



Part XXX IQA Accreditation Observer System Management Measures

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Formulating Institution: Quality Accreditation Committee of the International Association of Private Universities and Colleges (IAPUC)

Applicable Objects: All institutional representatives applying to become IQA accreditation observers, as well as accredited institutions and review teams accepting observer participation in accreditation activities

Preamble

The credibility of the IAPUC-IQA Accreditation System is built on the cornerstones of rigor, impartiality and transparency. Nevertheless, for many private higher education institutions with no prior experience in international quality accreditation, the "black-box perception" of the accreditation process — uncertainty about the conduct of site visits, lack of understanding of review experts' inquiry methods, and ambiguity over the verification of self-evaluation evidence — may constitute psychological and knowledge barriers to taking the first step in applying for accreditation. Such information asymmetry hinders the promotion of the accreditation system and runs counter to IAPUC's open mission of advancing quality improvement in private higher education.

The establishment of the Observer System aims to open a regulated and limited window while safeguarding the independence and confidentiality of the accreditation process. By allowing vetted institutional representatives to observe designated accreditation sessions as observers, IAPUC intends to achieve three core objectives: eliminate the mystique surrounding accreditation and enable potential applicant institutions to intuitively recognize the rigor and professionalism of IQA reviews; facilitate peer learning, enabling observers to apply insights gained from observation to internal institutional quality culture development; and enhance the transparency of the accreditation system, allowing external stakeholders to witness the standardized operation of accreditation procedures.

Meanwhile, IAPUC fully recognizes that improper management of the Observer System may bring risks such as disruption to review proceedings, leakage of sensitive information, and impairment of the legitimate interests of observed institutions. Therefore, these Management Measures establish strict admission criteria, clear behavioral red lines, stringent confidentiality constraints and a comprehensive supervision mechanism while providing open observation opportunities. The Observer System is not a backdoor for accreditation, but a well-designed learning channel with clear operational guidelines.

These Management Measures are interconnected with the *IQA Peer Review Expert Selection and Code of Conduct* and the *IQA Accreditation Appeal, Complaint and Dispute Resolution Management Measures* in terms of confidentiality and professional ethics, and complement the *IQA Management Measures for Quality Representatives of Accredited Institutions* in institutional participation, jointly forming an institutional balance between professionalism, rigor, openness and inclusiveness within the IQA Accreditation System.

Chapter I General Provisions

Article 1 Purposes and Basis

These Management Measures are formulated for the following purposes:

(1) To establish the IQA Accreditation Observer System and provide observation and

learning opportunities of accreditation review procedures for full IAPUC members that have not yet entered the accreditation application stage;

(2) To clarify the application qualifications, approval procedures, scope of rights and code of conduct for observers;

(3) To ensure that observation activities do not compromise the independence, impartiality and confidentiality of accreditation reviews;

(4) To protect the legitimate rights and interests and information security of observed institutions and prevent improper utilization of the Observer System.

These Management Measures are formulated on the following bases:

- Provisions on accreditation procedures and confidentiality principles specified in the *IAPUC-IQA Accreditation Manual*;

- Requirements for review independence and information confidentiality specified in the *IQA Peer Review Expert Selection and Code of Conduct*;

- Basic principles of integrity and confidentiality specified in the *IAPUC-IQA Academic Ethics and Code of Conduct*;

- Procedures for violation reporting and investigation specified in the *IQA Accreditation Appeal, Complaint and Dispute Resolution Management Measures*.

Article 2 Scope of Application

These Management Measures apply to:

(1) All representatives of full IAPUC member institutions applying to become IQA accreditation observers;

(2) Observed institutions that accept observer participation in accreditation activities;

(3) The IQA Office responsible for the approval and administration of observers;

(4) Review experts and relevant personnel interacting with observers during observation activities.

Article 3 Basic Principles

The Observer System adheres to the following basic principles:

Principle	Core Connotation
Voluntary Participation	Observer participation is based on voluntary application by applicant institutions, and observer acceptance is based on voluntary consent by observed institutions. No party shall be compelled to participate in observation activities.
Limited Openness	Only approved designated sessions of the

	accreditation process are open for observation. Sessions involving internal review panel discussions, accreditation decision deliberations and sensitive institutional information are excluded from observation.
Non-Interference in Reviews	Observers are limited to silent observation. They shall not participate in review discussions, raise questions or express opinions to review experts, or attempt to influence the review process or results in any manner.
Confidentiality Priority	Observers bear strict confidentiality obligations for all non-public information obtained during observation activities. The confidentiality obligation persists indefinitely after the conclusion of observation activities.
Learning Orientation	The core purpose of the Observer System is to facilitate peer learning, rather than external supervision or evaluation of review activities. Observers shall not regard themselves as supervisors.

Chapter II Observer Qualifications and Application

Article 4 Application Qualifications

Institutions applying for IQA accreditation observer qualifications must meet all of the following requirements:

- (1) Be a full IAPUC member (not an associate member) and have not submitted any IQA accreditation application;
- (2) Intend to apply for IQA accreditation in the future and submit a written statement of intent upon applying for observer qualifications;
- (3) Have no major violations or serious industry reputation-harming conduct within the past three years;
- (4) Undertake to comply with all provisions of these Management Measures.

Each eligible institution may apply to appoint a maximum of two observers per accreditation cycle. Observers must be full-time employees of the applicant institution, and at least one observer shall be the institutional quality representative or a core staff member responsible for quality assurance duties.

Article 5 Application and Approval Procedures

(1) **Application Submission:** The applicant institution shall submit the *IQA Accreditation Observer Application Form* to the IQA Office via its quality representative. The form shall include basic institutional information, name, position and contact details of proposed observers, a brief introduction to their internal quality assurance responsibilities, the main purposes and learning expectations of the observation application, and a formal commitment by the applicant institution to abide by all provisions of these Management Measures.

(2) **Qualification Review:** The IQA Office shall complete the qualification review within twenty working days upon receiving the application. The review focuses on whether the applicant institution meets the requirements of full membership and non-accreditation application status, whether proposed observers satisfy the qualification criteria, and whether the institution has any known risks that may compromise observation impartiality.

(3) **Training and Undertaking:** Observers who pass the qualification review shall complete the online IQA observer code of conduct training (approximately two hours) organized by the IQA Office and sign the *Observer Confidentiality and Code of Conduct Undertaking*.

(4) **Inclusion in Observer Candidate Pool:** Observers who complete training and sign the undertaking shall be included in the IQA Observer Candidate Pool, with validity synchronized with the institution's IAPUC membership status. Those who fail to obtain observation opportunities upon expiration shall reapply for qualification.

Article 6 Suspension and Revocation of Observer Qualifications

The IQA Office may suspend or revoke observer qualifications under any of the following circumstances:

(1) The observer's institution submits an IQA accreditation application — observer qualifications shall be automatically suspended upon acceptance of the accreditation application; qualifications may be restored after the release of accreditation results, but shall be permanently terminated if the institution receives a "non-accreditation" decision;

(2) The observer or their institution seriously violates these Management Measures;

(3) The observer's institution loses full IAPUC membership status;

(4) The observer voluntarily applies for withdrawal.

Chapter III Scope and Restrictions of Observation Activities

Article 7 Observable Accreditation Sessions

Subject to the written consent of the observed institution, the following accreditation sessions may be open to observers:

(1) Partial public sessions during site visits:

- Opening briefing meeting: The review panel introduces the visit objectives, scope and schedule to the institution;
- Exit preliminary briefing meeting: The review panel leader verbally informs institutional leaders of initial visit impressions at the conclusion of the site visit;
- Other non-confidential sessions approved by both the review panel leader and the observed institution.

(2) Public accreditation-related activities:

- Public briefings on accreditation standards and procedures organized by the IQA Office;
- Public sharing sessions of the annual accreditation practice exchange conference;
- Desensitized and recorded accreditation practice case displays approved by the observed institution.

Article 8 Strictly Prohibited Observation Sessions

The following accreditation sessions shall not be open to observers under any circumstances:

- (1) Internal review panel discussions: including expert deliberations during desk reviews, daily internal panel debriefs during site visits, and discussions and revisions during review report compilation;
- (2) Sessions involving sensitive institutional information: review experts' inspection of institutional financial vouchers, personnel files, student personal records and other confidential materials;
- (3) Symposia involving third-party information: panel discussions with current students, alumni or employer representatives — these sessions are generally closed to observers even with institutional consent to protect the privacy and freedom of expression of participants;
- (4) Accreditation decision-making sessions: deliberation and voting meetings of the Accreditation Decision Committee;
- (5) Appeal and arbitration sessions: all investigation, hearing and deliberation procedures involving accreditation appeals, complaints and dispute resolution.

Article 9 Acquisition of Consent

- (1) After selecting eligible observers from the Observer Candidate Pool, the IQA Office shall obtain written consent from the observed institution prior to arranging observation activities. The consent document shall specify the open observation sessions, observer names and affiliated institutions, observation dates, and the code

of conduct and confidentiality obligations stipulated in these Management Measures.

(2) Observed institutions have the right to refuse observer participation at any time without cause. Institutional refusal shall not affect the progress of its accreditation review and shall not give rise to any adverse presumption against the institution. Refusal decisions shall be recorded by the IQA Office but shall not serve as a reference for accreditation decision-making.

(3) Observed institutions may withdraw prior consent before the commencement of observation activities due to changed circumstances, with no justification required.

Article 10 Observer Quantity Restrictions

The total number of observers for a single site visit shall generally not exceed two, with a maximum of one observer from a single institution, so as to avoid disruption to the review process caused by observation activities.

Chapter IV Observer Code of Conduct

Article 11 Pre-Observation Code of Conduct

(1) Upon receiving observation notification, observers shall confirm that there are no interest conflicts that may compromise observation impartiality. Observers shall voluntarily declare to the IQA Office and withdraw from the observation activity under any of the following circumstances:

- Having a competitive relationship with the observed institution that may affect objective observation;
- Having kinship or close personal relations with senior management of the observed institution;
- Having been employed by the observed institution within the past five years.

(2) Observers shall complete pre-observation preparatory learning arranged by the IQA Office before the activity commencement, including understanding the basic procedures, code of conduct and precautions for designated observation sessions.

Article 12 In-Observation Code of Conduct

(1) **Silent Observation:** Observers shall remain silent throughout all observation activities and shall not raise questions, express opinions or make comments of any kind to review experts, institutional staff or other observers.

(2) **Identity Identification:** Observers shall wear unified official "IQA Accreditation Observer" nameplates during observation activities and clearly disclose their observer identity when introduced.

(3) **Non-Interference in Reviews:** Observers shall not intervene in or attempt to influence the review process and results in any manner. If the review panel leader or observed institutional representative determines that an observer's conduct is

interfering or may interfere with the review process, the panel leader has the right to order the observer to withdraw immediately. Observers shall comply with such orders without argument or delay.

(4) **Prohibition of Sensitive Information Recording:** Observers may take general learning notes but are prohibited from recording specific institutional data, financial information, personal names or other sensitive details; verbatim transcribing, audio-recording or video-recording symposiums or interviews; or photographing documents, screens or premises containing sensitive information.

(5) **Institutional Respect:** Observers shall abide by the on-site rules, cultural norms and personnel privacy of the observed institution, and maintain professional attire and demeanor throughout the activity.

Article 13 Post-Observation Code of Conduct

(1) **Persistent Confidentiality Obligation:** Observers bear indefinite confidentiality obligations for all non-public information obtained during observation activities after the conclusion of the activity. The confidentiality obligation survives the expiration of observer qualifications or changes in institutional membership status.

(2) **Observation Report Submission:** Observers may submit a brief *Observation Learning Report* to the IQA Office within 30 days after the observation activity, covering an overview of observed sessions, key learning outcomes, and insights for internal institutional quality assurance system development. The report shall not contain any specific institutional information or personal privacy obtained during observation. The report is for internal use only by the IQA Office and the observer's institution, shall not be publicly disclosed, and shall not be included in the observed institution's accreditation files.

(3) **Prohibition of Public Commentary:** Observers shall not describe or comment on specific institutional observation experiences in academic papers, social media, public speeches or third-party communications. General and non-targeted experience sharing regarding the Observer System is exempt from this restriction.

Chapter V Administration, Supervision and Violation Disposal

Article 14 Administrative Responsibilities of the IQA Office

(1) The IQA Office is responsible for the daily administration of the Observer System, including application acceptance, qualification review, training organization, observation opportunity matching and feedback collection.

(2) The IQA Office shall maintain an observer activity ledger to record the observation experience and compliance status of each observer.

(3) The IQA Office shall submit an annual operational report on the Observer System to the Quality Accreditation Committee at least once a year, covering observer participation data, feedback from observed institutions and notable administrative issues.

Article 15 Violation Disposal

(1) The IQA Office shall conduct investigations into observer violations of these Management Measures and grant observers the right to statement and defense during investigations.

(2) Violations shall be disposed of in accordance with the following graded penalties based on severity:

- **Verbal Reminder:** Minor unintentional misconduct with no substantial adverse impact;

- **Written Warning:** Obvious misconduct or failure to rectify non-compliant conduct after verbal reminder;

- **Qualification Suspension:** Serious violation of the code of conduct without permanent disqualification, with a suspension period of one to three years;

- **Permanent Disqualification:** Intentional disclosure of confidential information, abuse of observer identity for improper interests, serious disruption of accreditation procedures, or utilization of observation information for unfair competition by the observer's institution.

(3) Observers who disagree with the disqualification decision may file an appeal in accordance with the *IQA Accreditation Appeal, Complaint and Dispute Resolution Management Measures*.

Article 16 Feedback Rights of Observed Institutions

(1) Observed institutions may file formal complaints with the IQA Office regarding observer misconduct during observation activities. Complaint handling shall comply with the provisions of Chapter III of the *IQA Accreditation Appeal, Complaint and Dispute Resolution Management Measures*.

(2) The IQA Office shall duly record and handle feedback from observed institutions and notify complaining institutions of handling results upon investigation conclusion. For real-name complaints, feedback shall be provided to the complainant on the premise of protecting the respondent's privacy.

Chapter VI Supplementary Provisions

Article 17 Connection with Other Regulatory Documents

Document Name	Relationship with These Management Measures
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<i>IQA Peer Review Expert Selection and Code of Conduct</i>	The confidentiality requirements for review and institutional information accessed by observers are aligned with the confidentiality standards applicable to peer review experts stipulated in this code.
<i>IQA Management Measures for Quality Representatives of Accredited Institutions</i>	It is recommended that one observer be the institutional quality representative, so as to integrate observation learning with institutional accreditation preparation.
<i>IQA Accreditation Appeal, Complaint and Dispute Resolution Management Measures</i>	The appeal procedures for observer qualification revocation and complaint procedures for observed institutions shall be governed by these measures.
<i>Guidelines for Institutional Capacity Building and Development of Accredited Institutions</i>	The Observer System serves as a specific practical form of the peer learning philosophy advocated in the Guidelines.

Article 18 Term Definitions

Term	Definition
Observer	A representative of a full IAPUC member institution approved by the IQA Office to observe designated accreditation sessions for learning purposes.
Observed Institution	An accreditation applicant or accredited institution that permits observers to observe open sessions of its accreditation activities.
Open Sessions	Designated parts of accreditation activities approved jointly by the review panel leader and the observed institution for observer access.
Silent Observation	Observers are limited to on-site viewing and listening, and shall not ask questions, make statements or participate in or interfere with observation activities in any manner.

Article 19 Interpretation and Revision

(1) The right of interpretation of these Management Measures resides with the IAPUC Quality Accreditation Committee.

(2) Revisions to these Management Measures shall be subject to approval by the IAPUC Council.

Article 20 Effectiveness and Transitional Arrangements

These Management Measures shall come into force officially upon approval by the IAPUC Council. The existing Observer Candidate Pool (if any) upon the effective date shall undergo qualification review within three months in accordance with the provisions of these Management Measures.

Appendix: Observer Confidentiality and Code of Conduct Undertaking

This undertaking shall include: basic observer information, observation activity information, confidentiality commitments (specifying the scope and indefinite validity of confidentiality obligations), code of conduct commitments (silent observation, prohibition of sensitive information recording, etc.), statement of awareness of violation consequences, and signature columns.

Document Approval

Role	Name/Position	Date
Compiler	Observer System Working Group, IAPUC Quality Accreditation Committee	May 2026
Reviewer	IAPUC Quality Accreditation Committee	Pending
Approver	IAPUC Council	Pending

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