
ENQA AGENCY REVIEW: ACCREDITATION ORGANISATION OF THE NETHERLANDS AND FLANDERS (NVAO)

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EXECUTIVE SUMMARY

This report analyses the compliance of the Accreditation Organisation for The Netherlands and Flanders (Nederlands Vlaamse Accreditatie Organisatie, NVAO) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). The purpose of the review is to verify that NVAO acts in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015. ENQA requires all member agencies to undergo an external cyclical review, at least once every five years. Substantial compliance with the ESG is a condition for membership.

NVAO was established by Treaty on 1 February 2005 by the Dutch and Flemish governments as a bi-national organisation. It has operated as the formal accreditation body in these countries since then. NVAO passed two previous ENQA reviews, in 2007 and in 2012, and is registered in EQAR since November 2008.

In light of the documentary and oral evidence, considered by the review panel, the review panel has the following judgements and recommendations on separate standards.

F = Fully compliant; S = Substantially compliant, P = Partially compliant, N = Non-compliant

STANDARD	JUDGEMENT	RECOMMENDATION
ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE	F	
ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE	F	
ESG 2.3 IMPLEMENTING PROCESSES	S	NVAO remains sensitive regarding issues of implementation as experienced by stakeholders and adopts a clearer terminology to differentiate between substantively different approaches to follow up of decisions.
ESG 2.4 PEER-REVIEW EXPERTS	F	
ESG 2.5 CRITERIA FOR OUTCOMES	S	NVAO reflects on the grading system as presently applied and considers making it as straightforward as necessary for the purpose of yes/no/conditional accreditation.
ESG 2.6 REPORTING	S	NVAO analyses the actual and potential readership of its reports and their needs, and develops new means to reach a readership among students and employers.
ESG 2.7 COMPLAINTS AND APPEALS	P	NVAO develops a complaint procedure and opens a section 'Complaints and appeals' at its website with appropriate formats for complaints and appeals.
3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE	S	NVAO prepares coherent development plans on the future short-term and long-term development of accreditation processes in Flanders and The Netherlands, on the basis of comprehensive evaluations of the NL- and FL-pilots and taking into account expectations about the quality assurance in higher education by all relevant stakeholders.
3.2 OFFICIAL STATUS	F	
3.3 INDEPENDENCE	F	
3.4 THEMATIC ANALYSIS	S	NVAO reviews the approach to thematic analysis and in consultation with stakeholders, identifies a common purpose and a means to regularize processes and priorities in this area.

3.5 RESOURCES	F	
3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT	S	NVAO remains alert on loose loops in the plan-do-check-act-cycle of the quality assurance system.
3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES	F	

On the basis of these judgements the review panel is satisfied that, in the performance of its functions, NVAO is in substantial compliance with the ESG.

INTRODUCTION

This report analyses the compliance of the Accreditation Organisation for The Netherlands and Flanders (Nederlands Vlaamse Accreditatie Organisatie, NVAO) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted from November 2016 until August 2017 (from self-analysis by the agency until the finalisation of the review report).

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 substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

As this is NVAO's third review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

MAIN FINDINGS OF THE 2012 REVIEW

Summary of the 2012 review

The panel is convinced that NVAO acts in compliance with the ENQA membership regulations and is in substantial compliance with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area*. Details of the measure of compliance are given below. The Panel therefore recommends to the Board of ENQA that NVAO's Full Membership of ENQA be confirmed for a further period of five years.

During the 2012 site visit, interviewees mentioned several times that NVAO is in a 'transition state' as models and procedures for quality assurance were being changed in relation to Flanders or had recently been changed in The Netherlands. It was the view of the review panel that a situation of change and development is to be expected for most quality assurance agencies. The panel recognises that NVAO and its partners have work ahead in order to establish the institutional assessment approach in Flanders as well as to consolidate the new practice in The Netherlands. The panel encourages all the parties to learn from the experience gathered thus far.

Compliance

The Panel concludes that NVAO *fully complies* with the following ESG 2005 Standards

- 3.2 'Official status', (now ESG 2015, Standard 3.2, 'Official status');
- 3.3 'Activities'(now partly ESG 2015, Standard 3.1 'Activities, policy, and processes for quality assurance');
- 3.4 'Resources'(now ESG 2015 2015, Standard, 3.4 'Resources');
- 3.5 'Mission statement' (now partly ESG 2015, Standard 3.1 'Activities, policy, and processes for quality assurance');
- 3.6 'Independence'(now ESG 2015, Standard 3.3 'Independence');
- 3.7 'External quality assurance criteria and processes used by members' (now partly ESG 2015 Standard 2.3 'Implementing processes', Standard 2.4 'Peer-review experts', and Standard 2.7 ' Complaints and appeals');
- 3.8 'Accountability procedures (now partly ESG 2015 Standard 3.6 'Internal quality assurance and professional conduct', and Standard 3.7 'Cyclical external review of agencies');
- 2.1 'Use of internal quality assurance procedures' (now ESG 2015 Standard 2.1 'Consideration of internal quality assurance');
- 2.6 'Follow-up procedures' (now partly ESG 2015 Standard 2.3 'Implementing processes');

- 2.7 'Periodic reviews' (now ESG 2015, Standard 1.10, Cyclical external quality assurance').

On the following ESG 2005 Standards the review panel's conclusion was '*substantial compliance*':

- 3.1 'Use of external quality assurance procedures for higher education' (now partly ESG 2015 Standard 3.1 'Activities, policy, and processes for quality assurance');
- 2.2 'Development of external quality assurance processes' (now partly ESG 2015 Standard 2.2 'Designing methodologies fit for purpose');
- 2.4 'Processes fit for purpose' (now partly ESG 2015 Standard 2.2 'Designing methodologies fit for purpose');
- 2.5 'Reporting' (now ESG 2015 Standard 2.6 'Reporting');
- 2.8 'System-wide analyses' (now ESG 2015 Standard 3.4 'Thematic analysis').

On the following ESG 2005 Standard the review panel's conclusion was '*partial compliance*':

- 2.3 'Criteria for decisions' (now ESG 2015 Standard 2.5 Criteria for outcomes').

Recommendations

The main areas for further improvements relate to public information in various senses and to the formulation of explicit and public criteria about how NVAO reaches its accreditation decisions in relation to the programme assessments in all cases. On specific standards the review panel expressed the following recommendations:

ESG 2005 Standard 2.1 'Use of internal quality assurance procedures'

[NVAO] makes the link between the NVAO standards and ESG Part 1 more explicit in the assessment frameworks.

ESG 2005 Standard 2.2 'Development of external quality assurance processes'

[NVAO] further strengthens the focus on quality improvement and enhancement of the HEI's.

ESG 2005 Standard 2.3 'Criteria for decisions'

- [NVAO] refines the descriptions of the aims and objectives, ensures that they are prominent in the frameworks and show how the various elements of the frameworks contribute to the aims and objectives;
- [NVAO] formulates explicit and public criteria about how it reaches its accreditation decisions in relation to the programme assessments in all cases;
- [NVAO] establishes a clear procedure on how to handle cases where the conclusions in the assessment report are not accepted by NVAO;
- [NVAO] strengthens the predictability of the timeframe and efficiency of its decision-making process.

ESG 2005 Standard 2.5 'Reporting'

[NVAO] clarifies

- a. the purpose of every kind of report;
- b. the readership; and
- c. the needs of the various kinds of readers in order to enhance the readability;

ESG 2005 Standard 2.8 'System-wide analysis'

[NVAO] gives a high priority to

- a. the identification of the interested parties for system-wide analyses and of their needs;
- b. the definition of a realistic schedule of system-wide analyses; and
- c. the production of system-wide analyses corresponding to the needs which were identified.

Further to the panel's recommendations the Board of ENQA reconfirmed NVAO's full membership of ENQA in a letter, dated 29 January 2013. In this letter the Board suggested NVAO to pay attention to the following issue:

ESG 2005 Standard 3.7 'External QA criteria and processes used by the members'

To improve the consistency of accreditation judgments reached. Clustering of assessments may be beneficial to improve consistency in assessments and decision making, as well as to answer the stakeholders' need for more system-wide analysis.

REVIEW PROCESS

The 2017 external review of NVAO was conducted in line with the process described in the Guidelines for ENQA Agency Reviews and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of NVAO was appointed by ENQA and composed of the following members:

- Andy Gibbs (Chair), Senior Lecturer, formerly Glasgow Caledonian University, the UK (EUA nominee)
- Obe de Vries (Secretary), Independent consultant and QA professional, The Netherlands (ENQA nominee)
- Laura Beccari, Scientific collaborator, AAQ, Switzerland (ENQA nominee)
- Alexandra Raijmakers, Student at University of Oslo, Norway (Dutch national) (ESU nominee)

Maria Kelo, director of ENQA, acted as process coordinator for the review.

From September 2016 onwards panel members had regular e-mail exchanges about the organisation of the review. In December the panel received the self-assessment report (SAR) and from then on work on the review started. Following a proposal by the chair, specific standards were allocated to the panel members as specific focus points for their attention. In February 2017 the panel had a telephone conversation in which both practical details of the review, the proposed time schedule for the site visit, preliminary impressions and wishes for additional documents were discussed. At that time also special points for further investigation were brought together in a "mapping grid for panel members". Meanwhile the panel secretary had regular contacts with the ENQA process coordinator and the NVAO review coordinator. Further e-mails on SAR and additional documents were exchanged in February and March. On 28th March, a day before the site visit the chair and secretary met to establish a comprehensive document with proposed "topics per session".

On 29th March, the panel met in The Hague for two hours, shortly before the start of the site visit, to discuss the topics. It was decided that, while an individual panel member would have a first responsibility for bringing up topics related to 'his or her standard' in specific sessions, other panel members could join in the discussions whenever suitable. Thus, there would be no specific lead-person per session, apart from the chair.

Self-assessment report

The self-assessment report is a 76 page document with some 300 pages Annexes. According to the SAR it was produced in a collaborative effort of NVAO staff and Board. In May 2016 the first draft was accepted by the General Board of the NVAO for discussion with external stakeholders and NVAO's Advisory Council. The final version was distributed to the panel in December 2016, after scrutiny on formal aspects by the ENQA-secretariat.

The SAR contains chapters on higher education and quality assurance in the context of the NVAO; history, profile and activities of NVAO; a SWOT analysis; HE-QA-activities of NVAO; NVAO's processes and methodologies; NVAO's internal quality assurance; its international activities; and compliance with ESG Part 3 and Part 2. Also information and opinions of stakeholders are summarized, as well as

recommendations and main findings from previous review(s) and NVAO's resulting follow-up. The SAR ends with current challenges and areas for future development.

The Annexes consist of CV's of NVAO Board Members; key figures on higher education in The Netherlands and Flanders; assessment frameworks for the higher education accreditation system of The Netherlands 2014; assessment framework for the higher education accreditation system of The Netherlands 2016 and overview of standards and assessment rules frameworks 2014-2016; Frameworks for higher education Flanders and Quality Code 2015; details of NVAO activities and procedures including communication activities; differentiation in judgements in The Netherlands and Flanders; internal quality assurance, feedback analysis and samples of surveys; profiles panel chair and process coordinator; thematic analyses: short description and references.

In the course of February and March additional documents were supplied, partly on request of the panel (see Annex 5 of this report).

Site visit

The site visit took place from 29 to 31 March according to the time schedule as given in Annex 2. Interviewees were the SAR team, NVAO Executive and General Board, NVAO staff, representatives of the Dutch and Flemish ministries of higher education, Dutch and Flemish institutions of higher education, assessment agencies, panel members, students, teachers and employers.

The panel had allowed an 'open hour' for any stakeholder, who wasn't interviewed and still had a wish to speak with the panel about the functioning of NVAO. This open hour was announced at the NVAO-website well before the site visit, but nobody showed interest to make use of this opportunity.

During the interview sessions with the SAR team, and with the students, teachers and employers and during final de-briefing a representative of The Netherlands' Inspectorate of Education was present as an observer. The purpose of this was for her to get acquainted with the present accreditation system, in preparation of an evaluation survey among Netherlands HE-institutions, to be held in September 2017. The observation followed the ENQA-protocol for observers, and it was ensured that none of the interviewees had objections.

Before the start of the interviews and after the second day of the site visit the panel had clarification meetings with NVAO process coordinator on specific topics. In the course of the site visit additional documents were supplied on request of the panel (see Annex 5 of this report).

During the site visit panel members had various internal, consensus-forming discussions: on each day before the beginning of the interviews; in between and after interview sessions; and in the scheduled concluding meeting of the panel at the last day of the site visit. As regards the scope of the site visit the panel decided that activities referring to advisory work and decision making based on specific evaluations (see NVAO's FUNCTIONS, ACTIVITIES, PROCEDURES, p15) were as yet not within the scope of the ESG. Therefore they will not be covered in this report.

After the site visit panel members sent individual notes on specific standards to the secretary, who then compiled a first draft of the review report. After scrutiny by the chair and other panel members a final version of this draft was sent to the ENQA process coordinator by the end of May. After further refinements the report was sent to NVAO for a check on factual details in the first half of June. In the first half of July the panel received an extensive reaction from NVAO. In this reaction a number of minor textual changes were proposed, as well as corrections of factual mistakes, partly due to inaccuracies in the SAR. Furthermore, the panel was asked for some clarification on specific

considerations. Apart from that the NVAO Board raised some issues in which the Board had a different opinion than the panel. In the second half of July and the first half of August the panel considered all these elements and where relevant, amended the text. The judgements on specific standards were not affected. The final external review report was presented to the ENQA Board on 13th September 2017.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

In the SAR an extensive description of The Netherlands and Flemish higher education systems is provided, together with key figures on higher education in The Netherlands and Flanders. In Table 1 a summary of these data is shown.

Table 1: Key figures on higher education in The Netherlands (2015/16) and Flanders (2014/15)

		The Netherlands	Flanders
Inhabitants		16.900.726	6.471.996*
Institutions	Universities	14	6
	Universities of Applied Sciences (NL) and University Colleges (FL)	37	21
	Recognised private institutions (NL) and registered institutions (FL)	70	5
	Other statutory registered institutions		6
Programmes	Academic bachelor's programmes	402	233
	Higher prof. ed. Bachelor's programmes	1048	290
	Priv. Inst. Bachelor's programmes	164	
	Advanced higher prof. ed. Bachelor's programmes		68
	Associate degree programmes	128	
	Priv. Inst. Associate degree programmes	44	
	Academic Master's programmes	797	589
	Priv. Inst. Master's programmes	75	
	Higher prof. ed. Master's programmes	240	
	Advanced academic master's programmes		227
Students	Fulltime students academic programmes	258.100	108.098
	Fulltime students higher prof. ed. programmes	442.600	109.448
	Full time students Arts education (FL)		6.709
Staff	Staff (persons) academic programmes	51.246 (=44.243 fte)	15.085
	Staff (persons) higher prof.ed. programmes	45.838 (=33.840,8 fte)	10.637

* not including Brussels (1.180.531 inhabitants)

Dutch academic education

Academic bachelor's programme make up the first cycle and comprise 180 ECTS (3 years) and can be oriented towards a single discipline or have a broad, multidisciplinary profile. Most bachelor

graduates continue their studies in a master's programme. They are often required to go through a pre-master's programme before applying for admission into a master's programme in another discipline. The bachelor's programme is positioned at EQF-level 6 and leads to the degree Bachelor of Arts/Science, or Bachelor of Laws for law programmes. Master's programmes regularly comprise 60 ECTS (for most specialisations), 120 ECTS (for engineering, science and teacher training, or research master's programmes) or 180 ECTS (medicine, veterinary science, pharmaceutical science and dentistry). The master's degree is positioned at EQF-level 7. The degree associated with academic master's programmes is Master of Arts/Science, depending on the specialisation. Students who graduate from a law programme receive the title Master of Laws (LLM).

Dutch higher professional education

Universities of applied sciences and private institutions offer professional bachelor's, associate degree, and master's programmes. Some institutions also offer academic master's programmes, mostly in Business Administration. The bachelor's programme comprises 240 ECTS (4 years). Graduates can apply for admission to an academic master's programme, which also often requires finishing a pre-master's programme. Short cycle programmes of 120 ECTS are connected to the curriculum of professional bachelor's programmes. They lead to an Associate Degree (AD). Graduates can continue their studies in a professional bachelor's programme within the same domain. Professional master's programmes comprise 60 ECTS (1 year) or 120 ECTS (2 years) for some specialisations, such as Music or Architecture. These programmes are mostly intended for practising professionals. The master's programmes are positioned at EQF-level 7. Degrees associated with professional bachelors and master's programmes are Bachelor and Master, with the addition of Arts/Science or the professional domain (e.g. Social Work).

Flemish academic education

The first cycle consists of bachelor's programmes positioned at EQF-level 6, which comprises 180 ECTS and nominally takes three years, leading to the degree Bachelor, with the addition of the field of study. The second cycle consists of master's programmes of at least 60 ECTS for Humanities, Fine Arts, Industrial Engineering, and Social Sciences, and 120 ECTS for Sciences, Engineering, Music, Medicine, and Biomedical Sciences. Specifically, research-oriented master's programmes also comprise 120 ECTS. Master's and Advanced master's programmes are positioned at EQF-level 7 and have an academic orientation but can in addition also have a professional orientation. They are concluded with a final project, referred to as master's dissertation, of 15-30 ECTS. The project should comprise at least one fifth of the number of credits of the entire programme. Advanced master's programmes of 60 ECTS are also positioned at EQF level 7, and aim at further deepening the knowledge and competences in a certain field of study. A student must already hold a master's degree to enrol. Study programmes in Arts have a professional or an academic orientation. Bachelor's programmes comprise 180 ECTS (3 years), master's programme 60 ECTS (Fine Arts, Theatre) or 120 ECTS (Music).

Flemish professionally-oriented higher education

Professionally oriented bachelor's programmes at EQF-level 6 make up the first cycle. They comprise at least 180 ECTS and take three years. Short cycle programmes of 90/120 ECTS, positioned at EQF-level 5, are positioned in between secondary education and professionally oriented bachelor's programmes. They lead to the Associate Degree. Advanced bachelor's programmes of at least 60 ECTS aim at deepening the knowledge and/or competences acquired in a professional bachelor's programme. A student must therefore already hold a bachelor's degree to enrol.

Mutual recognition and international branches of Dutch and Flemish programmes

Since 2009 Flanders and The Netherlands recognized each other's diplomas provided they had been accredited by NVAO. On 18 May 2015 the Flemish Government, the Government of the Federation

Wallonia-Brussels, the Government of The Netherlands and the Government of Luxembourg agreed to mutual recognition of bachelor's and master's degrees in higher education.

In Flanders, the quality assurance of higher education provided abroad has always been part of the regular accreditation remit. As a result, the education provided at several international branch campuses has been accredited as part of a regular accreditation procedure. Until 2016, foreign students in Dutch programmes were required to spend at least 25 percent of the duration of their study at the Dutch location to receive a Dutch degree. The Ministry of Education is preparing a procedure for allowing Dutch institutions to provide an entire programme at a foreign campus (transnational education), on the condition that the institution already offers the programme at its Dutch location, that no public money is used to finance the foreign campus, and that the aim of the transnational programme is not entirely commercial. NVAO will assess the quality of the transnational education based on a specific framework and advise the Minister of Education. After approval, the transnational programme will be included in all regular accreditation procedures. The Ministry plans to have this procedure in place in 2017.

QUALITY ASSURANCE

The Netherlands and Flanders have separate systems of quality assurance, which are laid down in legislation. In The Netherlands: 'Wet op het Hoger Onderwijs en Wetenschappelijk onderzoek (WHW), art 5a Accreditatie in het hoger onderwijs. In Flanders: Codex Hoger Onderwijs, Deel 2, Titel II, Hoofdstuk 2, Accreditatieorganisatie. NVAO develops and maintains different frameworks for the two countries, which need approval by the Ministers of Education in The Netherlands and by Parliament in Flanders.

External quality assurance in The Netherlands and Flanders applies both to new and existing programmes (accreditation) and institutions (NL: institutional audit, FL: institutional review).

Recently the Dutch and Flemish systems of quality assurance entered a second phase in their development. In the first phase (2004-2010) the system focused primarily on programme assessment. In the second phase (2010-2016) The Netherlands introduced institutional audits as complementary to limited programme assessments. Because quality assurance, strategic policy and human resource management are assessed at the institutional level, the limited assessments focuses on the content of the curriculum, assessment and the intended and achieved learning outcomes, leaving more room for genuine peer review and dialogue between colleagues.

In Flanders, frameworks for limited programme assessments were introduced in 2012. In 2014, a pilot round of institutional reviews (without binding legal consequences) was added to the system.

Programme accreditation in The Netherlands and Flanders (in general)

Programme accreditation is mandatory for all new and existing programmes in higher education in Flanders and The Netherlands. It entitles the programmes to be registered in the national registers of higher education and, when offered by publicly funded institutions, to receive public funding and to grant legally recognised degrees and diplomas. The duration of an accreditation is six years in The Netherlands, eight years in Flanders, which is set in the law to change to six years in 2021. The frameworks used in both countries for the assessment of new and existing programmes contain standards relating to the following four quality aspects:

1. the objectives and intended learning outcomes of the programme;
2. the curriculum, the learning environment and teaching staff, and the quality assurance system;
3. the assessment procedures and examinations;

4. the achieved learning outcomes of existing programmes, or of new programmes when they are already running.

Programmes are assessed in clusters within the same domain. Assessment panels are composed of independent experts (peers) and are subject to approval or advice by NVAO. All assessment reports and all decisions of NVAO on the basis of these reports are made public by NVAO. In the assessment frameworks of The Netherlands and Flanders implementation varies in some details per procedure and per country.

Institutional audits in The Netherlands (current situation)

The institutional audit in The Netherlands introduced in 2010 is optional. It assesses the educational vision of an institution and the policies for putting this vision into practice, including human resources and internal quality assurance. A positive result entitles institutions to use the limited frameworks for (initial) accreditation. The audit does not entail institutional accreditation with self-accrediting powers at programme level.

Programme review in The Netherlands (current situation)

In 2013, the Dutch system of quality assurance was evaluated by the Inspectorate of Education and the Ministry of Education. The Dutch and Flemish Courts of Audit also performed an evaluation, which was mainly directed towards the functioning of NVAO. NVAO evaluated both systems and its own role too. The 2013 evaluations of the Dutch system were followed by intensive consultation with the field by the Minister of Education, in preparation for a strategic agenda which called for an optimisation of the accreditation system, resulting in a report with the title: 'Tailor-Made Accreditation' (*Accreditatie op Maat*). A steering group of stakeholders developed a proposal for the new policy. The 2016 framework is the result of this initiative, together with a proposal for a change of legislation.

The new 2016 framework has come into force in 2017 and optimises existing practices and procedures in order to reduce the administrative burden, to increase the flexibility of the system, and give actors more ownership over assessment procedures. The framework is radically simplified: the previous seven individual frameworks for limited and full (initial) accreditation and for institutional audit are reduced to two, and also the number of standards is reduced. Overlap is further reduced between the standards for institutional audit and (initial) limited programme accreditation, and the standards refer more explicitly to the latest version of ESG.

According to the document 'Update on developments in Dutch higher education and in the structure of NVAO' (17 March 2017) one element in the changes to the system introduced with the new framework in 2016 concerns a pilot with a lighter form of programme assessment that is planned to start in September 2017. For programmes in this pilot only intended and achieved learning outcomes (Standards 1 and 4) will have to be assessed by an external panel, while the quality of the learning environment and the system of assessment (Standards 2 and 3) will be assessed using peer review under the umbrella of the internal quality assurance of the institution. During the pilot programmes can opt to join the regular programme assessment clusters for the assessments of the intended and achieved learning outcomes, or have these assessed in a separate process. The institutions in the pilot will still undergo the regular institutional audits.

The pilot will run for six years from 2017 to 2023 and is to be evaluated in the fifth year. NVAO will be involved in the monitoring of the pilot. Institutions eligible for the pilot need to have a good track record in recent assessments. A very small number of institutions have expressed interest in taking part in the pilot. The Ministry of Education submitted a proposal for the implementation of the pilot to NVAO for consultation.

Programme accreditation and institutional review in Flanders (current situation)

In 2014, within Flemish institutions it was felt that the double burden of a pilot round of institutional reviews and programme assessments to be introduced that year was too demanding. This coincided with a growing awareness among institutions about the importance of quality improvement and reflection on the most effective programme assessment method, be it internal or external, particularly in programmes that already passed one or more accreditations.

As a consequence, a pilot was proposed in which the institutional review was to be extended to cover all aspects of the ESG, including guaranteeing the quality of study programmes. Institutions willing to take part in this “extensive” institutional review would be subject to transitional arrangements for programme accreditation. During the pilot, the period of accreditation was to be extended for programmes of participating universities and university colleges, except for: the initial and first accreditation of new programmes, the programmes that had a reduced period of accreditation (“in an improvement period”) and international joint programmes that are considered to be accredited in accordance with the stipulations of a European funding programme, e.g. Erasmus Mundus.

In 2015, the Flemish Minister of Education asked NVAO to design a new framework for this pilot phase. In 2016 and 2017 the pilot round of extensive institutional reviews is being held. The outcomes of the reviews will be published, but have no legal consequence. An evaluation of the pilot at the end of 2017 will decide on the outline of the new accreditation system in 2020. Assessments of all programmes are still required for all other institutions not undergoing the comprehensive institutional review and for all programmes falling under the exception criteria mentioned above.

The extensive institutional review assesses an institution’s educational policy as well as its conduct in assuring the quality at the level of programmes, in line with a Quality Code developed by NVAO. This code intends to make the comprehensive institutional review in line with the ESG and requires the inclusion of external experts, peers and stakeholders and the publication of information on the quality of individual programmes.

In 2015, new frameworks for (initial) programme accreditation were developed and put in place, which comprise three standards:

1. objectives and qualifications;
2. learning content and learning environment;
3. assessment procedures, examination and achieved learning outcomes.

For programmes not offered by institutions undergoing the institutional review, a fourth standard on the quality assurance system is added to the assessment.

Institutions and assessment agencies

A specific feature of the external quality assurance system in The Netherlands and Flanders is that institutions have a leading role in proposing panels. They are assisted by assessment agencies, which are typically agencies commissioned by institutions, not by NVAO. This is considered to enhance the ownership by institutions and create room for more diversity related to the specific nature of programmes.

In The Netherlands the main agencies are QANU, Hobéon, NQA, AeQui, and Certiked. QANU is EQAR-registered. Some of the other agencies are in the process of acquiring registration. In small, specific areas, international agencies such as Musique, AACSB and EQUIS are active. QANU focuses on academic programmes, while the others provide assistance to higher professional programmes mainly.

Until 2015, VLUHR-KZ was formally appointed as an assessment agency in Flanders. Presently, Flemish institutions are free to choose any EQAR-registered agency for the quality assessment of existing programmes, or an agency recognised by the accreditation agency. NVAO has a procedure for such recognition. NL-institutions are allowed to organise assessments by themselves, but they only do this in a very limited number of cases. VLUHR-KZ is registered in EQAR for its assessments of formally registered programmes in Flanders. In the accreditation frameworks, NVAO has developed guidelines for the quality and independence of the assessment panels, the support by trained secretaries and instructions for the assessment reports.

In both NL and FL, the agencies select panel members, plan and organise site visits and write the reports of assessments. They provide expertise and assistance to institutions, for instance on how to write self-evaluation reports, and practical guidelines for the programme staff who prepare the assessments. The agencies must follow NVAO protocols and guidelines for assessments as laid down in the accreditation framework. In this manner, NVAO ensures that all reviews and the decisions based on these are in line with ESG. The institutions commission the assessment agencies to coordinate assessments. Therefore, the agencies have a formal relationship with the institutions, but not with NVAO. NVAO has no direct influence on the activities of the agencies. In regular consultations with the agencies (at least three times per year), NVAO discusses the quality of assessments, the reports, and other issues that may come up in the handling of applications. In recent consultations, the quality of assessment reports and the administrative burden have been a recurrent topic in the consultations.

NVAO

NVAO was established by Treaty on 1 February 2005 by the Dutch and Flemish governments as a bi-national organisation. It has operated as the formal accreditation body in these countries since then. NVAO passed two previous ENQA reviews, in 2007 and in 2012, and is registered in EQAR since November 2008.

NVAO'S ORGANISATION/STRUCTURE

NVAO is governed by a General Board consisting of 13 members, four of whom form the Executive Board. In the Executive Board two members are from The Netherlands and two from Flanders. All members of the General Board are appointed by the Flemish and Netherlands Ministers of Education. An Advisory Council meets irregularly, and is gradually replaced by intensive resonance groups. By treaty, the 'Committee of Ministers' (Comité van Ministers), comprising the Ministers of Education of The Netherlands and Flanders, supervises NVAO's activities.

The organizational structure within NVAO consists of two departments, a Flemish one and a Netherlands one, each headed by a general manager. The Flemish team comprises of 8.8 fte, the Dutch team of 20.8 fte. A team of support services, serving the Board and the two departments comprises of 11 fte and consists of IT services, financial services, HRM services, Legal support, and secretariats for the Board and Management Team, including a position of HRM Manager of 0.6 fte.

This organisational structure is very recent (March 2017), as before the organisation had no split in a Flemish and Dutch department. According to the SAR the division in two departments has strategic as well as practical reasons. NVAO's strategy recognizes that the system of quality assurance in Flanders and The Netherlands develop each in their own directions, which calls for some adaptations in the organisation of NVAO to optimally support both systems. Both the nature and the scope of the workload will differ for the two countries, which would make it more efficient to set up two separate teams. There is an efficiency benefit in specializing on the specific new procedures in the two systems. The training of NVAO staff specifically for these new approaches in both countries is more

efficient than maintaining a large capacity with a more general level of specialisation. The new organisational structure is supported by the budget arrangements.

NVAO'S FUNCTIONS, ACTIVITIES, PROCEDURES

Mission

In the Strategy document 2017-2020, dated March 2017, NVAO's mission is formulated as follows:

The Accreditation Organisation of The Netherlands and Flanders (NVAO) is a quality assurance agency that, in an expert and independent manner, provides insight into the quality of higher education in The Netherlands and Flanders, and that promotes the quality culture within the higher education institutions in The Netherlands and Flanders. It decides on the accreditation of existing and new programmes, and assesses the quality assurance in place in higher education institutions. Thus, NVAO monitors quality. The NVAO decisions result in recognition of diplomas and degrees, and where applicable in funding of programmes. NVAO bases its assessment on recommendations by recognised experts.

ESG and core values of NVAO

Quality assurance in both countries is based on the principles expressed in the European Standards and Guidelines. Core values to NVAO are: independence, clarity and transparency, respect and trust.

The following basic methodologies are applied:

- Peer review and the use of generic frameworks and standards, and an emphasis on ownership by those who create quality;
- Accountability and improvement are integrated in quality assurance, and the development of a quality culture is considered equally important as accountability;
- A single framework applies to both academic and professionally oriented programmes. Programme accreditation is complemented by an institutional audit or review.

Activities

The SAR mentions a number of activities that NVAO carries out in accordance with its legal tasks and activities linked to that.

Activities based on legal tasks

Activities under this heading refer to (initial) accreditation of programmes and institutions in higher education, e.g..

- Deciding on applications for accreditation for programmes in higher education including Associate Degrees/HBO5, in Flanders and The Netherlands, including the so-called Caribbean Netherlands: the Caribbean islands Bonaire, St. Eustatius and Saba.
- Coordinating assessments and deciding on initial accreditation of programmes in Flanders and The Netherlands, on application by institutions.
- Accreditation of joint programmes preferably based on mutual recognition agreements and stimulating the use of these agreements; accreditation of joint degrees on the basis of the joint degree protocols for (initial) accreditation.
- Coordinating the assessments of and deciding on institutional audits in The Netherlands and institutional reviews in Flanders, on application by institutions.
- Coordinating assessments of higher education programmes on the Caribbean islands of Curaçao, Aruba and St. Maarten (so-called Caribbean part of the Kingdom of The Netherlands), on request of the Ministry of Education of The Netherlands.
- Coordinating assessments and deciding on the granting of distinctive (quality) features for programmes and institutions in The Netherlands and Flanders.

NVAO's assessments in the Caribbean region are carried out on the same basis as the regular assessments in The Netherlands, whereby NVAO upholds the same goals and objectives. They are to be distinguished between activities in Bonaire, Saba and St. Eustatius, which are regular municipalities of The Netherlands on the one hand, and Curaçao, Aruba and St. Maarten, which are independent countries within the Kingdom of The Netherlands, on the other hand. In the latter case NVAO carries out assessments on request. NVAO has clear protocols for all activities related to accreditation (distinctive features, approval of panels, drafting frameworks, assessments of features of programmes). As most of the procedures coincide with accreditation assessments, NVAO upholds the same principles in these. Protocols are discussed with stakeholders.

Activities linked to legal tasks

The SAR also mentions activities linked to legal tasks, in particular:

- Drafting and maintaining frameworks for accreditation for programmes and institutions in higher education, both in The Netherlands and in Flanders (ESG 2.2 and 2.3);
- Approving of/advising on panels for programme assessments proposed by institutions in Flanders and The Netherlands (ESG 2.4);
- Producing thematic analyses or evaluations, on the basis of assessments (ESG 3.4).

General activities connected to assessments

The above mentioned activities are supported by more general activities such as publishing assessment reports and decisions on accreditation of new and existing programmes, institutional audits or reviews and all other NVAO procedures; informing the public on the quality of higher education in Flanders and The Netherlands and implementing the training of panel chairs and secretaries in assessments organised by NVAO or by assessment agencies and activities related to international cooperation in the field of external quality assurance.

Advisory work and decision making

A separate field of activities is concerned with advisory work and decision making based on specific evaluations, such as:

- Advising the Minister of Education on applications for combining two or more existing programmes into broader programmes (NL);
- Advising the Minister of Education on applications for extending (and reducing in Flanders) the formal duration of programmes, including research master's programmes of 120 EC (advice in Flanders, initial accreditation in The Netherlands);
- Deciding on the changes of names of programmes and degrees (NL);
- Advising the Minister of Education on allowing additional admission criteria for programmes related to specific educational concepts (NL).

As mentioned before, the panel considered whether these types of activities fall within the scope of ESG. Having heard the ENQA Secretariat, considering the activities weren't directly related to ESG-linked activities up to now, and taking into account that only since 2016 the NL framework integrates these activities in procedures related to (initial) accreditation and institutional audit, the panel concluded that these types of activities will not be referred to in this report.

International cooperation

According to the SAR NVAO's active role in European networks on quality assurance brings international expertise to its activities. NVAO makes use of expertise from international experts in assessment panels, as do the assessment agencies. International experience and knowledge is a standard requirement for all panels appointed or approved by NVAO.

NVAO has also actively promoted the mutual recognition of accreditation of joint programmes, and signed the MULTRA agreement initiated by ECA, which facilitates a single accreditation procedure in

one country instead of multiple procedures in all countries of the joint programme consortium where accreditation is required. Under the MULTRA agreement, NVAO takes an independent decision based on a foreign accreditation. The same philosophy of a single accreditation procedure and mutual recognition is applied to the European Approach for Quality Assurance of Joint Programmes which was accepted by the EHEA Ministers in Yerevan in May 2015. NVAO signed a bilateral mutual recognition agreement with the German Accreditation Council in July 2015. The number of joint programmes that will be accredited on the basis of the European Approach for QA of Joint Programmes is expected to rise.

NVAO'S FUNDING

The SAR describes that the NVAO office has a number of staff comparable to 43 fte. An overview of financial data handed over during the site visit showed that the annual budget (2016) is 7,7 m€. NVAO is financed by the Dutch and Flemish governments with a ratio of 60/40 to a total amount of 5.5 m€. Fees in The Netherlands and Flanders amount to 2.2 m€. The fees for accreditation are in The Netherlands and Flanders 800 € and 500 € respectively, for initial accreditation in The Netherlands 17,1 k€ and in Flanders 5 k€.

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

ESG PART 3: QUALITY ASSURANCE AGENCIES

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.

ENQA review 2012

The present ESG 2015 Standard 3.1 contains elements of the former ESG 2005 Standards 3.1 ('Use of external quality assurance procedures for higher education'), 3.3 ('Activities') and 3.5. ('Mission Statement').

Compliance with ESG 2005 Standard 3.1, 3.3 and 3.5

On ESG 2005 Standard 3.1 the 2012 review panel concluded 'substantial compliance', on ESG 2005 Standards 3.3 ('Activities') and 3.5 ('Mission statement') 'full compliance'.

The panel's conclusion of 'substantial compliance' with Standard 3.1 was partially based on the assessment of ESG 2005 Part 2 Standards 2.1 - 2.8, which were described and analysed under Standard 3.1. The judgements on these standards were as follows:

On the ESG 2005 Part 2 Standards 2.1, 2.6 and 2.7 the review panel concluded '*full compliance*':

- 2.1 'Use of internal quality assurance procedures' (now ESG 2015 Standard 2.1 'Consideration of internal quality assurance');
- 2.6 'Follow-up procedures' (now part of ESG 2015 Standard 2.3 'Implementing processes');
- 2.7 'Periodic reviews' (now ESG 2015, Standard 1.10, Cyclical external quality assurance').

On the ESG 2005 Standards 2.2, 2.4, 2.5 and 2.8 the review panel concluded '*substantial compliance*':

- 2.2 'Development of external quality assurance processes' (now part of ESG 2015 Standard 2.2 'Designing methodologies fit for purpose');
- 2.4 'Processes fit for purpose' (now part of ESG 2015, Standard 2.2);
- 2.5 'Reporting' (now ESG 2015 Standard 2.6 'Reporting');
- 2.8 'System-wide analysis' (now ESG 2015 Standard 3.4, 'Thematic analysis');

On the ESG 2005 Standard 2.3 the review panel concluded '*partial compliance*':

- 2.3 'Criteria for decisions' (now ESG 2015 Standard 2.5, 'Criteria for outcomes').

Recommendations

Under ESG 2005 Standard 3.1 the 2012 review panel formulated a number of recommendations at some standards in the ESG2005, which are now Standards 2.1, 2.2, 2.5, 2.6 and 3.4 in ESG 2015. In this report these recommendations will be referred to under these five standards.

Evidence

Mission, vision and strategy

As mentioned in the Introduction (p15) NVAO's mission emphasizes decision-making on the accreditation of programmes and assessment of institutions in an independent manner and on the basis of peer review by recognised experts, while at the same time promoting a quality culture within higher education institutions in The Netherlands and Flanders. In the strategy document 2017-2020 a quality culture within institutions is seen as essential for pursuing continuous quality assurance and quality improvement. The external assessment of the quality as exercised by NVAO is meant to dovetail closely with the quality assurance in place at the educational institutions themselves. NVAO's strategy consists of:

- trust as the basic principle for quality assurance, but taking decisive action wherever necessary;
- respecting the autonomy of institutions as regards their own quality assurance;
- a tailored approach in the assessment of educational quality, actively reducing the administrative burden.

The strategy document 2017-2020 is a follow-up of an earlier strategy document 2013-2016, which like its successor also emphasizes justified trust and reduction of administrative burden, but is more topical on issues like quality of panels, reports, guidelines, cluster assessments and internal quality assurance. Also, in a special paragraph, the relevance of good communication is mentioned and illustrated with a number of good intentions.

Activities

Apart from analysing NVAO's compliance with ESG Standards 2.1-2.7, which will be covered in p32-44, the panel wanted to find out whether the methodologies used in NVAO's activities, mentioned in the INTRODUCTION (p15/16) are in line with NVAO's core values, mission and strategy as regards these standards.

2.1 Consideration of internal quality assurance

In NVAO's mission the autonomy of institutions ranks highly. Representatives of institutions and panel members informed the panel that in reviews the institution's autonomy as regards internal quality assurance was valued positively, while at the same time stressing the need to adhere to ESG Standards Part 1. The frameworks for the assessment activities as mentioned above and reports confirmed this view. The panel concludes that in practice the element of autonomy in NVAO's mission is well served.

Standard 2.2 Designing methodologies fit for purpose and Standard 2.3 Implementing processes

Trust and a tailored approach in the assessment of educational quality is another aspect of NVAO's mission, which shows itself in the design of methodologies, both at programme and institutional level (see also INTRODUCTION, p11-14). As will be discussed later in more detail stakeholder's involvement in governance and actual design of methodologies is high. At the same time one of the aims of improvement of methodologies (reduction of administrative burden) has not been realised so far. An interesting case in methodology design and implementation is the pilot institutional review in Flanders. This pilot came about as a sudden and substantive deviation from the Strategy document 2013-2016, to be discussed later under 'Current developments in Flanders' (p22), but all Flemish stakeholders informed the panel that they were actively engaged in formulating and implementing this pilot so as to make it fit for the specific situation in Flanders.

Standard 2.4 Peer-review experts

The use of recognised experts is an important element of NVAO's mission. On the basis of CV's of experts, and comments by panel members and stakeholders the panel concludes that this core value

is well adhered to, even though the experts could more frequently be drawn from a wider international field than The Netherlands and Flanders only.

Standard 2.5 Criteria for outcomes

Transparency is one of the core values of NVAO and this value should express itself in clear criteria for outcomes and in the handling of these criteria in actual reviews. During the 2012 ENQA Review the panel had serious concerns about this aspect. As will be discussed under ESG Standard 2.5 definite improvements have been made since. However, the grading of outcomes from insufficient to excellent remains a difficult issue, on which further reflection by NVAO and other relevant parties is needed.

Standard 2.6 Reporting

In Strategy document 2013-2016 good communication is emphasized as an important strategy component. Since the last ENQA-review progress is obvious, but on (initial) programme accreditation (NL/FL, C/A/StM) progress could still be made, in particular as regards reaching the student population.

Standard 2.7 Complaints and appeals

Respect is one of NVAO’s core values. However, while appeal procedures are in place and mentioned in all frameworks, a solid and formal comprehensive procedure on complaint handling is not present. The panel considers this as an omission, that would need to be addressed and solved.

Summarizing the above the panel concludes that most of NVAO’s activities are in line with its own core values, mission and strategy. As will be shown later in this report the same holds true for NVAO’s substantial compliance with ESG standards 2.1 - 2.7 (see p32-44). Table 2. serves as a brief overview of the panel’s findings.

Table 2: Overview of evidence as regards ESG 2015 Standards 2.1-2.7

Activities		Standards						
		2.1	2.2	2.3	2.4	2.5	2.6	2.7
a.	Programme accreditation NL	+	+	+	+	+/-	+/-	+/-
b.	Programme accreditation FL	+	+	+	+	+	+/-	+/-
c.	Initial programme accreditation FL, NL	+	+	+	+	+	+/-	+/-
d.	Initial joint programmes accreditation	+	+	+	+	+	+/-	+/-
e.	Institutional audits NL	+	+	+	+	+	+	+/-
f.	Institutional reviews FL	nya	+	+	+	nya	nya	+/-
g.	Initial programme assessment C/A/StM	+	+	+	+	+	+/-	+/-
h.	Distinctive features FL, NL	na	+	+	+	+/-	+	+/-
Standard 2.1 Consideration of internal quality assurance				+ = positive				
Standard 2.2 Designing methodologies fit for purpose				+/- = mixed				
Standard 2.3 Implementing processes				- = negative				
Standard 2.4 Peer-review experts				n(y)a= not (yet) applicable				
Standard 2.5 Criteria for Outcomes				FL = Flanders				
Standard 2.6 Reporting				NL = The Netherlands				
Standard 2.7 Complaints and appeals				C/A/StM = Curaçao/Aruba/St. Maarten				

As regards the pilot institutional review (FL) only a selected number of standards is indicated in Table 2, because the results of the pilot are not yet out. Institutional audits on Curaçao, Aruba and St.Maarten are not mentioned, as there have been none so far.

Work planning

Given the multitude of activities the panel wanted to be reassured that staff could cope with the workload involved in these activities. This proved to be the case, as outlined under Standard 3.5, and

even better than before since the new organisational structure was established. The review panel studied Excel-planning documents up till 2019, which showed that activities are well-planned. Following the recommendation by the ENQA Board reviews of clusters of programmes are now also undertaken in The Netherlands for professional higher education programmes; in NL-universities they were already common practice. The panel saw extensive planning schemes for clustered assessments for the years to come. However, one assessment agency told the panel that the operational aspect of cluster reviews was difficult for institutions and assessment agencies alike, for instance as regards the availability of panel experts.

Stakeholders

Stakeholders have input through a variety of means:

- Participation in the General Board. In the GB stakeholders from various backgrounds are represented such as: higher education institutions, students, Flemish Inspectorate of Education, Employers;
- Feedback from the Advisory Council. NVAO has an Advisory Council which consists of representatives from all relevant stakeholders. The Advisory Council is asked for feedback and consultation on NVAO policies. The NVAO Board usually sets the agenda, but the Advisory Council can convene a meeting with the Board on its own initiative as well;
- Regular meetings with representatives of institutions and students. They come together about every two months in so-called Resonance groups. In Flanders these groups are supplemented with the Cabinet and the Ministry of Education and with assessment agency VLUHR-KZ as an observer;
- Regular meetings with the assessment agencies. Assessment agencies are important stakeholders for NVAO. NVAO regularly consults with the joint agencies and also has meetings with each of the agencies separately;
- Regular meetings with representatives from the Dutch Ministry of Education to exchange information on developments in the political context and policy changes that have consequences for accreditation. There is also close cooperation with The Netherlands' Inspectorate of higher education;
- The NVAO Board regularly (every six weeks) consults with members of the Flemish Cabinet for Education.

During the site visit representatives of various stakeholders confirmed that NVAO takes stakeholders' opinions very seriously. Stakeholders play an important role in carrying out NVAO's strategy and activities. The new Dutch and Flemish frameworks for quality assurance were drafted after intensive consultation with stakeholders and reflect their input. All stakeholders appreciate the value of NVAO in particular as regards its independence in validating conclusions drawn by assessment panels. In spite of this some stakeholders express uncertainty about the role of NVAO as controller vs. critical friend. NVAO staff members inform agencies and institutions in response to questions on compliance, but also perform a formal role in handling procedures of applications. Stakeholders explained to the panel that this sometimes causes confusion. However, the NVAO Board assured the panel that this doesn't reflect a structural confusion of roles within NVAO.

Engaging the interest and involvement of employers and employer organizations in the work of NVAO is an area which the General Board is actively trying to address.

International expertise

According to the SAR NVAO's active role in European networks on quality assurance brings international expertise to its activities. NVAO makes use of expertise from international experts in assessment panels, as do the assessment agencies. International experience and knowledge is a standard requirement for all panels appointed or approved by NVAO. However, the review panel is

not impressed by the engagement of international experts in assessment panels, even though in a sample of 2016 assessment reports the review panel noticed use of international experts in academic reviews, and also various exchanges of Flemish and Dutch experts. Apparently, the Dutch language used in many reviews is an obstacle. Also there is no international membership in the General Board, but during the site visit the panel was informed that this has been noticed by the Board, and that the Board was looking for a (Dutch-speaking) international board member.

Current developments in The Netherlands

As mentioned before, both in The Netherlands and Flanders changes are taking place. In NL new frameworks have been put into operation in 2017, which are meant to enhance trust, respect institutional autonomy and reduce the burden of work. The further reduction of limited programme accreditation to two standards, which will take shape in a pilot that is intended to start in 2017, was applauded by staff from NL professional higher education institutions. The representative of NL universities commented that in the eyes of NL-universities the 30-year era of external programme accreditation in NL could come to an end ('external eyes [on programme quality] are not needed any more') and that institutional review would be a sufficient means to assure quality. This was contradicted by representatives from NL-professional higher education institutions, who stressed the relevance of programme accreditation. This view was supported by NL-student-representatives, from both universities and higher professional education institutions. They favour programme assessment, as it gives them more confidence in the quality of individual programmes.

Current developments in Flanders

In Flanders presently a pilot of institutional reviews of public universities and university colleges is taking place. The pilot quickly developed into a Flanders-wide experiment in external quality assurance and was brought to the attention of EQAR in a 'Substantive change report' on 20 February 2017. In the strategy document 2013-2016 the pilot wasn't mentioned and even though a move towards a QA system based solely on institutional reviews was envisaged already in 2013, during the site visit one stakeholder described it as a 'jump'. Among Flemish institutions, staff and employers, the review panel noticed great enthusiasm about the pilot, as it had triggered new dynamics of internal quality assurance within institutions. However, Flemish students representatives observed mixed feelings of the student body about it, some uncertainties remaining whether this would be an improvement in the external quality assurance of programmes. The panel also noted dissatisfaction in NL-institutions about the lack of communication on the pilot: 'We don't know what is going on'.

Cyclical external quality assurance

The extensive institutional review is a baseline assessment to spearhead the introduction of a QA system in which individual external programme assessments can be replaced by institutional assessments. Programme assessments would be carried out internally under the responsibility of institutions themselves, which will be considered for effectiveness in the external institutional review. A special feature of the pilot is, that in 2017 and 2018 a total of 53 programmes are expected to have an extension of existing accreditation beyond the regular cycle-time of external quality assurance. For the years 2017 and 2018 this number amounts to some 4% of a total of 1201 accredited programmes in Flanders. Depending on the outcome and speed of future decision-making this number could go up significantly from 2019 onwards. During the pilot phase, institutions are expected to fully take ownership of assuring the quality of the programmes as outlined in NVAO's Quality Code. According to the SAR the evaluation at the end of 2017 will decide on the outline of the new accreditation system in 2020. The validity of the accreditation of existing programmes is extended until at least the start of the new system, except for programmes in an improvement period and those that have only undergone initial accreditation. Consequently it is programmes which have been reviewed three times before, that are put 'on hold' (as mentioned in the SAR and in the Substantive change report to EQAR). Given the review-track-record of these

programmes neither the Board nor FL-institutions considered this as a risk. Considering that the Quality Code is designed in line with the ESG, and that new or problematic programmes are still assessed under the current framework, the panel believes that the pilot is not likely to engender risks in continuing assuring the quality of programmes, until a new accreditation system will be established.

Future perspectives: coming together or drifting apart?

A frequently debated subject during the site visit was whether the diversity in pilots (NL: programme accreditation on the basis of two standards; FL: full institutional review), together with the split of the NVAO into an NL- and a FL-department signalled drifting apart of FL and NL. According to the SAR, and in spite of the diverse pilots, there is a clear convergence of the systems in both countries in the direction of external quality assurance that is more directed at institutions. For the coming future, the institutional audit and review would gain in importance as defining assessments of whether institutions are capable of ensuring the quality of programmes. However, during the site visit in particular NL-stakeholders saw in the FL-pilot and the split into two departments a clear divergence, which was regretted by all. A representative from NL- professional higher education institutions reckoned that in the first years divergence would be unavoidable but that convergence could occur again later.

The General Board stressed that the higher education community in Flanders is too small to have its own independent quality assurance system and that there is one NVAO strategy for the two countries. The task ahead would be to develop common perspectives. The Chair concluded that the main challenge for NVAO is to serve two countries well. However, the SAR points out that it will prove difficult to satisfy the demands of all parties: institutions want more autonomy and flexibility; students and society demand guarantees for the quality of education; the political context, especially in The Netherlands, carries specific and fluctuating opinions on the instrumentation of quality assurance.

Analysis

Activities related to standards 2.1 - 2.7

The review panel is impressed by the range of activities conducted by NVAO and the way in which work is planned and carried out by NVAO-staff. As will be discussed in this report under ESG Part 2 there is room for improvement on specific aspects of NVAO's activities, but on the whole there is sufficient evidence of substantial compliance on the respective standards. The review panel is also satisfied with the way NVAO engages stakeholders in their work, although more engagement on the part of employers would be needed. In spite of the inherent international character of a binational organization and NVAO's involvement in international quality assurance networks the panel has hesitations about the international involvement in panel reviews and General Board, beyond NL and FL.

Future developments

The panel is satisfied with the small, but consistent steps taken in The Netherlands as regards the pilot in programme accreditation that is being planned now, in order to reduce the burden of work, while maintaining a high level of quality assurance and to achieve even further internalization of quality assurance within Dutch HEI's. With regards to developments in Flanders, the panel believes that a detailed and accurate analysis needs to be undertaken at the end of the pilot-phase, in order to make sure that the model applied is robust enough as to assuring public trust with regards to the new system and the maintenance of the quality of programmes. The student body in particular, as an essential stakeholder, would need to be closely involved in the analysis and conclusions about the effectiveness of the tested model, particularly in assuring the quality of programmes. In the absence of accessible reports, so far the panel would only limit itself to strongly advice NVAO to develop

plans for the years to come, considering different scenarios, and to make sure all relevant stakeholders are directly involved in the evaluation of the pilot, being able to consensively advice decision makers on the measures to be taken in the future.

Panel recommendation

NVAO prepares coherent development plans on the future short-term and long-term development of accreditation processes in Flanders and The Netherlands, on the basis of comprehensive evaluations of the NL- and FL-pilots and taking into account expectations about the quality assurance in higher education by all relevant stakeholders.

Panel conclusion: substantially compliant

ESG 3.2 OFFICIAL STATUS

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

ENQA Review 2012

Standard 3.2 was in ESG 2005 also Standard 3.2 'Official status'. The review panel concluded 'fully compliant'. No recommendations were given.

Evidence

NVAO was established by Treaty on 1 February 2005 by the Dutch and Flemish governments as a binational organisation. It has operated as the formal accreditation body in these countries since then. As described under 'QUALITY ASSURANCE' (p11), Dutch and Flemish legislation on higher education, explicitly describe the role and tasks of the NVAO. According to these legal documents, NVAO has the authority to decide on accreditation of programmes and institutions of higher education in The Netherlands and Flanders. All activities lead either to an independent decision by NVAO or an advice to the Minister of Education in The Netherlands or Flanders, as laid down in legislation. NVAO's decisions comply with the requirements for formal decisions under administrative law and mention the underlying legislation.

The official status of NVAO was strengthened in 2009 when The Netherlands and Flanders Governments decided to recognize each other's diploma's provided NVAO would have accredited the respective programmes. In 2015 this agreement was extended to the Benelux countries at large. In their meeting of September 2016 the Dutch and Flemish Ministers reconfirmed the commitment of both countries. In response to changes in the accreditation systems in The Netherlands and Flanders, both governments have asked NVAO to reflect on changes in its governance structure. However, the structural changes implemented in 2017 do not infringe on the formal status of NVAO. The authority of NVAO to assess programmes in Curacao, Aruba and St. Maarten is based on an agreement with the Dutch Minister of Education.

The recognition of NVAO's decisions is not only based on its formal authority, but also on support from the field of higher education, politics and society at large. Permanent platforms for consultation of stakeholders in both The Netherlands and Flanders are in place.

Analysis

NVAO is the binational QA agency for The Netherlands and Flanders, established by treaty and well founded in legislation. Its binationalism is being felt as one of the major values to assure independence and neutrality in rather small jurisdictions. The formal recognition of NVAO as accreditation agency by public authorities is up till now supported by the public in a larger sense.

Panel conclusion: fully compliant

ESG 3.3 INDEPENDENCE

Standard:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

ENQA-review 2012

Standard 3.3 was in ESG 2005 Standard 3.6. The panel concluded 'fully compliant'. No recommendations were given.

Evidence

Organisational independence

From the start of the accreditation system in The Netherlands and Flanders NVAO has been fully independent regarding decision making. Members of NVAO's Executive and General Board are mandated for four years by the Committee of Ministers. They are appointed in a strictly personal capacity and not as representatives of any organisation. In order to guarantee the independence of board and staff members, NVAO has ruled that members of both categories cannot participate in the decision making on or applications from institutions or programmes they have been associated with in any form during the previous five years. Members of the Board have to be completely independent in making decisions. If there is a specific application where this independence cannot be guaranteed, the member of the Board will withdraw from the decision-making process for the programme concerned. NVAO is accountable to the Committee of Ministers, which approves its budget, the annual report and the annual accounts. In accordance with the Treaty, the Committee of Ministers can only intervene in case of serious neglect by NVAO of its accreditation task. The Committee of Ministers can thus only intervene in the functioning of NVAO, but not in NVAO's decision-making nor internal allocation of the headline budget allocation.

Operational independence

NVAO's assessment frameworks and procedures of initial programme accreditation, institutional reviews and the profile of external experts are clearly defined. There is a Code of Conduct outlining requirements for independence. The value of independence is emphasized in the Internal Integrity Code. There is a standard procedure in the assessment and approval of all panels. NVAO has control over the recruitment, deployment and organisation of its human resource and financial resource is allocated according to the decisions of the Board. Since the start of NVAO its operational independence has, like its organisational independence never been put into question. During the site visit stakeholders confirmed NVAO's decision-making is independent, and mentioned this as the main advantage of having NVAO as accrediting body.

Independence of formal outcomes

Independence of NVAO and decisions of panels are shown in official documentation. Experts in all reviews, coordinated by NVAO and other agencies, are checked for independence according to the profile of NVAO. In NL NVAO approves of panels according to the guideline for the composition of panels. In Flanders NVAO issues a non-binding advice. Interviews show that in the very few cases NVAO's advice was not followed up this did not relate to the independence of experts.

Analysis

Independence is one of NVAO's core values and guaranteed by law. NVAO has full responsibility for its operations, methods and procedures. Interviews with NVAO and stakeholders confirm this. Legally binding assessment standards are developed together with stakeholders.

Commendation

NVAO is commended for the processes it has in place to ensure independence including the Code of Conduct and Internal Integrity Code. The professionalism and integrity of NVAO staff was highlighted by stakeholders during the review and apparent to panel members throughout the review process.

Panel conclusion: fully 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.

ENQA review 2012

Standard 3.4 is a slightly modified formulation of ESG 2005 Standard 2.8 'System-wide analysis'. In the 2102 review the panel concluded on this standard 'substantially compliant'. The panel recommended:

'[NVAO] gives a high priority to

- a) the identification of the interested parties for system-wide analyses and of their needs;*
- b) the definition of a realistic schedule of system-wide analyses; and*
- c) the production of system-wide analyses corresponding to the needs which were identified'.*

In a letter to NVAO by the ENQA Board, January 2013, system-wide analysis is mentioned in the context of the recommendation: *'... Clustering of assessments may be beneficiary to improve consistency in assessments and decision making, as well as to answer the stakeholders' need for more system-wide analysis'.*

Evidence

Recent thematic analysis

In the SAR and in Annex 10 several instances of thematic analysis are indicated that were undertaken in the past years. These include:

- Knowledge co-creation on quality culture in professional bachelor's Communication studies;
- Accreditations of academic programmes Humanities and Communication;
- Employability of professional bachelors from an international perspective;
- Four years of new accreditation system in The Netherlands;
- The profile of Research master's programmes;
- Teacher training programmes at universities;
- Teacher training programmes for primary schools;
- Assessment and demonstration of achieved learning outcomes.

In many of these thematic analyses information gained from review reports is actively being used.

Intentions for future thematic analysis

In the SAR also the importance of future thematic analysis is stressed several times. Examples of intended activities are:

- System-wide analyses in the new Flemish system of institutional reviews;
- Periodically selected domains or topics for an analysis in the new system of clustered reviews;
- Risk-based assessments and thematic analyses that complement the monitoring of the quality of study programmes in institutions, as a complement to institutional audits and

reviews in The Netherlands and Flanders. Such analyses could also focus on common practices or specific educational concepts.

The SAR also indicates instances in which existing activity could be extended to thematic analysis.

- cluster-analysis for large clusters of reports which primarily serve the decision-making can be extended to more thematic analyses;
- NVAO's annual reports which contain a full overview of all decisions taken and the scores and provide a comprehensive account of the yearly activities of the NVAO;
- periodical publications such as the half-yearly bulletins (Jaarbericht) with an oversight of the number of applications processed, the scores reached in assessments, and short comments on developments and trends in the last year.

Appreciation and priorities

During the site visit a number of stakeholders, including representatives from HE organisations, ministries and student organisations stated that they would find thematic analyses useful in understanding and contributing to further quality developments in the higher education system.

Student organisations suggested key areas for thematic analysis, whilst other stakeholders viewed the provision of such information important during the present period of change.

The Board informed the panel about research among stakeholders, conducted by an independent agency, commissioned by NVAO. This research showed that stakeholders had mixed feelings on thematic analysis. Some would like to see more of it, others less. In this respect the context of higher education in The Netherlands and Flanders proves to be relevant, as a variety of HE-agencies conduct thematic analyses. In Flanders VLUHR-KZ used to provide cluster-wide analyses as part of their assessment reports. In The Netherlands the Inspectorate of Higher Education is explicitly tasked with conducting thematic analysis, including making use of NVAO's assessments reports. During the site visit, the representative of the Inspectorate mentioned that NVAO and Inspectorate are working on a joint agenda of thematic analyses. NVAO has budgeted significantly for thematic analysis in NL from 2017 onwards. In Flanders thematic analysis is not foreseen before 2019.

Analysis

The review team considers that although thematic analysis has been carried out to a considerable extent, there is a lack of clarity regarding the nature, role and function of thematic analysis in future activity. NVAO has not yet solved all problems related to undertaking thematic analysis proactively as a regular function of NVAO activities. Additionally, the processes for identifying and prioritising thematic analysis are unclear. This is exemplified by two conflicting approaches:

- The choice to do thematic analysis depends on the demand for such an analysis. When there is a lot of public attention on a specific domain, or when there have been important changes, NVAO will produce a thematic analysis.
- In general, thematic analyses are produced either at the request of one of the ministries of education in both countries, or because NVAO feels it falls within its duty of providing public information.

The review panel concludes that there is need to find a way out of these two approaches.

Recommendation

NVAO reviews the approach to thematic analysis and in consultation with stakeholders, identifies a common purpose and a means to regularize processes and priorities in this area.

Panel conclusion: substantially compliant

ESG 3.5 RESOURCES

Standard:

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

ENQA review 2012

This standard was in the ESG-2005 part of Standard 3.4 Resources. In the 2012 ENQA-review the panel concluded 'fully compliant'. No recommendations were given.

Evidence

Financial resources

As shown in the paragraph 'NVAO'S Funding' (p17) NVAO draws its financial means from subsidies of the Dutch and Flanders governments and from fees. The SAR notes as a threat that financial support from both the Dutch and Flemish governments was steadily decreasing. To some extent NVAO had to economise its operations and to optimise its internal efficiency. A further decrease in financial support could eventually lead to a diminution of its activities, especially those that are not directly related to its statutory tasks. However, the review panel heard from the Executive Board that a satisfactory budget settlement from the Dutch Ministry of Education was imminent. This was confirmed by Dutch and Flanders Ministry representatives. The Flanders Ministry representatives also confirmed that they would maintain their funding in the ratio 40:60.

Human resources

The review panel was given access to three year work plans which indicated coverage of activities into the future. The Executive Board also advised their approaches to prioritisation of work and reorganisation of staffing structures to ensure fulfilment of their duties. Staff of NVAO indicated that they enjoyed a wide variety of activity within their portfolio of work and that supervision and management ensured they were able to conduct their duties without being overloaded. Stakeholders generally praised the professionalism of NVAO staff.

Analysis

The presented evidence creates a sense of confidence with the review panel that resources both financial and human are safe for the years to come.

Panel conclusion: fully compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

ENQA review 2012

Standard 3.6 was in the ESG 2005 part of Standard 3.8 'Accountability procedures'. On this standard the ESG 2012 review panel concluded 'fully compliant'. No recommendations were given.

Evidence

Inputs for quality assurance

Internal quality assurance at NVAO operates both at a strategic and operational level. Inputs for the strategic level are for instance recommendations by ENQA-reviews and preferences expressed by stakeholders in formulating the contours of new (2016) accreditation frameworks and the Strategy document (2017-2020). Inputs for the operational level are for instance checks on NVAO's assessment processes by the online tool Survey Monkey; discussions with stakeholders, such as the

assessment agencies, institutions and student organisations; the NVAO resonance group, meeting twice a year; feedback on a permanent basis in consultation with the Advisory Council; the overviews of evaluation activities; measures of improvement as formulated in documents; weekly discussions in the regular staff-meetings; peer-to-peer coaching of NVAO-staff and project process coordination. On the basis of these inputs lines of work are improved wherever possible.

Internal quality assurance policy and practice

The SAR outlines various processes in place for defining, assuring and enhancing the quality and integrity of its activities, which together form an integrated policy that covers all of NVAO's activities. Internal quality assurance is based on a plan-do-check-act approach. An ongoing evaluative and iterative process monitors the effectiveness of procedures, which are adjusted, when necessary to improve efficiency and effectiveness. There are an Integrity Code, a Code of Conduct and clear procedures for reviews and assessments. The protocol for internal quality assurance and the annual work plans are formally decided by the NVAO Board. A coordinator supervises the various activities and regularly consults with the responsible Board member. The current work plan and evaluation scheme was established in December 2014. The review team observed that the full internal quality assurance policy was not available on the website, but this was rectified during the site visit.

Internal quality assurance culture

The Strategy 2017-2020 mentions that NVAO promotes an organisational culture in which the pursuit of quality constitutes a self-evident component. This is given shape not only through training and courses, but also with peer group sessions and reinforcement of peer reviews. Interviews with management and staff members during the site visit reflect a strong quality culture, integrity and a supervisory management approach which fosters reflection focussed on enhancement of activities.

Appreciation of internal quality assurance

In meetings with the review panel stakeholders of the agency, which included HEIs, students, teachers and employers, valued and trusted the approach of NVAO and indicated effective means of communication regarding reviews and assessments. The review panel had the opportunity to look at the internal NVAO website of the internal quality assurance, and was impressed by the range of activities and the systematic approach. The review panel also noticed some loose loops, like not-evaluating the secretaries-training, and not checking the publishing time of reports, which the staff and internal quality assurance coordinator were ready to recognize as elements to be improved.

Analysis

NVAO has a strong commitment to internal quality assurance, which is expressed in policy-papers, engagement by the Board, a quality assurance coordinator, an impressive system of quality assurance and above all in a strong internal quality culture. The internal quality assurance system as such is mature. However, the review panel also observed some omissions in the quality system though. On balance the panel concludes to substantial compliance.

Recommendation

NVAO remains alert on loose loops in the plan-do-check-act-cycle of the quality assurance system.

Panel conclusion: substantially compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

ENQA review 2012

ESG 2015 Standard 3.7 was formerly part of ESG 2005 Standard 3.8 'Accountability procedures'. The 2012 review panel's conclusion on standard ESG 2005 3.8 was 'fully compliant'. No recommendations were given.

Evidence

Cyclical reviews

Since its inception in 2005 NVAO has undergone ENQA reviews in 2007 and 2012. The present 2017 review follows this five-yearly routine. The ENQA review reports form NVAO's periodic report about its activities to the Ministers of Education, as prescribed in the Treaty between The Netherlands and Flanders. Apart from the ENQA reviews also regular reviews by other agencies take place such as the Dutch and Flemish Accounting Offices and (in NL) the Inspectorate of Education. These are meant to constitute main input for the 4-yearly reports of the Dutch and Flemish Ministers of Education to their respective Parliaments.

Follow-up of recommendations

According to the 2012-ENQA-review panel in the period 2007-2012 NVAO had paid due attention to recommendations given in the 2007 review, even though not all 2007 recommendations had been followed up to an extent that full compliance on all ESG 2005 Standards was achieved. As regards the recommendations given in the 2012 ENQA-review the present review panel observes the same for the period 2012-2017. However, in this respect it is also worth mentioning that the demands of some ESG 2015 Standards are considerably higher than those of ESG 2005.

Analysis

NVAO is regularly reviewed by ENQA-review panels and various other external bodies. Recommendations of reviews are taken seriously and contribute significantly to the further development of the agency.

Panel conclusion: fully compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

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.

ENQA review 2012

Standard 2.1 was in ESG 2005 also Standard 2.1 'Use of internal quality assurance procedures'. The panel concluded 'fully compliant', but still added the recommendation: *[NVAO] makes the link between the NVAO standards and ESG Part 1 more explicit in the assessment frameworks.*

Evidence

Mapping in general

As stated in the SAR and confirmed by Board and staff during the site visit, compliance with ESG is a basic principle of the NVAO frameworks for The Netherlands and Flanders. As regards the inclusion of ESG part 1 Standards in the frameworks NVAO staff prepared, on request of the panel a document 'Mapping ESG part 1 and frameworks NL-FL' in which all NVAO-frameworks are systematically mapped against ESG part 1. A summary of this analysis is given in Table 3. The NVAO-analysis shows that, apart from the framework for distinctive features, which in a sense is an addition to the other frameworks, mapping with ESG is assured in all NVAO-frameworks: programme accreditation in NL and FL; initial programme accreditation in NL and FL; accreditation of joint programmes, institutional audits in NL, and institutional reviews in FL. The programme assessment in Curaçao, Aruba and St. Maarten, which has identical frameworks as in NL, likewise reflects the same kind of mapping with ESG. As mentioned before there is no institutional assessment in C/A/StM.

NL-frameworks

As the SAR notes NL frameworks of 2016 were specifically designed with ESG 2015 in mind. The institutional audit complements the limited programme accreditation and covers elements of ESG Part 1 primarily at institutional level. These are subject to an audit that takes the institutional perspective and consists of a first visit with a general view, followed by review trails on specific topics. The extensive framework for programme accreditation is used for programmes in institutions that did not apply for an institutional audit or did not pass the audit. It covers all elements of ESG. In the context of an institutional audit, some standards apply to the institution rather than to a programme, or have a different meaning than in the context of a programme. This principle has not changed with the new NL framework of 2016.

FL-frameworks

In the Flemish system, the elements of ESG Part 1 pertaining to quality assurance are included in the *Framework for Institutional Reviews – Flanders 2015-2017*. The Quality Code is a formal supplement to the framework for the institutional review. It focuses on those elements of the ESG that relate to the quality of education at programme level. When assessing an institution's conduct of assuring the quality of programmes, the review panel verifies how these quality features have been embedded in this conduct. The Quality Code includes an annex that outlines the relationship between the quality features and the ESG. For lack of evidence laid down in reports the panel could not establish how the mapping with ESG works out in practice. A remarkable feature of the pilot is that for a well-defined number of programmes, programme accreditation is put 'on hold' and the envisaged cycle-time extended.

Panels, stakeholders, staff and reports

During the site visit representatives of assessment agencies, and chairs and secretaries of panels proved very keen on adhering to NVAO-standards. They assumed that in doing so, the ESG 2015

demands are satisfied. During the site visit the review panel checked with students and teachers whether in practice specific elements of ESG Part 1 were covered during the reviews, which proved to be the case. NVAO-staff assured the panel that in assessments-reports the adherence to NVAO-standards is checked and thus implicitly also whether ESG Part 1 is adhered to. In a sample of reports the review panel saw that considerable attention to ESG Part 1 Standards was paid.

Table 3: Mapping of ESG Part 1 standards on NVAO frameworks

	Institutional audit IA-NL/IR-FL	Quality Code	Programme accreditation LPA-NL/EPA-NL/ PA-FL/PA-NL16	Initial accreditation LIA-NL/EIA-NL/ IA-FL/PA-NL16
Standards	Standards	Standards	Standards	Standards
(1) Policy and procedures for quality assurance	1,2/1,2,3,4 (NL16: 1,2)	-	*/9/4 (NL16: */9)	*/9/4 (NL16: */9)
(2) Design and approval of programmes	1,2/1,2,3 (NL16:1,2)	A,B,E	1,2/1,2,3,4,9/1,2 (NL16:1,2/1,2,3,4,9)	1,2/1,2,3,4,9/1,2 (NL16:1,2/1,2,3,4,9)
(3) Student-centred learning, teaching and assessment.	1,2/1,2 (NL16:1)	B,C,D,E,F,G	1,2,3,4/1,2,3,4,10, 11/1,2,3 (NL16:1,2,3,4/1,2,3,4,10,11)	1,2,3,4/1,2,3,4,10,12/1,2,3 (NL16:1,2,3,4/1,2,3,4,10,11)
(4) Student admission, progression, recognition and certification	2/2,3 (NL16: 2)	G	1,2,4/1,2,5,9,11/1,2,3 (NL16:1,2,4/1,2,5,8,9,11)	1,2,5/1,2,5,9,12/1,2,3 (NL16: 1,2,4/1,2,5,8,9,11)
(5) Teaching staff	2/2 (NL16:1,2)	C	2/6/2 (NL16:2/6)	2/6/2 (NL16:2/6)
(6) Learning resources and student support	2/2 (NL16:2)	D	2/7,8/2 (NL16:2/7,8)	2/7,8/2 (NL16:2/7,8)
(7) Information management	3,4/3 (NL16:3,4)		*/9/2,4 (NL16:*/9)	*/9/2,4 (NL16:*/9)
(8) Public information	2/2 (NL16:2)	G, H	2/8/2 (NL16:2/8,9)	2/8/2 (NL16:2/8)
(9) Ongoing monitoring and periodic review of programmes	3,4/3,4 (NL16:3,4)	B, D, F, H	*/9/4 (NL16:*/9)	*/9/4 (NL16:*/9)
(10) Cyclical external quality assurance	3,4/3,4 (NL16:3,4)	**	*/9/4 (NL16:*/9)	*/9/4 (NL16:*/9)

* Covered in institutional audit. ** Falls under the institutional review.

Abbreviations: NL: The Netherlands; FL: Flanders; IA-NL: institutional audit; IR-FL: institutional review; QC: Quality Code; LIA-NL: limited initial accreditation; EIA-NL: extensive initial accreditation; LPA-NL: limited programme accreditation; EPA-NL: extensive programme accreditation; PA-FL: programme assessment; IA-FL: initial accreditation; NL16: x/x: new Dutch framework (limited/extensive).

Analysis

In all NVAO-frameworks coverage of the ESG Part 1 standards is established. It is effective in actual quality assurance at institutional and programme level in all types of accreditation. The putting 'on hold' of accreditation of a limited number of programmes during the FL-institutional review pilot stretches the cyclicity, but this is somehow counterbalanced by the intended cyclical institutional review.

Commendation

NVAO is commended on the systematic coverage of the ESG Part 1 Standards in all frameworks that are presently in use.

Panel conclusion: fully 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.

ENQA review 2012

Standard 2.2 formed part of ESG 2005 Standard 2.2 'Development of external quality assurance processes' and Standard 2.4 'Processes fit for purpose'. On both standards 2.2 and 2.4 the panel concluded 'substantially compliant'. The panel formulated one recommendation: *[NVAO] further strengthens the focus on quality improvement and enhancement of the HEI's.*

Evidence

New frameworks

As described in 'NVAO'S FUNCTIONS, ACTIVITIES, PROCEDURES' (p15-16) both in NL and FL new frameworks have been developed over the past years in order to accommodate wishes from the field with respect to accreditation based on justified trust and the reduction of administrative burden.

In The Netherlands the new assessment framework was published in September 2016. It integrates many procedures related to (initial) accreditation or the institutional audit, such as: distinctive features, changes of name or degree, change in the duration of a programme, recognition as a research master or joint degree, additional admission criteria, which are presently described in separate protocols. The new framework takes the general standards as a starting point and incorporates the additional procedure, resulting in an integrated and concise framework. The framework creates space to institutions to demonstrate improved quality through increased ownership, but ensures a threshold of basic quality for new and existing programmes, on which NVAO has the mandate to decide.

In Flanders new frameworks were published in March 2015. In particular the framework for institutional review and its corresponding quality code signals a significant step away from previous frameworks, as they create much space for institutions' own interpretation of quality and quality assurance, while still remaining within the scope of ESG. The framework also includes the way by which institutions secure the quality of programmes by means of programme evaluation.

Stakeholder's involvement

Stakeholders confirm that they were involved in development of frameworks in both FL and NL.

The new NL framework is based on extensive evaluation and discussion with the field and the political goals defined by the Ministry of Education. At every step in this process institutions, students and other stakeholders were consulted and given the opportunity to comment on proposals. In FL the framework for the pilot institutional review, in particular the quality code, were developed in close collaboration with stakeholders. Institutions felt that the existing frameworks for programme accreditation were not fit for purpose anymore, as they didn't create impulses for improvement of programmes within the institution, in particular for those programmes that had been reviewed various times already.

An interesting outcome of the discussions during the site visit was that in assessments the differentiation between excellent, good, satisfactory and unsatisfactory in NL regular programme accreditation still existed, while assessment agencies and various staff of institutions maintained that this practice was out of date and frequently resulted in unfruitful debates. To the panel the

purpose of the continuation of this grading system was unclear. The panel is aware of the legislative context of the grading system and suggests that when a system causes too much unnecessary confusion, NVAO should advocate a process of review of the system, together with all relevant stakeholders to ensure fitness for purpose.

Official approval

All Dutch and Flemish frameworks have passed approval by the parliaments in both countries. This not only applies to (initial) accreditation and institutional audits and reviews, but also to the design of processes in assessments related to accreditation such as distinctive features, combination of programmes, extension of the duration of programmes, changes in name and degree, additional admission criteria etc.

Analysis

The panel considers that over the past years NVAO has made considerable progress in making frameworks fit for purpose. Stakeholders' participation is obvious and contributes to better fine-tuning, even though some specific elements of old frameworks remain unsatisfactory in the eyes of some stakeholders. The recommendation of the 2012 ENQA review panel to strengthen the focus on quality improvement and enhancement of the HEI's has definitely been followed-up properly. Justified trust as regards institutions has gained in importance. The panel noticed during the site visit high expectations of the FL-HEIs towards the institutional reviews and the enthusiasm for this approach was palpable. NVAO recognizes that the management of expectations would be a relevant policy issue, also for the sake of continued public trust in the new system.

Panel conclusion: fully compliant

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

ENQA review 2012

Standard 2.3 was formerly ESG 2005 Standard 3.7. On this standard the panel concluded 'fully compliant'. No recommendation was given. In a letter of 29 January 2013, the ENQA Board gave a recommendation on Standard 3.7. referring to elements presently falling under ESG2015 Standard 3.4 and 2.5. This recommendation is discussed under these standards.

Evidence

Self-assessment, site visit and report

As the SAR indicates all assessments for (initial) accreditation of programmes and institutional audits and reviews are based on a self-evaluation report. A site visit is part of the assessment procedures for (initial) accreditation and institutional audit or review and related procedures. All assessments for (initial) accreditation of programmes and institutional audits and reviews, regardless of the final decision, lead to a public assessment report by the panel and a decision by NVAO according to prescribed formats. The procedures for assessments are laid down in the accreditation frameworks and are compulsory for assessment agencies. NVAO checks if all steps have been followed for each application. The SAR describes that this applies to all accreditation processes, whether they are

directed to initial accreditation (NL, FL, C/A/StM), existing programmes (NL/FL), institutional audits or reviews (NL, FL), joint degrees or distinctive features.

Quality of assessment reviews

The review panel noted the focus on open dialogue between peers and ways to encourage this, including the inclusion of an open consultation, during which students, teachers or others can approach the panel anonymously with questions or complaints about the programme. The structure and elements of assessments are continuously improved in response to feedback from stakeholders and panels. NVAO ensures consistency between the handling of this procedure by different panels and process coordinators by developing internal guidelines for coordinators, training panel chairs and secretaries, by clustering analyses, and by critically monitoring the practices of assessment agencies.

Follow up

The SAR noted that the follow up of recommendations and improvements is primarily the responsibility of the institution. NVAO monitors the follow up of recommendations from previous assessments in its analysis of applications. Follow up after two years is formally foreseen in the case of conditionally positive decisions and extended accreditation during improvement periods. The institutional audit looks specifically at internal mechanisms for implementing and following improvements after programme assessments.

The review panel wished to test the robustness of the processes and clarify the situation regarding follow up, which did not seem compliant with EQAR interpretation. The team tested the robustness of the processes outlined by:

- a) review of the public website;
- b) requesting further information regarding the documentation for the process in each jurisdiction;
- c) undertaking a limited analysis of reports; and
- d) clarifying points in site meetings with key stakeholders.

The review panel found that NVAO propose recommendations both in instances where institutions receive accreditation for the full period and also when institutions must undergo a recovery period, normally lasting two years. Follow up is undertaken in the case of conditionally positive decisions and extended accreditation during improvement periods. In cases where there is no recovery period, recommendations will not be reviewed until the next application. Although NVAO maintains that the distinction between conditions and recommendations is clear, in developing a common European terminology and interpretation, the use of this distinction (and the different websites where conditions and recommendations are meant to be published, see Standard 2.6) may be considered problematic.

Issues in implementing processes

During the site visit various issues concerning implementing processes were discussed:

- *Clustering NL reviews of existing programmes*
In 2016 cluster assessment for NL existing programmes, already realized for universities, is also implemented for Dutch higher professional education. However both assessment agencies and institutions perceive an increase of workload due to the complexity of the evaluation and sometimes unfavourable operational conditions.
- *Reporting in FL institutional review*
While generally speaking implementation of the FL pilot institutional review meets with great enthusiasm and appears to work well, one feature of the implementation of the pilot is that reports of the pilot will only be published after the pilot is over. Single institutions

undergoing institutional review do get their report at the end of the procedure. However, it is not published -and therefore publicly accessible- until the pilot is over. NVAO informed the panel that FL institutions had pleaded for this arrangement. During the site visit one institution told the panel that waiting for a report for over a year was too long to work on further improving quality.

Grading in NL programme accreditation

The implementation of the grading in existing NL programme accreditation appears to cause difficulties even many years after introduction of this system.

- *Administrative burden*

So far none of the institutions and staff with whom the review panel spoke had experienced a noticeable reduction of administrative burden because of new frameworks and processes. At the same time it was pointed out that in an NL-institution by now the 'burden' of quality assurance was caused more by internal quality assurance (70%) than by external quality assurance (30%), which may also be a fair measure of the extent to which quality assurance has been internalized in institutions.

Analysis

The implementation processes as developed by NVAO over the last years follow ESG-standards and good practice closely, even though at times elements need further consideration. However the phrasing of follow up by NVAO remains to some extent difficult to understand by outsiders. On balance the panel decides on substantial compliance.

Recommendation

NVAO remains sensitive regarding issues of implementation as experienced by stakeholders and adopts a clearer terminology to differentiate between substantively different approaches to follow up of decisions.

Panel conclusion: substantially 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).

ENQA review 2012.

This standard was in ESG2005 part of Standard 3.7 External quality assurance criteria and processes used by the members. In ESG 2015 it has become a separate standard.

The 2012 review panel concluded on ESG 2005 standard 3.7 'fully compliant'. No recommendations were given.

Evidence

Panels in general

NVAO has clear guidelines for the composition of panels and the procedure of panel approval. Panels should consist of at least four members (at least five for the Dutch institutional audit), including a student member. The guidelines provide criteria for profile (skills/expertise) of experts including knowledge of the discipline, of the professional field, of education in the domain, of the international dimension, experience in reviewing or auditing and knowledge of assessment. There is a code of conduct for panel members and panel members sign a no conflict of interest document. The same criteria for selection of peers are used for evaluations in the Caribbean, with the addition that one of the peers should be from the Caribbean. Also for joint degree programme international expertise is taken care of.

For the composition of NVAO-panels for initial programme accreditation and institutional audits NVAO uses its binational status to have Flemish people in the Dutch evaluation, and vice versa. Other international experts are occasionally used, but less frequent. For institutional audits NVAO looks for experienced administrators.

NVAO has a register of experts that have previously participated in reviews. This also applies to students who participate in NVAO-led accreditations. NVAO always consults the institution before appointing a panel. NVAO tries to avoid engaging the same experts as those of the assessment agencies in order to obtain a variety of perspectives in the assessments.

Panels in Flanders

In line with a legal prescript in Flanders panel members for accreditations following the current framework are selected by VLUHR-KZ. NVAO assesses panel proposals and gives advice. In a limited number of cases the NVAO gave a negative advice on a panel, which was ignored by VLUHR-KZ. These cases referred to a combination of skills, not to the independence of the panel.

NVAO can only advise on the composition of the panel. The panel concluded that this advisory function is sufficient to balance the autonomy of VLUHR-KZ, national legal requirements and the requirements of NVAO. There are adequate procedures post accreditation to ensure that the process is conducted effectively and within guidelines. A recent development is that other assessment agencies than VLUHR-KZ are allowed to carry out reviews, provided they are registered with EQAR. In the pilot institutional review in Flanders, NVAO selects panel members and decides on all panel compositions.

Panels in The Netherlands

For regular programme accreditation in NL institutions propose peer experts for NVAO to approve, almost always in collaboration with assessment agencies. NVAO decides on the proposals for composition of the assessment panels. In the case of distinctive features NVAO assesses whether the panel has sufficient specialist expertise for the added procedure.

Training and quality of panel members

For initial programme accreditation and institutional audits NVAO provides training for experts. However, during the site visit representatives of employers informed the panel that they were briefed only, without further training. NVAO does provide training for secretaries of initial programme evaluations, but during the site visit there were mixed opinions about these trainings. In any case panel chairs were very positive about the quality of both secretaries and process coordinators. Assessment agencies provide training to experts for regular programme assessment and inform them of the procedures.

There are feedback mechanisms (as described under Standard 3.6) to monitor the quality of chairs, secretaries and process coordinators. During the site visit various external evaluators of NVAO praised the quality of chairs and experts and their judgements.

Analysis

The selection of panel members and the composition of panels is taken great care of both in NL and FL. There are mechanisms for a balanced panel composition and an expertise that is suitable for the specific tasks (initial accreditation, institutional audit, distinctive features joint degrees), even though international input in panels still is a point of attention.

Panel conclusion: fully compliant

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.

ENQA review 2012

Standard 2.5 was in ESG 2005 Standard 2.3 'Criteria for decisions'. The panel concluded 'partially compliant'. The recommendations formulated were:

- [NVAO] refines the descriptions of the aims and objectives, ensures that they are prominent in the frameworks and show how the various elements of the frameworks contribute to the aims and objectives;
- [NVAO] formulates explicit and public criteria about how it reaches its accreditation decisions in relation to the programme assessments in all cases;
- [NVAO] establishes a clear procedure on how to handle cases where the conclusions in the assessment report are not accepted by NVAO
- [NVAO] strengthens the predictability of the timeframe and efficiency of its decision-making process;

In its letter to NVAO of 29 January 2013 the Board of ENQA made an additional recommendation '*to improve the consistency of accreditation judgments reached*' also addresses the issue of decision-making.

In the Terms of Reference for the 2017-Review special mention was made of ESG2015, Standard 2.5 ('Criteria for outcomes'): '*It should be addressed whether NVAO has clarified (within its own operational documents and without questioning the holistic nature of its judgements) the criteria and decision-making process used in making decisions on the accreditation of existing programmes in The Netherlands, including the way in which it ensures consistency of its decisions based on reviews undertaken by different agencies*'.

Evidence

Developments since the 2012 ENQA-review

Since the previous 2012 review NVAO has taken a number of steps to improve the decision-making process. According to the SAR these are:

- introduction of cluster-based accreditation and project based handling of applications;
- further clarification of criteria and decision rules for the judgements;
- a project to make process coordinators more aware of their responsibilities as regards application of criteria;
- a training programme for panel chairs and secretaries to enhance the consistent use of criteria;
- approval (NL) or formal advice (FL) on panel compositions;
- a protocol for the assessment of students' final assignments;
- detailed internal manuals for NVAO-staff for programme accreditations;
- a 'four-eye and two-step' decision making process on the Board;
- asking for additional information when a judgement in an assessment report is not convincing;
- regular consultation with assessment agencies;
- measures ('fixed and explicit rules') to ensure that the possibility of small differences in interpreting generic frameworks doesn't stand in the way of consistency.

These measures were judged positively in the follow-up evaluation in 2014.

Conditions and improvement periods

In the Dutch system, a (conditionally) positive decision in the initial accreditation procedure entitles the programme to award valid degrees and diplomas. In the case of a conditional decision, the programme is granted up to two years to meet the conditions set in the assessment. Failure to do so leads to the immediate loss of accreditation. In the case of a negative decision on accreditation for existing programmes, NVAO can grant an improvement period. It means that the duration of the accreditation is extended for up to two (NL) or three (FL) years, allowing the programme to implement measures to improve the weaknesses or deficiencies indicated by the panel, and have these assessed. When the result of the assessment is negative, accreditation is withdrawn. While the Flemish system contained an improvement period from the start, it became an effective tool in The Netherlands only in 2010. A (conditionally) positive outcome of the Dutch institutional audit allows institutions to make use of the framework for limited programme assessments with four standards: intended learning outcomes, the curriculum, the assessment system and the achieved learning outcomes (when available for new programmes). The fulfilment of conditions is subject to reassessment within two years. In Flanders, there are no formal consequences to the institutional review in the current pilot round.

Grading

The frameworks contain precise guidelines for calibrating the scores used in the judgements. The initial programme accreditation or assessment (NL, FL, C/A/StM), the institutional audit (NL) and the regular programme accreditation (FL) is straightforward with a minimum of grading nuances: pass/fail/conditional. There is little discussion on this type of decisions, with hardly problematic cases over the past years. The calibration in regular programme accreditation (NL) and distinctive features (NL) ranges from insufficient to excellent. This system is perceived by a number of NL-stakeholders as an unnecessary complication, which affects consistency, in particular as regards the interpretation of the yes-decisions.

'Difficult' cases

In a stratified sample of NVAO decisions the review panel detected some 'difficult cases' in which the Board took decisions, which extended standard procedures. These cases appear to be a tiny minority, for which general rules may be difficult to establish, although here again the NL-grading system for regular programmes complicated one such case.

Analysis

Given the evidence provided and the opinions of stakeholders the panel is convinced that there has been good progress in clarifying criteria for outcomes, as far they are concerned on the yes/no/conditional decision. However, the grading of outcomes from insufficient to excellent remains a difficult issue, on which further reflection by NVAO and other relevant parties is needed.

Panel recommendation

NVAO reflects on the grading system as presently applied and considers making it as straightforward as necessary for the purpose of yes/no/conditional accreditation.

Panel conclusion: substantially 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.

ENQA-review 2012

Standard 2.6 was in ESG 2005 Standard 2.5 'Reporting'. On this standard the panel concluded 'substantially compliant'. The recommendation given was: *'[NVAO] clarifies*

- a) the purpose of every kind of report;*
- b) the readership; and*
- c) the needs of the various kinds of readers in order to enhance the readability'.*

In the Terms of Reference for the 2017-ENQA-review special mention was made of ESG2015, Standard 2.6 ('Reporting'): *'Issues related to the readability of its reports for its defined target audience should be addressed'.*

Evidence

Publishing reports

All NL and FL reports on initial and regular programme accreditation and all institutional reports are published at the NVAO website, including those that resulted in a negative decision or conclusion. This applies also to NVAO assessments like joint degrees, special features or assessment of programmes and institutions at the Dutch Caribbean islands. However, in applications for initial accreditation and distinctive features, institutions may withdraw their application in case of a negative decision. Reports are then not published. In Flanders the reports on the institutional review will be published together when the pilot is over.

Accessibility of reports at NVAO website

Reports are easily accessible on the NVAO website, once published. However, the publication of reports is sometimes delayed for various months after the decision has been taken. In an extended stratified sample of the NVAO decisions made in 2016, which the panel took in the beginning of March 2017, it appeared that at least 10 percent of the reports and decisions made in 2016 was not available. The review panel was told that the delay was caused by a temporary lack of personnel in the communication unit, due to a position that became suddenly vacant and needed to be filled following the typical timing of any transparent recruiting procedure.

Contents of reports

Compulsory elements in assessments reports include (among others) information on the institution and context, procedural aspects, programme site visit, composition panel, description of findings, considerations and judgements; recommendations and – if relevant – aspects related to a conditional judgement. There is no specific format for organizing the content of the report. Assessment agencies, which are commissioned by institutions, may choose their own format.

In the NVAO decision reports the name of assessed unit, the decision, detailed judgement standard by standard, the legal basis of the decision, the result and the validity period, and a list of panel members are mentioned, including a summary. This summary is normally taken literally from the panel assessment report.

Conditions and recommendations

Under the 2014 NL framework, recommendations in reports leading to a positive accreditation are published at the NVAO website in the reports. NVAO can also accentuate recommendations in the decision report. In the 2016 NL-framework, for procedures resulting in conditional accreditation the conditions are mentioned in the reports and at the website. However, following NL-government-regulations, and as explained under Standard 2.3, if there are recommendations in reports leading to a positive accreditation, these recommendations are not published at the NVAO website. They have to be published at the institutions' website. Thus a distinction is made between assessment and enhancement. The enhancement part is not published at the NVAO website.

Heterogeneous character of reports

Assessment reports on institutional reviews (FL) and or institutional audits of internal quality assurance (NL) are written by secretaries commissioned by NVAO. This also goes for assessment reports on initial accreditations in NL and FL. In most cases, the assessment reports on programmes in the Dutch Caribbean are written by NVAO staff. Reports on re-accreditation of programmes are offered to NVAO by institutions. They are generally written by assessment agencies. All experts are involved in producing the report, the secretary being responsible for most editing, although final reports are the result of a consensus among all panel members. Secretaries receive a common NVAO training, in addition to assessment agencies' own trainings.

In spite of compulsory elements in all reports, but due to the fact that external assessments are done by various agencies, assessment reports and summaries are very heterogeneous. The full experts' reports can largely differ in terms of length and style. The summary of the whole procedure and outcomes can range from an executive summary of one page up to twenty pages.

Readability and readership

NVAO stresses the importance of the readability of reports and trains secretaries accordingly. Chairs are trained as well, and tuned to writing reports. The executive summary is meant to be oriented towards a general audience. Also conditions for a positive initial accreditation and the issues to be addressed in a recovery period for re-accreditation should be clearly marked and taken over in NVAO-decisions, when they deal with important aspects of the programme.

During the site visit NVAO staff told the review panel that an analysis on the needs of different readerships has not yet taken place. Representatives from institutions informed the review panel that reports are clear and had greatly improved over the past years. Also staff from within institutions found reports readable and useful. However, students informed the panel that they do not read reports, not even the summaries. Also employers do not know of reports. As regards the general public, NVAO staff told the review panel that journalists appear to be able to read reports well, and write about them accordingly when there is an element of news in it. The panel was informed that in Flanders the NVAO-reports (or conclusions thereof) will feature at a new government-led website with comprehensive information on programmes and institutions in Flanders.

Analysis

Stakeholders have experienced significant positive progress since the 2012 review, due to concrete measures implemented by NVAO: regular common training of secretaries and chairs, regular 'tuning meetings' with assessment agencies, the introduction of a summary. Whilst reports can be considered clear if gathered by an expert readership, readability is hindered by the heterogeneity of style, which is alright for decision-makers, but less "user friendly" to a large public. The 'summary' appears to be open to wide interpretation and requires further professionalization in order to reach a wider readership. Neither reports nor summaries appear to appeal to a readership among students and employers. Possibly short abstracts with a maximum of 10 lines, like in scientific papers, are more suitable to students, in particular on individual programmes. Reports on institutional reviews could remain directed at expert institutional readership only, as these are generally speaking less interesting to students, employers and the general public.

Panel recommendation

NVAO analyses the actual and potential readership of its reports and their needs, and develops new means to reach a readership among students and employers.

Panel conclusion: substantially 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.

ENQA review 2012

Standard 2.7 was in the ESG-2005 part of Standard 3.7 'External quality assurance criteria and processes used by members'. The panel concluded 'fully compliant'. No recommendations were given.

Evidence

NVAO has appeal procedures in place. These are described in the SAR and in the assessment frameworks. An institution can lodge an internal appeal on the basis of General Administrative Law against any decision by NVAO. In Flanders an internal appeal may be lodged regarding an intended decision by NVAO. Appeals are being dealt with by NVAO's independent appeal committees. NVAO has separate appeal committees for Flanders and The Netherlands, with an overlap of one member. The Flemish committee deals with remarks, complaints and internal appeals, as outlined in the Regulations on Governance principles approved by the Flemish Parliament. Both Dutch and Flemish appeal committees are appointed by NVAO and consist of independent experts with legal and educational backgrounds. After receipt of an appeal, the committee advises the board of NVAO, which will take a final decision taking into account this advice. In case an internal appeal is rejected, an institution can lodge an external appeal against this decision with (in The Netherlands) the Administrative Jurisdiction Department of the Council of State [*Afdeling Bestuursrechtspraak van de Raad van State*] and (in Flanders) with the Flemish Government and finally with the Council of State of Belgium [*Raad van State*].

In the SAR a track record of appeal cases from 2012-2016 is mentioned. During the site visit an update including 2017 was supplied. Over this period in Flanders three internal appeals were lodged. Two of them were rejected; one appeal was withdrawn after an agreement with the complainants. In The Netherlands two internal appeals were lodged. One was rejected, but in the following external appeal accepted, because of an imperfection in the Dutch law (which is meanwhile rectified). Another internal appeal regarding the grading in assessment scores by the panel is still pending.

NVAO has no formal comprehensive complaint procedure as regards conduct or lack of professionalism, but there is a general route of complaint handling via the national ombudsman. Apart from the Regulations on Governance Principles mentioned above, for procedures (in FL) for which NVAO is responsible stakeholders, such as panel members, staff or students, may report to NVAO matters arising during the assessment that could affect the independence of the assessment. The SAR doesn't provide information on complaints, nor could information be provided during the site visit. Panel chairs generally praised the professionalism of NVAO staff and NVAO staff told the panel that complaints about conduct and lack of professionalism are rare. As mentioned before a widely advertised 'open hour' in which stakeholders who were not invited for the site visit could speak with the review panel during the site visit was cancelled for lack of complainants. However, during the site visit one of the stakeholders informed the panel about a complaint, which, to his dissatisfaction, was dealt with in an informal way only.

Analysis

The panel is satisfied with the procedures on appeals against decisions, but considers the lack of a solid and formal comprehensive complaint procedure an omission, even if some elements of complaint-handling are there and informal handling of complaints by NVAO normally suffices.

Panel recommendation

NVAO develops a complaint procedure and opens a section 'Complaints and appeals' at its website with appropriate formats for complaints and appeals.

Panel conclusion: partially compliant

CONCLUSIONS

SUMMARY OF COMMENDATIONS

Commendation on Standard 2.1

NVAO is commended on the systematic coverage of the ESG Part 1 Standards in all frameworks that are presently in use.

Commendation on Standard 3.3

NVAO is commended for the processes it has in place to ensure independence including the Code of Conduct and Internal Integrity Code. The professionalism and integrity of NVAO staff was highlighted by stakeholders during the review and apparent to panel members throughout the review process.

Apart from these two standard-linked commendations NVAO is congratulated with the superb preparation of the review and the smooth running of the site visit.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

F = Fully compliant; S = Substantially compliant, P = Partially compliant, N = Non-compliant

STANDARD	JUDGEMENT	RECOMMENDATION
ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE	F	
ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE	F	
ESG 2.3 IMPLEMENTING PROCESSES	S	NVAO remains sensitive regarding issues of implementation as experienced by stakeholders and adopts a clearer terminology to differentiate between substantively different approaches to follow up of decisions.
ESG 2.4 PEER-REVIEW EXPERTS	F	
ESG 2.5 CRITERIA FOR OUTCOMES	S	NVAO reflects on the grading system as presently applied and considers making it as straightforward as necessary for the purpose of yes/no/conditional accreditation.
ESG 2.6 REPORTING	S	NVAO analyses the actual and potential readership of its reports and their needs, and develops new means to reach a readership among students and employers.
ESG 2.7 COMPLAINTS AND APPEALS	P	NVAO develops a complaint procedure and opens a section 'Complaints and appeals' at its website with appropriate formats for complaints and appeals.
3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE	S	NVAO prepares coherent development plans on the future short-term and long-term development of accreditation processes in Flanders and The Netherlands, on the basis of comprehensive evaluations of the NL- and FL-pilots and taking into account expectations about the quality assurance in higher education by all relevant stakeholders.
3.2 OFFICIAL STATUS	F	
3.3 INDEPENDENCE	F	
3.4 THEMATIC ANALYSIS	S	NVAO reviews the approach to thematic analysis and in consultation with stakeholders, identifies a common purpose and a means to regularize processes and priorities in this area.

3.5 RESOURCES	F	
3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT	S	NVAO remains alert on loose loops in the plan-do-check-act-cycle of the quality assurance system.
3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES	F	

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

ANNEXES

ANNEX 1: 2012 AND 2017 EXTERNAL REVIEWS: A COMPARATIVE OVERVIEW OF THE FINDINGS

F = Fully compliant; S = Substantially compliant, P = Partially compliant, N = Non-compliant

ENQA Criterion/ESG	2012 review		2017 review	
	Level of compliance	Recommendation(s)	Level of compliance	Recommendation(s)
ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE (FORMERLY ESG 2.1)	F	[NVAO] makes the link between the NVAO standards and ESG Part 1 more explicit in the assessment frameworks;	F	
ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE (FORMERLY ESG 2.2 AND ESG 2.4)	S, S	[NVAO] further strengthens the focus on quality improvement and enhancement of the HEI's;	F	
ESG 2.3 IMPLEMENTING PROCESSES (FORMERLY ESG 2.6 AND 3.7)	F, F		S	NVAO remains sensitive regarding issues of implementation as experienced by stakeholders and adopts a clearer terminology to differentiate between substantively different approaches to follow up of decisions.
ESG 2.4 PEER-REVIEW EXPERTS (FORMERLY ESG 3.7)	F		F	
ESG 2.5 CRITERIA FOR OUTCOMES (FORMERLY ESG 2.3 AND 3.7)	P,S	<ul style="list-style-type: none"> - [NVAO] refines the descriptions of the aims and objectives, ensures that they are prominent in the frameworks and show how the various elements of the frameworks contribute to the aims and objectives; - [NVAO] formulates explicit and public criteria about how it reaches its accreditation decisions in relation to the programme assessments in all cases; - [NVAO] establishes a clear procedure on how 	S	NVAO reflects on the grading system as presently applied and considers making it as straightforward as necessary for the purpose of yes/no/conditional accreditation.

		<p>to handle cases where the conclusions in the assessment report are not accepted by NVAO</p> <ul style="list-style-type: none"> - [NVAO] strengthens the predictability of the timeframe and efficiency of its decision-making process; - To improve the consistency of accreditation judgments reached. Clustering of assessments may be beneficiary to improve consistency in assessments and decision making, as well as to answer the stakeholders' need for more system-wide analysis. 		
ESG 2.6 REPORTING (FORMERLY ESG 2.5)	S	<p>[NVAO] clarifies</p> <ul style="list-style-type: none"> a) the purpose of every kind of report, b) the readership, and c) the needs of the various kinds of readers in order to enhance the readability; 	S	NVAO analyses the actual and potential readership of its reports and their needs, and develops new means to reach a readership among students and employers.
ESG 2.7 COMPLAINTS AND APPEALS (FORMERLY ESG 2.7 AND 3.7 [GUIDELINE])	F		P	NVAO develops a complaint procedure and opens a section 'Complaints and appeals' at its website with appropriate formats for complaints and appeals.
3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE (FORMERLY ESG 3.1, 3.3, AND 3.5)	S,F,F		S	NVAO prepares coherent development plans on the future short-term and long-term development of accreditation processes in Flanders and The Netherlands, on the basis of comprehensive evaluations of the NL- and FL-pilots and taking into account expectations about the quality assurance in higher education by all relevant stakeholders.
3.2 OFFICIAL STATUS (FORMERLY ESG 3.2)	F		F	
3.3 INDEPENDENCE (FORMERLY ESG 3.6)	F		F	
3.4 THEMATIC ANALYSIS (FORMERLY ESG 2.8)	S	<p>-[NVAO] gives a high priority to a)the identification of the interested parties for system-wide analyses and of their needs b) the</p>	S	NVAO reviews the approach to thematic analysis and in consultation with stakeholders, identifies a common purpose and a means to regularize

		<p>definition of a realistic schedule of system-wide analyses and c)the production of system-wide analyses corresponding to the needs which were identified.</p> <p>-To improve the consistency of accreditation judgments reached. Clustering of assessments may be beneficiary to improve consistency in assessments and decision making, as well as to answer the stakeholders' need for more system-wide analysis.</p>		<p>processes and priorities in this area.</p>
3.5 RESOURCES (FORMERLY ESG 3.4)	F		F	
3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT (FORMERLY ESG 3.8)	F		S	NVAO remains alert on loose loops in the plan-do-check-act-cycle of the quality assurance system.
3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES (FORMERLY ESG 3.8 [GUIDELINE])	F		F	

ANNEX 2: PROGRAMME OF THE SITE VISIT

Schedule ENQA Review NVAO 29-31 March 2017

29 March 2017

Timing	Topics/organisations	Persons for interview	Issues to be discussed
14.00-16.00	Review panel's kick off meeting and preparations for Day 1		
16.00-16.30	A pre-visit meeting with the agency contact person to clarify elements related to the overall system and context	Panel and ENQA-coordinator NVAO Policy Officer as contact person, Mr. Thomas de Bruijn	Standards 2.4, 3.1
Session 1 16.30-17.00	Meeting with SAR team NVAO	Mr. Thomas de Bruijn/Mr. Henri Ponds, policy officers NVAO	SAR, Standards 2.6, 2.7, 3.6
15 minutes	Break		
Session 2 17.15-18.15	Meeting with NVAO Executive Board and General Manager	NVAO Board: - Mr. Anne Flierman (Chair) - Mrs. Ann Verreth (Vice Chair) - Mr. Paul Zevenbergen (Member) - Mr. Marc Luwel (Member) - Mr. René Hageman, Head of department NL - Mr. Axel Aerden, General Manager FL.	Standards 2.3, 3.1, 3.2, 3.3, 3.5
15 minutes	Break		
Session 3 18.30-19.15	Meeting with General Board of NVAO	- Mr. Paul van Roon, Mrs. Lieteke van Vucht Tijssen, Mrs. Mia de Schampelaere, Mr. Bart Maes	SAR, Standards 2.4, 2.5, 2.6, 3.1, 3.3
19.30	Dinner for panel		

30 March 2017

Timing	Topics/organisations	Persons for interview	Issues to be discussed
8.30-9.00	Review Panel preparation Day 2		
Session 4 9.00-10.00	Meeting with NVAO Staff (Policy advisors and Management Team)	Policy Officers: Mrs. Lisette Winsemius/ Mrs. Lieve Desplenter/ Mr. Pieter Caris/ Mr. Frank Wamelink/ Mr. Dagmar Provijn/ Mrs. Nancy van San/ Mr. Henri Ponds	Standards 2.1, 2.4, 2.5, 2.6, 3.1, 3.4, 3.6
15 minutes	Break		
Session 5 10.15-11.00	Meeting with representatives of the Dutch Ministry of Education, Culture and Science (OCW) and Inspectorate of education	- Mr. Feite Hofman, director of higher education, Dutch Ministry of Education - Mr. Dirk Haen, policy advisor, Dutch Ministry of Education - Mr. Gerben Kerkhof, Dutch Ministry of Education - Mr. Bert Jaap van Oel, Inspectorate of Education, The Netherlands	Standards 2.5, 2.6, 3.1, 3.2, 3.3, 3.4, 3.5,
15 minutes	Break		
Session 6 11.15-12.00	Meeting with representatives of the Flemish Ministry of Education, Culture and Science	- Mr. Koen Pelleriaux, General Director, Flemish Ministry of Education - Mrs. Sophie Landuyt, policy advisor, Flemish Ministry of Education	Standards 3.1, 3.2, 3.3, 3.4, 3.5

12.00-13.00	Lunch panel		
Session 7 13.00-13.45	Meeting with Dutch Universities of Applied Sciences and Dutch universities (Vereniging Hogescholen/ VSNU)	Delegation of VSNU - Mr. Karl Dittrich, Chair of the VSNU - Mrs. Katinka Eikelenboom, domain coordinator education, VSNU Delegation of VHS: - Mr. Leendert Klaassen, Board member of VH, Chair of the Board of Stenden University of Applied Sciences, Leeuwarden - Mr. Roeland Smits, policy advisor Vereniging van Hogescholen.	Standards 2.1, 2.3, 2.5, 3.1, 3.4
15 minutes	Break		
Session 8 14.00-14.30	Meeting with Dutch private institutions for higher education (NRTO)	- Mr. Eric Verduyn, director of education Hogeschool NCOI, Board member of NRTO, responsible for higher education	SAR, Standards 2.5, 2.6, 3.1
Session 9 14.30-15.15	Meeting with Flemish professional education and universities (VLIR/VLOHRA)	Delegation of VLIR: - Prof. dr. Jan Danckaert, vicerector education VUB, member of the Working Group Education of VLIR, and member of the Klankbordoverleg - Prof. dr. Didier Pollefeyt, vicerector education KU Leuven, Chair of the Working Group Education of VLIR, member of the evaluation group for the new Flemish system - Prof. dr. Rosette S'Jegers, secretary-general of VLIR Delegation of VLHORA: - Mrs. Hilde Sels, QA-manager Thomas More Hogeschool - Mr. Ignace Van Dingenen, QA-manager, Erasmus-hogeschool Brussels	SAR, Standards 2.5, 3.1, 3.2
15 minutes	Break		
Session 10 15.30-16.15	Meeting with Dutch and Flemish assessment agencies NQA, Hobéon, AeQui, Certiked, QANU, and VLUHR-KZ	- Mr. Willem van Raaijen, Hobéon - Mr. Paul Esveld, Certiked - Mr. René Kloosterman, AeQui - Mr. Sietze Looijenga, QANU - Mr. Paul Thijssen, NQA - Mrs. Marleen Bronders, VLUHR-KZ	Standards 2.3, 2.4, 2.5, 2.6, 2.7, 3.1
15 minutes	Break		
Session 10a 16.30-17.30	Meeting with panel members and secretaries	-Dr.mr. Eric van de Luijngaarden, lector European Law, Zuyd Hogeschool (panel member for agencies and NVAO) - Drs. Raoul van Aalst, auditor, AeQui (panel chair in many assessments) - Prof. dr. Ton van Haften, professor of Dutch Discourse Studies, Leiden University (panel chair and member in various institutional audits NL) - Prof.dr. Frank Witlox, professor of Economic Geography, Ghent University (panel member in Flemish assessments by VLUHR-KZ and also in Dutch research master's assessments) - Prof. dr. Joost Lowyck, em. professor of Educational technology, KU Leuven (panel member in Dutch and Flemish assessments)	Standards 2.1, 2.2, 2.4, 2.5, 2.6, 2.7

		<ul style="list-style-type: none"> - Prof.dr. Paul de Knop, professor of Sociology of Sport, Vrije Universiteit Brussel (panel member various assessments FL/NL) - Mrs. Drs. Johanneke Braaksma, Secretary for NVAO, NQA, VLUHR (until 17.15) - Mrs. Dr. Jetje de Groof, Secretary and process coordinator for QANU, NVAO, VLHOVLHORA, VLIR 	
17.30-18.00	Meeting with NVAO-contactperson and NVAO-specialist Dutch Caribbean	Mr. Thomas de Bruijn and Mrs. Irma Franssen	Dutch Caribbean and Joint Degrees
18.00- 19.00	Review panel meeting on preliminary findings		
19.00	Panel dinner		

31 March 2017

Timing	Topics/organisations	Persons for interview	Issue to be discussed
8.30-9.00	Review panel preparation Day 3		
Session 11 9.00-9.45	Meeting with Dutch and Flemish Student organisations: LSVB, ISO and VVS	<ul style="list-style-type: none"> - Mr. Remco Barendregt, mr. Robin de Bles, ISO - Mr. Ben Windey, Mr. Lorenzo Ego, VVS 	Standards 2.1, 2.4, 2.6, 3.1, 3.4
15 minutes	Break		
Session 12 10.00-10.45	Meeting with teachers from Dutch and Flemish higher education institutions	<ul style="list-style-type: none"> - Mrs. Annick van Kerckhove, lic., lecturer Communication, Artevelde Hogeschool, Antwerp - Mr. Kevin Picalausa, lic., lecturer professional bachelor ICT, Odisee Hogeschool, Ghent - Mr. Jan Loisen, lic. lecturer Communication Sciences, Vrije Universiteit Brussel - Mr. Rik Vanderhaege, lic. lecturer Communication. Thomas More Hogeschool, Antwerp - Prof. dr. Wieger Bakker, professor of Public Governance and Management, Utrecht University - Dr. Gerard van der Bunt, associate professor of Sociology, Vrije Universiteit Amsterdam - Drs. Margriet Plasman, educational advisor and lecturer HRM and Applied Psychology, Saxion Hogeschool 	Standards 2.2, 2.5, 3.1, 3.4
15 minutes	Break		
Session 13 11.00-11.45	Meeting with representative of employers	<ul style="list-style-type: none"> - Mr. Louis Spaninks, coordinator Human Capital Agenda ICT (HCA ICT) - Mr. Frans Berntsen, former general manager Slachtofferhulp Nederland, member of workfield advisory committee - Mrs. Annette Geirnaert, former general manager of Kwinta, Flemish Centre for Quality Management - Mr. Patrick Audenaerde, Prevention Advisor, Ghent Harbour 	SAR, Standards 2.2, 2.4, 3.1
11.45- 12.30	Lunch for panel		
12.30-13.00	Meeting of panel to decide on issues to be clarified		
13.00-13.30	Meeting with NVAO board to clarify pending issues	Board of NVAO	Standards 2.3, 2.7, 3.1, 3.4
13.30-15.30	Concluding meeting of panel		
15.30-16.00	Final de-briefing meeting with Board	NVAO-Board, staff	n.a.

	members and staff to inform about preliminary findings		
16.00	End of site visit		

ANNEX 3: TERMS OF REFERENCE OF THE REVIEW

1. Background and Context

NVAO is the independent and binational accreditation organisation set up by the Dutch and Flemish Parliaments on 1 February 2005, whose primary goal it is to provide an expert and objective judgement of the quality of higher education in Flanders and the Netherlands. Its operations are supervised by the Committee of Ministers of Education of both the Netherlands and Flanders.

NVAO's main activities are related to its legal tasks and include drafting and maintenance of the frameworks for accreditation, deciding on applications for accreditation for existing programmes, coordinating assessments and deciding on initial accreditation and institutional audits or reviews in the Netherlands and Flanders. In addition, NVAO can be asked to advise the ministries of education in both countries regarding specific topics or carry out assessments related to quality assurance.

NVAO operates in two different systems of higher education which have both implemented the Bologna reforms on the basis of shared principles for quality assurance. Compliance to the European Standards and Guidelines has been a cornerstone for the Dutch and Flemish systems of quality assurance since their inception. The systems of quality assurance in both the Netherlands and Flanders enter a third phase of their development, which is characterized by reduction of administrative burden on institutions and increasing their autonomy with regard to quality assurance, while maintaining guarantees for the quality of study programmes. NVAO further maintains a strong international presence in European and global networks for external quality assurance, which enables NVAO to channel back new developments in higher education to institutions in both countries.

NVAO has been a full member of ENQA since 2003. With the review of 2017 NVAO aims to renew its ENQA membership. NVAO has been registered on EQAR since 2008 and aims at renewing its registration in September 2017.

2. Purpose and Scope of the Evaluation

This review will evaluate the way in which and to what extent NVAO fulfils the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of NVAO should be reconfirmed and to EQAR to support NVAO application to the register.

The review panel is not expected, however, to make any judgements as regards granting membership.

2.1 Activities of NVAO within the scope of the ESG

In order for NVAO to apply for ENQA membership and for registration in EQAR, this review will analyse all activities of NVAO that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is regardless whether these activities are carried out within or outside the EHEA, and whether they are obligatory or voluntary.

The following activities of NVAO have to be addressed in the external review (self-assessment report and the external review report):

1. Programme accreditation in Flanders, the Netherlands and the so called “Caribbean Netherlands”;
2. Initial programme accreditation in Flanders and the Netherlands;
3. Accreditation of joint programmes;
4. Institutional audits/reviews in the Netherlands and Flanders;
5. Programme assessment in Curaçao, Aruba and St. Maarten;
6. Institutional assessment in Curaçao, Aruba and St. Maarten
7. Assessments of distinctive (quality) features for programmes and institutions in the Netherlands and Flanders.

In addition, while the following activities are separate parts of external quality assurance activities, they may be relevant in relation to a number of the ESG standards as follows, and should thus be addressed appropriately in the self-assessment report and the external review report:

8. Approval of/advising on panels for programme assessments - ESG 2.4;
9. Production of thematic analyses or evaluations on the basis of assessments - ESG 3.4;
10. Drafting and maintaining frameworks for accreditation for programmes and institutions in higher education - ESG 2.2 and ESG 2.3.

NVAO carries out evaluations of various features of programmes, in most cases as part of assessments for (initial) accreditation. These result in either advise to the Dutch or Flemish Minister of Education or an independent decision by NVAO. The ENQA review panel will consider on the basis of NVAO’s self-evaluation report whether these evaluations are part of the regular external quality assurance activities of NVAO or a separate evaluation of study programmes in relation to learning and teaching in higher education, and thus whether they are within the scope of the ESG. The evaluations include:

1. Advising the Minister of Education on applications for combining two or more existing programmes into broad programmes (NL);
2. Advising the Minister of Education on applications for extending (or reducing in Flanders) the formal duration of programmes, including research masters of 120 EC (advise in Flanders, initial accreditation in the Netherlands);
3. Deciding on the changes of names of programmes and degrees (NL);
4. Advising the Minister of Education on allowing additional admission criteria for programmes related to specific educational concepts (NL).

Furthermore, the self-evaluation report and external review report should also address (1) NVAO’s requirements for the recognition of other agencies and (2) how NVAO ensures that the decisions taken on the basis of reviews carried out by other agencies are in line with the ESG, especially in case the agency is not registered on EQAR.

The following issues that were flagged when NVAO’s registration in EQAR was last renewed and should be addressed in NVAO’s self-evaluation report and in the external review report:

ESG 2.5 – Criteria for outcomes [ESG 2005: standard 2.3]

It should be addressed whether NVAO has clarified (within its own operational documents and without questioning the holistic nature of its judgements) the criteria and decision-making process used in making decisions on the accreditation of existing programmes in the Netherlands, including the way in which it ensures consistency of its decisions based on reviews undertaken by different agencies.

ESG 2.6 – Reporting [ESG 2005: standard 2.5]

Issues related to the readability of its reports for its defined target audience should be addressed.

3. The Review Process

The process is designed in the light of the *Guidelines for ENQA Agency Reviews* and in line with the requirements of the *EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-assessment by NVAO including the preparation of a self-assessment report;
- A site visit by the review panel to NVAO;
- Preparation of the final evaluation report by the review panel;
- Check of the report for factual accuracy and grave misunderstandings by the agency;
- Completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow-up of the panel's and/or ENQA Board's recommendations by the agency, including a voluntary follow-up visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts, an academic employed by a higher education institution, student member, and eventually a labour market representative (if requested). One of the members will serve as the chair of the review panel, and another member as a review secretary. Two of the reviewers are nominated by the ENQA Board on the basis of proposals submitted to ENQA by the member national agencies. The third external reviewer is drawn from a nomination provided by the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE). The nomination of the student member comes from the European Students' Union (ESU).

In addition to the four members, the panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA expectations are met throughout the process. The ENQA staff member will not be the Secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide NVAO with the list of suggested experts with their respective curriculum vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards NVAO review.

3.2 Self-assessment by NVAO, including the preparation of a self-assessment report

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

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;

- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which NVAO fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat who has 4 weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the Guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case 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 reject the report and ask for a revised version within 4 weeks. In such cases, an additional fee of 1000 € will be charged to the agency.
- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A Site Visit by the Review Panel

NVAO will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel at least two months before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is 2,5 days. The approved schedule shall be given to NVAO at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by NVAO in arriving in Hague, Netherlands.

The site visit will close with an oral presentation and discussion of the major issues of the evaluation between the review panel and NVAO.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings with regards to each ESG. A draft will be first submitted to the ENQA review coordinator who will check the report for consistency, clarity and language and it will be then submitted to NVAO for comment on factual accuracy. If NVAO chooses to provide a 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 NVAO, finalise the document and submit it to NVAO and ENQA.

The report is to be finalised within three months of the site visit and will not exceed 40 pages in length.

When preparing the report, the review panel should also bear in mind the *EQAR Policy on the Use and Interpretation of the ESG*, so as to ensure that the report will contain sufficient information for the Register Committee for application to EQAR.

NVAO is also requested to provide a letter addressed to the ENQA Board outlining its motivation applying for membership and the ways in which NVAO expects to contribute to the work and objectives of ENQA during its membership. This letter will be discussed along with the final evaluation report.

4. Follow-up Process and Publication of the Report

NVAO will consider the expert panel's report and will publish it on its website once the ENQA Board has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. NVAO commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting a follow-up report to the ENQA Board. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

The follow-up report will be complemented by a small-scale visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered as of particular importance or challenge by NVAO. Its purpose is entirely developmental and has no impact on the judgement of membership and/or compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

5. Use of the report

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.

The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether NVAO has met the ESG and can be thus admitted/reconfirmed as a member of ENQA. The report will also be used for registration on EQAR, and is designed so as to serve these two purposes. However, the review report is to be considered final only after being approved by the ENQA Board. Once submitted to NVAO and ENQA and until it is approved by the Board the report may not be used or relied upon by NVAO, the panel and any third party and may not be disclosed without the prior written consent of ENQA. NVAO may use the report at its discretion only after the Board has approved of the report. The approval of the report is independent of the decision on membership.

The Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

6. Budget

NVAO shall pay the following review related fees:

Fee of the Chair	4,500 EUR
Fee of the Secretary	4,500 EUR
Fee of the 2 other panel members	4,000 EUR (2,000 EUR each)
Fee of 2 panel members for follow-up visit	1,000 EUR (500 EUR each)

Administrative overhead for ENQA Secretariat	7,000 EUR
Experts Training fund	1,400 EUR
Approximate travel and subsistence expenses	6,000 EUR
Travel and subsistence expenses follow-up visit	1,600 EUR

This gives a total indicative cost of 30,000.00 EUR VAT excl. for a review team of 4 members. In the case that the allowance for travel and subsistence expenses is exceeded, NVAO will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and subsistence expenses in the limits of the planned budget, and will refund the difference to NVAO if the travel and subsistence expenses go under budget.

The fee of the follow-up visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it.

In the event of a second site visit required by the Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as travel and subsistence costs are recoverable from the agency.

7. Indicative Schedule of the Review

Agreement on terms of reference	By September 2016
Appointment of review panel members	November/December 2016
Self-assessment completed	By 1 st November 2016
Pre-screening of SAR by ENQA coordinator	November 2016
Preparation of site visit schedule and indicative timetable	January/February 2017
Briefing of review panel members	February/March 2017
Review panel site visit	March/early April 2017
Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	May/early June 2017
Draft of evaluation report to NVAO	June 2017
Statement of NVAO to review panel if necessary	June/July 2017
Submission of final report to ENQA	By Mid-August 2017
Consideration of the report by ENQA Board and response to NVAO	September 2017
Publication of the report	September 2017

ANNEX 4: GLOSSARY

ENQA	European Association for Quality Assurance in Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	higher education
HEI	higher education institution
QA	quality assurance
SAR	self-assessment report
NL	The Netherlands
FL	Flanders
C/A/StM	Curaçao, Aruba, St. Maarten (Dutch Caribbean)
GB	General Board NVAO
EB	Executive Board NVAO
CV	curriculum vitae
HRM	human resource management
n(y)a	not (yet) applicable

ANNEX 5. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY NVAO

- NVAO strategy documents 2013-2016 and 2017-2020;
- Assessment frameworks as valid from 1 Jan 2017;
- An elaboration on p55 and 56 of the SAR as regards the concordance between NVAO's assessment frameworks and ESG part 1;
- An overview of the approx. 500 decisions made by NVAO in 2016, on programmes, including Dutch Caribbean programmes and Joint Degrees;
- An overview of the assessment agencies carrying out reviews of institutions and programmes;
- An overview of the correspondence between NVAO and EQAR in 2016 and 2017 on substantive changes in the accreditation routine in Flanders up till 27 March 2017;
- An overview of new developments as regards developments in accreditation in The Netherlands, and NVAO organisational structure;
- An overview of subsidies and fees (2014-2016);
- NVAO quality policy paper (Jan. 2017);
- All documents relating to internal quality assurance
- Excel-sheets with work plans for NVAO-NL and NVAO-FL;
- A selection of reports on Joint Degrees;
- Overview on the context of higher education and NVAO in The Netherlands and Flanders;
- Update on developments in Dutch higher education and in the structure of NVAO, including list of members of the General Board (March 2017);
- An overview of types of decisions in Flanders (2015-2018);
- An overview of complaints and appeals NL and FL (2012-2017).

OTHER SOURCES USED BY THE REVIEW PANEL

- European Approach for Quality Assurance of Joint Programmes (October 2014, approved by EHEA ministers in May 2015);
- ENQA review QANU 2016;
- ENQA review VLUHR-KZ 2014 and follow up.



THIS REPORT presents findings of the ENQA Agency Review of the Accreditation Organisation of the Netherlands and Flanders (NVAO), undertaken in 2017.



2017 ENQA AGENCY REVIEW