12	16.45	Wrap-up meeting among panel members and preparations for day 2	
		Dinner (panel only)	
12.05.2026 – Day 2			
	08.30	Review panel's private meeting	

13	09.15	Meeting with heads of some reviewed HEIs/ HEI representatives	Vice President, University of Applied Sciences Diploma, Germany (national, programme) (2023, 2024) President, University of Applied Sciences Macromedia, Germany (European Approach, Programme) (2025) President National Economics University, Vietnam (FIBAA programme and institutional) (2024, 2025, 2026) Dean, AASTMT, Cairo, Egypt (FIBAA programme) (2020, 2024) Head of Quality Assurance Office, Maqsut Narikbayev University (MNU), Kazakhstan (FIBAA programme) (2016, 2022, 2024, 2026) Deputy Chairman of the Board, Maqsut Narikbayev University (MNU), Kazakhstan (FIBAA programme and institutional) (2016, 2022, 2024, 2026) Provost, Maqsut Narikbayev University (MNU), Kazakhstan (FIBAA programme and institutional) (2016, 2022, 2024, 2026)
	10.00	Review panel's private discussion	

14	10.15	Meeting with the quality assurance officers of HEIs	International Academic Director, Narxoz Business School, Kazakhstan (FIBAA programme and institutional) (2022, 2025) Head of Quality Management, International Business School, Hungary (FIBAA programme) (2021, 2025, 2026) Head of Quality Management, University of Economics HCMC, Vietnam (FIBAA programme and institutional) (2022, 2024, 2025, 2026) Head of the Department of Educational Quality and Testing, National Economics University, Vietnam (FIBAA programme and institutional) (2024, 2025, 2026) Head of Quality Assurance Office, Maqsut Narikbayev University (MNU), Kazakhstan (FIBAA programme) (2016, 2022, 2024, 2026)
	11.00	Private panel meeting	
15	11.15	Meeting with representatives from the reviewers' pool, to include international experts and those involved in procedures for the accreditation of joint programmes	Reviewer from University of Technology and Applied Sciences Lebanese French, Lebanon (academia, European Approach and international programme procedures) (2024, 2025) Senior Customs Expert, Tetra Pak (professional practice, national and international programme and institutional procedures) (2019, 2021, 2022, 2023, 2024, 2025) Student reviewer, (programme procedures) (2024, 2025)
	12.00	Review panel's private discussion and lunch	

16	13.30	Meeting with the agency staff/representatives on the agency's self-selected enhancement area	Division Managers for National Accreditations (2) Division Manager for International Accreditations Division Manager for Quality Management Division Manager for Certifications Senior Project Managers (2) Project Managers (3) Managing directors (2)
	15.00	Private panel meeting	
17	15.30	A session to further investigate additional topics that arose during the site visit regarding agency's compliance with the ESG	
18	16.00	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions	
13.05.2026 – Day 3			
19	09.00	Meeting among panel members to agree on final issues to clarify	
20	10.00	Meeting with CEO to clarify any pending issues	Managing directors (2) Division Manager for Quality Management
21	10.30	Private meeting between panel members to agree on the main findings	

	12.00	Lunch (panel only)	
22	13.30	Final de-briefing meeting with staff and Board members of the agency to inform about preliminary findings	

ANNEX 2: MAPPING OF ALL FIBAA'S ACTIVITIES AGAINST ESG 2.1 (EXCLUDING THE EUROPEAN APPROACH)

ESG	Digital Education accreditation	Institutional accreditation	Programme accreditation (B&M)	Doctoral programme accreditation	Institutional strategic management accreditation	Continuing Ed/Micro-credentials	Panel comments
1. Policy for quality assurance Institutions should have a policy for quality assurance that is made public and forms part of their strategic management. Internal stakeholders should develop and implement this policy through appropriate structures and processes, while involving external stakeholders.	5. Quality Assurance	I. Mission Statement, HEI's Profile and Strategic Objectives II. Management Structure and Quality Management	5. Quality Assurance 5.1 Quality assurance and quality development with respect to contents, processes and outcomes. 5.2 Instruments of QA	5. Quality Assurance	1. Management 1 1. Strategic objectives 1 2. Taken measures 1 3. Development of processes 1 4. Decision-making 1 5. Management system 1 6 Societal impacts 1 7. Resources	5.1 Quality assurance and development of course content, processes and outcomes (Asterisk Criterion) 5.2 Instruments of quality assurance	**Digital Ed:** ESG 1.1 is not only QA instruments; it also concerns strategic management, governance, stakeholder roles and public commitment **Inst. Accred:** Section 1 on Mission Statement, HEI's Profile and Strategic Objectives does not refer to the policy to QA

							Section II Q 3, 4, 5, 7, do not explicitly state that experts must consider the policy existence for quality assurance. **Prog Accred:** Requires a 'quality assurance and development *procedure'* to be developed and implemented with the involvement of faculty members and students and that responsibilitie s are clear. No mention of appropriate structures.

							Inst Strat Man: There is no mention of a policy for quality assurance as a part of strategic management at the institutional level; nor about its implementation through appropriates structures and processes with involvement of external stakeholders **Cont Ed/Micro-Creds:** More explicit reference needed to the institution's public QA policy,

							governance structure, stakeholder involvement and how continuing education is embedded in institutional QA.
1.2 **Design and approval of programmes** Institutions *should have processes for the design and approval of their programmes.* The programmes should be designed so that they meet the objectives set for them, including the intended learning outcomes. The qualification resulting from a programme should be clearly	1.1-1.4 (Goal Setting; Future Orientation; Strategy and Action Plan; Implementation of the Strategy - Review and Measures), 4.1 Didactical concept	III.2 Outline the following areas for the selected programmes and describe the relevant processes of development. III.4 Which processes are used for the quality assessment of studies and teaching? Please	1. Objectives 3. Implementation of the study programme 3.1 Structure and content 4.3. Cooperation and partnership 5.1 Quality assurance and quality development with respect to contents, processes and	1.Objectives 3. Implementation 5. Quality Assurance	III. Teaching and Learning III 2. Study programmes III 3. Internationality III 4. Quality assurance III 5. Resources	1.1 Logic and transparency of course objectives (Asterisk Criterion) 3.1.1 Structure of the course, application of the "European Credit Transfer and Accumulation System" (ECTS) and modularisation (Asterisk Criterion) 3.1.4 Regulations for participation and assessment (Asterisk Criterion) 5.1 Quality assurance	**Digital Ed:** The mapping captures digital teaching strategy and instructional design, but ESG 1.2 also requires programme objectives, intended learning outcomes, qualification level and approval processes

specified and communicated, and refer to the correct level of the national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the European Higher Education Area.		describe the relevant procedures (e.g. course evaluations, graduate surveys) and include information on regularity, responsibility, process and students' involvement. How are the results implemented?	outcomes 5.2.3 Evaluation by alumni, employers and third parties			and development of course content, processes and outcomes (Asterisk Criterion) 5.2 Instruments of quality assurance	**Inst Accred:** Section III part 2 covers processes for development of processes, but not for approval. 'Qualification objectives (LO)' and the qualification resulting from a programme mentioned in the section regarding processes, but not from the programme content point of view. In the evaluation of the quality requirements for section III fulfilment the

							qualifications are mentioned in relation to the HEIs profiled, not to the national qualifications framework. **Prog Accred**: Communication of qualification and its level could be more explicit. **Inst. Strat. Man:** Only partly covers the ESG 1.2 on the processes for the design and approval of the programmes -

							Since there are no questions on approval of programmes.
1.3 Student-centred learning, teaching and assessment Institutions should ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach.	2.3 Support for Digital Teaching 3.1 Overall Technical Responsibility and Technical Support 3.3 Teaching and Learning Platform/Learning Environment 3.4 Digital Skills 4.1-4.5 (Concept for Teaching and Learning Methodology; Teaching and Learning Methods; Learning Materials,; Assessments; Academic Support for	III.2 Outline the following areas for the selected programmes and describe the relevant processes of development. (Didactical Concept, Examination Concept)	3.1.1 Structure of the study programme 3.1.3 Conceptual coherence of the curriculum 3.1.4 Study and exam regulations 3.1.5 Examination and final thesis 3.2.1 Methods and scientific practice 3.2.2 Integration of theory and practice 3.2.4	3. Implementation 4. Scientific environment and framework conditions	III 2. Study programmes III 4. Quality assurance III 5. Resources	3.1.3 Logic and conceptual coherence of the curriculum (Asterisk Criterion) 3.1.4 Regulations for participation/assessment (Asterisk Criterion) 3.1.5 Types of Assessment (Asterisk Criterion). 3.2 Training of Competences and Skills 3.3 Teaching and Learning Methodology	**Digital Ed:** The guide is good on instructional design and digital teaching strategy, but it does not fully test formal programme design and approval: intended learning outcomes, qualification level, workload, approval bodies, and alignment with national qualification frameworks.

	Students)		International contents 3.2.5 Professional ethics and societal issues 3.3. Teaching and Learning Methodology 3.3.2 Acquisition of future and soft skills 3.4 International environment and mobility opportunities				This is acceptable if the EDE seal is supplementary, but not if it is used as ESG programme-level evidence. **Inst Accred:** Section III subsection 2 subsection does not put sufficient emphasis on the Student-centred learning, teaching and assessment, merely requiring description of didactical and examination concepts.

							Prog Accred: Covers all aspects of T&L process but there is no mention of programmes being "delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach." **Inst Strat Man:** no questions on the assessment of students

							taking in
1.4 Student admission, progression, **recognition and certification** Institutions should consistently apply pre-defined and published regulations covering all phases of the student "life cycle", e.g. student admission, progression, recognition and certification.	1.1 Objectives, 4.5 Academic support for students, 5 Quality assurance	III.2 Outline the following areas for the selected programmes and describe the relevant processes of development. (Admission) V.3 Student services VII 2 Publications /Public	2. Admission 3.Implementation of the study programme 3.1 Structure and content 3.1.4 Study and exam regulations 4.2 Programme management and administrative support 4.4.2 Inclusive and equitable education 4.2.5 Career counselling and placement service	1. Objec-tives 2. Admis-sions 3. Implementation 4. Scientific environment and framework conditions	III 4. Quality assurance	2.1 Focus on target group (Asterisk) 2.2 Admission conditions (Asterisk) 2.3 Legal relationship (Asterisk) 3.1.2 Certificate and Certificate Supplement	**Digital Ed:** The guide covers digital certificates and learning analytics, but does not sufficiently ask about admission rules, progression rules, recognition of prior learning, recognition of digital learning, appeals, complaints or certification governance **Inst Accred:** Student admission criteria and recruiting

							process are mentioned in Section III, subsection 2 subsection, but no reference to regulations on all phases of student 'life cycle". In Section VII Publication / public information, Q2 asks how regulations on the "student life cycle" (e.g. admission, organisation of studies, examinations, degree) are defined and published? This partially covers ESG 1.4 but not fully, e.g. progression. It

							is not clear why this is dealt with under Section 7. **Inst Strat Man:** The content of this section does not relate to ESG 1.4.
1.5 Teaching staff Institutions should assure themselves of the competence of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff.	2.1-2.4 (Staffing; Further Training; Support for Digital Teaching; Knowledge and Competence Management)	VI Resources	4.1 Teaching staff	4. Scientific environment and framework conditions	IV. RESEARCH (in the broadest sense) IV 1. Strategic objectives IV 2. Research activities IV 3. Quality assurance IV 4. Resources	4.1.1–4.1.6 (Structure, qualifications, support by teaching staff) 4.2.1 Course management (content and methodology, Asterisk Criterion)	**Inst Accred:** Assurance of the competence of teaching staff is limited to the employment of full-time professors. **Prog Accred**: Staff development

							is implicit. **Inst Strat Man:** There are no questions about the competence of the teaching staff or about the processes for their recruitment and development.
1.6 Learning resources and student Support Institutions should have appropriate funding for learning	3.1 Overall Technical Responsibility and Technical Support 3.2. Technical Infrastructure	V. Student Services VI Resources	4.2 Programme management and administrative support 4.4. Facilities and	4. Scientific environment and framework conditions	II 2. Study programmes III 4. Quality assurance III 5. Resources	4.2.2 Process organisation and administrative support for learners and teaching staff (Asterisk Criterion) 4.4.1–4.4.5	**Inst Accred:** Does not link provision of resources to ESG 1.6. **Inst Strat**

and teaching activities and ensure that adequate and readily accessible learning resources and student support are provided.	and EdTech Tools 3.3 Teaching and Learning Platform/Learning Environment 4.3 Learning Materials, 4.5 Academic support for students, 5 Quality assurance		equipment			(Infrastructure, learning platforms, technical support)	**Man:** Not directly related to appropriate funding for T&L and provision of adequate and readily accessible learning resources and student support.
1.7 Information management Institutions should ensure that they collect, analyse and use relevant information for the effective management of their programmes and	1.1 Goal setting 1.3 Strategy and Action Plan 2.4 Knowledge and Competence Management) 3.1. Overall Technical	II.4 Quality Management System II.5 Quality Management Instruments III.4 Quality assurance	0.1 Development of the study programme 0.2 For re-accreditation (Implementation of recommendatio	1. Objec-tives 4. Scientific environment and framework conditions 5. Quality Assurance	II. NETWORKS (in the broadest sense) II 1. Strategic objectives II 2. Partners II 3. effectiveness and efficiency	4.2.3 Information/transparency (Asterisk Criterion)	**Digital Ed**: ESG 1.7 is about collecting, analysing and using information; learning analytics and QA indicators are the

other activities.	Responsibility and Technical Support 3.3 Teaching and Learning Platform/Learning Environment 4.2 Teaching and Learning Methods 4.5 Academic Support for Students		ns) 4.2.3 Public information 5.2 Instruments of quality assurance		II 4. Resources		clearest fit rather than some of the detail in this section. **Inst Accred:** No reference to data such as intake, progression and completion statistics. **Prog Accred**: No reference to data such as intake, progression and completion. **Inst Strat Man:** This section is about

							networks, not Information management as required by ESG 1.7. **Cont Ed/Micro-Creds:** The Guide is more about publishing information than collecting and analysing data.
1.8 Public information Institutions should publish information about their activities, including programmes, which is clear, accurate, objective, up-to date and readily accessible.	1.4 Implementation of the Strategy - Review and Measures	VII Publication/ Public	4.2.3 Public information	Not addressed.	V. DYNAMICS V 1. Capacity for change V 2. Development of quality assurance V 3. Measures and affects V 4. Innovation	4.2.3 Information/transparency Criterion) 1.1 Logic and transparency of course objectives (Asterisk Criterion) 1.2 Positioning of the Course	**Digital Ed:** The guide asks about communicating goals and strategy, but it does not sufficiently require public, accurate, up-to-date information about the

					V 5. Stuffing policy ***(Should this be staffing policy?)*** V 6 Resources		digital learning offer, digital requirements, assessment rules, AI use, support availability **Doctoral Ed:** This standard is insufficiently covered. The assessment guide does not ensure that the institution publishes accessible information on its doctoral programme on its website. **Inst Strat Man:** No questions in

							section V about publishing information.
1.9 Ongoing monitoring and periodic review of programmes Institutions should monitor and periodically review their programmes to ensure that they achieve the objectives set for them and respond to the needs of students and society. These reviews should lead to continuous improvement of the programme. Any action planned or taken as a result	1.4 Implementation of the Strategy - Review and Measures 5 Quality assurance	II.4 Quality Management System II.5 Quality Management Instruments III.4 Quality assurance	1.1. Subject-specific qualifications and employability of students 5.1 Quality assurance and quality development with respect to contents, processes and outcomes	1. Objectives 3. Implementation 5. Quality Assurance	V. DYNAMICS V 1. Capacity for change V 2. Development of quality assurance V 3. Measures and affects V 4. Innovation V 5. Stuffing policy V 6. Resources	0.2 Statistical Data and evaluation results; development of the course 1.1 Logic and transparency of course objectives (Asterisk Criterion) 5.1 Quality assurance and development of course content, processes and outcomes (Asterisk Criterion)	**Inst Accred:** No emphasis on periodic review and monitoring of programmes; no reference to responsiveness to the needs of society and communication of results. **Prog Accred:** No mention of periodic review. **Inst Strat Man**: Section V contains no questions on

should be communicated to all those concerned.							programme monitoring and review.
1.10 Cyclical external QA Institutions should undergo external quality assurance in line with the ESG on a cyclical basis.	5.1 Quality Assurance of Digital Teaching; 5.2 Quality Assurance of Technical Infrastructure 5.4 Systematic Continuous Improvement of Digital Teaching	II.4 Quality Management System (in a broadest sense) Relevant through reaccreditatio n	General information 0.1 Development of the study programme 0.2 For re-accreditation 5.2 Instruments of quality assurance	Only required for programmes that have already been accredited by FIBAA and ask for re-accreditation.	III 4. Quality assurance IV 2. Research activities IV 3. Quality assurance V 3. Measures and affects V 4. Innovation V 5. Stuffing policy	5.1 Quality assurance and development of course content, processes and outcomes (Asterisk Criterion) 5.2.3 External evaluation by alumni, employers and/or other third parties	Application forms for the various accreditation procedures require the applicant to state all previous accreditation procedures undertaken, whether by FIBAA or another entity.

Targeted review of FIBAA against the ESG

Annex I: TERMS OF REFERENCE

The present Terms of Reference were agreed between FIBAA (applicant), ENQA (coordinator) and EQAR.

September 2025

1. Background

FIBAA has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2008 and is applying for renewal of EQAR registration based on a targeted external review against *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* coordinated by ENQA.

FIBAA has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2002 and is applying for renewal of ENQA membership.

FIBAA is a German-based, internationally recognised quality assurance agency with more than 30 years of experience in programme and institutional accreditation, as well as certification in continuing education. It was founded in 1994 by leading business associations from Switzerland, Austria, and Germany as a non-profit international foundation. FIBAA's mission is to promote transparency and quality in the field of education.

FIBAA's areas of expertise include business and management, economics, law, social sciences, humanities, natural sciences, engineering and technology, computer science and IT, education, and related fields.

FIBAA is carrying out the following activities within the scope of the ESG:

(1) Programme Accreditation:

- Programme accreditation in accordance with the rules of the German Accreditation Council (GAC) (awarding the GAC's seal)
- Programme accreditation outside the competence area of the GAC (to obtain FIBAA's quality seal for programmes, including accreditation of Bachelor's, Master's study programmes and doctoral/PhD programmes)
- Programme Accreditation: Excellence in Digital Education in accordance with the FIBAA quality standards (to receive the FIBAA Seal Excellence in Digital Education).

(2) Institutional Accreditation:

- System accreditation in accordance with the rules of the GAC (to obtain the GAC's seal)
- Institutional Audit Austria ("certification") in accordance with the rules of the Austrian Act on Quality Assurance in Higher Education (HS-QSG) (to obtain the FIBAA quality seal Institutional Audit Austria)
- Institutional Accreditation according to the Federal Act on Funding and Coordination of the Swiss Higher Education Sector (HFKG)
- Institutional Accreditation in accordance with the FIBAA quality standards (to obtain the FIBAA quality seal 'Institutional Accreditation')
- Institutional Accreditation: Strategic Management in accordance with the FIBAA's quality standards (to receive the FIBAA quality seal Institutional Accreditation: Strategic Management)
- Institutional Accreditation: Excellence in Digital Education in accordance with the FIBAA quality standards (to receive the FIBAA Seal Excellence in Digital Education).

(3) Certification of Continuing Education Courses:

- In accordance to the FIBAA quality standards, FIBAA certifies further education courses which do not lead to an academic degree but are offered at HEI level. They lead to the award of the FIBAA quality seal for further education courses.

(4) European Approach to Quality Assurance of Joint programmes.

All these activities will be included on the agency's profile on the EQAR website and linked to DEQAR database. NB: The agency may not upload reports from other activities to DEQAR.

The following activities of the applicant are outside the scope of the ESG:

- Activities of FIBAA's organizational unit, FIBAA Consult (CONS), i.e. SWOT analyses, evaluation of HEIs exams, presentations and workshops

While these activities are not relevant to the application for renewal on EQAR, it is FIBAA's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

2. Purpose and scope of the targeted review

This review will evaluate the extent to which FIBAA continues to fulfil the requirements of the ESG. The targeted review aims to place more focus on those parts that require attention and provide sufficient information to support FIBAA's application to EQAR.

The review will be further used as part of the agency's renewal of membership in ENQA.

2.1 Focus areas

A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision:

   a. ESG 2.4 due to lack of mandatory training for experts, unequal preparation of the English-speaking experts and the limited involvement of international experts in FIBAA's expert pool

   b. ESG 2.7 due to the limited scope and the rudimentary nature of the appeals' procedure

   c. ESG 3.1 due to the shortcomings of involving students in FIBAA's governance structures, the lack of a comprehensive Strategic Plan and a clear separation of its consultancy and external QA procedures

   d. ESG 3.4 due to the limited work regarding the thematic analysis

B) Standards 2.1 to 2.7 for the following activities:

   a. European Approach to Quality Assurance of Joint programmes

C) Standards affected by other types of substantive changes:

   a. ESG 2.1 regarding whether all of the standards of the Part 1 of the ESG are effectively covered in the (updated) procedures Programme accreditation outside the competence area of the GAC (to obtain FIBAA's quality seal for programmes) and FIBAA Quality Seal for Certified Continuing Education Courses/Micro-Credentials

   b. ESG 2.2 regarding whether the stakeholders were consulted appropriately and whether the methodologies are fit for purpose in the (updated) procedures Programme accreditation outside the competence area of the GAC (to obtain FIBAA's quality seal for programmes) and FIBAA Quality Seal for Certified Continuing Education Courses/Micro-Credentials

   c. ESG 2.4 regarding whether the panel experts receive appropriate training on the (updated) procedures Programme accreditation outside the competence area of the GAC (to obtain FIBAA's quality seal for programmes) and FIBAA Quality Seal for Certified Continuing Education Courses/Micro-Credentials

D) ESG 2.1 Consideration of internal quality assurance;

E) Selected enhancement area: ESG 3.5

F) Other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any), including:

a. ESG 2.6 – regarding the redaction of the reports prior to their publication on FIBAA's website

G) These issues should be investigated by the review panel as far as possible, providing an analysis and conclusion on the ESG standard(s) concerned.

3. The review process

The review will be conducted in line with the requirements of *the EQAR Procedures for Applications* and *the Policy on Targeted Reviews*, and following the methodology described in the *Guidelines for ENQA Targeted Reviews*.

The evaluation procedure consists of the following steps:

- Agreement on the Terms of Reference between EQAR, FIBAA and ENQA;
- Nomination and appointment of the review panel by ENQA;
- Self-assessment by FIBAA including the preparation and publication of a self-assessment report;
- A site visit by the review panel to FIBAA;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Analysis of the final review report and decision-making by the EQAR Register Committee;
- Decision on ENQA membership by the ENQA Board;
- Attendance to the online follow-up seminar.

3.1 Independence of the review coordinator

The coordinator has not provided remunerated (e.g. consultancy) or unremunerated services to FIBAA during the past 5 years, and conversely FIBAA has not provided any remunerated or unremunerated services to the coordinator.

3.2 Nomination and appointment of the review team members

The review panel consists of four members including an academic employed by a higher education institution, a student member and one other expert. At least two members are from another country**.**

At least one panel member should be a quality assurance professional that is currently employed by a QA agency and has been engaged in quality assurance within the past five years. When requested by the agency under review or when considered particularly pertinent, other stakeholders (for example, a representative of the labour market) may be included. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

One of the members serves as the chair of the review panel, and one as the review secretary. At least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. At least two panel members come from outside the national system of the agency under review (if relevant).

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The Review Coordinator will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

ENQA will provide the agency with the proposed panel composition and the curricula vitarum of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

Once appointed, the coordinator will inform EQAR about the appointed panel members.

3.3 Self-assessment by FIBAA, including the preparation of a self-assessment report

FIBAA is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment includes all relevant internal and external stakeholders;

The self-assessment report is expected to contain:

- a description of the self-assessment process and the production of the SAR;
- a description of changes occurred within the agency since the last full review, including any eventual changes in the higher education system and quality assurance system in which the agency predominantly operates, the agency's structure, funding, its list of external quality assurance activities within the scope of the ESG, as well as the changes in the agency's quality assurance activities abroad (where relevant);

a section that addresses the focus areas of the review, including standards that were considered to be partially compliant with the ESG in the last full review as well as ESG 2.1 and one self-selected ESG standard for enhancement (see

- **2.1 Focus areas**);

- a SWOT analysis of the agency as a whole;
- for each of the individual standards enlisted above (see section 2) a consideration of how the agency has addressed the recommendations as noted in the previous EQAR Register Committee decision of inclusion/renewal (if applicable).

The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which FIBAA fulfils its tasks of external quality assurance and continues to meet the ESG and thus the requirements for EQAR registration.

The self-assessment report is submitted to the review coordinator, which has two weeks to carry out a screening. The purpose of a screening is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The coordinator will not judge the content of information itself but rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Targeted Reviews*, is present. If the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

3.4 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule considering the aspects included under the focus area (as defined under point 2.1 of the Terms of Reference).

The schedule will include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit. The approved schedule shall be given to FIBAA at least one month before the site visit, in order to properly organise the requested interviews.

The site visit should enable the review panel to explore how the agency has addressed the standards where it has been found to be partially compliant (if the case), aspects of substantive change, consideration of internal quality assurance (ESG 2.1) and the self-selected ESG standard(s) for enhancement. The panel will include extra time during the site-visit to address any other arising issues (if the case) that might have an impact on the agency's compliance with the ESG.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency.

Prior to the physical site visit, the panel attends a joint briefing call between the panel, ENQA and EQAR to clarify the review expectations and address any possible arising matters.

In advance of the site visit (at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

3.5 Preparation and completion of the final review report

The review report will be drafted in consultation with all review panel members and correspond to the purpose and scope of the review as defined under articles 2 and 2.1. In particular, it will provide a clear rationale for its findings concerning each ESG. When preparing the report, the review panel should bear in mind the *EQAR Policy on the Use and Interpretation of the ESG* to ensure that the report will contain sufficient information for the Register Committee for application to EQAR[7].

The external report will present the facts and analysis reflecting the reality at the time of review. This will form the main basis for the Register Committee's decision making.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language. After panel has considered coordinator's feedback, the report will go to the agency for comment on factual accuracy. If FIBAA chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report.

Thereafter, the review panel will take into account the statement by FIBAA and submit the document for scrutiny to ENQA's Agency Review Committee and then to EQAR along with the remaining application documents (self-evaluation report, Declaration of Honour, statement to review report-if applicable). The report is to be finalised normally within 2-4 months of the site visit and will normally not exceed 30 pages in length. All panel members will sign off on the final version of the external review report. The coordinator will provide to FIBAA the Declaration of Honour together with the final report.

4. Publication and use of the report

FIBAA will receive the expert panel's report and publish it on its website once the ENQA Agency Review Committee has validated the report. Prior to the final

7 See here: https://www.eqar.eu/assets/uploads/2025/01/EQAR-UseInterpretation-v4.0.pdf

validation of the report, the ENQA Agency Review Committee may request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome. The report will also be published on the EQAR website together with the decision on registration, regardless of the outcome.

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA.

5. Decision-making on EQAR registration and ENQA membership

The agency will submit the review report via email to EQAR before expiry of the agency's registration on EQAR. The agency will also include its self-assessment report (in a PDF format), the Declaration of Honour and any other relevant documents to the application to EQAR (i.e. annexes, statement to the review report).

EQAR is expected to consider the review report and the agency's application at its Register Committee meeting in autumn 2026. The Register Committee's final judgement on the agency's compliance with the ESG as a whole can either be substantially compliant (approval of the application) or not substantially compliant (rejection of the application). In case of a positive decision (substantially compliant with the ESG), the registration is renewed for a further five years (from the date of the review report).

The decision on ENQA membership by the ENQA Board will take place after EQAR Register Committee decision.

To apply for ENQA membership, the agency is requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

6. Indicative schedule of the review

Agreement on Terms of Reference	September 2025
Appointment of review panel members	September 2025

Self-assessment report (SAR) completed by FIBAA	31 January 2026
Screening of SAR by ENQA Review Coordinator	February 2026
Preparation of site visit schedule and indicative timetable	March 2026
Briefing of review panel members	April 2026
Review panel site visit	May 2026
Submission of the draft review report to ENQA Review Coordinator	End-June 2026
Factual check of the review report by the FIBAA	July 2026
Statement of FIBAA to review panel (if applicable)	August 2026
Submission of review report to ENQA	End August 2026
Validation of the review report by the Agency Review Committee	September 2026
EQAR Register Committee meeting and decision on the application by FIBAA	Autumn 2026
Decision on ENQA membership by the ENQA Board	Autumn/winter 2026

ANNEX 3: GLOSSARY

A&CC	Appeals and Complaints Committee
BAN-PT	National Accreditation Agency for HE (Indonesia)
CRM	Customer Relationship Management
DEQAR	Database of external QA results
EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAA	External Quality Assurance Agency
EQAR	European Quality Assurance Register for Higher Education
ESG	*Standards and Guidelines for Quality Assurance in the European Higher Education Area*, 2015
F-ACC	FIBAA Accreditation and Certification Committee
FIBAA	Foundation for International Business Administration Accreditation
HE	higher education
HEI	higher education institution
QA	quality assurance
SAR	self-assessment report
SDG	Sustainable development goal
ToR	Terms of Reference
UN	United Nations

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY FIBAA

- Self assessment report
- Mapping grid of FIBAA activities against ESG 2.1
- A briefing note on the self-selected enhancement area for the ENQA Targeted Review of FIBAA
- FIBAA substantive change report to EQAR, 18th March 2026
- FIBAA annual operational plan 2026
- Further document to respond to panel questions on:
- Budget trends and procedure costs
- Composition of the FIBAA expert pool
- Supplementary information to Table 1 "Activities of the Last Five Years" in the Self-Assessment Report, with projections for 2026–2027.
- Proportion of national and international procedures in 2025
- FIBAA's Approach to the Use of Artificial Intelligence

OTHER SOURCES USED BY THE REVIEW PANEL

- A live demonstration of Asana and Viflow
- The FIBAA website: www.fibaa.org
- FIBAA's LinkedIn account

ENQA TARGETED **REVIEW 2026**

THIS REPORT presents findings of the ENQA Targeted Review of the Foundation for International Business Administration Accreditation (FIBAA), undertaken in 2026.

enqa.
European Association for
Quality Assurance in Higher Education