

ENQA Review 2017

Self-Assessment Report

October 2016

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Table of content	Chapter 1 Introduction	5
	Chapter 2 Development of the Self-Assessment Report (SAR)	6
	Chapter 3 Higher education and quality assurance in the context of the agency	7
	Chapter 4 History, profile and activities of the agency	17
	Chapter 5 SWOT analysis	23
	Chapter 6 Higher education quality assurance activities of the agency	26
	Chapter 7 Agency's quality assurance processes and their methodologies	33
	Chapter 8 Agency's internal quality assurance	39
	Chapter 9 Agency's international activities	41
	Chapter 10 Compliance with European Standards and Guidelines (Part 3)	44
	Chapter 11 Compliance with European Standards and Guidelines (Part 2)	55
	Chapter 12 Information and opinions of stakeholders	66
	Chapter 13 Recommendations and main findings from previous review(s) and agency's resulting follow-up	69
	Chapter 14 Current challenges and areas for future development	74
	Glossary of Terms	76
	List of Annexes	76

Chapter 1 **Introduction**

The following self-assessment report (SAR) intends to demonstrate that the Accreditation Organisation for the Netherlands and Flanders (NVAO) carries out its tasks and activities in compliance with the European Standards and Guidelines in the European Higher Education Area (ESG), in its latest revision of 2015. The aim of the review for NVAO is to renew membership of ENQA and the continuation of its registration in EQAR.

NVAO was formally established by the Dutch and Flemish governments on 1 February 2005. The statutory task and mission of NVAO is to assess and ensure the quality of new and existing programmes and institutions of higher education in the Netherlands and Flanders, and to issue formal accreditations. Core values are: independence, clarity and transparency, respect and trust. NVAO operates in two different systems of higher education on the basis of shared principles for quality assurance. It learns from its bi-national status and applies an inherently comparative approach in its decision making.

Compliance with the European Standards and Guidelines has been a cornerstone of the Dutch and Flemish systems of quality assurance since their inception. NVAO has also contributed to the development and reformulation of the ESG, lately in 2015. Currently, the Dutch and Flemish systems of quality assurance are entering a new phase of their development. This implies the following shift in NVAO's strategy and practices:

- validating institutional quality assurance and quality culture, instead of safeguarding the quality of individual programmes;
- establishing the right conditions for reliable assessments up front, instead of reacting after the fact;
- working together with stakeholders to further reduce the administrative burden caused by accreditation, and to increase the ownership of quality assurance by institutions, teachers and students;
- accommodating greater flexibility and customisation in quality assurance;
- ensuring the consistency of the handling of procedures and decision making, in order to perpetuate acceptance by stakeholders in higher education;
- promoting robust quality assurance based on the development of quality culture;
- monitoring the rapid changes in higher education as a result of globalisation and digitisation;
- maintaining a strong international presence in European and global networks for external quality assurance, and informing institutions in both countries on developments in higher education.

NVAO is confident the external review will demonstrate how NVAO carries out its activities in compliance with ESG and fulfils the necessary conditions for membership of ENQA as well as for registration in EQAR.

Guide to the reader

In the main document, details are kept to a minimum to contain the length of the document. Chapter 3 describes the systems in both countries, and Chapters 6 and 7 give further details on activities and procedures. Chapters 10 and 11 provide explicit argumentation for the ESG relevance of all NVAO's procedures and activities. The annexes contain a selection of documents that are immediately relevant to the SAR, or lists and overviews that are not available elsewhere. The SAR and its annexes contain links to other relevant documents that are available online.

Chapter 2 Development of the Self-Assessment Report (SAR)

The SAR is a collaborative effort of NVAO staff and Board. It presents the results of intensive reflection on the functioning of NVAO, both internally, as well as in the the context of Dutch and Flemish higher education. The SWOT analysis was developed in series of sessions with NVAO staff and Board. The practical preparation of the SAR was in the hands of a project leader, and overseen by a steering committee of Board members, Management Team (MT) and project leaders for the new frameworks in the Netherlands and Flanders.

In May 2016, the first draft of the report was accepted by the General Board of the NVAO for discussion with external stakeholders and NVAO's Advisory Council. These consultations involved the Dutch Ministry of Education, Culture and Science,¹ the Inspectorate, the Dutch rector's conference (VSNU), the association of Universities for Applied Sciences (Vereniging van Hogescholen), the association of private institutions for higher education (NRTO), the student unions ISO and LSVB, and the assessment agencies.

In Flanders, the draft of the SAR was discussed in sessions of the Flemish resonance group, comprised of representatives of the Cabinet of the Minister of Education, the universities and university colleges, and student unions, and with the council for higher education of the Flemish Council for Education (VLOR), which comprises of representative authorities of various organisers of higher education. Feedback from these sessions was received at the beginning of July 2016 and integrated into the current document.

Feedback from stakeholders

The feedback from the stakeholders was generally positive. They suggested to underpin the positive image of NVAO's authority in the field and its performance with more evidence. The consultation also gave insight into the way NVAO is perceived in the Netherlands and in Flanders, and into the differences between the two countries. This led to discussions on whether the Dutch and Flemish systems drift apart or come closer together. The feedback has been taken account of in the finalisation of the current document.

This self-assessment report is written at a point in time at which a new assessment framework for the higher education accreditation system in the Netherlands is being submitted to the Dutch Parliament. This framework is based on the current legislation and is meant to optimise the practices introduced in the framework of 2014. At the same time, legislation is in preparation which introduces more fundamental changes in procedures and in NVAO's position within the system. The SAR describes the frameworks and procedures as they are currently defined in the 2014 framework and mentions the innovations introduced in the 2016 framework. In support of some of the changes introduced in this framework, new legislation is in preparation. With elections coming up in March 2017, the legislative trajectory of this draft is too uncertain for NVAO to include it in the present SAR.

¹ The official titles of the Ministers of Education in the Netherlands and Flanders are, respectively: Minister of Education, Culture and Science, and vice-prime-minister of the Flemish Government, and Minister of Education. This SAR refers to both as 'Minister of Education'.

Chapter 3 Higher education in the Netherlands and Flanders

Higher education and quality assurance in the context of the agency

In general, the Dutch and Flemish systems of higher education have a similar structure, the outlines of which reflect the Bologna reforms. Both systems distinguish between academic (research-oriented) and professionally oriented programmes and institutions, and have bachelor's and master's programmes in the first and second cycle. Recently, short-cycle Associate Degree programmes at EQF-level 5 were added.

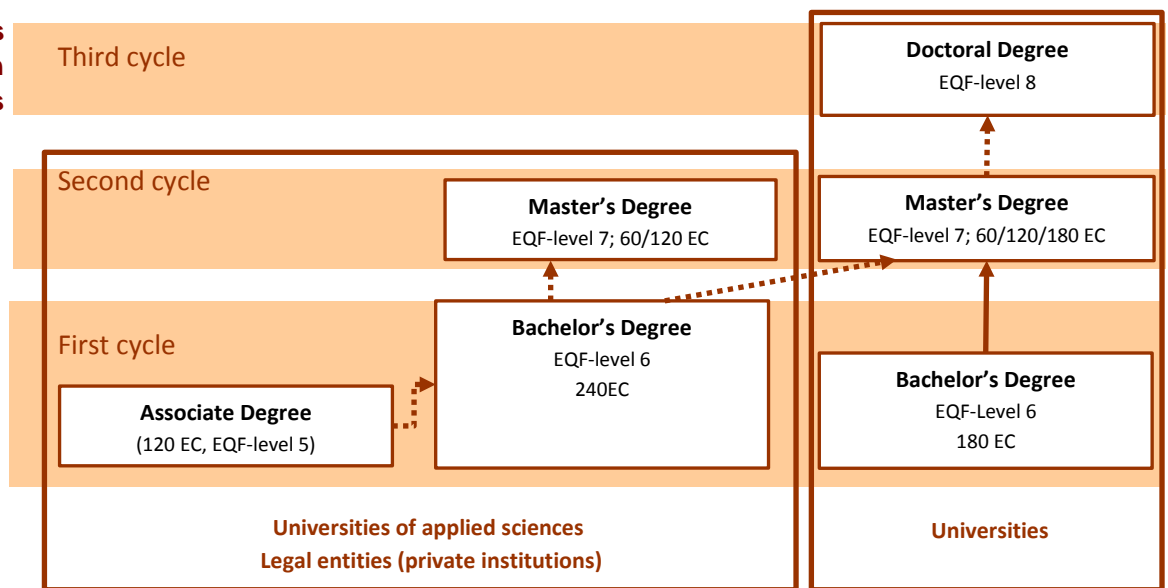
The majority of institutions in the Netherlands and Flanders are publicly funded. Institutions without public funding can also offer accredited bachelor's and master's programmes, provided that they are recognised as 'legal entities for higher education' in the Netherlands, or as 'registered institutions' in Flanders. Annex 2 provides key figures on higher education in both countries.

Despite the basic similarity, there are a number of differences between the Dutch and the Flemish systems, which originate from variations in the implementation of the Bologna reforms and from existing structures of higher education in the two countries before that time. For the context of accreditation the following differences are relevant:

- The English name for institutions for professional education is universities of applied sciences in the Netherlands, university colleges in Flanders.
- Dutch universities of applied sciences can offer professional master's programmes.
- All master's programmes in Flanders have an academic orientation, including those offered by Schools of Arts, which are formally part of the university colleges, and collaborate with universities in the field of research.
- All Flemish university colleges in Flanders work together with a university in 'Associaties'.
- In addition to bachelor's and master's programmes, the first and second cycles in the Flemish system comprise advanced bachelor's and advanced master's programmes (bachelor-after-bachelor, master-after-master), which are accredited separately from the regular bachelor's and master's programmes. The first two cycles in the Dutch system comprise only bachelor's and (professional) master's programmes.
- The duration of programmes differs between the two systems: see the diagrams below.

Only education providers included in the Dutch or Flemish higher education register can award legally recognised degrees. Both higher education systems have a procedure in place that can lead to the status of recognised higher education institution. These procedures are open to all education providers. The underlying principle of these recognition procedures is the demonstration of quality at programme level via an initial accreditation procedure.

Institutions, degrees and programmes in the Netherlands



Dutch academic education

Academic bachelor's programmes make up the first cycle and comprise 180 EC (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 EC (for most specialisations), 120 EC (for engineering, science and teacher training, or research master's programmes) or 180 EC (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

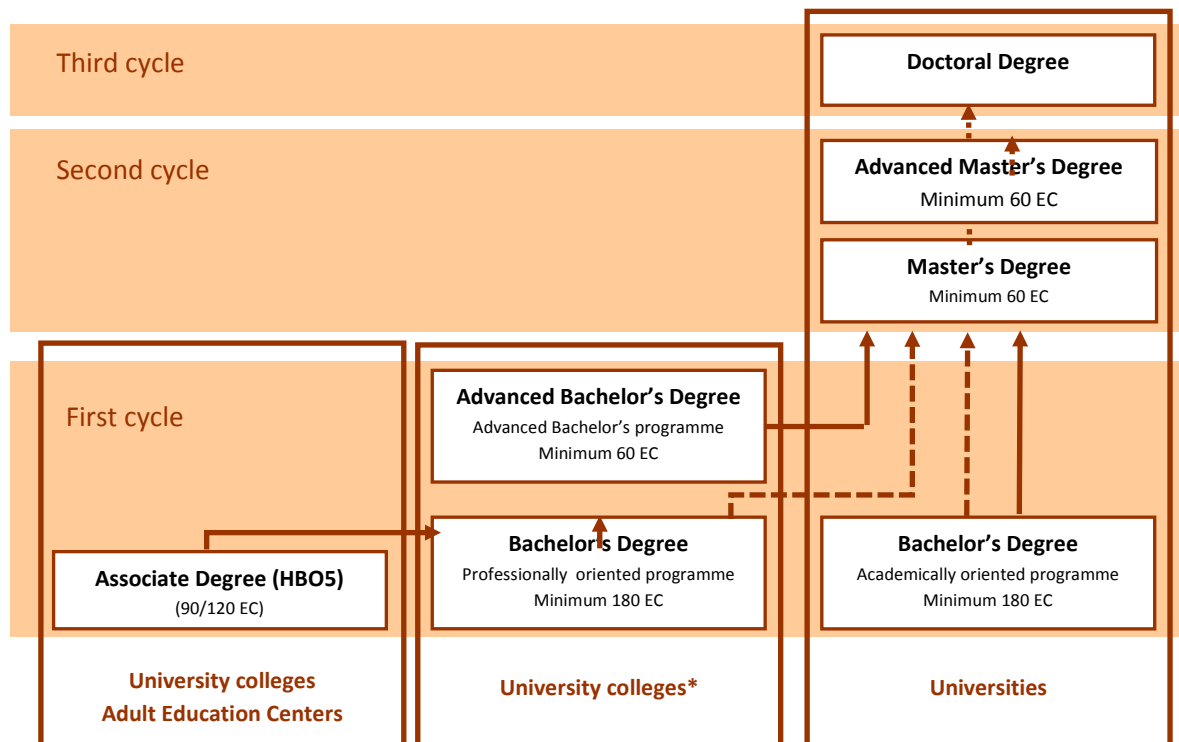
Universities of applied sciences and private institutions offer professional bachelor's, associate degrees, and master's programmes. Some institutions also offer academic master's programmes, mostly in Business Administration. The bachelor's programme comprises 240 EC (4 years). Graduates can apply for admission to an academic master's programme, which also often requires finishing a pre-master's programme. Short cycle programmes of 120 EC 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.²

Professional master's programmes comprise 60 EC (1 year) or 120 EC (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-

² See for the framework: <https://www.nvao.net/beoordelingskaders/beoordelingskader-associate-degreeprogramma>

level 7. Degrees associated with professional bachelor's and master's programmes are Bachelor and Master, with the addition of Arts/Science or the professional domain (e.g. Social Work).

Institutions, degrees and programmes in Flanders



* University Colleges can include Schools of Arts which offer both professionally-oriented and academically-oriented programmes. The academic orientation is sustained through a cooperation with a university (in the context of an 'Associations').
- The dotted lines indicate the intermediate programmes ('schakel/voorbereidingsprogramma') that are required for admission in some cases.

Flemish academic education

The first cycle consists of bachelor's programmes positioned at EQF-level 6, which comprise at least 180 EC and take three years, leading to the degree Bachelor, with the addition of the field of study. The second cycle consists of master's programmes of least 60 EC for Humanities, Fine Arts, Industrial Engineering, and Social Sciences, and 120 EC for Sciences, Engineering, Music, Medicine, and Biomedical Sciences. Specifically, research-oriented master's programmes also comprise 120 EC. 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 EC. The project should comprise at least one fifth of the number of credits of the entire programme.

Advanced master's programmes of 60 EC 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 EC (3 years), master's programme 60 EC (Fine Arts, Theatre) or 120 EC (Music).

Flemish higher professional education

Professionally oriented bachelor's programmes at EQF-level 6 make up the first cycle. They comprise at least 180 EC and take three years. Short cycle programmes (HBO5) of

90/120 EC, positioned at EQF-level 5, are positioned in between secondary education and professionally oriented bachelor's programmes. They lead to the degree Associate Degree and in most cases offer the possibility to continue studying in a bachelor's programme.³

Advanced bachelor's programmes of at least 60 EC 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

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 education provided at international branch campuses, e.g. the branch campus of Ghent University in Incheon (South-Korea), has been accredited as part of a regular initial 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 in the Netherlands and Flanders

By treaty, the 'Committee of Ministers' (Comité van Ministers), comprising the Ministers of Education of the Netherlands and Flanders, supervises NVAO's activities. The Netherlands and Flanders have separate systems of quality assurance, which are laid down in legislation. For the Netherlands, this is the 'Wet op het Hoger Onderwijs en Wetenschappelijk Onderzoek: for Flanders, the 'Codex Hoger Onderwijs'.⁴ 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.

Quality assurance in both countries is based on the principles expressed in the European Standards and Guidelines and therefore shares the following basic concepts:

- 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.

³ See for the framework: <https://www.nvao.net/beeoordelingskaders/beeoordelingskader-hbo5>

⁴ See: <https://www.nvao.net/whw-hoofdstuk-5a-accrreditatie-het-hoger-onderwijs>, and <http://data-onderwijs.vlaanderen.be/edulex/document.aspx?docid=14650>

- 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.

Recognition and programme accreditation

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 will probably 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 quality aspects:

- the objectives and intended learning outcomes of the programme;
- the curriculum, the learning environment and teaching staff, and the quality assurance system;
- the assessment procedures and examinations;
- the achieved learning outcomes of existing programmes, or of new programmes when they are already running.

In the assessment frameworks of the Netherlands and Flanders implementation varies in some details per procedure and per country. Annexes 3,4 and 5 contain the Dutch and Flemish frameworks, the Flemish Quality Code, and a comparison of standards and assessment rules in 2014 and 2016 Dutch frameworks. The changes in the new Dutch framework are discussed below under the heading 'Current situation: the Netherlands'. The following paragraphs explain the basic features of the Dutch and Flemish systems and their development.

Institutional audit the Netherlands

External quality assurance in the Netherlands applies both to institutions (institutional audit) as well as to new and existing programmes (accreditation). The institutional audit in the Netherlands introduced in 2010 is optional and assesses the educational vision of an institution and the policies for putting this 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.

Institutional review Flanders

In Flanders also, assessments apply both to institutions (institutional review) as well as to new and existing programmes (accreditation). The institutional review was introduced in the framework of 2015 and 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 requires the inclusion of external experts, peers and stakeholders and the publication of the results of their inclusion as information on the quality of individual programmes. It refers directly to the relevant ESG standards.

In 2016 and 2017 a pilot round of institutional reviews is being held. Participation is mandatory for all formally registered universities and university colleges, though not for private institutions. The outcomes of the reviews have no legal consequence, but an

evaluation of the pilot will provide input in the decision making on the integration of the pilot into the accreditation system that will come into force in 2020.

During the pilot, the duration of accreditations of programmes from universities and university colleges that have already passed three consecutive external reviews is extended. Assessments for new and existing programmes are still required for (registered) private institutions. In 2015, new frameworks for (initial) programme accreditation were developed and put in place, which comprise three standards:

- objectives and qualifications;
- learning content and learning environment;
- assessment procedures, examination and achieved learning outcomes.

For programmes in registered (private) institutions, a fourth standard on the quality assurance system is added to the assessment.

Scores, improvement period and conditional judgements

The following table indicates the judgements used in the Dutch and Flemish frameworks:

Framework	The Netherlands	Flanders
Institutional audit/review	Standards: meets, does not meet or partially meets the standard. General judgement: positive, negative or conditionally positive.	Standards: Meets the standard, partially meets the standard, does not meet the standard. General final conclusion: positive, conditionally positive, negative.
Existing programmes**	(limited and extensive framework) Standards and general conclusion: unsatisfactory*, satisfactory, good, excellent.	Standards: satisfactory, unsatisfactory. Final conclusion: satisfactory, satisfactory with limited validity, unsatisfactory.
Initial accreditation***	(limited and extensive framework) Standards: meets, does not meet or partially meets the standard. General conclusion: positive, negative or conditionally positive	Standards and final conclusion: satisfactory, unsatisfactory.

* When a panel is convinced the deficiencies can be remedied, NVAO can grant an improvement period.

** Including Associate Degrees. *** Including Associate Degrees (NL/FL). For Associate Degrees (NL): unsatisfactory/satisfactory for standards and unsatisfactory/satisfactory under condition/satisfactory for the general conclusion.

The frameworks contain precise guidelines for calibrating the scores used in the judgements. 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 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. Having the option of granting an improvement period stimulates a more open discussion with peers during the assessments and contributes to the improvement of the quality of programmes.

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.

Assessment agencies

In the Dutch and Flemish systems, the assessments of existing programmes are typically coordinated by 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.

Until 2015, VLUHR-KZ was the formally appointed 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.⁵ Institutions are allowed to organise assessment 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.

With the start of the accreditation system in 2004, the assessment agencies took over the task of coordinating assessments of existing programmes from the umbrella organisations of the universities and universities of applied sciences, both in the Netherlands and Flanders. The new accreditation law forced QANU and NQA to split off from the umbrella organisations. Other agencies had their roots in consultancy in higher education or quality assurance in other areas. In the current accreditation system, the agencies have no formal role or position.

In general, 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.

⁵ <https://www.nvao.net/actueel/publicaties/handreiking-engageren-kwaliteitszorgorganisaties-opleidingsbeoordelingen>

Development of the systems 2004-2016

The Dutch and Flemish systems of quality assurance recently entered a new phase in their development. In the first phase (2004-2010), the system focused primarily on programme assessment. The second phase (2010-2016) introduced institutional audits in the Netherlands in 2010 as complementary to limited programme assessments. Because quality assurance, strategic policy and human resource management are already 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, an institutional review (without binding legal consequences) was added to the system.

2013 Evaluations

In 2013, the Dutch system of quality assurance was evaluated by the Inspectorate of Education and the Ministry of Education.⁶ The Dutch and Flemish Courts of Audit also performed an evaluation, which was mainly directed towards the functioning of NVAO. NVAO also evaluated both systems and its own role. The evaluations provided input for the report of the Committee of Ministers of Education to Dutch and Flemish parliaments on the functioning of the NVAO.⁷

The outcome of the evaluation of both systems was in general positive. In a report to the Dutch parliament of 12 September 2013, the Minister of Education qualified the Dutch system as robust and functioning well, but she also indicated that improvement was called for to retain the widespread support for the system.⁸ The report praised the expertise of expert panels and the quality of their judgements, just as the quality of the processes, the flexibility and the capacity for self-improvement of the various agents in the process. The report also mentions the following points for improvement:

- reduction of the administrative burden;
- improvement of the consistency, reliability and validity of judgements;
- more flexibility in instrumentation;
- more ownership of quality assurance by teaching staff and students;
- more trust in the case of proven quality.

Current situation: Flanders

In 2015, the Flemish Minister of Education concluded that the double burden of a pilot round of institutional reviews and programme assessments introduced in 2014 was too demanding. There was also a growing dissatisfaction in institutions with the effectiveness of the assessments for improvement. As a consequence, programme accreditations were extended for registered institutions, except for the accreditation of new programmes, programmes in an improvement period and programmes that are funded by the EU.

⁶ <http://www.onderwijsinspectie.nl/documenten/publicaties/2013/09/12/de-kwaliteit-van-het-nederlandse-accreditatiestelsel-hoger-onderwijs> (in Dutch only).

⁷ <https://www.nvao.net/actueel/publicaties/vier-jaar-nieuw-accreditatiestelsel-hoger-onderwijs-nederland-cijfers-2015>

⁸ <http://www.onderwijsinspectie.nl/documenten/brieven/2013/09/12/brief-overkoepelende-rapportage-evaluatie-nieuw-accreditatiestelsel-met-beleidsreactie> (in Dutch only).

In 2015, the Flemish Minister of Education asked NVAO to design a new framework and set up a pilot phase for the institutional review for publicly funded universities, university colleges and Schools of Arts. An 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.

Current situation: the Netherlands

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*).⁹ A steering group of stakeholders developed a proposal for the new policy.

The 2016 framework is the tangible result of this initiative, together with a proposal for a change of legislation. The new framework will come into force in 2017 after a transition period 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.

The assessment protocols provide more room for an open dialogue with peers on development, separating this more strictly from accountability, both in the site visit and in reports. Suggestions for development are reported directly to the institutions and will not be part of the assessment report. The structure of site visits and the scope of self-assessment reports can be adapted to the nature of a programme. Students and representative bodies have a more prominent role in the assessments. Limitation of the required documentation should result in a lower administrative burden.

The 2016 framework 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, (see Chapter 4 below) 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. Guidelines and criteria for the related procedures will be presented on NVAO's website and will replace separate protocols, except in some cases where legislation requires a separate protocol. This is, for instance, the case for some of the specific distinctive features. The integration with the framework brings the related procedures fully within the scope of ESG.

The 2016 framework is based on the notion of trust and emphasises the development of a quality culture. At the same time, it ensures a threshold of basic quality for new and existing programmes. NVAO retains a sufficient mandate to intervene when that level is

⁹ <https://www.rijksoverheid.nl/documenten/rapporten/2015/06/02/accreditatie-op-maat> (in Dutch only).

not being met. Annex 4 contains a comparative overview of the standards and assessment rules of the frameworks of 2014 and 2016 which highlights the most important changes.

The new framework is based on extensive evaluation and discussion with the field and the political goals defined by the Ministry of Education. NVAO is an actor in these discussions and takes a proactive role in the implementation of the improvements. With the new framework, a pilot with a reduced form of accreditation has been announced, but no details of its implementation are defined at the time of writing. The present SAR therefore focuses on the existing practices from the 2014 framework, and the evaluations and improvements derived from that as laid down in the new framework. As mentioned in Chapter 2, new legislation is in preparation which adds further support for some of the changes introduced in the new framework, but it is uncertain when this will come into force.

Coming together or drifting apart

It has been argued above how the new systems in Flanders and the Netherlands developed with specific differences. Yet, there is a clear convergence in the direction of development of the two systems towards external quality assurance that is more directed at institutions. For the coming future, the institutional audit and review will gain in importance as defining assessments of whether institutions are capable of ensuring the quality of programmes. The changes in the Flemish system and the implementation of the review have inspired elements in the Dutch situation, and *vice versa*.

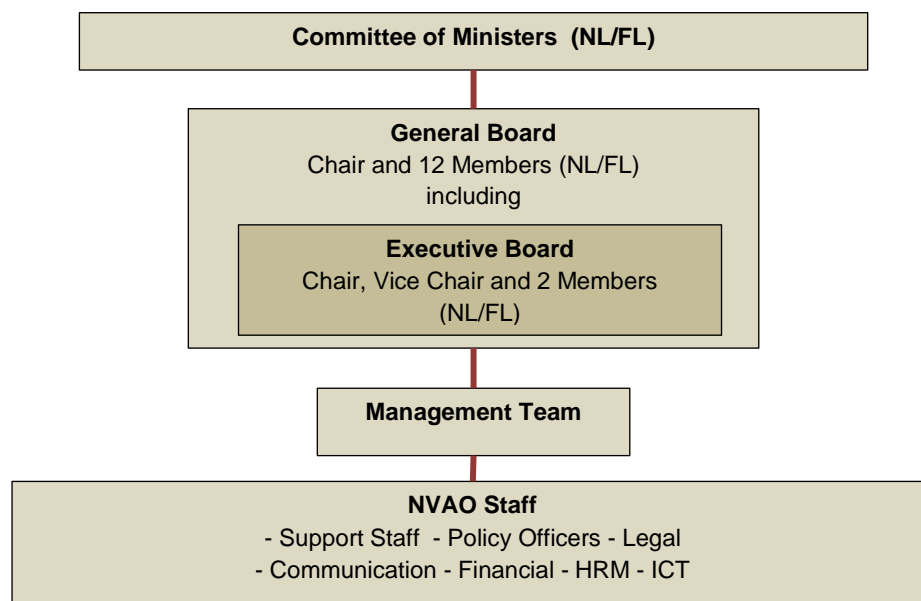
Chapter 4
History, profile and
activities of the
agency

NVAO was established by Treaty on 1 February 2005 by the Dutch and Flemish governments as a bi-national organisation.¹⁰ 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 2008.¹¹

Since the previous ENQA-review in 2012, NVAO has proven its authority as accreditation body in Dutch and Flemish higher education, among other things by its role in the design of new accreditation systems. It has a constructive, critical attitude, respects the autonomy of institutions and their primary responsibility for the quality of their education, and has an open eye for the increasingly international context. NVAO is visible in society as it provides information on the quality of programmes and institutions through its database of decisions and assessment reports. It also responds to questions from students and other members of the public, and actively disseminates expertise on quality assurance in higher education in national and international seminars.

NVAO is engaged in the design and implementation of changes in the systems of quality assurance in both countries in close cooperation with its stakeholders. In the current development of these systems, as well as for the foreseeable future, it will focus even more on quality culture and on appreciating the existing strengths of institutions and programmes.

Current administrative position and structure of NVAO
(see Annex 1 for CV's of NVAO Board members)



Different contexts

The profile of NVAO in the Netherlands and in Flanders differs, as a result of differences in the political context, in the traditions of administrative and governance practice, and in

¹⁰ <https://www.nvao.net/beoordelingskaders/verdrag-vlaamse-gemeenschap-van-belgi%C3%AB-en-koninkrijk-der-nederlanden>

¹¹ <http://www.enqa.eu/index.php/reviews/review-reports-and-decisions/page/8/> and <https://nvao.com/actueel/publicaties/enqa-external-review-nvao>

the perception of higher education in society. In 2010, problems with the reliability of the assessment of achieved learning outcomes in some programmes in the Netherlands caused a breach of public trust in the quality of higher education. The incidents received much attention in the media and the political arena, which led to a greater emphasis in the accreditation frameworks on ensuring the quality of assessment procedures and on guaranteeing the level of achieved learning outcomes. NVAO reacted by focusing more on ensuring the quality of programmes and informing society on quality issues in higher education. In a new composition, the NVAO Board decided to be more proactive in bringing the results of assessments into the open.

This new policy became evident in 2014 when NVAO published the results of a large number of negative assessments of Dutch academic bachelor's programmes in the Humanities. Initially, this led to discussions with the institutions and drew considerable attention, also in the political context. In the end, all parties agreed that this case demonstrated that the accreditation system had been effective in recognizing a quality deficiency and in enforcing improvements. In 2016, NVAO concluded that the improvement of the affected programmes had been successful and resulted in an increase of the overall quality of these programmes.

The two events mentioned above had an effect on the current profile of NVAO and the way the system of quality assurance in the Netherlands is set up, with a strong emphasis on guarantees for the quality of individual programmes.

Students and other stakeholders in the Netherlands have always favoured programme assessments over institutional accreditation. While trust in the management of quality assurance by institutions increased after the first round of institutional audits, a full institutional accreditation is not yet foreseen in the current phase of the Dutch system.

In Flanders, public trust in the quality of higher education has never been as much a matter of debate as it was in the Netherlands. The profile of NVAO in Flanders is therefore based more on its formal role as an accreditation body and authority on quality assurance. This became evident in 2015 when the Minister of Education asked NVAO to develop and implement new accreditation frameworks and a pilot round for institutional reviews, in 2015 and 2016. NVAO coordinates these pilots and will play an important role in the evaluation of the new system in 2017, as well as in the development of a new system that will become effective in 2020.

Position and status

Both in Flanders and the Netherlands, NVAO operates on the basis of educational legislation. The evaluations of 2013 confirmed that NVAO fulfils its legal tasks sufficiently well. Although NVAO has a firm statutory base in legislation on higher education, it considers the support of its stakeholders equally important. It cannot function without broad support in the community for higher education. NVAO has regular meetings with all institutional stakeholders in the Netherlands and in Flanders, including the student unions. It also has an Advisory Council in which its stakeholders are represented. NVAO works closely together with both Dutch and Flemish ministries and other stakeholders in drafting accreditation frameworks.

NVAO communicates its activities regularly in Annual Reports and half-yearly reports, and provides accessible information to the public on the quality of higher education.¹² NVAO organises a biennial conference which alternates between the Netherlands and Flanders. This has developed into an important event for exchanging views on quality assurance matters and NVAO's activities and strategies together with the higher education community in both countries.

International profile

NVAO is actively involved in international networks of quality assurance, such as ENQA, ECA, and INQAAHE. Chapter 8 describes NVAO's international activities and its strong profile in and contribution to the relevant networks.

Mission and strategy

NVAO revised its mission and strategy in 2013, taking into account the ENQA review of the previous year and the external evaluations of NVAO described in Chapter 3.¹³ The SWOT analysis in Chapter 5, below, reflects the perceptions of NVAO by external stakeholders in these evaluations and in other forms of feedback on NVAO's activities. NVAO's internal quality assurance provides information on a more operational level aimed at improving processes.

In 2013, NVAO reformulated its strategy for 2013-2016, focusing on the following main themes:

- basing assessments on justified trust, and refining its instruments;
- stimulating quality culture;
- meeting procedural deadlines and streamlining procedures;
- improving the quality of panels, and training panel chairs, members and secretaries;
- improving the quality and accessibility of assessment reports;
- setting up cluster-based assessments;
- increasing international cooperation and the international recognition of qualifications.

In response to the changes in the systems in both countries NVAO will finalise its new strategy at the end of 2016. It continues its mission to be a reliable and authoritative partner in the quality of higher education, and to stimulate the development of quality culture. It will focus on efficient and reliable procedures of a high standard, innovation in external quality through pilots in the Netherlands and Flanders, and a leading international presence. Keywords in its new strategy are: co-creation with stakeholders, authority and independence, an open, transparent and respectful internal and external mode of operation, developing and sharing expertise. NVAO will put more emphasis on justified trust by allowing a lighter form of analysis for application for the accreditation of programmes from institutions with a proven good track record.

NVAO reinforces its position and role in between government and institutions by adopting an independent and high-quality perspective, and by strengthening its ties with the network of higher education. It will improve its internal and external communication processes, develop its role as a centre of expertise on quality in higher education, sharing

¹² <https://www.nvao.net/actueel/publicaties/nvao-jaarverslagen>; <https://www.nvao.net/actueel/publicaties/nvao-jaarbericht-2015>

¹³ <https://www.nvao.net/actueel/publicaties/nvao-strategie-2013-2016>

information with its stakeholders and staff. NVAO will optimise its processes using peer-to-peer coaching to ensure consistent and timely handling of procedures.

NVAO will work towards achieving the aims of the new frameworks in the Netherlands and Flanders: increasing the ownership of institutions and teaching staff, and reducing the administrative burden. It will gradually shift its attention from the ex post analysis of assessment reports to creating the right conditions up front for reliable assessments. NVAO will make itself more visible to institutions in the process leading up to assessments. It will also work together with the assessment agencies to ensure that institutions are put in the position to exert ownership over the assessment process.

In Flanders, the focus of NVAO will also be on creating the right conditions for institutions to take quality assurance into their own hands. The new accreditation system will put NVAO in a more supervisory role. Depending on the outcome of the current pilot round, NVAO's main instruments in the new system will be the institutional reviews and periodic risk-based evaluations, both of which safeguard the continued quality of individual programmes.

Focus points in implementing the new frameworks will be:

- training and briefing of panel chairs and members and NVAO process coordinators;
- assisting in putting into practice the new procedures, making sure that the administrative burden is kept to a minimum and that stakeholders exercise their increased ownership;
- disseminating good practices and stimulating a dialogue between institutions;
- consulting with stakeholders to optimise the connection between external and internal quality assurance procedures and policies in institutions;
- extending international collaboration with assessment agencies, such as AACSB/EFMD, and EAPAA, to further integrate procedures and thus reduce the administrative burden.

Activities of NVAO

Primary quality assurance activities

NVAO carries out a range of quality assurance activities based on its legal tasks that converge on (initial) accreditation of programmes and institutions in higher education. The description in this SAR distinguishes between NVAO's **primary** quality assurance activities that are fully relevant for ESG, activities related to the primary tasks, based on NVAO's legal responsibilities, and activities in support of the main tasks. This division also informs the presentation of NVAO's compliance with ESG in Chapters 10 and 11:

1. 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.
2. Coordinating assessments and deciding on initial accreditation of programmes in Flanders and The Netherlands, on application by institutions.
3. 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.
4. Coordinating the assessments of and deciding on institutional audits in the Netherlands and institutional reviews in Flanders, on application by institutions.

5. Coordinating assessments of higher education programmes on the Caribbean islands of Curacao, Aruba and St. Maarten (so-called Caribbean part of the Kingdom of the Netherlands), on request of the Ministry of Education of the Netherlands.
6. Coordinating assessments and deciding on the granting of distinctive (quality) features for programmes and institutions in the Netherlands and Flanders.

Activities linked to primary activities

A **second** category of NVAO's activities are part of its tasks as laid down in law and are linked to the agency's primary activities. Thereby, they are relevant for a number of ESG standards and comprise the following:

1. Approving of/advising on panels for programme assessments proposed by institutions in Flanders and the Netherlands (ESG 2.4).
2. NVAO produces thematic analyses or evaluations, on the basis of assessments (ESG 2.2 and 2.3).
3. NVAO drafts and maintains frameworks for accreditation for programmes and institutions in higher education, both in the Netherlands and in Flanders (ESG 3.4).

Procedures related to primary quality assurance activities

A **third** category of activities consists of evaluations on features of programmes leading to either an independent decision by NVAO or an advice to the Minister of Education in the Netherlands or in Flanders. Currently, these evaluations are in most cases carried out as part of the assessments for accreditation or initial accreditation, but they can also be applied for separately. These evaluations include:

1. Advising the Minister of Education on applications for combining two or more existing programmes into broader programmes (NL).
2. Advising the Minister of Education on applications for extending (or reducing in Flanders) the formal duration of programmes, including research master's programmes of 120 EC (advice 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).

The 2016 Dutch framework integrates the procedures related to (initial) accreditation and institutional audit mentioned above in the second and third category. As far as their legal status permits, these procedures will be integrated into the assessment for (initial) accreditation or institutional audit bringing them fully within the scope of ESG. Where the legal status of the procedures allows this, NVAO will set up guidelines and criteria for these procedures, not as separate protocols. Chapters 10 and 11 describe the relevance to ESG for the procedures mentioned above in the second and third categories.

Other activities

NVAO further performs many activities that support NVAO's main external quality assurance procedures or are aimed at improving its operations. These activities include:

1. Activities related to international cooperation in the field of external quality assurance (see Chapter 9).
2. Formally validating the Domain Specific Learning Outcomes for programmes in Flemish higher education.
3. Publishing assessment reports and decisions on accreditation of new and existing programmes, institutional audits or reviews and all other NVAO procedures.

4. Informing the public on the quality of higher education in Flanders and the Netherlands.
5. Implementing the training of panel chairs and secretaries in assessments organised by NVAO or by assessment agencies.

The activities mentioned above are described further in Chapter 6 and Annex 6, which also contain more detailed information on NVAO's additional activities including those related to NVAO's internal processes. International activities are described in Chapter 9.

Chapter 5 The SWOT-analysis presented here takes a 'wide-angle' perspective, as it focuses mainly on the recent past, the present and the short term future of the NVAO. It is prepared in consultation with internal and external stakeholders.

SWOT analysis

Strengths

- NVAO has authority in the field of higher education in the Netherlands and Flanders. Stakeholders qualified the accreditation systems in both countries as robust in evaluations in 2013, and praised the quality of the judgements by peers and the processes and decision making by NVAO.
- NVAO's expertise is valued in the field. Both the Dutch and Flemish governments asked NVAO to develop and implement new frameworks and perform various tasks related to quality assurance.
- Stakeholders report positively on NVAO's staff: it is well qualified and capable of handling both regular tasks and other activities in a professional manner.
- NVAO has an effective set of tools for safeguarding and improving the quality of higher education. Panels observe an improvement of the quality of programmes which underwent an improvement period after a negative assessment.
- NVAO uses generic frameworks and peer-review, a principle which is valued and recognised by stakeholders. NVAO's training of panel chairs, secretaries and process-coordinators, such as in the implementation of the Dutch institutional audit, contributes in the eyes of stakeholders to consistent procedures and judgements.
- The bi-national status of NVAO offers various benefits:
 - o NVAO operates on a basis of 'unity in diversity', integrating good practices from both contexts, learning from each other, providing an interesting workplace for NVAO staff and Board.
 - o It provides an inherently comparative perspective to its activities and decisions.
 - o In comparison to agencies in a monolithic political context, NVAO's relationship with two different governments increases the agency's independence.
- NVAO is a leading member of various international networks of external quality assurance. It is on top of important new developments and shares these with the field in various activities aimed at disseminating knowledge and good practices.
- NVAO works together with its stakeholders and involves them in important processes, such as the design and implementation of the new accreditation systems. NVAO's regular consultation and open dialogue with stakeholders is appreciated in both countries.

Weaknesses

- NVAO has limited control over the assessments coordinated by assessment agencies on behalf of institutions. Through the approval of panels and the analysis of reports NVAO standards of quality in these assessments are ensured, but achieving the intended reduction of the administrative burden and increasing the ownership of stakeholders requires that NVAO is more present 'ex ante' to create the right conditions for the assessments.
- Although there are already many informal meetings, NVAO could intensify its contacts with institutions outside the formal stakeholders' consultation, in the form of brainstorm-sessions or focus meetings.

- The management of deadlines by NVAO leaves room for improvement, for instance with the use of ICT-tools. The handling of procedures can be streamlined further and made even more consistent.
- Stakeholders appreciate the formal communication with the NVAO office, but NVAO can improve on a more uniform communication between policy officers and applicant institutions on the progress of procedures and the stages in decision making.
- The readability of NVAO decisions and reports has improved but remains a point of attention.
- NVAO publishes decisions and reports on its website. It has experienced that the accessibility of these documents needs improvement and is developing new tools.

Opportunities

- Higher education is developing fast: participation remains high, new ways of transferring knowledge and skills are being developed. Students demand more flexibility in the organisation of education, especially in life-long learning. NVAO can use its expertise to assist maintaining standards of quality in these developments. It has published papers on quality assurance in online education and MOOCS.
- Internationalisation and globalisation of higher education and of quality assurance are still increasing. NVAO has signed collaboration agreements with professional accrediting bodies such as AACSB, EFMD and EAPAA and aspires to sign similar agreements with other accrediting or assessment bodies.
- The customisation of procedures and increased ownership of quality assurance by teachers and students mean that quality assurance agencies need to explore new ways of collaboration with stakeholders. Compliance assistance becomes increasingly important for NVAO.
- In its regular operations, NVAO accumulates data and good practices on higher education in the Netherlands and Flanders which can benefit the development of higher education. NVAO already publishes thematic analyses, such as the NVAO report “Four years new framework in the Netherlands” of 2014.¹⁴
- Various agencies are involved in monitoring higher education in the Netherlands, such as the Inspectorate, the Review Committee, and the Committee for Macro-efficiency. This offers interesting perspectives for synergy and further integration. NVAO already closely collaborates with the Inspectorate.
- NVAO will explore new ways to streamline its operations and thus reduce the administrative burden on institutions.

Threats

- The new framework for programme assessments in the Netherlands creates uncertainties for all stakeholders. NVAO will need to be more present in the preparation of assessments to ensure that the intended innovations – more ownership by teachers, students and management, more room for dialogue with peers on improvement, and reduction of burden – are realised in practice. It will work together closely with the assessment agencies to achieve this.
- The quality of reports produced by agencies in the Netherlands and Flanders, in terms of argumentation of the judgements and the readability of reports, has improved. Still, in 3 - 5 percent of the reports, insufficiencies in the argumentation of judgements lead

¹⁴ See note 7 above.

to a disproportionate amount of effort and delays in the handling and decision making by NVAO. This relatively small number of cases leads to an additional burden on institutions and impacts negatively on the acceptance of the system of quality assurance.

- NVAO operates in a particularly volatile context, both in the Netherlands and in Flanders. Recent changes to the systems of accreditation addressed issues raised by stakeholders and the political context. 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.
- NVAO's expertise and its formal status mean that it carries out many activities in addition to its primary statutory tasks, mostly on demand of the Ministers of Education in the Netherlands or Flanders. Although NVAO has never had problems in fulfilling its obligations, it has to combine 'line' work with project-oriented tasks and activities. The workload is already high, which requires the balancing of limited capacity with various demands.
- Financial support from both the Dutch and Flemish governments is steadily decreasing. NVAO had to economise its operations to an extent and optimise its internal efficiency. A further decrease in financial support will eventually lead to a diminution of its activities, especially those that are not directly related to its statutory tasks.

Analysis and strategic choices

In view of this SWOT-analysis NVAO has decided to be more pro-active in creating the right conditions for assessments and decision making ex ante. As also explained in Chapter 4, this will be achieved in the following manner:

- NVAO will increase its involvement in the coordination of assessments, encouraging institutions to take the opportunities for more ownership and reduction of the administrative burden.
- Appreciating the positive contribution of assessment agencies, NVAO will see to it that they contribute to the desired change in the system. It will consult with the agencies and critically monitor their involvement in the process and the quality and readability of their reports.
- Cluster-based assessment for all programmes, and the training or briefing of all those involved – chairs, panel members, secretaries and process coordinators – will ensure consistency in process coordination and decision making.
- NVAO will improve all forms of communication, including the accessibility of its decisions and reports through the NVAO website.
- NVAO will increasingly act as a 'network-organisation', intensifying its consultation with stakeholders.
- NVAO will maintain its international position and network, and also seek further collaborations with profession oriented accreditation agencies to combine procedures and thus reduce the burden on institutions.
- NVAO will continue to publish thematic analyses and disseminate knowledge and good practices in seminars.
- NVAO will further streamline its decision making procedures and organisational processes.

The following description follows the distinction made between primary activities and related procedures or activities as indicated in Chapter 4. International activities are described in Chapter 9.

Institutional audit and review

The first institutional audits in the Netherlands were held in 2011. The first round comprised all Dutch universities and the majority of universities of applied sciences, resulting in 24 positive decisions, one withdrawn application, and ten conditionally positive decisions. Of the latter, eight have been converted to a fully positive decision after reassessment. In 2016 the last three audits in this round were finalised: one positive, one positive after a conditional judgement, one re-assessment after a conditional judgement is still on-going at the time of writing.

NVAO prepared the first round by training panel chairs and members, secretaries and staff members who coordinated the audits. In general, the feedback on the handling of these audits by NVAO was positive (see also Chapter 8). From evaluations of the new system in 2013 NVAO concluded that the audits stimulated the quality culture and boosted the internal quality assurance in institutions. The institutions with a positive result in the audit comprise ca. 80% of the programmes in the Netherlands.

The second round of institutional audits in the Dutch system will start in 2017, and follows the framework of 2016. This means the audits will focus more on the realisation of the educational vision and the development of a quality culture, taking into account the performance of programmes since the first round of audits.

NVAO coordinated the first (pilot) round of the Flemish institutional review, which started in 2015 and will finish in 2017. NVAO developed a protocol for the reviews, selected peers for the panels, and set up training sessions for panel members and secretaries. NVAO staff members coordinated the reviews. In total, 18 institutions (universities and university colleges) participated in the pilot round. The outcomes of the reviews will be made public in the summer of 2017.

Accreditation

The handling of applications for the accreditation of existing programmes and the coordination of assessments for initial accreditation provided the bulk of NVAO's activities in the period 2012-2016 (see the table below). Since 2015, all assessments for existing programmes are clustered in groups of programmes in a similar discipline. This was already the rule for Dutch academic programmes and all Flemish programmes. Dutch higher professional programmes used to make individual arrangements with agencies, but now follow the model of large, nation-wide comparative assessments within a single domain.

The clustering of assessments in a domain strengthens cooperation within the sector, for instance by developing collective learning outcomes. Thereby, it is also considered an important tool for ensuring consistent judgements.

Since 2014, the grouping of assessments for all programmes is prescribed by law. NVAO supervised the formation of these clusters in 2015, in consultation with the institutions.

An application for changing the name or degree of a programme or for a distinctive feature can be included in the assessment for accreditation. With the 2016 framework, such procedures will be further integrated into the regular assessment procedure.

Initial accreditation

The continuous innovation in higher education leads to a steady stream of initial accreditation procedures for programmes in public and private institutions. Since 2015, initial accreditation in Flanders has been put on hold for formally registered institutions. The success rate in initial accreditation procedures is rather low as the demands on new programmes are high.

	Positive NL	Conditionally positive NL	Positive FL*
2014	40% (of 60)	13%	85% (of 12)
2015	47% (of 68)	19%	75% (of 14)

* There is no conditional judgement for new programmes in Flanders.

Related procedures, such as the extension of the legal duration of a programme in the Netherlands should be assessed in its initial accreditation. This procedure applies to all master's programmes in the Netherlands with a duration of more than 60 EC, including research master's programmes. The procedure for the recognition of private parties as 'legal entities for higher education' involves a more extensive initial accreditation procedure for the first programme proposed by the institution (see Annex 6). In the 2016 framework these procedures are integrated in the assessment process for accreditation.

The number of handled applications for (initial) accreditation, institutional audit or review:

Year	Total	NL Existing programmes	NL Inst. audit	NL Initial accreditation	FL Inst. review	FL Existing programmes	FL Initial accreditation
2016*	185	66	2	44	6**	67	-
2015	652	397	4	68	-	169	14
2014	807	646	15	60	-	74	12
2013	801	515	24	50	-	206	6
2012	578	339	5	55	-	166	13

* Until 30 June 2016; ** At the time of writing. Review is concluded, no decision has been taken.

Recognition of joint degrees and accreditation of joint programmes

In 2014, the Dutch Ministry of Education established criteria for the recognition of new and existing programmes as joint degree programmes with partners in the Netherlands or across the borders. These criteria can be assessed in regular assessments for (initial) accreditation. An important criterion is the presence of an agreement between the partner institutions which specifies the formal arrangement for collaboration for quality assurance and other relevant aspects. The protocol allows existing joint programmes in Erasmus Mundus collaborations to seek conversion to a formal joint degree programme.

NVAO advises institutions to apply the European Approach for Quality Assurance of Joint Programmes, which contains more standards. In the 2016 framework, the recognition procedure for joint degrees is further integrated with the process of assessment for (initial) accreditation.

Recognition of other agencies (joint and regular programmes)

NVAO recognises accreditations and assessments of joint programmes by other recognised agencies through the MULTRA agreements with other accreditation agencies. In 2015 NVAO took several decisions on the basis of an agreement with the German Accreditation Council. In June 2016 NVAO took its first accreditation decision based on the framework of the European Approach for Quality Assurance of Joint Programmes (see Chapter 9). In all these cases NVAO still takes an independent decision. The MULTRA agreement stipulates that all partners should be EQAR-registered agencies, which ensures that all decisions and reviews under this agreement are in line with ESG.

In the Netherlands, NVAO takes decisions on accreditation of existing programmes on the basis of reports submitted by institutions, but produced by assessment agencies. Not all of these agencies are EQAR-registered, but their reports must comply with the formal requirements of the accreditation frameworks, which are checked by NVAO during the handling of the application. This guarantees that the assessments and reports comply with ESG.

Only in Flanders, NVAO is legally permitted to recognise reviews by other agencies as fully equivalent. A protocol describes the conditions and requirements for this procedure, which ensures that the foreign agency conforms to ESG.¹⁵

Distinctive (quality) features

The Dutch and Flemish accreditation frameworks allow programmes or institutions to profile themselves by defining specific characteristics. These are assessed as 'distinctive features' (NL), or 'distinctive quality features' (FL). In addition to features that are defined by a programme or institution, NVAO coordinates the assessment of a number of pre-defined distinctive features, such as 'Small-scale and Intensive Education' in the Netherlands, which entitles programmes to select students and demand a higher fee. Other pre-defined distinctive features include Internationalisation, Sustainability, and Entrepreneurship.¹⁶

Distinctive features are included in the accreditation decision of the programme and need to be re-assessed with every new accreditation. The 2016 framework contains criteria for the generic distinctive features for institutions and programmes, which have been renamed 'specific aspects'. The pre-defined distinctive features based on separate protocols remain fully intact.

Cross-border quality assurance activities (Caribbean part of the Netherlands)

By formal arrangement with the Dutch Ministry of Education, NVAO carries out assessments of programmes in higher education in the Caribbean part of the Kingdom of the Netherlands, which includes the islands of Curacao, Bonaire, Aruba, St. Maarten, Saba and St. Eustatius. For Curacao, Aruba and St. Maarten, the assessments do not lead to formal accreditation, as these are independent countries within the Kingdom of the Netherlands. They result in a formal advisory report that is evaluated and confirmed by NVAO. Bonaire, Saba and St. Eustatius are, in a legal sense, Dutch municipalities, so NVAO has a full mandate to accredit programmes on these islands. The intention behind the involvement of NVAO is to stimulate the further development of higher education in

¹⁵ <https://www.nvao.net/actueel/publicaties/reglement-erkenning-evaluatieorganen>

¹⁶ See Annex 6 for more information and links to the frameworks for these distinctive features.

the region in compliance with international quality standards. See Annex 6 for more details.

Consultation with stakeholders

In support of its primary activities, NVAO regularly consults stakeholders. More information on this consultation is presented in Chapter 12.

Activities linked to the primary activities

The following three quality assurance activities are linked to NVAO's primary activities and are also prescribed by Dutch or Flemish legislation as tasks of NVAO. They are also relevant for at least a number of standards of ESG.

Approval of (or advice on) panel composition (ESG 2.4)

The first step in the procedure for accreditation of existing programmes is the validation of the expertise and independence of the expert panels. Panels for programme assessments are submitted to NVAO for mandatory approval in the Netherlands by assessment agencies on behalf of institutions. In Flanders, NVAO issues a non-binding advice on the panel composition to the assessment agency. NVAO maintains a guideline for the composition of panels, on which the analysis of proposals and the decision are based.¹⁷ As of 2016, this guideline will be updated to bring it in line with new accreditation framework and integrated into the application form, which will be made available through NVAO's website.

Producing thematic analyses or evaluation, on the basis of assessments (ESG 3.4)

Since 2012, NVAO has produced thematic reports on various topics, as listed below:¹⁸

Year	Title
2014	<ul style="list-style-type: none">- Knowledge Co-Creation Quality Culture Professional Bachelors Communication Studies (NL).- Employability of professional bachelors from an international perspective (NL/FL)
2015	<ul style="list-style-type: none">- Analysis of accreditations of academic programmes Humanities and Communication Sciences (NL).- Four years of new accreditation system in the Netherlands in figures (NL).- Discussion paper on the profile of Research Master programmes (NL) (not published).- Teacher training programmes at universities (NL).- Teacher training in primary education programmes (NL)
2016	<ul style="list-style-type: none">- Assessment and Demonstration of Achieved Learning Outcomes: Recommendations and Good Practices. Outcomes of the NVAO Peer Learning Event on 29-30 October 2015.- Teacher training programmes in higher professional education (expected 2016)

A state of the art report of each cluster of assessments is published in the assessment reports of Flemish programmes of both universities and university colleges.

The production of thematic analyses is tightly integrated in the regular accreditation process in NVAO. In general, 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 following describes examples of both scenarios. Analyses are based on the results of assessments and NVAO's conclusions during the decision making process. The policy officers who handled the relevant accreditation dossiers are also involved in the making of a thematic analysis.

¹⁷ <https://www.nvao.net/actueel/publicaties/leidraad-eisen-panelsamenstelling>

¹⁸ See Annex 10 for a summary of the analyses.

In 2014, NVAO produced the 'meta-evaluation report' on the Dutch Humanities assessments to inform the field about the quality of the programmes and the causes for the large number of negative judgements, which had earlier drawn considerable public attention. The report provided an overview of the many good aspects of the programmes and also analysed the problems leading to the negative judgements. The analysis was drafted by the project-leader responsible for the handling of the dossiers, together with the NVAO Board member responsible for this project. Making an analysis was foreseen in the project plan and was started after the decisions had been finalized.

In the summer of 2014, NVAO had already produced information for a wide audience when the results of the accreditation decisions were made public. Therefore, the meta-evaluation report was only shared with the stakeholders that were directly involved: the universities, the association of Deans in the Humanities and Theological Studies, the Minister of Education, the Inspectorate and the 'Regieorgaan Geesteswetenschappen' - a government body responsible for a subsidy programme in the Humanities. It is publicly available though. The report was cited in the final report of the Regieorgaan Geesteswetenschappen as a source on the quality of the programmes in the domain.¹⁹

Thematic analyses of NVAO also played a role in a process of a different nature. In 2015 NVAO produced an analysis on the basis of the assessment of Dutch academic teacher training programmes. Drafts of the analyses were discussed with the stakeholders in this domain and compared with the improvement measures taken by the institutions involved. NVAO integrated the outcome of this consultation in the final version of the analyses. This interactive use of the thematic analysis greatly enhances its impact in the field. The NVAO analyses of the teacher training programmes further played an important role in the assessment by the Minister of Education of the quality of these programmes, which had been a subject of debate. A similar approach is planned for two subsequent analyses of teacher training programmes.

It is evident from the list of analyses above and in Annex 10 that the two examples described here do not cover all instances in which NVAO decides to invest in a thematic analysis. Analyses such as the Faboto-guidelines have a background in an international project. Providing information to the field on the basis of NVAO's handling of quality assessments remains the main impetus for producing these studies.

In the Flemish system, all assessment reports of a cluster of programmes in a domain by VLUHR-KZ contained a 'state of the art' analysis. System-wide analyses will continue to be an important instrument for NVAO in the new Flemish system, in combination with the institutional reviews. It is foreseen in the new system that NVAO will, in consultation with the field, periodically select certain domains or topics for an analysis.

Drafting and maintaining frameworks (ESG 2.2 and 2.3)

Dutch and Flemish legislation prescribes that NVAO drafts and maintains the frameworks for (initial) accreditation and the institutional audit or review. In 2014, NVAO drafted a major update of the Dutch frameworks, in which standards relating to the assessment system and the level of achieved learning outcomes were separated, following consultation with stakeholders and the political context. It also reduced the amount of documentation for all procedures and introduced a judgement 'partially meets the standard' on the standards for initial accreditation. The drafting of the new Dutch and

¹⁹ <https://www.regiegeesteswetenschappen.nl/images/uploaded/92/editorial/id=385.pdf>

Flemish frameworks in 2015 and 2016 is described in Chapter 3 above. Two project teams in NVAO took part in the intensive consultation with stakeholders and drafted the texts of the framework and assisted in the implementation. In Flanders this encompassed the pilot round of institutional reviews.

In 2016, NVAO worked together with the Dutch universities to draft a revision of the additional criteria for assessing research-master's programmes. At the request of the Dutch Minister of Education, NVAO developed frameworks for specific distinctive features, teacher-training programmes, and Associate Degrees.²⁰

Assessment of features of programmes

Dutch and Flemish legislation assigns to NVAO the assessment of several features of programmes, which leads to either an independent decision by NVAO or an advice to the relevant Minister of Education (see Chapter 4). In most cases, these assessments are combined with regular assessments for (initial) accreditation or institutional audits. This concerns the following procedures, which are introduced briefly here (see also Annex 6).

Combining of existing programmes into broader programmes (NL)	NVAO assesses whether the proposed programme does not entail a new programme, according to a protocol. With a positive assessment by NVAO, institutions can apply for permission to the Minister of Education.
Extension (or reduction in Flanders) of the formal duration of programmes (NL/FL)	This includes a large number of research master's programme of 120 EC. The procedure is part of the regular (initial) accreditation in the Netherlands and leads to an advice to the Minister in Flanders.
Change of name or degree (NL)	Can be applied for in accreditation or separately. Degrees are regulated according to rules in legislation. NVAO sees to proper use of these.
Additional admission criteria (NL)	Programmes related to specific educational concepts or professional can apply for the use of additional admission criteria. NVAO has a protocol and assessment can be included in accreditation.

As most of the assessments take place in the context of regular assessments, NVAO applies and maintains the same principles as for NVAO's primary activities: consultation with stakeholders on procedures; well defined standards or criteria; peer review by independent experts and, where relevant, a student panel member; public reports and decisions. This also brings them within the scope of ESG. The 2016 framework further integrates these and other related procedures in assessments for (initial) accreditation.

Various projects related to quality assurance

NVAO is or was involved in various projects at the request of the Dutch Minister of Education which are closely related to primary quality assurance activities, and in international projects. Some of the projects involved developing frameworks or guidelines. See Annex 6 for further information on the projects.

Projects at the request of the Dutch Ministry of Education:

Experiment Learning Outcomes (NL)	Part of a grant programme by the Dutch Ministry of Education to increase the participation of adults in higher education by experimenting with more flexible learning paths. NVAO advises on applications for the subsidies and will eventually accredit the programmes involved (start 2016, duration 6 years).
Teacher Training	In 2013, NVAO developed frameworks for the trajectories 'Teacher Training School', 'Academic Extension', and 'Education minors in bachelor's programmes' in Teacher Training Programmes, at the request of the Dutch Ministry of Education. ²¹

²⁰ See Annex 6 for links to the relevant frameworks.

²¹ See also Annex 6.

International projects (see also Annex 6 and Chapter 8):

ARQATA (2011-2014)	A project of NVAO and the National Centre for Professional Education Quality Assurance Foundation in Yerevan, Armenia (ANQA), funded by the World Bank, which aimed at the further development of a quality assurance system and quality culture in Armenian higher education.
CeQuint	Developing an assessment methodology to assess the internationalisation of a programme or an institution.
JoQar	Cross-border quality assurance of joint programmes and recognition of degrees.
Faboto (2014-2016)	Organizing a Peer Learning Activity on the Assessment and Demonstration of Achieved Learning Outcomes, in collaboration with the Dutch Ministry of Education, Culture and Science and the Erasmus+ agency EP Nuffic.

NVAO has the formal task in Flanders to validate Domain Specific Learning Outcomes for programmes. Proposals for these are developed by institutions in the context of the proposal for a new programme. The Flemish Council for Universities and University Colleges (VLUHR) submits the Domain Specific Learning Outcomes for formal validation by NVAO, which leads to their establishment in the Flemish Qualification Framework. NVAO also maintains the Flemish register for higher education. In the Netherlands, this is done by the Ministry of Education.

Public information and dissemination of knowledge

Part of NVAO's legal tasks concern providing public information on higher education in the Netherlands and Flanders. NVAO publishes assessment reports and decisions on accreditation of new and existing programmes, institutional audits or reviews and all other NVAO procedures, through its website. NVAO publishes half-yearly reports of facts and figures, which inform the public and the political context about the quality of higher education and the activities of NVAO (see note 8 above). Annex 6 contains a short description of seminars, conferences and workshops for national and international stakeholders aimed at disseminating knowledge, held from 2012-2016.

Improving NVAO procedures and internal processes

An important tool for ensuring consistency in judgements by panels is a customized training programme for panel chairs and student members of panels, and secretaries. All panel members are briefed prior to the assessments by the process coordinator. The assessment agencies train the panel members according to the training programme and profiles drafted by NVAO. For the purpose of the training NVAO has developed a profile for the role and behaviour of a panel chair. Also the roles of other panel members have been clearly defined.

NVAO has also drafted a profile for the NVAO process coordinator which defines his/her responsibilities and the desired mode of operation, in order to ensure consistent handling and coordination of assessments coordinated by NVAO. The profile is also used in internal consultations. A programme of peer-to-peer coaching has been developed to support the comparative discussion of approaches and responses to dilemmas faced by process coordinators. See Annex 9 for the profiles of the panel chair and the coordinator.

Another important improvement is the optimisation of internal processes. This involves both policy officers and support staff. The planning of handling of applications is maintained much more strictly, resulting in better management of the deadlines for decisions on applications.

Institutional audit or review

The general outline of the process of an institutional audit or review is as follows:

Application	In case of renewal, the institution applies for the audit or review at least one year before expiration of the current term.
Consultation with NVAO Board	NVAO Boards meets with the management of the institution to discuss aspects of the audit or review, such as: planning, composition of the panel, specific themes or focus points, possible themes for audit trails. NVAO prepares an overview of accreditation results of all programmes offered by the institution.
Panel composition and appointment	NVAO staff member (in the role of process coordinator) and Board member draft a panel proposal. - The panel members and secretary are asked to verify and state their independence. - The institution is consulted on the composition of the panel.
Self-evaluation report	At least six weeks before the site visit, the institution submits a self-evaluation report and the required documentation. In the Dutch framework of 2016, the representative bodies in the institution are requested to advise on the SAR before it is submitted.
Preparatory meeting	In a preparatory meeting, the panel discusses the self-evaluation report and prepares the interviews.
Site visits	- The first site visit (1 day) is meant to gather a general impression of the institution, its policies and structures and is filled with interviews with all relevant actors in the institution. Audit trails are decided upon at the end of the visit. - The second visit of 2,5 days is meant for the audit trails. - The second site visit concludes with a short presentation of the findings and judgements by the panel chair. - An 'open consultation hour' is part of the site visit, allowing anonymous access to the panel.
Report*	The report is drafted by secretary in consultation with panel chair and NVAO coordinator and on agreement sent to the institution for verification.
Decision making*	- The NVAO Executive Board discusses the report and consults with the panel chair before taking a preliminary decision. - The General Board of NVAO decides on acceptance of the report and the final decision. - Before taking a final decision, the draft decision is sent to the institution for reaction or complaint / appeal.**

* This stage is different for the current Flemish institutional reviews. Reports – both the review report and the advisory report on the handling of quality assurance – are drafted and finalised by the panel, but submitted to NVAO when all reviews are completed in July 2017. When a set of six reviews is completed, the project coordinator of the Flemish institutional reviews will orally present a summary of the findings and judgements to the institution.

** In NL, appeal is possible after the final decision, in FL after a draft decision.

Focus points related to institutional audit or review

- The institutional audit or review focuses on policies related to the quality of education, implementation and the operational quality of internal quality assurance. NVAO selects panel experts with sufficient experience in the management of institutions of higher education. The panel members and secretaries are trained specifically for this type of assessment.

- In the pilot round of institutional reviews in Flanders, NVAO applies an appreciative approach, whereby the assessment departs from the choices of the institution for the management of educational policy and quality assurance. The review panel only assesses whether these choices are effective and match the intentions and context of the institutions. This approach avoids a normative perspective.²² Part of the pilot review looks

²² See for a description of the appreciative approach: <https://www.nvaio.com/quality-assurance-systemsflandersinstitutional-review/appreciative-approach>

at the development of internal quality assurance in preparation for institutional accreditation in 2020, and leads to an advisory report, separate from the review report. NVAO has taken the lead in developing this approach, training the panels to apply it and making it the basis for the reports.

- The institutional audit is an intensive procedure: on average, a panel interviews more than 100 staff members, students and other stakeholders during an audit. An important task for the NVAO coordinator is effective and timely communication with all those involved. NVAO emphasised this in its profile of the process coordinator and will include this in the training protocols.

- In the 2016 framework, the Dutch institutional audit emphasises the realisation of the educational vision, and the way an institution makes tangible progress in implementing a quality culture. Therefore, it will look deeper into quality assurance mechanisms and improvements at programme level. The new framework focuses less on 'hard controls' and procedural aspects but underlines professionalism, reflection on what ownership means and other aspects of a quality culture. See Annex 4 for the major differences in standards and assessment rules with the previous framework.

Programme assessment, including joint programmes

Accreditation of existing programmes starts with an assessment of a programme by an expert panel, coordinated by an assessment agency. The resulting assessment report is the basis for the institutions' application for accreditation with NVAO. The process has two quite distinct steps. The first takes place in interaction between the institution and an assessment agency, the second in interaction between the institution and NVAO. Focus points are given separately for each of these two steps.

Step 1: Assessments in a cluster, coordinated by assessment agencies

Preparation:	- Programmes in a cluster select panel members.
selecting a panel and writing a self-evaluation	- The assessment agency (or the institution) submits the panel proposal for approval (or advice in Flanders) to NVAO. Handling time for NVAO is a maximum of four weeks.
Site visit	- Programmes write a self-evaluation report.
	- The panel prepares by reading the self-evaluation report and a sample of final projects or theses.
	- Meetings with management, teachers, students, the professional field, and the examination board.
	- The panel passes judgement and presents a summary of its preliminary findings to the programme. The Flemish framework stipulates that the panel does not mention scores or judgements on standards.
	- The 2016 framework separates the assessment part of the site visit from the dialogue with peers on improvement and development.
Report	- The secretary of the assessment agency drafts a report, which is finalised after verification of factual correctness and comments on the findings and conclusions by the institution. In Flanders, institutions can formally appeal against the draft report with the assessment agency at this stage.
	- In the 2016 framework, the report only describes the assessment. A separate report with recommendations for improvement and development is sent to the institution.
Application for accreditation to NVAO	- Institution accepts the report from the agency and submits it to NVAO with an application for accreditation.

Focus points related to step 1 in accreditation

- NVAO will increase its presence in the preparation of assessments to encourage students, teachers and programme managers to exert more ownership over the process and to ensure that the room for an open exchange with peers on improvement and

development is actually used. It will also discuss these matters with the assessment agencies.

- With the introduction of increased differentiation in the judgements, the quality of the argumentation in assessment reports became more critical (see Annex 7). NVAO had to consult more often with the agencies on the quality of the reports in this respect. Even though the number of such cases is small (3-5%), it leads to additional steps and delays in the handling of applications.

The issues described here apply to the Netherlands, but similar issues occur in Flanders. NVAO has regularly discussed problems with the quality of reports from VLUHR-KZ. The burden of the assessment process as implemented by the agency has been criticised by Flemish institutions and meant that the assessments became less productive, in their eyes.

Step 2: Handling of applications for accreditation by NVAO

Application	Institution submits a request for accreditation based on an assessment report.
Analysis by NVAO	Formal compliance: is the application correct and complete? Content: is the report convincing and compliant with the framework?
Draft-decision	NVAO policy officer and Board member prepare an analysis report and a draft decision.
Decision by NVAO Board	Positive: - accreditation after finalisation by General Board. Postponed: - NVAO asks for additional information or consults the panel. In case of a negative assessment report the programme is asked to submit an improvement plan.
Resuming decision	After receipt of additional information or insights from the panel: - NVAO decides positively → accreditation - (eventually) NVAO demands additional assessment (verification)
Decision on improvement period	NVAO accepts improvement plan with positive advice of an expert panel and grants an improvement period of up to two years in the Netherlands or three years in Flanders.
Decision making	- NVAO Executive Board discusses the report and consults with panel chair when additional information is needed, and takes preliminary decision. - General Board of NVAO decides on acceptance of the report and decision. Before taking a final decision, the draft decision is sent to the institution for reaction or complaint/appeal.*

* In NL, appeal is possible after the final decision, in FL after a draft decision.

Focus points related to step 2 in accreditation

- NVAO analyses submitted reports on the basis of the following criteria:

- does the assessment comply with the framework, especially the decision rules?
- is the judgement convincing in light of the reported findings?
- have the recommendations from the previous assessment been followed up consistently and successfully?

- Each application should be seen by at least 'four eyes'. The responsible NVAO policy advisor and Board member are the first to judge the report. In case of doubts as to the judgements or the underlying argumentation, the report is read by a second policy advisor or a second Board member before it is put before the Board. NVAO uses standard forms for analysis to ensure a consistent presentation to the Board.

- Where possible, clusters are handled by a team of policy advisors, who analyse the reports in the cluster in a coordinated manner. This increases the balance in the analysis and prevents individual bias. The collective preparation of the decisions ensures consistency in the handling of the applications and the decision making.

- The granting of improvement periods in the case of negative expert judgements is increasing in recent years. Although negative judgements have an impact on the image of programmes, NVAO sees that nearly all reassessments after the improvement period have a positive outcome, and that the overall quality of the programmes involved has increased. Improvement plans are subject to approval by the panel before NVAO grants an improvement period. In the Netherlands, the improvement plan is usually judged by the original assessment panel. In Flanders, the NVAO takes the initiative to have the improvement plan assessed by an expert panel, which can consist of members from the original panel or other experts.

- Applications for accreditation of joint programmes are handled by a team of NVAO staff members who are trained in handling joint programme and joint degree applications. This also includes the applications which are based on recognition of decisions or reports of other agencies on the basis of MULTRA agreement.

- In the 2016 framework, the site visit in assessments of existing programmes has a dual purpose: ascertaining the quality of the programme, and an open exchange with the programme staff on development. These two aspects have been marked more distinctively in the framework. The assessment report, therefore, will only cover the assessment of the quality of the programme. Recommendations resulting from the open conversation with the panel will be presented separately to the institution, which will publish a summary of this within a reasonable period. NVAO will not take into account these recommendations in its decision making.

Initial accreditation (including joint programmes)

General outline of the process of an initial accreditation

Application	<ul style="list-style-type: none"> - The institution applies for initial accreditation. Publicly funded programmes can only do this if they passed the macro efficiency assessment, which is not part of NVAO's mandate. - The institution supplies an information dossier, as prescribed in the frameworks.
Panel composition and appointment	<p>NVAO process coordinator and Board member draft a panel proposal:</p> <ul style="list-style-type: none"> - panel members and secretary are asked to verify and state their independence; - the institution is consulted on the panel composition; - site visit is planned.
Preparatory meeting	In a preparatory meeting of the panel and the process coordinator, the site visit is prepared, frameworks and information dossier are discussed
Site visit	The framework prescribes the various groups to be seen during the site visit: management, students, teachers, examination board, and work field. The site visit takes one day.
Report	The report is drafted by the secretary in consultation with panel chair and NVAO process coordinator. It is sent to the institution for verification.*
Decision making	<ul style="list-style-type: none"> - NVAO Executive Board discusses the report and consults with panel chair when additional information is needed, and takes preliminary decision. - General Board of NVAO decides on acceptance of the report and decision. <p>Before taking a final decision, the draft decision is sent to the institution for reaction or complaint / appeal.**</p>

* This verification is not part of the Flemish system. ** In NL, appeal is possible after the final decision, in FL after a draft decision.

Focus points related to initial accreditation

- NVAO has defined guidelines for the tasks and conduct of policy advisors in their role as process coordinator of assessments, in order to set consistent standards for communication with the panel and the institution (see Annex 9). The coordinator also sees to it that the judgement is consistent and based on solid evidence.

- NVAO selects panels for initial accreditation assessments. It prefers to engage experienced panel members and uses its bi-national status to appoint Flemish experts for Dutch applications and vice-versa. In the case of internationally oriented or joint degree programmes, international experts are engaged as well. NVAO may ask institutions for suggestions for panel members. Before appointing these, NVAO thoroughly checks their independence. NVAO employs a Code of Conduct for panel members.²³

- NVAO frameworks prescribe that a panel convenes in a preparatory meeting some time before the site visit. The project coordinator briefs the panel members on the framework and methods to be applied during the assessment, which is an important tool to ensure consistency in the judgement. The panel discusses the dossier, prepares questions and may request additional information from the institution. In some cases, the preparatory meeting is planned on the eve of the site visit for practical reasons. In this case the first impressions and requests for additional information are exchanged through e-mail. The coordinator always makes sure panel members are sufficiently briefed on the methods of the assessments.

General focus points

Decision making

NVAO uses standardised forms for documents used in the decision making. All decisions are verified by its legal advisors for legal correctness. In the decision making process, NVAO follows protocols for Administrative Law in the Netherlands and Flanders. The two steps in finalizing the decision on all applications, first by the Executive Board, followed by the validation by the General Board, ensure careful consideration and optimise consistency at this stage. Clustering of applications allows a more comparative consideration in the decision making process and therefore further contributes to consistency of the decisions.

Frameworks and protocols

The maintenance of accreditation frameworks and related protocols by NVAO involves minor updates and correction of details or major changes, following adaptations in the systems of quality assurance as a result of political decisions. Fixed elements in this process are:

- consultation with stakeholders on the acceptance of the proposed changes in regular consultancy or specific meetings;
- consultation with the relevant Ministry of Education for drafting the frameworks;
- internal consultation in NVAO Board and Advisory Board before decision making;
- approval by the Minister of Education or, in Flanders, by Parliament.

Generic frameworks and peer review have always been primary methodological principles for NVAO frameworks and procedures. Assessments concern 'how' and not 'what': they respect the choices made by institutions and programmes and only judge whether these choices actually work and lead to programmes of sufficient quality. Panel members are expected to take the programme's perspective as vantage point for their judgement. NVAO analyses all reports along these lines.

In the process of developing frameworks NVAO primarily provides expertise and is careful to maintain its neutral position with respect to the outcomes. NVAO has

²³ <https://www.nvao.net/actueel/publicaties/nvao-gedragcode>

established a solid reputation in drafting frameworks. In this respect, the last few years have been both interesting and challenging for NVAO, as it was confronted with rapid changes in political opinions in the field of higher education and in the political field. It adapted to these news circumstances and delivered frameworks that are received positively.

Handling times

NVAO has managed to significantly reduce handling times for (initial) accreditation procedures. For existing programmes this still exceeds the legal term of three months, but stays within the deadline of six months agreed on by NVAO and the institutions. In the Netherlands, NVAO used to face peaks in the submission of applications at the end of each year, when 80% of applications for accreditation of existing programmes was submitted between the months of October and December. Since 2016 there are two annual submission periods (1 May, 1 November), which will spread out this peak. It is expected that the introduction of cluster based assessments for all programmes will bring down handling times, because of the higher efficiency of the handling of large numbers of applications within one domain.

The legal deadline of six months for the completion of initial accreditations is still not yet reached for all programmes, but also here NVAO expects improvement from an internal project to streamline its handling procedures.

Average handling time (months)	2013-2014	2014-2015	2015
Existing programmes NL	7.61	5.38	4.5
Existing programmes FL	7.7	5.93	5.3
Research master's	10.88	10	8
Initial accreditation NL	8.68	7.33	7.66
Initial accreditation VL	7.45	7.6	7.16

Review and improvement of processes and methods

NVAO continuously reviews and improves its processes and methods in consultations, using feedback from stakeholders. Consistent handling of the procedures and assessments is also regularly discussed among NVAO policy advisors. NVAO has developed a training protocol for panel chairs and secretaries, which is also used by assessment agencies, to ensure optimal consistency of judgements. Student members are trained by NVAO for the initial accreditation of proposed programmes and for institutional audits or reviews before they can be appointed a panel. Other measures for improvement are described in Chapter 8, which deals with internal quality assurance.

As part of the effort of optimising the internal processes, NVAO considers options for a lighter handling of applications for accreditation for programmes in institutions that have successfully passed two rounds of institutional audit. The relevant reports will still be checked for consistency and possible quality problems, but when these are not apparent NVAO could further simplify the trajectory to a positive decision.

Chapter 8
Agency's internal
quality assurance

Internal quality assurance at NVAO operates both at a strategic and operational level. At both levels, NVAO collects information and opinions from stakeholders and takes actions to adapt its strategy and improve its operations. Sources for the strategic planning of NVAO are the periodical external surveys by ENQA and the evaluations by external stakeholders, such as the Committee of Ministers, the Inspectorate, and the Dutch and Flemish Courts of Audit. These evaluations are based on feedback from institutions, students, and assessment agencies.

Strategic level

The ENQA-reviews of 2007 and 2012 and the evaluations by Dutch and Flemish supervisors provided input for NVAO's strategy defined in 2013 (see Chapter 4). Elements such as the emphasis on consistency, trust and reduction of the administrative burden can be traced back directly to recommendations by stakeholders. A similar adjustment took place in 2016, when the contours of new accreditation frameworks in the Netherlands and Flanders became more solid. In these new systems, the external stakeholders clearly expressed their preference for more ownership and a lower administrative burden, themes which define NVAO's strategy for the coming years.

Operational quality assurance

NVAO's internal quality assurance operates within the strategy and is based on a PDCA-cycle in which all major quality assurance activities are evaluated by the stakeholders involved in the process. The following scheme shows the various elements in the cycle.

Phase	Activity	Actor	Planning
Plan	NVAO Board approved the plan on Internal Quality Assurance.	Board	Dec-2014
	NVAO's Strategy 2012-2016 is translated into a Work plan, updated annually by NVAO's Management Team (MT).	MT	Jan
	Analysed and discussed evaluation results are processed into measures for improvement and added to the Work plan.	MT	Feb – Aug
Do	A critical attitude of NVAO staff members is part of the operational process and team meetings.	Staff	Constantly
Check	NVAO's assessment processes are permanently evaluated by the online tool Survey Monkey. NVAO Board members periodically discuss the operation of the accreditation system with stakeholder organisations. Feedback is used to develop the system.		Constantly
	NVAO's resonance group meets twice a year.	Staff	May - Nov
	NVAO's evaluation scheme provides an overview of all evaluation activities.		
Act	Measures of improvement are formulated in a document.	MT	Feb – Aug
	Weekly discussions in the meeting on Tuesday.	Staff	Constantly
	Peer-to-peer coaching of NVAO staff.	Staff	6 x yearly
	Project Process coordination.	Staff	2014-15

Each of NVAO's quality assurance activities and processes is monitored in a cycle of evaluation and improvement on the basis of online surveys (see Annex 8). In Flanders, initial accreditation is also evaluated by online surveys, and the 2017 evaluation that is part of the development of the new accreditation system also encompasses NVAO's regular queries.

Accreditation for existing programmes is monitored through periodic consultations with institutions ('Tour of Flanders') and VLUHR-KZ, the assessment agency. Since 2014, all Flemish assessment activities are integrated into the work scheme, including the institutional reviews. The evaluations are directed at the various parties involved: institutions, panels, and NVAO staff members. The cycle of evaluations also involves the internal organisational processes of NVAO. The Management Team of NVAO plays a central role in analysing the feedback from the surveys, sharing the outcomes with the

staff of NVAO and including them in the cycle of improvements. This ensures that internal quality assurance mechanisms reach all staff members.

Structure of internal quality assurance

The protocol for internal quality assurance and the annual work plans are formally decided by the NVAO Board. The protocol focuses on developing, implementing and analysing NVAO's main quality assurance activities and the follow up of evaluation surveys. It also facilitates quality assurance of additional activities and related processes. NVAO's internal quality assurance has an integral approach: it is part of everyone's daily work and contributes to the further development of a strong quality culture. A coordinator supervises the various internal activities and regularly consults with the responsible Board member on the progress of the activities. Initial accreditation, institutional audits and reviews, and internationalisation activities are evaluated more intensely than the secondary activities in order to achieve a 'lean and mean' practice. An outline of NVAO's internal quality assurance and the follow up measures are published on the NVAO internal website.

The current work plan and evaluation scheme was established in December 2014. The coordinator regularly makes a feedback analysis and presents this to policy advisors, the MT and the Executive Board (see Chapter 12 and Annex 8). On the basis of the analysis, the MT formulates measures for improvement twice a year after consultation with NVAO's staff and Board. The measures are included in NVAO's annual work plan for its primary and secondary activities.

NVAO staff meets weekly to discuss procedures and cases, with the aim of strengthening the uniformity of processes and the consistency of decision making. NVAO introduced peer-to-peer coaching for staff-members as a tool for further ensuring the consistent handling of procedures and the improvement of operational quality. Internal quality assurance is part of the agenda of periodic meetings of the supporting staff. Chapter 10.6 lists some of the improvements that have been initiated as a result of signals in internal quality assurance.

An internal resonance group with members of all units in NVAO meets twice a year to discuss the actual internal quality assurance approach and to formulate possibilities for further development. NVAO's internal quality assurance policy is renewed every four years. Feedback on NVAO's operation is also sought on a permanent basis in consultation with the Advisory Council, the assessment agencies, institutions and student organisations in the Netherlands and Flanders, as described in Chapter 12.

Integrity Code

NVAO has an internal integrity code which provides a frame of reference for safeguarding integrity in all of NVAO's procedures and activities.²⁴ The code was established after internal consultation in 2014 and 2015 with the aim of incorporating the principles in daily practice and further improving professional attitudes. It covers the internal conduct and attitudes towards external stakeholders and 'clients'. It is principle based and provides general principles of adequate and ethical good conduct, which cover all fields mentioned in ESG.

²⁴ <https://www.nvao.net/actueel/publicaties/nvao-integriteitscode>

Chapter 9
Agency's international
activities

The strategic plan of NVAO 2013-2016 formulates two priorities regarding internationalisation: to focus on cooperation with European partners, and to contribute to the mutual and international recognition of accreditation decisions and of qualifications. From these strategic aims two policy goals are derived that have currently taken prominence:

1. To focus the cooperation with European partners in view of the Bologna agenda;
2. To enhance the international mind-set of the organisation.

This has resulted in the Action Plan on Internationalisation for 2015-2016 which is explained below and, for the purpose of the review, includes the achievements since 2012.

Focus on the operation with European partners in view of the Bologna agenda

1. Active participation in relevant organisations and networks (see also Annex 6)

Since September 2015 NVAO is represented again on the Board of ENQA after an absence of two years. NVAO has been represented continuously on the Board of ECA and carries out the functions of ECA Coordinator and Secretariat. NVAO has also coordinated several ECA projects: E-TRAIN on training and sharing international experts (2010-2012); JOQAR on QA and recognition of joint programmes (2010-2013); CeQuInt on establishing a European certificate for quality in internationalisation (2012-2015). From 2008 to 2013 NVAO hosted the Secretariat of INQAAHE. It takes part in meetings of all three networks and is an active member of several working groups of ENQA and ECA. A former Board member is Vice-Chair of the Register Committee of EQAR.

2. Setting up preferred partnerships with other quality assurance agencies

In addition to cooperation with agencies in quality assurance networks, NVAO strives to establish partnerships with agencies that have a comparable methodology or mind-set regarding quality assurance. Topics that NVAO wants to explore in such partnerships include the development of new quality assurance systems, the exchange of experts and expertise, and professional development. Board and staff members have visited QAA (UK), NOKUT (Norway), the Danish Accreditation Institution and the German Accreditation Council to explore such partnerships. Visits from these agencies to NVAO took place or are foreseen in 2016. NVAO currently participates in an international project (EUROMA) led by NOKUT regarding the benchmarking of Master's programmes.

3. Input in discussions on quality assurance and accreditation in the Bologna process

NVAO contributed to the development of the ESG, to discussions and meetings on learning outcomes, qualifications frameworks, joint programmes, quality culture, and MOOCs. NVAO took part in the Structural Reforms working group that had a role in preparing the Yerevan Communiqué. NVAO contributed to the Bologna actions with regard to joint programmes. As part of the FaBoTo project (coordinated by the Dutch Ministry of Education and EP-Nuffic) NVAO organised a seminar on the achievement and measurement of learning outcomes with some 100 representatives from a dozen EU countries in October 2015, resulting in an NVAO publication. Each year NVAO organises in cooperation with ECA a topical international seminar with participation of Dutch and Flemish HEIs, on themes related to the Bologna agenda (e.g. mutual recognition of qualifications; online learning; employability; joint programmes).

From 2011 to 2014 NVAO carried out the ARQATA project which was funded by the World Bank and aimed at capacity building and assisting the development of the QA system in Armenia, one of the Bologna signatories (see Annex 6 for project details).

4. Stimulating mutual recognition and simplification of accreditation of joint programmes
NVAO signed ECA's multilateral agreement on the mutual recognition of accreditation of joint programmes (MULTRA) and accredited several joint programmes on the basis of an accreditation by a MULTRA partner. In 2015 an agreement was signed with the German Accreditation Council that allows for the mutual recognition of accreditation of joint degrees in which German, Dutch and/or Flemish HEIs participate. As a result of the methodology developed in the JOQAR project NVAO could participate in the ad hoc expert group on joint programmes established by the Bologna Follow-Up Group. This work led to the adoption of the European Approach for QA of Joint Programmes. In April 2016 NVAO concluded the first initial accreditation procedure that used the European Approach. In 2015 NVAO signed agreements with AACSB and EFMD which makes it possible to use an assessment procedure that enables a double accreditation by NVAO and AACSB/EFMD. In 2016, a similar agreement was reached with the European Association for Public Administration Accreditation (EAPAA).

5. The Certificate for Quality in Internationalisation and NVAO's distinctive quality feature in internationalisation

The development of the distinctive quality feature on internationalisation has led to nearly 50 successful applications since 2010, mainly by Dutch institutions. Two distinctive features were awarded at the institutional level. Since 2016 NVAO uses the ECA assessment framework that has been developed in the CeQulnt project. The ECA Certificate for Quality in Internationalisation can be awarded to programmes that obtained the NVAO distinctive quality feature on internationalisation and were assessed as "good" in 2014 and 2015. As a result, 17 programmes of Dutch institutions were awarded the ECA Certificate. In addition, NVAO contributes to the organisation of the Good Practices in Internationalisation workshops which are organised by EP-Nuffic and Knowledge Area Flanders for Dutch and Flemish HEIs.

Enhancing the international mind-set of the organisation

1. Enhancing international expertise with regard to applications for the distinctive quality feature internationalisation and the (initial) accreditation of joint programmes

In 2015 a group of five policy advisers was formed to handle applications for the distinctive quality feature internationalisation and the (initial) accreditation of joint programmes. The group meets regularly to discuss experiences and exchange knowledge and good practices. As a result, the knowledge base within the organisation will be broadened and consistency in dealing with these international applications should be enhanced.

2. Exchange of expertise with regard to internationalisation and professional development regarding international competences

More NVAO policy advisers have been involved in international activities, such as projects such as FaBoTo, EUROMA, ARQATA, and in working groups of ENQA and ECA. They have also contributed to international activities like the extension of agreements with international agencies and the participation in the further development of the Code of Conduct for international students. They also made presentations for foreign delegations, and presented papers at international conferences to enhance international competences within the organisation. Further measures that are being considered include the exchange of staff members with other accreditation agencies and the involvement of policy advisers in assessments abroad, in addition to the assessments that have been

carried out in the Dutch Caribbean since 2006. International activities are announced on the intranet and discussed at regular staff meetings.

Focus points

- NVAO regards its international activities as central to its mission and as contribution to its primary activities, and therefore as fully relevant to ESG.
- Communication on international activities to its stakeholders is essential. Therefore, an international newsletter has been published three times a year since autumn 2016. The English version of the website of NVAO was renewed in summer 2016. Since the end of 2016 feedback is sought from institutions on NVAO's internationalisation activities; this is done in conjunction with the annual seminar on an internationalisation theme which attracts more than 100 representatives from Dutch and Flemish higher education institutions. NVAO will continue its appearances at stakeholders' conferences, seminars and meetings on joint programmes, good practices in internationalisation, recognition of qualifications and other internationalisation topics. Internationalisation is also included in the presentations and discussions with foreign delegations which visit NVAO on average every month.

Chapter 10
Compliance with
European Standards
and Guidelines
(Part 3)

10.1 ESG 3.1 Activities, policy and processes for quality assurance

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.

Evaluative description

As described in Chapters 4 and 6, since 2012 NVAO has decided on ca. 3000 applications for accreditation of existing programmes, coordinating assessments for initial accreditation and institutional audit or review in the Netherlands and Flanders. These activities are at the core of NVAO’s legal tasks and constitute the main part of its workload. In addition, activities also include approval of panels, the assessment of distinctive features, or the assessment of specific features of programmes, as listed and specified in Chapters 4 and 6. At the request of the Dutch Minister of Education, NVAO coordinates assessments and accredits new and existing programmes in the Caribbean Netherlands, and coordinates assessments of programmes on Curacao, Aruba and St. Maarten.

In addition, NVAO approves or advises on the composition of expert panels for assessments in the Netherlands and Flanders. It produces thematic analyses and evaluations, and drafts and maintains frameworks for accreditation and related procedures. It also engages in activities oriented towards international cooperation in quality assurance, participates in projects related to external quality assurance, publishes reports and decisions, and otherwise informs the public on the quality of higher education.

The activities mentioned above are directly related to NVAO’s mission statement, which explicitly mentions that it is responsible for providing an expert and objective assessment of the quality of higher education in the Netherlands and Flanders, providing information to the public, and producing analyses related to the state of higher education in certain fields. NVAO focuses on improvement of the quality of higher education and stimulating a quality culture within institutions, for which purpose it also keeps abreast of developments in the international context and keeps institutions informed.

Its core values are Independence, Clarity and Transparency, Respect and Trust (Strategy 2013-2016: 6-7). NVAO has formulated an Integrity Code on the basis of its core values. The goals and objectives set out in NVAO’s current strategy (2013-2016) inspire its daily operations in the following manner:

Quality culture	In all of its quality assurance activities NVAO emphasises the value of quality culture. It is also a principle in the Dutch and Flemish frameworks for accreditation of programmes and institutions. Thereby NVAO encourages institutions, teachers and students to take responsibility for the quality of education and choose their own way of developing and improving quality.
Justified trust	The limited assessments for (initial) accreditation of programmes in the Netherlands and the institutional review in Flanders are based on this principle. NVAO considers the track record of programmes and institutions in all its decisions. Trust is also at the heart of recent innovations in the Dutch and Flemish systems of external quality assurance.
Reduction of administrative burden	NVAO considers this element in all its decisions and procedures. It allows applicants optimal freedom to comply with formal requirements and make sure that the administrative burden is kept to a minimum. An example is the protocol for panel approval, which facilitates thorough analysis, but promotes swift procedural handling. This also goes for the handling of accreditation applications of institutional audits when there is a record of proven quality.

Consistency of judgement and procedures

Cluster-based accreditation for all programmes and training of panel chairs are put in place to ensure consistent panel judgements and handling of procedures by NVAO. This aspect is monitored through internal quality assurance within NVAO.

NVAO's new strategy for 2016-2019, which will be finalized at the end of 2016, adds to the previous elements: communication, the development of expertise and NVAO's position as a 'network player'. Thereby, the strategy responds to developments in the systems of quality assurance in both countries and the new frameworks.

Stakeholders and governance

NVAO involves stakeholders in the development and maintenance of its processes and policies by means of regular consultation with resonance groups of institutions and students (see Chapters 6 and 12). A good example of this is the development of the new Dutch and Flemish systems of quality assurance, which were drafted after intensive consultation with stakeholders and reflect their input. In its Annual Reports, NVAO also describes the outcomes of consultation with stakeholders.

The link with the stakeholders is also reflected in NVAO's governance: the General Board and Advisory Council consist of members with extensive experience in higher education and in the professional field in the Netherlands and Flanders. Requirements for this aspect are laid down in the profile for Board members. The Advisory Council has the right to independently call for a session with the Board and includes representatives of student associations.

Cross-border assessments and other activities

NVAO's assessments in the Caribbean region are carried out on the same basis as regular assessments in the Netherlands, whereby NVAO upholds the same goals and objectives. NVAO has clear protocols for all activities related to accreditation (distinctive features, approval of panels, drafting frameworks, assessments of features of programmes (see Chapter 4). As most of the procedures coincide with accreditation assessments, NVAO upholds the same principles in these. Protocols are discussed with stakeholders. An example is the new assessment method and framework for research master's programmes adopted in 2016, which was developed jointly by NVAO and the Dutch universities.

NVAO expects that the Minister of Education in the Netherlands will put in place a procedure by which transnational education is recognised and accredited (see also Chapter 3). Thereby, international locations of programmes can be fully integrated in the accreditation of the Dutch locations. NVAO will integrate this in its regular processes.

Recognition of other agencies

NVAO has actively promoted the mutual recognition of accreditation of joint programmes, and signed the MULTRA agreement initiated by ECA (see Chapter 9), 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.

International expertise

NVAO's active role in European networks on quality assurance brings international expertise to its activities (see Chapter 8, and Annex 6). NVAO often 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.

Conclusion, points for further development

- The goals and objectives of NVAO are directly linked to its daily work and are communicated extensively to stakeholders in regular consultation, seminars and other activities. On the basis of the feedback NVAO receives on the handling of processes and of external evaluations, NVAO is confident that stakeholders recognise the principles in the daily practice of NVAO.
- With all efforts taken by NVAO to reduce the administrative burden on institutions, the formal nature of its procedures and the high level of quality required have an effect on its handling of applications.
- Under its new strategy, NVAO will increasingly work together with institutions and the assessment agencies commissioned to organise the assessments, to ensure that the administrative burden of external quality assurance is reduced and that institutions exert more ownership over the process.
- The 2016 framework integrates a large number of procedures related to the primary quality assurance activities of NVAO that are currently based on separate protocols.

10.2 ESG 3.2 Official Status

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

Evaluative description

The formal role and tasks of the NVAO are described explicitly in Dutch and Flemish legislation on higher education, as well as in the Treaty on accreditation between the Netherlands and Flanders. These documents grant NVAO the authority to decide on accreditation of programmes and institutions of higher education in the Netherlands and Flanders. All activities leading to either an independent decision by NVAO or an advice to the Minister of Education in the Netherlands or Flanders as mentioned in Chapters 4 and 6 are based on legislation. All NVAO's decisions comply with the requirements for formal decisions under administrative law and mention the underlying legislation. The authority of NVAO to assess programmes in Curacao, Aruba and St. Maarten is based on an agreement with the Dutch Minister of Education.

In addition to (initial) accreditation and institutional audit or review, NVAO is responsible for carrying out a number of related procedures, as described in Chapters 4 and 6. The integration of these procedures in the new accreditation framework of 2016 is based on the fact these are all based on legal tasks attributed to NVAO in Dutch and Flemish legislation.

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. NVAO expects to respond to this in the course of 2017. NVAO is looking at shifting the more operational decision making to the management of the NVAO office. The Executive

Board should focus on decision making in procedures and the General Board will focus on strategic management, with a reduced frequency of meetings. The balanced representation of Dutch and Flemish members in the General Board will remain, but international expertise will also be included. This will bring NVAO more in line with the structure of other European accreditation organisations. In its daily operations and administrative practices, there will be more room for a specific Dutch or Flemish approach. These changes will not touch the core of the formal status of the NVAO.

Conclusion, points for further development

- Although the system of quality assurance in the Netherlands and Flanders has undergone important changes, these do not infringe on the formal status of NVAO.
- NVAO's formal authority provides the basis for the acceptance of its decisions, but support from the field of higher education, politics and society at large is of equal if not more importance for the recognition of NVAO's authority. Therefore, NVAO invests in a continuous dialogue with the field to broaden this support, for instance by putting in place permanent platforms for consultation of stakeholders in both countries.

10.3 ESG 3.3 Independence

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.

Evaluative description

Independence is one of NVAO's core values. The organisational independence of NVAO is guaranteed by law, both in the Netherlands and in Flanders. The NVAO Board members are appointed by the Committee of Ministers, but decisions of the Board are taken in full autonomy. NVAO is also independent in its operations. The frameworks for accreditation need approval by the Minister of Education in the Netherlands, or the Flemish Parliament in Flanders.

In the process of developing new frameworks in the Netherlands and Flanders, NVAO worked together closely with the relevant ministries of education and with stakeholders. Within these legal frameworks NVAO has full organisational and operational autonomy in implementing procedures. This also applies to the outcomes of assessment procedures.

All experts engaged in assessments, whether or not coordinated by NVAO, for (initial) accreditation and institutional audits or reviews, sign a declaration of confidentiality and independence before the start of the procedure. This practice is mentioned explicitly in the guidelines for the composition of expert panels. Panel members should not have had links with the applicant institution for at least the last five years preceding a review. The Code of Conduct for panel members and chairs also outlines the requirements for independence. NVAO checks the independence when approving or advising on panel compositions.

NVAO applies the same rules for independence for panel experts in all other activities involving panel assessments (distinctive features, change in duration, name or degree of programmes) if these are carried out separately from accreditation assessments.

NVAO staff and Board members cannot take part in the handling of or decision making on applications from institutions by which they were employed or had ties with in the last five years. NVAO emphasised the value of independence in its internal integrity code

(see Chapter 8). The rules concerning the independence of panel members are also upheld for panels that are composed by assessment agencies. The check for independence is a standard procedure in the assessment and approval of all panels (see Chapter 6).

Conclusion, points for further development

NVAO has strict policies on independence for its staff, Board members and experts. In the ten years of its existence the organisational or operational independence of NVAO have never been put into question in a legal procedure or complaint.

10.4 ESG 3.4 Thematic analysis

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

Evaluative description

NVAO regularly produces analyses of its external quality activities, in addition to its decisions and reports. Periodical publications include, for the Netherlands and Flanders, 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. NVAO's Annual Reports contain a full overview of all decisions taken and the scores and provide a comprehensive account of the yearly activities of the NVAO.²⁵

NVAO has published thematic analyses based on large scale cluster-based accreditation projects, such as the academic programmes in the Humanities and Communication Sciences (2014 NL); the programmes in Communication Studies in higher professional education (2014 NL); teacher-training programmes in professional education and universities (2015 NL), and research master's programmes (2015 NL). In 2015 NVAO published a report on the evaluation of the accreditation system in the Netherlands in the period 2011-2015. See Chapter 6 for a list of recent analyses, as well as a description of the motives for choosing to produce an analysis, their intended use and audience, and their impact. Annex 10 contains a short summary of the analyses and references.

Conclusion, points for further development

As cluster-based assessments become standard, NVAO publishes comparative analyses on a regular basis. These comprise at least the findings from the accreditation process and the scores. Not all clusters have the scope and complexity to justify a full thematic analysis. As these involve a considerable amount of work, NVAO is selective in choosing topics for thematic analysis. Flemish reports of clustered assessments always contain an analysis of the state of the art in the domain.

NVAO also considers distinctive features and other features of programmes in its thematic analyses. An example of this is the 2015 analysis of research master's programmes made for a meeting with the assessment panels of these programmes.

²⁵ <https://www.nvao.com/recent/publications/nvao-annual-reports-0>

10.5 ESG 3.5 Resources

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

Evaluative description

Staff and Finances

NVAO staff (total: ca. 43 fte)			
Policy Officers	20 pers.	General Board	13 members (max 15)
Support staff	20 pers. (19 fte)	Advisory Council	14 members
Dutch/Flemish legal advisor	2 pers.		
Finances			
Annual budget 2016			7.6 m€
Fees initial accreditation NL/FL			17.7 k€/5 k€
Fees accreditation NL/FL			800 €/ 500 €

The NVAO office has a staff of ca. 43 fte's (for the organisation chart, see Chapter 4). A Management Team (one managing director, two team-leaders and a Head of Human Resources) is in charge of the daily management of the NVAO office. Two fte's at the level of policy advisor are available for international assignments. Staff members can take different roles, such as: process coordinator or project-leader.

Policy officers have different educational and professional backgrounds. Some of them have substantial work experience related to higher education or education policy. Staff and Board members have sufficient experience in policy or management positions in (higher) education to prepare them for the main tasks of NVAO. External evaluations on the coordination of assessments supervised by NVAO are positive and prove that NVAO policy advisors are highly regarded by stakeholders (see Annex 8).

As a result of budget cuts by the ministries of education, NVAO faced budget cuts in the period from 2012-2016 that were only partially compensated by its own revenues. NVAO was able to absorb this by cutting expenses and reducing its office space. The current capacity suffices for the regular workload consisting of accreditation applications and assessments of new programmes or institutions. Capacity is stretched by intensive projects such as the pilot with institutional reviews in Flanders or the development of new accreditation frameworks in the Netherlands. NVAO staff are increasingly involved in additional activities related to accreditation, such as internationalisation or reviews requested by the Ministry of Education or other parties.

The workload for NVAO staff is high as a result of the diversification of the portfolio of activities and the standard of quality NVAO aims for in its decision making. This requires optimal planning and making choices to prevent excessive workloads. With the current capacity, there is little leeway.

NVAO's annual budget for 2016 is ca. 7.6 million euros. It is financed jointly by the Dutch and Flemish governments with a ratio of 60/40. The NVAO budget is indirectly approved by the Committee of Ministers and both parliaments. In addition to governmental financing, NVAO charges fees for assessments it carries out under its own supervision. The fees for procedures are defined by the Ministers of Education in the Netherlands and Flanders. In 2015 NVAO raised the fees for all non-mandatory applications in the Netherlands, in order to partially compensate the budget cuts by the government. NVAO also lowered the fee for panel members of initial accreditation assessments to € 1.200. This also affects the procedures for an assessment for the distinctive feature Small Scale and Intensive Education, if this is part of an initial accreditation assessment or assessed

separately from a regular accreditation of an existing programme, and is also relevant for other procedures related to accreditation as described in Chapters 4 and 6.

The financing of additional tasks and assessments is included in the financial support by the two governments. For some projects, the Dutch Ministry of Education provides extra funding. Where possible, NVAO charges applicant institutions cost-covering fees for assessments related to (initial) accreditation, such as for distinctive features. NVAO faces additional budget cuts by the Dutch government in the coming years. Meetings with the Ministry are foreseen in order to discuss the tasks of the NVAO and the fees that are charged for the handling of applications.

Human resources policy

NVAO has developed a Human Resource policy, which includes options for professionalization and career management. It participated in an ENQA working group on HR policy making for QA agencies, and contributed good practices in the recruitment and training of new staff members. NVAO has a procedure for regular job evaluation interviews. In 2015 it put in place a new policy for career development. In relation to its strategic goals of ensuring consistency in the handling of procedures, it started a round of peer-to-peer coaching focusing on the coordination of assessments. In 2014 NVAO started with project based operational management and it trained NVAO staff to support their activities as project leaders. Projects have become a regular form of organisation of NVAO's activities. NVAO has an acceptable gender balance among its staff.

Facilities

Since 2005, NVAO has had its offices in the Parkstraat in The Hague, close to the city centre and the Dutch parliament and Ministry of Education. In 2015 NVAO rented a small office in Brussels, Belgium, to assist her activities in preparation of the Flemish institutional reviews. The equipment of NVAO is up to date, with specific workflow information, database and digital archive systems. State of the art audio-visual technology allows for effective video conferencing and for organizing symposia.

Conclusion, points for further development

- NVAO has been sufficiently financed until now by both governments for its legal tasks. Large scale projects and peaks in regular tasks require careful planning to prevent delays or excessive demands on staff.
- The bi-national status of NVAO creates an interesting work environment. Dutch and Flemish Board and staff members work together very well. Flemish staff are deployed on Dutch and Flemish applications and vice versa. Cultural differences are perceived as stimulating.
- In recent years, more attention has been paid to developing human resource policies for professionalization, selection and coaching. Innovations such as project based operations have expanded the portfolio of roles for policy advisors.
- In response to a request by the Committee of Ministers, NVAO made a suggestion for changes in the structure of the Board. Also, it will create more room for a specific Flemish and Dutch administrative and organisational structure. This will lead to changes to the organisation of the NVAO office and the role of the Management Team.

10.6 ESG 3.6 Internal quality assurance and professional conduct

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

Evaluative description

NVAO has 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. NVAO is currently preparing a more explicit integration of these elements in a policy document, which it expects to finalise at the end of 2016. On its website, it has published a paper which explains the various elements in NVAO's quality policy, informing stakeholders on the way NVAO ensures both the integrity of all parties involved and manages the quality of its processes and procedures.²⁶

The building blocks that make up its policy are described below. These procedures apply to all NVAO's primary quality assurance activities in the context of institutional audit or review, and (initial) accreditation. They equally apply to other procedures, which are often carried out in the context of NVAO's primary activities: the approval of panel proposals, the assessment of distinctive features, the drafting of frameworks, the production of thematic analyses, and the assessment of features of programmes. NVAO's cross-border activities follow its primary protocols, so these are covered by the policies explained below.

Internal quality assurance

NVAO has an effective internal quality assurance system based on feedback from stakeholders. The description in Chapter 8 distinguishes between strategic and operational level of evaluation and improvement. The operational quality assurance is coordinated by a NVAO staff member.

NVAO has mapped all planned evaluations in a work plan. Currently, all planned evaluations are carried out as foreseen. Since 2013, (initial) accreditation and institutional audits or reviews have been evaluated systematically by using an online evaluation tool (Survey Monkey). The evaluation results are more than satisfying, but there is still room for improvement. Respecting deadlines and timely communication deserve permanent attention.

The evaluation results of the NVAO training of panel chairs and secretaries show that the training sessions are generally much appreciated. The evaluation also covers the way NVAO staff handle their role as process coordinators of initial accreditation and institutional audits. The results are very satisfying, with room for further improvement. See Annex 8 for a feedback analysis and surveys of initial accreditation, institutional audits and process coordination by NVAO.

Internal projects are also evaluated. The results are positive, but show that cooperation by staff in these projects can be more effective. NVAO's supporting staff has regular meetings with the Human Resource manager, during which internal quality assurance is discussed. Points of improvement are immediately addressed.

Twice a year NVAO's Executive Board meets with the ministers of education of the Netherlands and Flanders responsible for NVAO (Committee of Ministers) to discuss

²⁶ <https://www.nvao.com/about-nvao/internal-quality-assurance>

NVAO's performance and strategy. The Executive Board discusses operational matters on a regular basis with the Flemish Cabinet of Education, the directorates of higher education in the Dutch and Flemish ministries of education, the umbrella organisations of institutions in both countries, student and employer's organisations, and the trade unions. These meetings contribute to further improve NVAO's assessment processes.

Integrity Code and Code of Conduct

NVAO has an internal integrity code which provides a frame of reference for safeguarding integrity and the professional, ethical conduct of NVAO staff and Board in all of NVAO's procedures and activities. The code covers the internal conduct and attitudes towards external stakeholders and 'clients'. The code is principle based, and provides general principles of proper and ethical good conduct. NVAO holds regular sessions to discuss cases where integrity may have been at stake and thus ensures that the code is a 'living' document. NVAO's Code of Conduct regulates the behaviour of panel members, chairs and secretaries. It is sent to all panel members at the start of assessment procedures.

NVAO's Human Resource policy looks to professionalization and training of staff members for their role as process coordinators for other activities (see Chapter 10.5). Similarly, panel chairs, student-members and secretaries are trained for the various assessments, as described in Chapters 6 and 7.

Assessment agencies and secretaries

The framework and the guidelines issued by NVAO prescribe the procedures for assessments, also when carried out by other agencies, as is the case for all assessments of existing programmes coordinated by assessment agencies. As part of internal quality assurance, NVAO's Executive Board regularly evaluates the performance of the assessment agencies in the Netherlands. Points of improvement are immediately addressed in periodic meetings with the agencies, in joint session or individual meetings. A regular item in the discussions with the agencies is the quality of reports and the reduction of the administrative burden on institutions. NVAO takes great care to impose its principles on external secretaries of assessment reports.

The accreditation framework, as well as the protocols for procedures outside the scope of this framework, regulates NVAO's communication with the relevant authorities.

The measures for improving the processes and methods of NVAO mentioned here are taken in response to the feedback of stakeholders. Examples of these measures are:

Frameworks	<ul style="list-style-type: none"> - Adding a partly positive judgement on standards in the update of the Dutch framework for initial accreditation in 2014. - Preparing new accreditation frameworks in 2015 and 2016 in cooperation with stakeholders (NL/FL).
Assessments	<ul style="list-style-type: none"> - A project on process coordination of assessments supervised by NVAO, which contributed to a more consistent support of the panels. - Weekly internal discussions of cases. - Training programme for chairs of panels and student members by NVAO or assessment agencies. Secretaries have been trained since 2011.
Internationalisation	<ul style="list-style-type: none"> - Establishment of a Certificate for Quality in Internationalisation, CeQuint
Communication	<ul style="list-style-type: none"> - Active publication of the results of NVAO procedures and assessments. - Redesign of NVAO website and intranet (2015-2016), renewal of NVAO's newsletter.
HRM	<ul style="list-style-type: none"> - Appointment of Head of Human Resources and reformulation of HRM-policy.
Organisation	<ul style="list-style-type: none"> - Drafting of the periodic NVAO work plans, mapping all activities and workloads. - Implementation of a Management Team and improvement of its internal processes.

Conclusion, points for further development

- NVAO employs an effective internal evaluation system based on a PDCA approach. All of its main quality assurance activities – (initial) accreditation, institutional audit and review – are subject to periodical evaluation and improvement. The evaluation activities are on track and sometimes adjusted in the interest of efficiency. NVAO has developed its internal quality assurance on a lean but effective basis and with practicality in mind. It is backed up by a strong quality culture within NVAO. The motivation, self-reflective attitude and the proactive approach of NVAO staff is equally important to achieve NVAO's quality objectives.

- The various building blocks described here form a coherent policy for safeguarding the quality of NVAO's activities and for ensuring that all activities are in line with ESG, also when carried out by other agencies. The further development of an integrated quality policy on the basis of the existing elements is in progress.

10.7 ESG 3.7 Cyclical external review of agencies

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

Evaluative description

NVAO invites an ENQA-review every five years to have its compliance with ESG assessed. The report of ENQA-review also forms NVAO's periodic report about its activities to the Ministers of Education of both countries, as prescribed in the Treaty between the Netherlands and Flanders. Chapter 13 describes the recommendations from the 2012 ENQA review and its follow-up. The review process was concluded by the mid-term evaluation of 2014. In the Netherlands, the Inspectorate is the formal supervisor of the accreditation system, but not of NVAO.

Every four years, Dutch and Flemish Ministers of Education report to their parliaments on the functioning of NVAO. In 2013, various organisations evaluated the systems of accreditation in the Netherlands and Flanders and – to a certain extent – the functioning of NVAO. The evaluations did not specifically focus on compliance with ESG. The report of the Dutch and Flemish Accounting Offices dealt with NVAO's handling of its legal tasks. NVAO also published its own evaluation of the system in the Netherlands and its own operations in the form of a thematic analysis.²⁷ The Dutch Minister of Education issued a summative reaction to the evaluations which has been important for the changes introduced in the Dutch system in 2015 and 2016. Chapter 3 describes the main recommendations of these evaluations, which relate to reduction of the administrative burden, optimizing the consistency and validity of panel judgements, better readability of NVAO reports, and the management of deadlines.

Conclusion, points for further development

- NVAO is subject to periodic external reviews. The five yearly cycle of the ENQA-review of the compliance with the ESG suffices in that respect.

- NVAO's response to the external evaluations in 2013 in the Netherlands was adequate. On all the points that were raised in the reports, NVAO has improved its processes and

²⁷ <https://www.nvao.com/recent/publications/four-years-figures>

put new policies in place. Two recommendations from the evaluations refer to the diversification between the Netherlands and Flanders and the role of the assessment agencies. With the introduction of the pilot round for full institutional accreditation in Flanders, the diversification of the systems has increased. For NVAO the differences relate more to implementation, while the principles remain the same. The Dutch and Flemish Accounting Offices recommend a review of the role and function of the assessment agencies and suggest that reviews be organised without the intervention of the agencies. NVAO invests in ensuring that the agencies operate according to NVAO protocols and produce reports of the desired quality.

Chapter 11
Compliance with
European Standards
and Guidelines
(Part 2)

11.1 ESG 2.1 Consideration of internal quality assurance

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

Evaluative description

The standards and guidelines of Part 1 of the ESG are addressed in the legislation regarding accreditation and in NVAO frameworks for (initial) accreditation of programmes and institutional audit or review. In the Dutch framework for the institutional audit, institutions are made responsible for implementing the elements of Part 1 in their vision and policies on education and quality management. In Flanders, this is covered in the Quality Code which regulates the handling of internal quality management for programmes under the institutional accreditation. In the 2016 Dutch framework, the link of these with Part 1 is made more explicit, both for NVAO's primary activities as well as for related procedures as described in Chapters 4 and 6. The following table shows which standards of the Dutch and Flemish frameworks cover the respective aspects and elements of Part 1 of the ESG.

	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
ESG-Standards	Standards	Standards	Standards	Standards
(1) Policy and procedures for quality assurance	1,2/1,2,3 (NL16: 1,2)	-	*/9/4/9 (NL16: */9)	*/9/4 (NL16: */9)
(2) Design and approval of programmes	2/1,2 (NL16: 2)	A	1,2/1,2/1,2 (NL16:1,2/1,2,3,9)	1,2/1,2,3,9/1,2 (NL16:1,2/1,2,3,9)
(3) Student-centred learning, teaching and assessment.	1,2/1 (NL16:1)	B,C,D,E,F,G	2,3/2,10,11/ 1,2,3 (NL16:2,3,4/4,10,11)	1,2,3/2,10,11/ 1,2,3 (NL16:2,3,4/4,10,11)
(4) Student admission, progression, recognition and certification	2/2 (NL16: 2)	G	2,4/2,5,9,11/2,3 (NL16: 2,5,8,11)	1,2,3/1,2,5,9/2,3 (NL16:2,5,8,11)
(5) Teaching staff	2/2 (NL16:2)	C	2/6/2 (NL16:2/5)	2/6/2 (NL16:2/5)
(6) Learning resources and student support	2/2 (NL16:2)	D	8/2/2 (NL16:2/7)	8/2/2 (NL16:2/7)
(7) Information management	3,4/2 (NL16:3,4)		*/10/2 (NL16:*/9)	*/10/2 (NL16:*/9)
(8) Public information	2/2 (NL16:2)	G	2/8/2 (NL16:2/8)	2/8/2 (NL16:2/8)
(9) Ongoing monitoring and periodic review of programmes	3/4 (NL16:3/4)	B, D, H	*/10/4 (NL16:*/9)	*/10/4 (NL16:*/9)
(10) Cyclical external quality assurance	3/4 (NL16:3/4)	B, D, H	*/10/4 (NL16:*/9)	*/10/4 (NL16:*/9)

* Covered in institutional audit.

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: new Dutch framework.

Assessments for generic and the pre-defined distinctive features (Internationalisation, Small Scale and Intensive Education, Entrepreneurship and Sustainability) are in most cases carried out as part of assessments for (initial) accreditation of programmes or institutional audit or review. Being accredited is a condition for being awarded a distinctive feature, which ensures that internal quality assurance in programmes and institutions is addressed in the procedure for distinctive features. This is also the case for assessments for changes in the duration, name or degree of programmes, or for additional admission criteria (see also Chapters 4 and 6, and Annex 6).

Focus points for the standards of ESG Part 1

ESG 1.1: The first round of institutional audits in the Netherlands and the preparation of the pilots for the institutional review in Flanders have strengthened internal quality assurance in institutions. The second round will put more emphasis on the realisation of the educational vision and the development of a quality culture.

- Student satisfaction is often used as key indicator in evaluation systems. NVAO encourages the use of a wider range of indicators and the focus on quality culture rather than on indicators alone.
- Academic integrity is covered in institutional policies for research and human resource management.
- Involvement of external stakeholders in quality assurance is a fixed element in all NVAO assessment procedures. In the 2016 Dutch framework, all standards involve an assessment of the involvement of stakeholders.

ESG 1.2: An interview with the work field, employers and external stakeholders is part of all NVAO assessments, both at the institutional and programme level. Alumni are also consulted regularly.

ESG 1.3: NVAO has adapted its terminology in the latest version of the Dutch frameworks to the concept of student centred learning. It refers to intended and achieved learning outcomes. The Flemish Quality Code refers to the relevant ESG standards.

ESG 1.5: NVAO and expert panels are strict in signalling problems with staff numbers, especially with increasing budgetary restraints in higher education, as this affects the quality of education in many adverse ways.

ESG 1.6: In the case of assessments of long-distance education, a specialist with expertise in online education is mandatory in the expert panel.

ESG 1.7: Information management is assessed as part of the learning environment.

ESG 1.8: Related to 1.6 and 1.7, as far as it concerns communication with (future) students. In the Quality Code that is applied in the Flemish institutional review system, providing information on the quality of programmes is a crucial responsibility for institutions.

ESG 1.9: This is part of the internal quality assurance and crucial for a quality culture.

ESG 1.10: Periodic external reviews of programmes are mandatory in the Dutch accreditation systems. In the Flemish system, the connection between internal and external quality assurance is through the institutional review and the implementation of the Quality Code in the internal quality assurance of the institution. Institutions are required to critically review programmes, using external peers and stakeholders.

Conclusion, points for further development

Part 1 of ESG is well integrated into the NVAO frameworks for assessments at institutional and programme level in the Netherlands and Flanders, increasingly so in the newest versions. This also applies to related procedures carried out in the context of (initial) accreditation or institutional audit and review. Compliance with Part 1 of the ESG is primarily the responsibility of institutions. The guidelines provided in ESG Part 1 provide characteristics, not standards to be met, and are interpreted as such by NVAO, in

line with the principle of generic standards, allowing institutions the freedom to choose ways of implementing these elements.

- NVAO has brought the new Dutch frameworks explicitly more in line with ESG Part 1. The standards mention learning outcomes and the development of a quality culture. NVAO also consulted international experts to advise on the compliance of the new framework to ESG. In the Flemish system, the Quality Code refers directly to ESG part 1.

11.2 ESG 2.2 Designing methodologies fit for purpose

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.

Evaluative description

Drafting and maintaining frameworks is a primary legal task for NVAO in the Netherlands and in Flanders. In the development of accreditation frameworks since 2004, NVAO has worked together with stakeholders to accommodate their demands and make the frameworks fit for purpose. At every step in this process, institutions, students and other stakeholders were consulted and given the opportunity to comment on proposals. Important achievements in this respect are:

- The Flemish institutional review takes the ownership of quality assurance by the institution as its main perspective.
- The improvement period in the Netherlands is used effectively to support institutions in improving the quality of programmes. Since 2011, an improvement period has been granted to 7% of programmes. NVAO sees a considerable increase in overall quality for the programmes after the improvement period, which is also attested in a report by the Inspectorate.²⁸
- The Dutch frameworks were simplified by reducing the number of protocols and standards, and the required documentation. Reducing the administrative burden was explicitly put forward as a critique at the previous accreditation system. This was taken up in an update to the frameworks in 2014 as well as in the 2016 framework.
- NVAO took effective measures to increase the readability of reports, although this still remains a point of attention. Each report should have an executive summary oriented towards a general audience, which is copied in the accreditation decisions of the NVAO. Recommendations are clearly marked and taken over in NVAO-decisions when they deal with important aspects of the programme.
- The 2016 framework deliberately puts emphasis on the institutional audit and gives institutions more freedom to arrange assessments. This fits in with their primary responsibility to comply with ESG Part 1. NVAO adopts a policy that puts emphasis on content, which allows more flexibility in the process.

Related procedures

The above description concerns (initial) accreditation, and institutional audits or reviews, but applies similarly to the design of processes in assessments related to accreditation, such as the distinctive features and the assessment of features of programmes (combination of programmes, extension of the duration of programmes, changes in name

²⁸ <https://www.destaatvanhetonderwijs.nl/documenten/rapporten/2016/04/13/svho-2014-2015>, p.172

and degree, additional admission criteria). The 2016 Dutch framework integrates many of these procedures in assessments for (initial) accreditation and institutional audit. In some cases separate protocols for minor procedures will remain in place for legal reasons. In the implementation, NVAO follows the same methodology as in its primary assessments.

Legal status

All current Dutch and Flemish frameworks have passed approval by the Parliaments in both countries, so their compliance with relevant regulations is guaranteed.

Conclusion, points for further development

- The recent changes to the accreditation systems in both countries are in line with NVAO's goals and with demands from the stakeholders, although not all of these could be met, such as the wish of Dutch universities for a pilot for full institutional accreditation. Students and other stakeholders in the Netherlands favour programme assessment, as it gives them more confidence in the quality of individual programmes.
- The development of the framework increasingly creates space for institutions to demonstrate and improve quality, by increasing their ownership in external quality assurance processes. Measures such as the improvement period and similar elements in the new Dutch framework give more room for improving quality. NVAO expects that this will make it possible in the future to use a much lighter analysis for accreditation applications for programmes from institutions that have passed the institutional audit twice and have demonstrated their responsibility for the quality of education.
- NVAO continues to improve its tools on the website to provide clear information on the outcomes of assessments and application procedures. Also, the communication with applicant institutions is monitored, with room for improvement.

11.3 ESG 2.3 Implementing processes

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.

Evaluative description

Chapters 6 and 7 describe the procedures for (initial) accreditation of programmes and institutional audits and reviews in the Netherlands and Flanders and the steps mentioned in this standard and the relevant guidelines.

- All assessments for (initial) accreditation of programmes and institutional audits and reviews are based on a self-evaluation report of limited size, which should give an adequate picture of the intended and achieved quality and facilitate the dialogue with peers. When applied for in the accreditation procedure, the reports should also deal with the distinctive features or the additional criteria related to research master's programmes. All additional evaluations of features of programmes as listed in Chapter 4 and 6 should be described in relevant sections of the self-evaluation report.
- A site visit is part of the assessment procedures for (initial) accreditation and institutional audit or review and related procedures (distinctive features, research master's programmes). NVAO encourages institutions to experiment with new ways of setting up the site visit to create optimal conditions for an open dialogue between peers. An additional mandatory part of each site visit is an open consultation, during which students, teachers or others can approach the panel anonymously with questions or

complaints about the programme. This is usually held at a location that guarantees anonymity.

Under the 2016 framework, the site visit for existing programmes is more explicitly split into a part that focuses on assessing the quality of the programme and a part for an open exchange with peers on improvement and development. Only the first part is described in the assessment report. In this manner, accountability and improvement are separated in the site visit.

- 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 (see also 11.6). The report also contains the outcomes of applications of distinctive features or the evaluation other special features (research master's programmes, changes of name or degree) that were part of the assessment. Only when an application is withdrawn by the applicant institution during the procedure, the assessment report is not published. Under the 2016 framework, the recommendations for improvement discussed with the programme in the second, informal session with the panel, will be presented to the institution. This is required in order to publish a summary within a reasonable period.

- 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 is also 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 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.

- Where relevant, site visits are required for the assessment of procedures related to accreditation, as described in Chapter 4. In most cases, these assessments are combined with regular assessments for accreditation, so they follow the same protocol. Under the 2016 Dutch framework, the integration of the related procedures is taken further.

Conclusion, points for further development

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.

11.4 ESG 2.4 Peer-review experts

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

Evaluative description

NVAO has clear guidelines for the composition of panels for all assessments, which are also used in the procedure for approval of panel proposals. An expert panel consists of at least four experts including a student member. The expertise of the panel should include

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. NVAO judges the panel proposal on the basis of a fixed set of documents, including CV's of the panel members, a concordance table of the experts' competencies and a motivation of the proposal and of the independence of the experts. The guidelines for panel proposals and the Code of Conduct describe the requirements.²⁹

NVAO prefers experts with experience of assessments in the same domain, especially as panel chairs. Suggestions for panel members by the applicant institution are accepted, but NVAO carefully screens their independence. NVAO always consults the institution before appointing a panel. This rarely leads to the substitution of panel members. Approval or appointment of panels is a formal decision by the Board of NVAO and is based on criteria that are published in the accreditation framework and guidelines for panel compositions. NVAO makes good use of its bi-national status and asks Flemish experts to take part in assessments in Dutch institutions and vice-versa. This practice has led to a healthy exchange of information and good practices between the two systems.

Related procedures

When the assessments for procedures related to accreditation are combined with the primary assessment, NVAO assesses whether the panel has sufficient specialist expertise for the added procedure. In the case of specific distinctive features, the relevant protocols or the guidelines provided by NVAO prescribe the nature and the level of expertise that should be present in such a panel. This is also checked in the panel approval procedure. For some assessments (change of name or degree, additional admission criteria) the regular panel usually suffices. For research master's programmes, NVAO has very strict rules on the additional expertise of panel members.³⁰

Conclusion, points for further development

- NVAO approves the composition of all assessment panels in the Netherlands to ensure that their expertise is relevant and that there is no conflict of interest. In Flanders, NVAO assesses panel proposals and gives an advice to the Flemish assessment agency VLUHR-KZ, which selects the panel members. In a limited number of cases, a negative advice by NVAO has not been acted upon by VLUHR-KZ.
- Various external evaluations of NVAO praised the quality of experts and their judgements was praised (see Chapter 3).
- NVAO seeks to continuously renew its base of experts. It can prove difficult to engage active experts, who often have no time for lengthy review procedures.
- For institutional audits, NVAO looks for experienced administrators, preferably also from outside the academic field. It can be a challenge to find younger panel members with the required expertise and independence. For large clusters of assessment, the amount of time experts are required to invest is considerable.
- 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.

²⁹ <https://www.nvao.com/recent/publications/guidelines-panel-composition>;

<https://www.nvao.net/actueel/publicaties/nvao-gedragcode>

³⁰ <https://www.nvao.net/beoordelingskaders/aanvullende-criteria-onderzoeksmasters>

11.5 ESG 2.5 Criteria for outcomes

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.

Evaluative description

The previous ENQA review was critical of the way NVAO explicates and publishes criteria on which its decisions are made. In response, NVAO has since 2012 taken a number of steps to improve on this point. These measures were judged positively in the follow up evaluation in 2014. NVAO has since continued to develop these measures, as is explained also in Chapter 13.

- NVAO has further clarified the criteria and decision rules for the judgements on standards as well as overall judgements in all its frameworks. This includes also the criteria used for deciding the scores unsatisfactory, satisfactory, good and excellent. The new Dutch and Flemish frameworks continue on these lines.
- NVAO has set up a project to make coordinators of assessments more aware of their responsibilities for the correct application of these criteria by panels in the field.
- NVAO has set up a training programme for panel chairs to enhance the consistent use of criteria.

Assessments by assessment agencies

For programme assessments by assessment agencies NVAO put in place a number of measures to ensure consistent application of the criteria in the frameworks:

- Approval or (in Flanders) formal advice of panel compositions by the NVAO and training of secretaries and panel chairs (see also 11.4).
- A protocol for the assessments of students' final assignments and theses in assessments of existing programmes, which is used by the assessment panels in the Netherlands. In Flanders, rules for this part of the assessment are part of the protocol that is published by the assessment agency VLUHR-KZ. In the Dutch 2016 framework, the guidelines for theses are integrated into the protocol for the assessment.
- Detailed internal manuals for the analysis of reports by NVAO staff for programme accreditations. Project-based handling of applications leads to a more consistent analysis. Cases are discussed in regular staff meetings.
- The 'four eyes' principle and a two-step decision making process on the Board of the NVAO (see Chapter 7). Each application is evaluated by a policy advisor and the responsible Board member. In cases of doubt, other staff members or board members are asked for a second opinion, certainly when a possible negative decision on an application for accreditation is imminent.
- Additional information may be requested from the panel or the institution when the motivation of a judgement in a report is not convincing, or to ensure that each application is fully documented according to the criteria outlined in the frameworks. NVAO can also call for an additional assessment ('Verificatie' in the Netherlands, 'Aanvullende beoordeling' in Flanders) in a case where the original assessment is not convincing.

Conclusion and points for further development

- External evaluations in 2013 have been positive on the quality of the judgements in the accreditation system. The evaluation of the Dutch Inspectorate has pointed out small differences in the judgements between the assessment agencies. NVAO is aware of this and addresses this in its regular consultation with the agencies. The NVAO decisions on

the pass/fail threshold were deemed to be consistent and reliable, mostly because of the standardisation in the analysis and handling by NVAO.

- Generic frameworks are a much praised feature of the accreditation system, but open up the possibility of small differences in the appreciation by panels. NVAO has taken enough measures to make sure that such differences do not stand in the way of consistent assessment and decision making. In the update of the Dutch frameworks in 2014, the criteria for judgements and levels were made more explicit. The new framework of 2016 adds explicit criteria for the judgement 'partially meets the standard' introduced in the 2014 framework and for the consequences of such a judgement for a standard on the overall judgements. These are fixed and explicit rules.

- NVAO used its experience with large projects in 2014 to improve internal guidelines for the handling of applications. These involve criteria for the request for additional information from institutions or panels, for analysing the argumentation of panel judgements and the specification of recommendations in NVAO decisions.

- All protocols for procedures related to (initial) accreditation and institutional audit or review provide explicit criteria for outcomes. This applies to the procedures mentioned in Chapter 4. The protocols for specific distinctive features also provide criteria for outcomes. These procedures often lead to an advice or decision independent of the outcome of the accreditation assessment and are therefore judged on specific criteria.

11.6 ESG 2.6 Reporting

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.

Evaluative description

NVAO publishes all decisions and the assessment reports on which these decisions are based on its website. Reports and decisions follow a mandatory format. The assessment report contains:

- information on the institution and its context;
- a description of the way the procedure was carried out, including the composition of the panel, the appointed secretary and process coordinator;
- the programme of a site visit and the documentation that is used by the panel;
- an executive summary of the findings and the judgements by the panel which is oriented towards a wider audience and is included in accreditation decision documents;
- a description of the findings of the panel, the considerations and judgements;
- a list of recommendations for improvement by the panel;
- in the case of a conditional judgement: the conditions that should be met before full accreditation.

In the Netherlands, all reports are sent to the institutions for a check of factual details before a decision is taken by NVAO. In the Flemish initial accreditation, factual corrections can be requested as part of the appeal procedure. In the procedures for initial accreditation, institutional audit, and distinctive features, an institution has the right to withdraw an application, in which case no report is published. The new 2016 framework in the Netherlands distinguishes between the assessment report for accreditation on the basis of the standards of the framework and the results from the session oriented towards

improvement and development. The latter are not part of the assessment report but are published as a summary by the institution.

When the assessment includes procedures related to accreditation (e.g. distinctive features, change of name or degree, duration of the programme or additional admission criteria), the findings and judgements for these procedures are clearly marked in the reports. In all cases where such procedures are assessed in a separate assessment, a public report is made according to NVAO's protocols. The 2016 framework intends to integrate these assessments, which means they will be included in the main report.

The reports resulting from the pilot round of Flemish institutional reviews of 2016 and 2017 contain a linear account of the panel's research over two site visits. The judgements are given per standard. This structure of the report accommodates the appreciative approach that is chosen for the pilot-round of 2016-17, which intends to prevent a normative assessment and to mirror the 'narrative' of the institution. The reports of the Flemish institutional reviews will not be published before all institutions have been reviewed. NVAO will summarise the findings in a general assessment, which will be published in August 2017. Institutions will be briefed confidentially on the most important conclusions of the review one to three months after the site visit, to allow them to follow up on recommendations.

As explained in Chapters 2 and 3, NVAO publishes all decisions and assessment reports on its website (www.nvao.net) and announces this on social media. NVAO trains secretaries in writing concise and convincing reports. NVAO regularly discusses the quality of the reports with the assessment agencies and secretaries.

Conclusion, points for further development

NVAO uses clear formats to obtain readable and convincing reports for all its assessments and ensures these are publicly available. Improvement of the readability of reports and decisions is a continuous element in internal quality assurance. NVAO has observed that reports and decisions function well in the cases where the media reported in individual cases or when reports were quoted in political discussions. The accessibility of the search engine and its context on the NVAO website is a point for further development.

11.7 ESG 2.7 Complaints and appeals

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

Evaluative description

Both in the Netherlands and Flanders, institutions can lodge an appeal against decisions on (initial) accreditation or institutional audits taken by NVAO. This applies also to all other procedures which lead to a formal decision by the NVAO, also when this takes the form of an advice to the Minister. The latter is the case in some of the procedures related to (initial) accreditation and institutional audit or review. Although formal appeal procedures slightly differ in both countries, the principles behind them are to a large extent similar, and the main steps in the procedure are the following:

- Prior to taking a final decision concerning an application for (initial) accreditation, NVAO informs the institution about its 'intended decision'. By law, the institution has

two weeks to reply to this and put forward textual corrections or react on the decision. When the institution has no major remarks or complaints, NVAO takes its final decision. For Flemish application, formal appeal is directed against the intended decision by NVAO. Textual corrections are included in the final documents.

- An institution can lodge an appeal on the basis of General Administrative Law against any (intended) decision by NVAO. Appeals are being dealt with by NVAO's independent appeals committees. NVAO has separate appeal committees for Flanders and The Netherlands, with an overlap of one member. Both Dutch and Flemish appeal committees are appointed by NVAO and consist of independent experts with legal and educational backgrounds. After receipt of a complaint, the committee advises the board of NVAO, which will take a final decision taking into account this advice.
- In the case when an internal appeal is rejected, an institution can lodge a formal appeal against this decision with the Administrative Jurisdiction Department of the Council of State [*Afdeling bestuursrechtspraak van de Raad van State*] in the Netherlands. In Flanders, institutions can lodge an external appeal with the Flemish Government and finally with the Council of State of Belgium [*Raad van State*].

Track record

Since 2012 NVAO has received one internal appeal in the Netherlands, which was rejected by the appeal committee. NVAO upheld its decision and the institution lodged an external appeal with the Administrative Jurisdiction Department of the Council of State. In this case, the Council decided in favour of the appealing institution on the grounds that Dutch law did not explicitly state the need for an extensive initial accreditation as explicated in the accreditation framework. The Ministry of Education has decided to change the law in this respect.

In Flanders, one case of internal appeal came up, which was withdrawn during the procedure. At the time of writing, four external appeals have been lodged against a decision of NVAO in the Netherlands. One external appeal has been granted for procedural reasons. The others were rejected. In Flanders no external appeals have been lodged.

NVAO has the mandate to advise the minister of education in the Netherlands to withdraw accreditation from a programme. In recent years, NVAO has given such an advice in three cases. One of these has been acted upon by the minister. In this case, the ensuing legal procedure to withdraw accreditation has recently been completed successfully.

Informal complaints

NVAO also receives a number of complaints from students or other members of the public concerning the quality of specific programmes. When such a complaint is relevant in the context of an on-going assessment procedure, and when complainants agree, NVAO refers the complaint to the panel. One such case occurred in 2015. In most cases, and when the complaints have no relevance to a procedure, NVAO informs the institution of the complaint and also the Inspectorate for Education. In principal, NVAO does not investigate complaints, as it has no legal mandate to do so.

Conclusion, points for further development

NVAO's internal appeals procedures are designed adequately and have proven to function effectively. NVAO takes great care to communicate its intended decision to institutions, which may contribute to the relatively low number of appeals and complaints.

- NVAO has noted that the procedure for withdrawing accreditation is much more complicated and difficult in practice than the law suggests. NVAO has been involved in lengthy and costly legal proceedings in recent years. This complexity restricts NVAO's mandate to safeguard the quality of education in the case when the institution does not take its own responsibility. Luckily, such cases are rare and exceptional.

Chapter 12 The activities of NVAO in Dutch and Flemish higher education are embedded in a network or relations with relevant stakeholders. The present chapter provides information on the various stakeholders and the way NVAO interacts with them. It will also briefly indicate what kind of feedback NVAO receives from them. Annex 8 provides a feedback analysis and samples of the feedback in online surveys on NVAO's primary procedures.

Information and opinions of stakeholders

Resonance groups

NVAO consults with stakeholders in the Netherlands and in Flanders about every two months in resonance groups consisting of representatives of institutions and students. In the Netherlands this group comprises the associations of universities (VSNU), universities of applied sciences (VHS), and private education suppliers (NRTO), the student unions LSvB and ISO. In Flanders the group consists of the universities (VLIR), the higher education council (VLOHRA), the Cabinet and the Ministry of Education, the student union (VVS), with assessment agency VLUHR-KZ as an observer.

The nature of the meetings with these groups is to receive feedback and to consult the stakeholders on important policy changes planned by NVAO or on the developments in the system of external quality assurance. In recent years, concepts in procedures and the general structure of the new frameworks and accreditation systems have been discussed in these groups. Stakeholders appreciate NVAO's open approach and the frequent consultation. Even though consensus is not always possible because of conflicting demands and interests, they feel that they are connected to the developments and are given the chance to 'co-create' the system.

When an assessment report is less convincing or has other problems, NVAO consults the applicant institution. In the case of cluster-based assessment this can also involve domain-related organisations.

On several occasions the Flemish stakeholders have expressed their appreciation of NVAO's handling of the transition to a new system. Especially, the introduction and consistent implementation of the appreciative approach is received positively by Flemish institutions and students. In preparation of the institutional reviews, NVAO organised separate meetings and seminars to inform institutions and give them the opportunity to participate in the development and co-creation of the concept.

Assessment agencies and expert panels

The assessment agencies are an important stakeholder for NVAO. NVAO regularly consults with the joint agencies and also has meetings with each of the agencies separately. These meetings serve to receive feedback on NVAO's handling of the system and of particular procedures. For the approval of panels, the agencies directly interact with NVAO. The conduct of this procedure, but also the quality of panels, is a frequent topic of discussion. An important purpose is also to inform the agencies of the developments in the system of quality assurance and of new guidelines and protocols.

A regular topic is the quality of reports. The bilateral meetings with the agencies are meant for in depth discussions on specific reports. These discussions are an important element in NVAO's quality assurance system as they allow NVAO to ensure that the agencies follow the framework and the protocols for assessment. NVAO also reports from feedback it has obtained in its online surveys. The results of the meetings with the agencies are taken back to the internal meetings of NVAO policy officers and discussed there to improve aspects of NVAO's processes.

NVAO invites panel members for consultation when an assessment report is not convincing enough on which to base a decision. In most cases, the explanation by the panel solves the problem and is adopted in the decision making. These exchanges also allow NVAO to observe how the panels operate, how they are instructed by agencies and if there are sufficient guarantees for the quality and consistency of their judgement. In large clusters of assessments, such as the Dutch Humanities programmes, with many negative judgements, NVAO consulted all panels involved to make sure the judgements were consistent across the different panels.

In the institutional audit, a consultation with the panel chair is a structural element in the decision making. For assessments of new programmes, this only happens when the reports give rise to additional questions. In this manner, NVAO consults a large number of panel chairs and members and picks up many signals and feedback from that side of the process.

Occasionally, NVAO invites panel chairs for consultation. This was the case after the first round of institutional audits. There, the chairs reported that the handling of the assessment process was quite different, depending on the project coordinator. NVAO took this feedback seriously and initiated a project to develop a profile of the project coordinator.

Formal stakeholders

Although NVAO is independent in its operations, it operates in close cooperation with the Dutch and Flemish ministries of education and with other formal bodies that have the task of supervising higher education. In the Netherlands, this is the Inspectorate of Education. In Flanders, there is no Inspectorate for higher education. Supervision is a task of the Flemish Ministry of Education. At the institutional level, each institution is monitored by a commissioner of the Flemish government, whose task is of a financial and legal nature.

The NVAO Board regularly meets 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. As NVAO is involved in a large number of projects and procedures leading to an advice at the request of the Ministry, practical and financial planning is discussed there as well. The consultation of the Ministry does not serve the purpose of providing feedback, but in the course of the meetings, the appreciation of the role of NVAO is discussed. In particular, the cases in which NVAO specially addressed the public on the outcomes of assessments, coordination with the Ministry was taken care of. When needed, this consultation also allows NVAO to mark its autonomy.

The NVAO has a formal agreement for cooperation with the Inspectorate, which mainly comes down to keeping both parties informed of important developments of signals on the quality of higher education. The mandate of the Inspectorate concerns the legal compliance of institutions and the supervision on the functioning of the accreditation system. It is not the supervisor of the NVAO. The open nature of the consultations with the Inspectorate and the cooperation in some delicate cases makes it also possible to give and receive feedback. NVAO invited the Inspectorate to comment on the self-assessment report for the ENQA-review, as it also did for other NVAO publications.

The NVAO Board regularly (every six weeks) consults with members of the Flemish Cabinet for Education. As there is no supervising relationship between these two parties, the consultations are aimed at information exchange, feedback on policy issues, and monitoring timetables. The Flemish Ministry of Education is a member of the resonance group.

In addition to the formal consultation, there is a consistent practice of informal meetings with institutions. The Chair of the NVAO Board regularly meets newly appointed board members of institutions. In Flanders, NVAO Board members visit all institutions that take part in the institutional reviews in a 'Ronde van Vlaanderen'.

Advisory Council

NVAO's Advisory Council is asked for feedback and consultation on NVAO policies. The council consists of representatives from all relevant stakeholders. The NVAO Board usually sets the agenda, but the council can convene a meeting with the Board on its own initiative as well. The fact that most members are experienced in various aspects of the accreditation process makes the consultations with the council very valuable.

The council was also involved in the preparation of the self-assessment report. One element that was mentioned specifically by members there, was a positive appraisal of the way NVAO has implemented the principle of generic frameworks and peer-review in such a manner that there are enough guarantees for a consistent judgement. The first round of institutional audits in the Netherlands was mentioned as an example. By training panel chairs, student members, secretaries and NVAO staff members involved for this new tool, NVAO has achieved a uniform approach even though this procedure involved many different actors. The council was also positive on NVAO's handling of the development of the new accreditation framework.

Feedback analysis

Annex 8 contains a feedback analysis based on online surveys of NVAO's main activities, which also provides the improvement measures connected with the observations from the surveys. The samples show that the feedback is generally positive. The analysis of the various surveys is summarized into the following areas for improvement, for which measures have been taken:

- communication on applications on the website and during procedures (delays, alternative or additional trajectories);
- respecting deadlines;
- improving the consistency (of analyses and application of decision rules) and of judgements by panels, by training chairs, peer-to-peer coaching of external secretaries, cluster-based assessments, consultation with the assessment agencies;
- registration of the performance of panel in NVAO's internal database;
- keeping assessment agencies informed and discussing the quality of reports with them.

In the sample surveys institutions observe also that preconceptions play a role in the discussion with panel members. In the feedback on the handling of assessments by NVAO coordinators, stakeholders are positive about the professional handling and the neutrality of the coordinators. Similarly, the feedback from institutions on the institutional audit has been positive. NVAO has already followed up on the feedback concerning the improvement of communication procedures during assessments or the handling of applications.

In the ENQA-review of 2012, the panel made the following recommendations:³¹

In relation to its assessment of NVAO's compliance with the ESG, the Panel recommends that NVAO:

- makes the link between the NVAO standards and ESG Part 1 more explicit in the assessment frameworks;
- refines the descriptions of the aims and objectives, ensures that they are prominent in the frameworks and shows how the various elements of the frameworks contribute to the aims and objectives;
- formulates explicit and public criteria about how it reaches its accreditation decisions in relation to the programme assessments in all cases;
- establishes a clear procedure on how to handle cases where the conclusions in the assessment report are not be accepted by NVAO;
- strengthens the predictability of the timeframe and efficiency of its decision-making process;
- further strengthens the focus on quality improvement and enhancement of the HEI's;
- 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;
- 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.

Follow-up by NVAO

NVAO's follow-up of these recommendations comprised a number of measures that addressed the issues raised by the review panel. The follow-up review by ENQA in 2014 established that these measures were adequate. The measures can be divided into two categories:

1. Changes in legislation and other measures regarding the accreditation system

- the introduction of cluster based assessment for all existing programmes;
- regular consultation with the assessment agencies in the Netherlands and Flanders on: developments in the accreditation system; the interpretation of the accreditation frameworks and additional guidelines; the composition of panels; the design and implementation of the assessment process including the site visit and the quality of the panel reports (in particular the quality and the target group of the summary in the report).
- an adaptation of the framework in the Netherlands by January 2015 which included:
 - separate standards for the quality of the assessment and achieved learning outcomes;
 - extension of the mandatory training of panel chairs;
 - clarification of the criteria for the four points assessment scale.

2. Measures regarding NVAO's strategy and internal processes

- an update of the NVAO strategy document emphasises the improvement of consistency in decision making; improvement of the quality of the assessment panels by training the chairs; extending the trainings of chairs and secretaries of all panels for the coming institutional audits in Flanders.
- in addition to this, the quality and accessibility of the panel reports and the manuals has been improved, as well as NVAO's internal analysis of reports.
- grouping of applications for accreditations in clusters has improved the consistency of decision making. A (system-wide) analysis of the whole cluster is part of the agenda of the Board meeting. The first evaluation results show that this internal procedure contributes to a better consistency of the decision making process. System-wide analyses of these clusters are discussed with stakeholders.

³¹ <https://nvaio.com/actueel/publicaties/enqa-external-review-nvaio>

- Project-based organisation of the handling of accreditation decisions in major clusters and the production of system-wide analyses.
- The consistency of internal decision making regarding the institutional audits is enhanced by a new procedure: before a decision is taken the Board has a meeting with the chair of the panel to discuss the most important issues of the panel report. After the meeting the findings, the considerations and the judgements on specific topics are compared to the judgement on similar topics in previous panel reports on which NVAO has already decided. The Board of the NVAO also decided on overruling some scores after discussion with the panel in order to maintain consistency in its decisions.
- NVAO has also improved its internal guidelines regarding:
 - requests for further information to the applicant institution and/or the assessment panel;
 - highlighting panel recommendations in NVAO decisions;
 - the application of the improvement period (concerns programme accreditation);
 - introducing conditions for a positive decision on proposed programmes and institutional audits/reviews).

ENQA Review of 2007

In the ENQA-review of 2007, the following recommendations were formulated.³²

The committee formulates recommendations concerning:

- ESG 2.8; NVAO is advised to give more attention to the production of system-wide and comparative analyses – also with regard to the functioning of the accreditation procedures. More attention for these analyses will be beneficial for the „information function“ of accreditation, as expressed by umbrella organizations of institutes and by student organizations.
- ESG 3.8; NVAO is advised to strengthen its accountability procedures (regarding the relationship with and commitment of stakeholders) and to focus into their internal quality assurance system. NVAO will benefit more from a stronger and better positioned Advisory Council. More formal lines of communication with stakeholders are also in order. The review panel advises to include relevant stakeholders that are not yet represented, in the General Board, especially students.
- Further harmonization of regulations and procedures between the two countries with regard to:
 - Legal protection of titles. This is absent in the Dutch situation. The committee considers legal protection of titles a necessary prerequisite for an accreditation system, certainly given the presence of private institutions offering HE programmes.
 - Sanctions in the case of a negative accreditation. The Flemish system (of a statutory repair period) should also be implemented in the Dutch system.
 - The position of the macro-efficiency check. The Flemish procedure (where new programmes must first pass the macro-economic check before they can apply for initial accreditation) is preferable. The committee has learned that the position of the macro-efficiency check will be altered in The Netherlands, starting in July 2008.
 - The length of the accreditation cycles. There appears to be no clear ground for the present differentiation. The Committee therefore suggests a harmonization between the two countries as far as the standard validity of a granted accreditation is concerned. But at the same time the Committee suggests to grant NVAO powers to vary the period of validity and thus the length of the accreditation cycle according to considerations of proven quality.
 - The scale of assessments. Although NVAO is bi-national, the quality assessment agencies are in fact organized on a national scale. The outcome of the system would benefit if there were clustered assessments on a bi-national scale.
 - Different time limits for the processing of applications and differing the sanctions (in case NVAO does not adhere to the time limit). A situation in which Flemish applications get precedence is to be avoided.

³² <http://www.enqa.eu/index.php/reviews/review-reports-and-decisions/page/8/>

- The relationship between NVAO and the quality assessment agencies. The positioning of the quality assessment agencies is not sufficiently clear, a problem that is aggravated by the „market“ situation in The Netherlands. There is an issue of „low trust“ that needs to be adjusted.
- The further development of the system as the committee believes that the current system will show strongly diminishing results after the first cycle. A more or less legally demanding reform seems unavoidable. The committee suggest looking into the concept of self-accrediting institutions.

Follow-up by NVAO

NVAO's follow-up of these measures is discussed in NVAO's self-assessment report for the 2012 ENQA-review.³³ NVAO there points to the continuous production of system-wide analyses. It also points out how it strengthened its internal quality assurance system, and included relevant stakeholders on its General Board, Advisory Council and how it has set up for consultation with stakeholders in the Netherlands and Flanders. NVAO further explains how progress has been made to address the issues in the accreditation systems in the Netherlands and Flanders and which steps have been taken to further harmonise these. It concludes that the two systems have come closer together, and that the differences that remain evident, also provide opportunities for learning from each other.

The report of the 2012 ENQA-review concluded on p.41 (ESG Standard 8): “Without going in details, it seems that NVAO has had a fairly good approach to this kind of follow up.” The recommendation on developing the relationship between NVAO and the quality assessment agencies is dealt with on several occasions in the present report.

General outline of the follow-up by NVAO

The two previous ENQA-reviews pointed out relevant points for improvement. The 2012 review was followed by evaluations by external stakeholders in 2013, which defined the space for change and innovation. The follow-up to the ENQA-review is embedded in the measures that were taken in response to the evaluations. A few themes are singled out here from the reviews and the follow-up measures by NVAO to demonstrate how it responded to the feedback.

Relationships with stakeholders

The drafting of the new frameworks in the Netherlands and in Flanders has occasioned much more intensive collaboration and co-creation with stakeholders than before. The changes in the accreditation systems and the frameworks are largely the result of demands by stakeholders as expressed in the recent evaluations. The development of the frameworks has brought NVAO closer to the field and also introduced a more direct and open form of consultation and co-creation. Permanent resonance-boards have been set up and NVAO has used seminars and other activities in the field to exchange views with stakeholders. This has also ensured that the frameworks more explicitly express NVAO's strategic goals and objectives, such as the reduction of the administrative burden, customisation and the development of a quality culture, which are more explicit than before.

Clarification of criteria and decision-making process; consistency of review by different agencies

An important observation in the 2012 ENQA review concerned the clarity of the criteria and the decision-making process, and the consistency of the reviews by different assessment agencies. The upgrade of the Dutch frameworks in 2014 included a further

³³ *Ibid.*

refinement of the criteria for the judgement and the various scores by panels. In practice, this has made it more transparent to underpin a positive or negative judgement and argue for above average scores of good or excellent. NVAO has also translated these new guidelines to the manuals for handling applications for accreditation by NVAO staff, and thus to the decision-making process. In recent large scale clusters, such as the Dutch Humanities programmes or the teacher-training programmes, these manuals have proven to be adequate in practice. The simultaneous assessments by a limited number of panels and the coordinated handling have further improved the consistency of the decisions.

The consistency of reports by different agencies is a critical point. The consultation with the agencies has been intensified in recent years, and an evaluation of the report has been included in the handling of applications. The feedback from these evaluations is discussed with the agencies on a regular basis. Where needed, NVAO increased the pressure on agencies to bring their reports in line with what the framework and related guidelines prescribe. The differences in scores between the agencies are also monitored permanently.

Cluster-based assessments in all sectors and domains provide more checks and balances, as these are coordinated by the various agencies involved. NVAO's strategy explicitly states that it will be more present 'ex ante' to make sure the panels are briefed correctly and the agencies apply similar practices. This further narrows the scope for inconsistencies. Internally, the cluster-based handling of applications makes it easier to spot inconsistencies between the agencies and to address these.

From experience, NVAO knows that only a small number of cases are 'problematic'. It is of the opinion that further regulation of the review process conflicts with the principle of peer review and generic standards. This would also go against the notion of increased ownership of external quality assurance by stakeholders which is at the heart of the new systems in the Netherlands and Flanders. Also, the role of agencies in the assessment process will have to comply with this development. The new Dutch framework contains a new protocol for the site visit for existing programmes and for the report, separating accountability from the discussion with peers on development and improvement of programmes. This will separate judgement and recommendation more effectively.

The readability of reports in view of their intended audience

NVAO has taken several measures to gauge the readability of reports in its analysis, for instance in its internal quality assurance. The nature of the reports is defined by the demands of the framework. It is up to the secretaries to produce a clear and readable text under these conditions. NVAO considers the reports to be intended for both the stakeholder in the programme under review and also for the larger audience. An important test of the reception of the reports by a larger audience came with the cluster of Dutch Humanities programmes in 2014. NVAO published the findings, which led to a public debate on the quality of the programmes. In this process, it became evident that the reports were effective in conveying the deficiencies that were observed and the measures for remedying them. It proved to NVAO that the readability of the report is sufficient for explaining to a wider audience the outcomes of the assessment and the level of quality of programmes.

In the Flemish institutional review, NVAO decided to adapt the formal structure of the reports in order to facilitate the appreciative approach chosen in the pilot round of

reviews. The reports present the findings of the panel more in a linear narrative, without a division in standards. This makes it easier for the institutions to recognise their own narrative in the report and increases the readability for an outside audience. Judgements are given for each of the standards.

System-wide analyses

NVAO provides information on the quality of education in specific domains and uses its cluster-based accreditations to produce overview and analyses. This has been a recommendation in two reviews and has been followed up by NVAO. Currently, the practice of producing a cluster-analysis for large clusters of reports within a domain is structural. These analyses primarily serve the decision-making, but can be extended to more thematic analyses. The choice to do so 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 the coming years, the supervisory role of NVAO will increase, so it will produce thematic or risk-based analyses 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 analysis of the research master's programmes of 2015 is an example of this type of analysis.

Consistent handling and respecting deadlines

NVAO implemented various measures to optimise its internal processes, on the basis of feedback from stakeholders. Practices for coordinating assessments are discussed regularly in internal consultation. The newly developed profiles for the panel chair and the coordinator of assessment processes are important documents in this respect. The profile for panel chair is embedded in a training programme for chairs and internal training of coordinators (see Annex 9).

A project-based approach to coordinating assessments was implemented in the Flemish institutional review, to ensure that all institutions were assessed in a uniform and consistent manner, with enough room to adapt the process to the nature and context of the institutions. The NVAO process coordinators invested much in applying an uniform approach and shared this with the panel members and chairs in initiation sessions, and with stakeholders in the institutions. This kind of centralised planning led to a consistent implementation of the reviews. A similar approach will be followed by NVAO in the second round of the institutional audits in the Netherlands.

Considering the deadlines for the handling of applications, NVAO has optimised its internal planning and processes. It expects a positive effect from this in the coming peak period in 2017 and beyond. Some elements are outside of NVAO's control. Even with two predefined submission dates, institutions are free to submit applications before the deadline. This requires additional planning of the handling and decision making. NVAO expects that it has enough control over the planning of decision making that it can fulfil its legal obligations and prevent negative effects for programmes.

Chapter 14
Current challenges
and areas for future
development

Current challenges

Workload and capacity

NVAO is capable of performing its legal tasks, but it will remain challenging to combine the handling of large numbers of applications at certain peak periods with additional tasks and policy oriented activities, especially, given impending budget cuts. The challenge is not only planning the workload but also combining 'line' processes with more complex content-rich activities, such as the design of new frameworks and the implementations of changes to the systems of accreditation in the Netherlands and Flanders. A second challenge lies in the streamlining of NVAO's internal handling of applications and the coordination of assessments, with the aims of reducing the administrative burden for institutions, managing the deadlines, ensuring consistency. This challenge also involves optimizing the internal organisation of NVAO after changes in the staff and Management Team.

Implementing change in the systems

At the time of writing major changes in the systems in the Netherlands and Flanders are being implemented or announced. The implementation of the Flemish institutional review and the adaptations to the Dutch frameworks are complex operational projects. It also involves a strategic aspect: balancing between the innovation in quality assurance and guarantees for the quality of education as demanded by students and society at large.

Areas for future development

Justified trust and quality culture

NVAO will continue to stimulate the development of quality culture and to operate on the basis of justified trust when institutions are capable of managing the quality of programmes reliably. The handling of applications of individual programmes can be more marginal when the institution has a proven good track record. NVAO observes that external quality assurance develops in the direction of accrediting institutions rather than individual programmes. The Flemish pilot with the institutional reviews is an important step in this respect. NVAO will prepare for this by developing instruments for risk-based assessments and thematic analyses that complement the monitoring of the quality of study programmes in institutions.

Reliable judgements

Trust in the judgement of panel is of primary importance for the trust in the system of quality assurance and accreditation. NVAO has already developed effective tools for training panel chairs, secretaries, student members and policy officers who coordinate assessments, but will continue to develop these further in the coming period.

Sharing data and good practices

The large amounts of data collected by NVAO in the course of its activities on good practices in higher education and quality assurance are an important asset for the development of higher education. A point for further development is to find ways of disclosing and disseminating these data in the field.

Collaboration with other agencies in higher education

Especially in the Netherlands, institutions in higher education are accountable to a number of different government organisations, which focus on specific aspects of their activities and each use different sets of data, definitions and formats. These organisations include the Inspectorate, which supervises compliance with legal regulations, the Review-

committee which monitors agreements between the Ministry of Education on output and study duration, the Committee for Macro-efficiency, which assesses plans for new programmes on their efficiency effects, and the NVAO which monitors the quality of education. Supplying information to these organisations puts enormous strains on institutions. Collaboration between these organisations is a major point of development for the system of higher education as a whole.

Glossary of Terms	AACSB	Association to Advance Collegiate Schools of Business
	ANQA	the National Centre for Professional Education Quality Assurance Foundation in Yerevan, Armenia
	EAPAA	European Association of Public Administration Accreditation
	EMFD	Accreditation body of quality in management education
	ECTS	European Credit Transfer System
	EQF	European Qualification Framework
	VSNU	Association of Dutch Universities
	VHS	Association of Universities of Applied Sciences
	NRTO	Association of private education suppliers
	LSVB	Dutch Student Union
	ISO	Dutch Student Union
	VLIR	Flemish university council
	VLOHRA	Flemish higher education council
	VVS	Flemish student union
	VLUHR	Council of Flemish universities and university colleges

- List of Annexes**
1. CV's of NVAO Board Members
 2. Key figures on higher education in the Netherlands and Flanders
 3. Assessment frameworks for the higher education accreditation system of the Netherlands 2014
 4. Assessment framework for the higher education accreditation system of the Netherlands 2016 and overview of standards and assessment rules frameworks 2014-2016
 5. Frameworks for higher education Flanders and Quality Code 2015
 6. Details of NVAO activities and procedures including communication activities
 7. Differentiation in judgements in the Netherlands and Flanders
 8. Internal quality assurance, feedback analysis and samples of surveys
 9. Profiles panel chair and process coordinator
 10. Thematic analyses: short description and references

Colophon **ENQA Review 2017
Self-Assessment Report**

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