

***Report of the committee for the review of the
Accreditation Organization of The Netherlands
and Flanders (NVAO)***

September 2007

TABLE OF CONTENTS

1. EXECUTIVE SUMMARY	5
1.1 Introduction.....	5
1.2 Review process	5
1.3 Evidence	5
1.4 Conclusions	6
1.5 Recommendations	6
2. INTRODUCTION.....	8
2.1 Outline of the review process.....	8
2.2 Description of the agency: NVAO.....	9
2.3 Outline of the report	10
3. DESCRIPTION OF NVAO AND ACCREDITATION SYSTEM	11
3.1 Formation of NVAO.....	11
3.2 Status.....	12
3.3 Mission	12
3.4 Tasks.....	12
3.5 Accreditation process	13
3.6 Organization	15
3.7 Specific characteristics of the system	17
4. GENERAL OBSERVATIONS AND RECOMMENDATIONS	21
4.1 Accountability function versus quality improvement.....	21
4.2 Market situation in The Netherlands.....	24
4.3 Complications of the three tiered system.....	25
4.4 Harmonizing in the bi-national context.....	27
5. FINDINGS ENQA/ESG COMPLIANCE	30
5.1 ESG 2.1 Use of internal quality assurance procedures	30
5.2 ESG 2.2 Development of external quality assurance processes:	31
5.3 ESG 2.3 Criteria for decisions.....	32
5.4 ESG 2.4 Processes fit for purpose	35
5.5 ESG 2.5 Reporting.....	37
5.6 ESG 2.6 Follow-up procedures	38
5.7 ESG 2.7 Periodic reviews.....	39
5.8 ESG 2.8 System-wide analyses	40
5.9 ESG 3.1 (and section 2)/ENQA criterion 1: Use of external QA procedures	42
5.10 ESG 3.2/ENQA criterion 2: Official status.....	42
5.11 ESG 3.3/ENQA criterion 1: Activities	43
5.12 ESG 3.4/ENQA criterion 3: Resources	44
5.13 ESG 3.5/ENQA Criterion 4: Mission statement.....	46
5.14 ESG 3.6/ENQA Criterion 5: Independence	47
5.15 ESG 3.7/ENQA Criterion 6 & 8: External quality assurance criteria and processes	48
5.16 ESG 3.8/ENQA Criterion 7: Accountability procedures	49
5.17 Active contribution to ENQA aims	52
6. FINDINGS ECA CODE OF GOOD PRACTICE COMPLIANCE	53
6.1 The accreditation organization has an explicit mission statement.....	53
6.2 The accreditation organization is recognised as a national accreditation body by the competent public authorities	53
6.3 The accreditation organization must be sufficiently independent from government, from higher education institutions as well as from business, industry and professional associations	53

6.4	The accreditation organization must be rigorous, fair and consistent in decision-making	53
6.5	The accreditation organization has adequate and credible resources, both human and financial	53
6.6	The accreditation organization has its own internal quality assurance system that emphasises its quality improvement.....	53
6.7	The accreditation organization has to be evaluated externally on a cyclical basis	53
6.8	The accreditation organization can demonstrate public accountability, has public and officially available policies, procedures, guidelines and criteria	53
6.9	The accreditation organization informs the public in an appropriate way about accreditation decisions	54
6.10	A method for appeal against its decisions is provided	54
6.11	The accreditation organization collaborates with other national, international and/or professional accreditation organizations.....	54
6.12	Accreditation procedures and methods must be defined by the accreditation organization itself	55
6.13	Accreditation procedures must be undertaken at institutional and/or programme level on a regular basis	55
6.14	Accreditation procedures and methods must include self-documentation/-evaluation by the higher education institution and external review (as a rule on site).....	56
6.15	Accreditation procedures and methods must guarantee the independence and competence of the external panels or teams	56
6.16	Accreditation procedures and methods must be geared at enhancement of quality.....	56
7.	CONCLUSIONS.....	59
7.1	NVAO compliance with ENQA/ESG	59
7.2	NVAO compliance with ECA Code of Good Practice.....	59
7.3	Bi-nationality	59
7.4	Enhancement of transparency and public trust	62
7.5	Further development of the system	63
8.	ANNEXES	65
8.1	Glossary of acronyms.....	65
8.2	Members of the review committee	66
8.3	Schedule of the site visit	67

1. Executive summary

1.1 Introduction

NVAO (in Dutch: Nederlands-Vlaamse Accreditatie Organisatie) is the bi-national Accreditation Organization of The Netherlands and Flanders. It was established by international treaty and it ensures the quality of higher education in The Netherlands and Flanders by means of accrediting study programmes.

NVAO is a member of ENQA and ECA and their membership regulations stipulate a periodic review of the agency.

The Ministers of Higher Education of The Netherlands and the Flanders (Committee of Ministers) have agreed on an international peer review of NVAO during 2007, taking the European Standards and Guidelines (ESG) of ENQA and the Code of Good Practice of ECA as a framework for the evaluation.

The Committee of Ministers appointed hereafter a review committee consisting of international experts to review the performance of NVAO. The committee was also asked to evaluate NVAO with respect to the bi-national treaty between The Netherlands and Flanders and to present proposals to straighten the differences between the two accreditation systems and their implementation (transparency).

1.2 Review process

A preparatory visit to NVAO by the chairman and the secretary took place on April 23, 2007. Next, the committee, in close cooperation with NVAO drew up a programme of on-site meetings involving about 70 people including the chairman and members of the NVAO Board, the NVAO managing director and a number of staff members, representatives of umbrella organizations of higher education institutions, representatives of student organizations, representatives of quality assessment organizations, representatives of key stakeholders and representatives of the Committee of Ministers. All meetings were held in the NVAO offices in The Hague between June 5 and 9, 2007. The site visit also included a visit to the 'Haagse hogeschool'.

The committee submitted a draft report for factual verification to the NVAO board on August 26, 2007. The final report was submitted to the Committee of Ministers on September 19, 2007.

1.3 Evidence

NVAO presented its Self Evaluation Report on May 11, 2007. This was considered by the committee, as well as various other documents that were available to the committee in advance of and during the site visit.

The site visit provided further oral evidence.

1.4 Conclusions

ENQA compliance

In the light of the documentary and oral evidence considered by it, the review committee is satisfied that, in the performance of its functions, NVAO is in compliance with the *ENQA Membership Regulations* and in substantial compliance with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area*. The Panel therefore recommends to the Board of ENQA that NVAO should have its Full Membership of ENQA confirmed for a further period of five years.

ECA compliance

In the light of the documentary and oral evidence considered by it, the Review Panel is satisfied that, in the performance of its functions, NVAO is in compliance with the *ECA Code of Good Practice*.

Bi-nationality

There are various legislative, political and cultural differences between the two countries. They add to the complexity but do not lead to serious problems in the functioning of the accreditation system.

There is however reason to argue for more harmonization with respect to:

- Legal protection of titles that is absent in the Dutch situation.
- Sanctions in the case of a negative accreditation.
- The sequence of initial accreditation and macro-efficiency check.
- The length of the accreditation cycles (validity of accreditation).
- The use of clustered assessments on a bi-national scale.
- The different time limits for the processing of applications.

Transparency and public trust

The accreditation system certainly contributes to the goals of more transparency with regard to the quality of programmes and to an enhancement of public trust in higher education – but only to a certain degree. The system can guarantee *threshold* quality but has only a limited function in quality enhancement above that level.

The output of the system is and can be trusted by students, employers and the general public, but the development of the system itself – especially in the relationships between institutions, quality assessment agencies and NVAO – might be hindered by a 'low trust' characteristic, which is related to the positioning of the assessment agencies (the 'free market' system in The Netherlands is a case in point).

1.5 Recommendations

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 de 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.
- 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.

2. Introduction

2.1 Outline of the review process

2.1.1 NVAO

NVAO (in Dutch: Nederlands-Vlaamse Accreditatie Organisatie) is the bi-national Accreditation Organization of The Netherlands and Flanders. It was established by international treaty and it ensures the quality of higher education in The Netherlands and Flanders by means of accrediting study programmes.

NVAO is a member of ENQA and ECA and their membership regulations stipulate a periodic review of the agency.

2.1.2 Aims of the review and frame of reference

On 14 December 2006, the Ministers of Higher Education of The Netherlands and the Flanders (Committee of Ministers) agreed on the principle of an international peer review of NVAO during 2007. They took the European Standards and Guidelines (ESG) of ENQA and the Code of Good Practice of ECA as a framework for the evaluation. In addition, they decided that the review had to be the first evaluation of NVAO with respect to the international treaty between The Netherlands and Flanders and that the review could be used as an opportunity for presenting proposals to straighten the differences between the two accreditation systems and their implementation.

In the appointment letter of the members of the committee the following four purposes of the international peer review are summed up.

- "The international peer review should serve the following purposes.
- NVAO is a member of the European Association for Quality Assurance in Higher Education (ENQA). The ENQA membership regulations require all member agencies to be subject of an external review at least once every five years. The review should establish that NVAO meets the criteria for full membership as laid down in Part 2 and 3 of the European Standards and Guidelines in Quality Assurance (ESG) in the European Higher Education Area, adopted by ministers in Bergen in 2005; part 1 being not applicable to NVAO.
 - Furthermore NVAO is member of European Consortium for Accreditation (ECA). The review should establish that NVAO meets the standards of the ECA Code of Good Practice.
 - NVAO is unique in being a bi-national accreditation organization. This implies that NVAO operates in two legislative contexts as a consequence of which various procedures and practices differ. We would welcome reflections of the review committee about the procedural and practical differences as well as any suggestions for further adjustments.
 - Both in The Netherlands and in Flanders an evaluation of the functioning of the accreditation legislation is foreseen. The findings of the review committee will then also be taken into account. This does not imply, however, that the review committee should review accreditation on a system level. The review only bears on the functioning of NVAO within

the system, but we would welcome if the committee could dwell upon what we consider the most important function of the accreditation legislation, namely the enhancement of transparency and of public trust (on a national and international scale) in our systems of higher education.”

Therefore the review is more than only an assessment of NVAO compliance with ESG and ENQA membership criteria. This will be reflected in the outline of the report also.

The committee wishes to stress that a distinction must be made between findings, reflections, conclusions and recommendations with regard to the functioning of NVAO *within the given system* and with regard to *(the functioning of) the system at large*. For decisions about ENQA and/or ECA-membership only the former are relevant.

2.1.3 Committee and review method

The review committee members were selected and formally appointed by the Committee of Ministers. The committee consisted of seven members; a secretary (not being a member of the committee) was added to assist the committee and to write the report. The composition of the panel is recorded in annex 8.2.

The committee has studied the Self Evaluation Report and inspected various documents during the site visit. The schedule of the site visit is recorded in annex 8.3. In a tight and full schedule the committee has met and discussed with representatives of all relevant parties.

The committee has praise for the Self Evaluation Report, which is well written, contains relevant information and is notably straightforward in identifying strengths, weaknesses and points of attention, both on a system level and specifically with regard to the functioning of the organization itself. In an early phase of the writing process, some stakeholders were consulted by NVAO about a draft version. In the meetings most representatives stated that the Self Evaluation Report gives an adequate and comprehensive picture and identifies the central discussion points.

NVAO has in a very professional way organized the site visit and has assisted the committee in every way. The committee had access to all documents and people it wished to see. The atmosphere in the meetings with (executive) board members and staff members was very open and straightforward.

The committee wishes to compliment NVAO for the professional preparation of the review and the smooth organization during the visit.

2.2 Description of the agency: NVAO

NVAO is not a 'typical' accreditation organization. It is a bi-national organization (The Netherlands and Flanders) and the accreditation legislation refers to special arrangements as an 'initial accreditation' and a 'macro-efficiency check'. This requires a somewhat lengthier explanation to facili-

tate a better understanding of the descriptions and analyses given by the committee in the report. This is done in a separate chapter (chapter 3).

2.3 Outline of the report

As just mentioned, the committee first presents a description of NVAO in chapter 3.

Subsequently the committee formulates its general observations and recommendations. The committee does this before presenting its findings per ENQA standard and ECA code because it is felt that a more comprehensive presentation can facilitate a better understanding of the various, sometimes more isolated analyses per standard/code.

The committee presents in chapter 5 the findings regarding NVAO's compliance with the European Standards and Guidelines and ENQA membership criteria.

In chapter 6 the committee presents the findings with regard to NVAO's compliance with the ECA Code of Good Practice.

The committee presents in chapter 4 some general observations and reflections. These are not always directly pertinent to the assessment of the ESG/ENQA criteria and ECA Code of Good Practice, but may be helpful to get a better understanding of the functioning of NVAO within the given system. Furthermore, these observations serve as background to the conclusions and recommendations regarding the third and fourth purpose of the review as differentiated in paragraph 2.1.2.

In chapter 7 the committee formulates conclusions and recommendations. In this chapter the committee also goes into the topics raised by the Committee of Ministers regarding the bi-national system.

A word on terminology: the Dutch Universities of Applied Science are alternatively called Universities of Professional Education, Polytechnics and Universities of Applied Science, whereas their Flemish counterparts are called University Colleges. In this report we use the terms Universities of Applied Science and University Colleges.

3. Description of NVAO and accreditation system¹

3.1 Formation of NVAO

In 2000, The Netherlands and Flanders expressed the intention to establish a joint accreditation organization. This organization would be charged with the accreditation of higher education programmes in both The Netherlands and Flanders. Accreditation would be the keystone of the already existing external review system. The Dutch government took the first step in establishing the NAO, The Netherlands Accreditation Organization, in June 2002, as a preliminary step to establishing the NVAO, the Accreditation Organization of The Netherlands and Flanders. This preliminary step was necessary for compliance with the Dutch law that ordered the implementation of both the bachelor-master system and the accreditation system and was enacted one year earlier than the Flemish Act.

In 2001, tentative talks took place between the Dutch and Flemish ministers about the establishment of an international accreditation organization. In December 2002, an observer from Flanders was attached to the Board of NAO. In April 2003, the then Dutch and Flemish Education ministers started their talks on the content of what was to become the Treaty by which NVAO would be established as a bi-national organization. On 3 September 2003, the Treaty for the establishment of a bi-national accreditation organization was signed by the competent ministers of The Netherlands and Flanders. Hence, the NVAO (in formation) was a fact. The Treaty assigns the tasks of NVAO, its form of administration and its supervision. On 1 February 2005, all legal formalities regarding the establishment of NVAO had been concluded and NVAO was formally established.

It should be pointed out that The Netherlands and Flanders already (before the introduction of the accreditation system) had a fully-functioning external review system that led to quality improvement in education. Characteristic of this system was the fact that the sector was evaluating itself, even if in The Netherlands there was independent oversight on an *ex post* basis from the Inspectorate of Education. With the introduction of the new system, efforts have been made to strengthen the former system of external review, to develop it and make it internationally more acceptable. This was achieved by making the system more independent and better aligned with external benchmarks and standards, by having the outcome result in explicit and clear judgements and by strengthening the power of possible sanctions. These developments resulted in the establishment of one accreditation organization for The Netherlands and Flanders.

It is important to note that, formally speaking, the only element that the Dutch and Flemish accreditation system really have in common is an accreditation agency in the form of NVAO as installed and organized by the 2003 treaty. Otherwise The Netherlands and Flanders each have their own accreditation system. Each defines by legislation and independently the position and role of accreditation in their HE systems, the accreditation procedures, the accreditation criteria, the consequences of accreditation and the

¹ This chapter is largely based on the NVAO Self Evaluation Report.

system of legal review. In practice, because of informal consultation and reciprocal influence, many of these issues are addressed in quite similar ways in the two countries, although substantial differences exist and cause problems – as the evaluation will show.

3.2 Status

In accordance with the Treaty, and in order to be able to operate independently, NVAO was granted the status of an autonomous administrative body with legal rights according to Dutch legislation. Consequently, NVAO does not report to a particular minister or the Committee of Ministers and is not subject to ministerial responsibility. The Committee of Ministers has no power over NVAO operations or decision-making. This implies that NVAO has full decision-making powers as regards applications for (initial) accreditation.

However, NVAO is accountable to the Committee of Ministers, which approves its budget, the annual report and the annual accounts. Five years following the enacting of the Treaty and subsequently every four years, the Committee of Ministers draws up a report on the operation and functioning of NVAO. In accordance with the Treaty, the Committee of Ministers can only intervene in case of serious neglect on the side of NVAO of its (initial) accreditation task, threatening the execution of that task. The Committee of Ministers can thus only intervene in the general functioning of NVAO, but not in NVAO's decision-making.

3.3 Mission

NVAO has defined its mission as follows:

“The Accreditation Organization of The Netherlands and Flanders (NVAO) independently ensures the quality of higher education in The Netherlands and Flanders by assessing and accrediting programmes, and contributes to furthering this quality. In addition, NVAO contributes to raising quality awareness within higher education and advancing the position of higher education in The Netherlands and Flanders in the national and international context.”

3.4 Tasks

NVAO's major task is (initial) accreditation of higher education programmes both in The Netherlands and Flanders. The tasks of NVAO in The Netherlands were stipulated in the Dutch Act² and can be summarized as the (initial) accreditation of programmes of higher education and giving advice on the possible extension of academically oriented master's programmes including the research masters.

² Act on Higher Education and Research (Wet hoger onderwijs en wetenschappelijk onderzoek).

In Flanders, the Flemish Act of April 4, 2003³ forms the legal basis for (initial) accreditation in higher education and stipulates that the responsibility for (initial) accreditation of programmes lies with NVAO. In accordance with the Flemish Act and based on its stipulations, the Flemish Government has approved the frameworks for (initial) accreditation.⁴ In addition, the Flemish authorities have ratified several regulations concerning the implementation of the Flemish Act.⁵

Another important task for NVAO, stipulated by the Treaty, concerns the importance of the international perspective for the decisions and position of NVAO.

Apart from its primary responsibilities (i.e. (initial) accreditation), NVAO is charged with some additional tasks. These tasks have to be approved by the Committee of Ministers and should be compatible with NVAO's mission. For these tasks, extra budgetary provisions are made available. In the Strategic Policy Statement it was set down that if a new task is agreed upon, it should be in line with or provide an obvious connection with quality assessment of programmes.

The NVAO tasks that are not directly related to (initial) accreditation and/or quality assurance have not been considered in this review.

There is an important distinction to be made between 'accreditation' and 'initial accreditation':

- Accreditation refers to *existing* programmes on offer by institutions that have students enrolled.
- Initial accreditation refers to *newly designed* programmes that are not yet on offer. New programmes can receive public funding (in The Netherlands) and may grant legally recognised and protected (in Flanders) bachelor and master degrees only if initial accreditation has established that they conform to threshold quality standards.

To actually receive public funding, there is also another condition: the macro-efficiency check. The execution of this check is not part of NVAO tasks; it will be discussed in paragraph 3.7.5.

3.5 Accreditation process

The accreditation process consists of three layered steps:

- *Self-evaluation report.*

The procedure starts with a self-evaluation report. This report is written

³ Act of 4 April 2003 regarding the Higher Education Structure in Flanders (Decreet van 4 april 2003 betreffende de herstructurering van het hoger onderwijs in Vlaanderen).

⁴ There are various frameworks, one for accreditation and one for initial accreditation. The frameworks differ – as a result of differences in legislation – for Dutch and Flemish programmes, although the differences are minimized as far as possible. Besides NVAO has developed separate frameworks for initial Accreditation of Associate Degree programmes in The Netherlands and for Research Master programmes in The Netherlands.

⁵ The Netherlands and Flanders are each individually responsible for their own legislation on education and for their educational systems.

by the institution and forms the basis for the external assessment. The self-evaluation report is not made public and is not included in the accreditation application that is filed with the NVAO, as the report should contain self-critical and reflective aspects on the basis of which a panel should be able to form balanced judgements.

In cases of initial accreditation, the institution produces a programme dossier.⁶ This dossier is submitted directly to NVAO where it is examined to determine whether it is complete and suitable for the initial accreditation procedure.

The NVAO (initial) accreditation frameworks stipulate the required content of these documents.

- *External assessment.*

The second step is an external assessment by a quality assessment agency (see paragraph 3.7.3). The assessment panel should be composed of experts who have subject-/discipline-specific knowledge and who have experience in the relevant professional practice. There should always be a student member on the panel. In addition, there should also be an expert with pedagogical/didactical experience and one with quality assessment and audit expertise.

For *initial* accreditation, both in The Netherlands and Flanders, it is generally NVAO that selects the panel members. As with the external assessment by a quality assessment agency, these panel members should also have authority in their specific discipline, be independent and have expertise. There is no student member on the panel. In The Netherlands, a quality assessment agency can also be asked to carry out the initial accreditation procedure. In this case, the composition of the panel should be approved by NVAO prior to the assessment. It goes without saying that such a panel is subject to the same requirements as those selected by NVAO.

Prior to the assessment of the programme, the assessment panel should produce a subject-/discipline-specific frame of reference in which they specify what the learning outcomes of the programme should be to offer sufficient threshold quality.⁷ Then the site visit takes place during which the panel examines additional information, holds discussions with representatives of the programme (such as the programme management, the teaching staff, the professional practice and the students). Furthermore, the facilities are inspected (such as the library or laboratories). During the site visit, several aspects of the self-evaluation report or programme dossier are verified, supplemented or, if necessary, clarified. On the basis of the self-evaluation report or the programme dossier and the site visit, the panel reaches a judgement of the programme. This judgement is described in the assessment report. Before the assessment report is endorsed, it is first presented to the institution for factual verification. The institution then needs to submit the final version of the report together with the application for accreditation to NVAO. In the case of initial accreditation, the panel submits its report directly to NVAO.

⁶ The distinction will be evident; in the case of initial accreditation, there can be no self-evaluation as the programme is not yet on offer.

⁷ NVAO uses the expression 'generic quality' to denote threshold quality. The committee prefers the later expression as it is more clear.

- *Accreditation decision.*
On the basis of the panel report NVAO will formulate its 'intended decision'. The institution can react to this intended decision before it is finalized by NVAO.
In the case of an initial accreditation procedure in Flanders, the considerations are formulated in an initial accreditation report. In the case of an accreditation procedure in Flanders, NVAO will formulate its considerations in an accreditation report that forms the basis of its accreditation decision.
At any moment during the course of an initial accreditation, the institution can decide to withdraw its application. Withdrawal usually occurs if a programme was negatively assessed by the assessment panel. Withdrawals of applications are not published. In this way, institutions do not lose public confidence unnecessarily.
If NVAO takes a negative accreditation decision, the institution will be granted an improvement period; see paragraph 3.7.4.
In case new programmes want to receive public funding, the initial accreditation procedure will (in The Netherlands) have to be followed by a macro-efficiency check by the government. In Flanders the macro-efficiency check precedes the initial accreditation by NVAO. See paragraph 3.7.5.
- *Appeal.*
Both in The Netherlands and in Flanders, institutions can lodge an appeal against (initial) accreditation decisions taken by NVAO. The appeal procedures are stipulated by law. There is the possibility of internal appeal (appeal at NVAO) and external appeal (appeal at court). Regulations and procedures differ between Flanders and The Netherlands. As yet there have been only a relatively small number of internal and external appeals.

3.6 Organization

3.6.1 Governing body

The NVAO governing body consists of an Executive Board and a (General) Board.

The Executive Board (four members) meets every week and is responsible for the day-to-day management of the organization for which it is accountable to the Board. The day-to-day management comprises: the administrative organization of NVAO; the decision-making process preceding the ratification of an (initial) accreditation decision; the employment, the salary and dismissal of personnel; the decision to seek advice on legal, financial or policy matters; and, finally, finance management and management of the moveable assets of NVAO.

The General Board (as yet twelve members, including the executive board members) ratifies decisions from the Executive Board and plays an explicit role in handling difficult cases concerning applications for (initial) accreditation. If necessary, the Executive Board can acquire a mandate, an authorization and/or full power to take decisions. The Board meets every month.

The Committee of Ministers appoints the members of the Board for a four-year term on the recommendation of the Dutch and Flemish Higher Education ministers. Members of the Board are eligible for reappointment for another term of four years and are recommended on the basis of their expertise in higher education, their professional practice related to higher education or their field of research or quality assurance. The Board constitutes a complete entity and as such takes decisions on applications concerning (initial) accreditation irrespective of whether these concern an application from The Netherlands or Flanders.

3.6.2 Advisory Council

The NVAO has an Advisory Council consisting of eleven members who represent NVAO's stakeholders.⁸ The Advisory Council's primary task is to provide advice – solicited or unsolicited - to NVAO on the general policy of NVAO. The Advisory Council meets twice a year on average. The Advisory Council does not discuss accreditation decisions.

3.6.3 Staff and management

The Director manages the NVAO staff, is responsible for the organization's day-to-day affairs and implements the strategic policy as set out by the Board. The Director sees to the correct implementation of decisions taken by the Board and is responsible for periodical reporting to the Board.

The NVAO staff includes staff members (policy, legal and communication advisors) and support staff (secretariat, finances and human resources, records department and general services); about thirty FTE in total.

The staff members are a mix of young and experienced people from The Netherlands and Flanders. The more experienced staff members are expected to possess wide-ranging knowledge of higher education and/or quality assurance, or a specific legal or communications background. Together they represent all major academic disciplines.

The policy advisors have their own secretariat that is responsible for the administrative processing of applications. The Records Department archives the digital and hard copy of incoming and outgoing mails and application dossiers. Support services are managed by the Controller.

3.6.4 Internal quality assurance

NVAO has developed a system for its internal quality assurance. Initially, this system had more a thematical approach than a structural one. As the organization gradually took on a more structured form, the system for internal quality became more structured as well (2006) and a more systematic approach for evaluation was developed (2007).

This system, that is currently being implemented, is designed to:

⁸ The Dutch members of the Advisory Council are appointed on the recommendation of the following organizations: The Netherlands Association of Universities of Applied Sciences (HBO-raad), the Dutch National Students Association (ISO), the National Union of Students (LSVb), the Platform of recognised private institutions (PAEPON) and the Association of Universities in The Netherlands (VSNU). The Flemish members of the Advisory Board are appointed on the recommendation of: the Flemish Interuniversity Council (VLIR), the Council of Flemish University Colleges (VLHORA), the National Union of Students in Flanders (VVS) and the Flemish Social and Economic Council (SERV).

- Allow an integrated approach of the organization and its working processes by applying the nine criteria of the EFQM-model.
- Allow frequent evaluation of the results and a structured plan for improvement (by following the Plan-Do-Check-Act cycle).
- Be transparent, simple and non-bureaucratic through the application of a limited number of instruments.
- Provide the basis for an external (international) evaluation by the adoption of international standards in the development of the internal quality assurance system.
- Stimulate involvement of all staff members, and in addition, guarantee involvement of all stakeholders by means of an open dialogue with these stakeholders.

NVAO distinguishes 13 quality areas within the internal quality assurance system ('Strategy, Policy and Leadership', 'Accreditation', 'Initial Accreditation - including Research Master's Programmes', 'International Affairs', 'Communication', 'Legal Affairs', 'Support Services', 'Additional Tasks', 'Quality Assurance', 'Human Resources', 'General Services', 'Finances and ICT'). For each quality area, a Quality Area Working Group has been formed consisting of NVAO staff members and a quality area coordinator. A member of the Executive Board is appointed as primarily responsible for each quality area. The 'Working Group Quality Assurance' (the quality group pertaining to the quality area of quality assurance) coordinates all tasks regarding quality assurance.

3.6.5 Financial situation

NVAO is financed both by The Netherlands and Flanders (60% by The Netherlands and 40% by Flanders) and has an annual budget of approximately € 6 million.

External reviews of programmes (by quality assessment agencies) are financed by the institutions themselves. These costs are thus not accrued to NVAO. The costs incurred by NVAO for initial accreditation of programmes are partly charged through to the institutions. For The Netherlands, this amounts to a maximum of € 10.000,- and for Flanders to a maximum of € 5.000,-. The costs per accreditation amount to € 500,- financed by the institution. The income gained from (initial) accreditation procedures are deducted from the amount assigned to NVAO from government funding.

Staff members of NVAO are directly recruited or appointed by NVAO. NVAO bears all labour costs of its work force.

3.7 Specific characteristics of the system

3.7.1 NVAO decision making

On the basis of the information provided in the assessment reports, NVAO should be able to reach a well-evidenced decision. In the case of accreditation, NVAO assesses the quality of the assessment report and the working method of the quality assessment agency. Standard procedures and internal handbooks have been developed for that purpose. If NVAO cannot make an independent positive decision on the basis of the assessment report, this

application is submitted to further scrutiny. Subsequently, there are still several ways for NVAO to reach a well-evidenced decision: NVAO can ask additional questions or claim additional information, organize hearings, reject the assessment report and appoint an NVAO verification commission. The procedure that applies is different in The Netherlands and Flanders due to the differences in legislation.

In the Self Evaluation Report NVAO calls this a 'pro-active' attitude.

3.7.2 Three tiered system

A specific characteristic of the Dutch and Flemish accreditation system is that it is three tiered system (whereas generally a two tiered system is more common):

- Tier one is the institution: there lies the principal responsibility for quality assurance. In the process of (initial) accreditation the institution provides a Self Evaluation Report (or programme dossier).
- The second tier is the external quality assessment agency. Its task is to assess programmes using an independent panel, leading to a panel report. The agency is hired by the institution and reports to the institution. See also paragraph 3.7.3
- NVAO is the third tier. On the basis of the panel report, submitted by the institution, NVAO decides upon accreditation.

So as a rule NVAO does not execute the actual quality assessments; these are done by separate quality assessment agencies and their panels. These agencies have to adhere to the framework and NVAO checks this in the process of assessing the panel report.

In the case of initial accreditation however, the system is as a rule two tiered. The actual quality assessment is generally done by an NVAO panel. It is possible though (only in The Netherlands) that this is done by a panel from a quality assessment agency, in which case it is again a three tiered system.

3.7.3 Quality assessment agency

In The Netherlands, the legislative opted for an open system of quality assessment agencies (a free market). In Flanders, the umbrella organizations for university colleges and universities have been recognised as quality assessment agencies by law. In The Netherlands, given the open system, NVAO has been given the legal task to annually draw up a list of quality assessment agencies that are considered capable of producing assessment reports that meet NVAO requirements. To be eligible for inclusion on the list, quality assessment agencies annually submit a programme dossier to NVAO in which they point out how they meet the requirements of the 'Protocol for Quality Assessment Agencies'. Five quality assessment agencies in The Netherlands were included on the list for 2006 (Certiked, Hobéon, Netherlands Quality Agency (NQA), Quality Agency Netherlands Universities (QANU) and Det Norske Veritas (DNV)) and two German ones (Fachakkreditierungsagentur für Studiengänge der Ingenieurwissenschaften, der Informatik, der Naturwissenschaften und der Mathematik e.V. (ASIIN) and Foundation for International Business Administration Accreditation FIBAA). Each quality assessment agency has a different approach to quality assessment stemming from their origin. The approach applied by NQA and QANU (which have their origin in the umbrella organizations of the

universities of applied science and universities, respectively) has developed from a content-oriented 'peer review' system. The approach of Hobéon, Certiked and DNV (originally certification agencies and/or consultancy agencies) is more focussed on a process-based audit. QANU is oriented towards universities while the other quality assessment agencies primarily focus on universities of applied science. Institutions can choose the quality assessment agency that applies the working method that best accords with their vision for their programme. Whichever approach is used, NVAO ensures that sufficient attention is given to the content and the achieved learning outcomes of the programmes in its decision-making process.

3.7.4 *Improvement period*

In Flanders, institutions can submit an improvement plan for the programme with the Flemish Government in the case of a negative accreditation decision. This means that, during a maximum period of three years, the institution will be allowed to work on improving the quality of the programme; after this period a new application for accreditation can be submitted. This temporary recognition is not granted automatically, but on the basis of the quality of the programme and the feasibility of the improvement measures. As yet, there has been no application for temporary recognition with the Flemish Government.

In The Netherlands, there is also a possibility for an improvement period, but as long as a programme is not accredited, the institution cannot enrol new students in that specific programme. This has occurred in a number of programmes.

3.7.5 *Macro-efficiency check*

In Flanders, an institution submits an application for initial accreditation for each bachelor or master's programme that does not yet appear on the Higher Education Register under the programmes offered by that institution. Before NVAO can begin the initial accreditation procedure, a statutory registered institution⁹ should submit an application with the Recognition Commission to carry out a macro-efficiency check of the new programme. New programmes offered by non-statutory registered institutions¹⁰ do not need to undergo a macro-efficiency check.

In The Netherlands, a macro-efficiency check takes place *after* the initial accreditation decision. A positive initial accreditation decision by NVAO entitles a publicly funded institution to apply for a macro-efficiency check with the Ministry of Education, Culture and Science. After having passed this

⁹ Statutory registered institutions are the traditional higher education institutions, i.e. the universities, university colleges, institutions for postgraduate programmes and 'other statutory registered institutions'. These institutions were already recognised by the Flemish or Belgian government before the introduction of the bachelor and master's degree system in 2003. All these institutions receive public funding for their education and research.

¹⁰ (Non-statutory) Registered institutions: since 2004, some private institutions have successfully completed a procedure for registration and, consequently, obtained official registration by the Flemish government. They are called (non-statutory) registered institutions. The registration procedure consists of providing proof of financial solvency and the entering into partnership agreements with statutory registered institutions or recognised higher education institutions abroad.

macro-efficiency check, a programme can be included in the Central Register for Programmes in Higher Education (CROHO). After receiving a positive initial accreditation decision, a privately funded institution can have a new programme listed immediately on the CROHO register. In July 2008 also in The Netherlands the macro-efficiency check will be carried out before the initial accreditation takes place.

4. General observations and recommendations

In this chapter the committee presents some general observations and reflections. These are not always directly pertinent to the assessment of the ESG/ENQA criteria and ECA Code of Good Practice,¹¹ but may be helpful to get a better understanding of the functioning of NVAO within the given system. Furthermore, these observations serve as background to the descriptions and analyses with regard to the ENQA/ECA standards/codes in the subsequent chapters.

4.1 Accountability function versus quality improvement

NVAO is central to the accountability function in the Higher Education systems within the two countries, Flanders and The Netherlands.

The accreditation system serves to guarantee (to all parties concerned) that all programmes on offer reach threshold quality. The committee sees a clear relation to public funding. The government simply wants accreditation to be able to guarantee the quality of publicly funded higher education to the tax payer and the student. In other words, threshold quality plays a dominant role in the system: the system is designed to assure that tax payers' money is spent adequately and that consumers are adequately protected.

In the few years of its existence the system has been generating at least the following three benefits:

- The implementation and development of internal quality assurance systems within institutions has made substantial progress. Of course this does not imply that there was no internal quality assurance before. In the last 15 to 20 years a large amount of work has been performed in the field of evaluation. Nevertheless, since the start of the new system improvements may still be perceived.
- Without exception, peer reviews at programme level are appreciated and do contribute to reflection upon and improvement of programmes – generally at a level above threshold quality. Of course there are various comments and criticisms to be heard (which the committee discusses in chapter 5 and 6), but basically the instrument of peer review is seriously appreciated.

It is also firmly established that a substantial number of programmes has already been withdrawn from offer as institutions judged that these programmes would not pass the criterion of threshold quality and thus would not be accredited. Unfortunately this is not directly visible because (almost) all programmes that are assessed pass the accreditation. This can lead to the false impression that the system has no added value. There is added value, but that materializes *before* the actual accreditation process and not as a visible result of negative decisions.

- The system of *initial* accreditation does definitively serve to improve the quality of new programmes and will probably shorten the development cycle in which a new programme gets consolidated. The major criticism has to do with the fact that in The Netherlands the 'macro-efficiency check' that all new programmes have to undergo for public funding is in-

¹¹ If they are they are touched upon in the paragraph(s) in chapter 5 and 6.

efficiently placed *after* the initial accreditation (instead of before as in Flanders).

- The accreditation system has a very large impact on the private sector in The Netherlands (in Flanders there is no private sector offering bachelor and master programmes). NVAO estimates that of the 3.000 higher education programmes registered in the private sector before the start of the accreditation system, considerably less will remain at the end of the accreditation cycle.¹²

All this should certainly not be underestimated. The committee signals however a downside that should be addressed with respect to the system in the phase after the first full cycle.

There is a very strong orientation on processes and procedures (which are rather formalistic and legalistic) and there is too little attention paid to content and to quality improvement above the threshold level.

The orientation on process, procedures and an 'appeal-proof' legal phrasing of decision documents – and less upon content – seems to be related to the fact the accreditation system consists of threshold accreditation as a condition for funding (especially in the Dutch public sector) and recognition (in the private sector).¹³ As one committee member put it during an internal discussion: "NVAO is not about quality, it is about accountability and funding."

Threshold quality has to a certain degree to do with formal aspects, like the presence of an adequate system for internal quality assurance. The fact that funding of an accredited programme (offered by a public institution) is conditional on accreditation implies a somewhat legalistic approach; the stakes are high and institutes can appeal at court. This quite naturally forces NVAO into more formal and procedural processes. Every decision is carefully scrutinized by one of NVAO's lawyers. A consequence of this is that the documents containing the accreditation decisions are no easy reading – at least not for the general public.

The situation differs between The Netherlands and Flanders.

- In Flanders the decision documents have to comply with many regulations, making them very elaborate (thirty to forty pages); decisions pertaining to Dutch programmes are considerably shorter: about ten pages.
- In The Netherlands the consequences of a negative accreditation are harsher than in Flanders. The institute is granted an improvement period during which funding stops and no first-year students may be enrolled. In Flanders, a negatively accredited programme can improve for a certain period during which funding continues and new students may still be enrolled after a positive decision by the government.

While institutions do recognize the importance of threshold accreditation for the system as a whole, the general feeling (as emphasised in the meeting with the umbrella organizations of institutions) is that the system does not

¹² Strictly speaking, there were 3.000 licences; not all of the 3.000 programmes were actually offered.

¹³ The latter primarily in The Netherlands as there is hardly any private sector in the Flemish higher education system.

provide an effective drive for real quality improvement of individual programmes. There is not much interest in the conclusion that all programmes are equal in the sense that they all pass the threshold level. The fact that it results in a certain 'clean up' is a valuable, but probable only one-time benefit.

A more comparative system that differentiates in terms of quality and that would enable institutions to be benchmarked with reference to a certain 'league' is considered much more preferable by the umbrella organizations. The Dutch student organizations support this view. The Flemish national union of students support a more comparative system that differentiates in terms of quality, but are not supportive of a benchmark approach. They oppose any evolution in the direction of (international) ranking.

The committee agrees that the clustered programme accreditations as done in Flanders and in the Dutch University sector can provide more useful information to the institutions on quality improvement at the programme level. However the committee doubts that some type of ranking or benchmarking against other institutions will improve the quality of student learning in the system. If the ranking/benchmarking is based upon subjective assessments of programme content, staff quality, resources, or other traditional input measures, which is almost always the case, then such benchmarking is apt to drive up the costs of higher education without providing educational value-added to students. The real challenge is to provide incentives and encouragement for programmes and institutions to systemically assess student learning and to use such empirical evidence to guide their efforts to improve academic quality. Without this type of concrete evidence at the institutional level alternative efforts to improve academic quality are likely to be wasteful and ineffective.

Although institutions state that they are not very interested in a system of threshold quality, they are apprehensive about the risk of not being accredited. In The Netherlands especially, the consequences of a negative accreditation are very harsh: such programmes cannot enrol first-year students or receive public funding during the improvement period. This leads to some risk reducing behaviour. This tendency is intensified by the fact that NVAO was (and partly still is said to be) inclined to view recommendations of panels as criticism and as a negative assessment of parts of the programme. This has led to reluctance within panels to formulate criticism and recommendations above threshold level. Perhaps sometimes even below that level if it is supposed that it might lead to an unsubstantiated negative accreditation decision by NVAO.

There were rumours in some meetings that recommendations were all kept out of the reports and only stated in side letters to the institutions, but this was not confirmed by the quality assessment agencies.¹⁴

NVAO confirms in the Self Evaluation Report (and in meetings with the committee) the erosion of the improvement function and seeks actively (in communication with the quality assessment agencies to) to turn the tide.

¹⁴ Only one of the agencies present told that in very few cases (10 out of 300 panel reports) side letters were written.

A possible suggestion would be that NVAO agrees to a guideline that all evidence for accreditation decisions by accreditation agencies would be presented in one section of the report and that a special section (i.e. 'below the line') would be reserved for recommendations to the institutions on means of strengthening the programme. NVAO would agree not to consider information from this latter section in its decisions.¹⁵

The committee once more points to benefits of the current system but doubts whether these can be prolonged after the first cycle. Unchanged, a next cycle would still fulfil an accountability function, but an accountability function without a strong quality improvement function might have too little added value to both institutions and the general public – also in the light of the costs and administrative burden.

4.2 Market situation in The Netherlands

In The Netherlands, the government has chosen to let the institutions free choice as to the quality assessment agency: a market system. Institutions can hire an agency of their choice to execute the programme review. NVAO has drawn up a list of 'recognized' quality assessment agencies, but institutions are not obliged to choose from that list.¹⁶

The committee closely looked at the market, but the closer one looks, the less market one sees. In fact, the initial expectations for an efficient market in this field appear naïve:

- The market is too small to be attractive for new market entrants.
- The threshold to enter the market is too high, given the very specific knowledge of the field that is required.
- Furthermore the required accreditation framework does not encourage existing international accreditors to enter the market as they would have to change/compromise their well-established processes.¹⁷
- The return on investment (the profit margin) in this field is far too low to encourage many new entrants.
- There is much 'differentiation by client (type)', leading to close client – agency relationships where the division between assessment and consultancy may not always be strictly kept.
- The combination of a small market and differentiation by client could possible create a dependency of agencies upon institutions (while the original expectation of policy makers was probably that a free market would lead to independency). There are, however, no indications that the independence of panel assessments is in any way jeopardised. In the 'monopoly' situation (Flanders and Dutch Universities) the dependency risk is at any rate much smaller.
- As a result of the frameworks and the strict guidelines for recognition of agencies there is actually little bandwidth for differentiation between

¹⁵ The committee has understood that this is in the process of being implemented.

¹⁶ The term 'recognition' does not imply a recognition to the effect that NVAO accepts the conclusions of the panel reports.

¹⁷ The occasional presence of FIBAA on the Dutch market does not contradict this.

agencies in working methods. There is differentiation between a more content oriented peer review method and a more process oriented audit method, but there is a certain convergence. There is also differentiation on clustering, with some agencies using this method and others not.

- It should be emphasized that in actual fact only for the Dutch publicly funded Universities of applied science (hogescholen) to some extent, and for the Dutch commercial private Universities of applied science (hogescholen) there is a free market in operation.

Most importantly, if NVAO is to make valid assessments of programme quality, it is illogical for them to try to base their decisions on independent accrediting agencies using different accrediting methods. There is no accepted academic discipline of accreditation with clear professional standards to assure the objective performance of independent agencies. An unregulated market for accrediting agencies will compromise the validity and reliability of the regulatory process. It is in the public interest for all the accrediting agencies to be using assessment processes of similar demonstrated validity and reliability. For this to occur, either NVAO needs a formal contractual relationship with each agency to assure that its accrediting processes are effective and/or it needs some means for assuring the validity and reliability of each agency's processes (e.g. auditing/supervising their activities). In either case, this will require an ongoing relationship between the accrediting agencies and the NVAO.

4.3 Complications of the three tiered system

NVAO works in a three tiered system as described in paragraph 3.7.2: institution, quality assessment agency and NVAO.

In the Self Evaluation Report NVAO states that this tiered system "self-evidently leads to considerable 'tensions' between the quality assessment agencies and NVAO" (SER, 51).

An important factor is that NVAO adopts what is called a pro-active attitude; NVAO desires to be able to formulate an independent assessment. Therefore it happens (very) regularly that NVAO poses additional questions and even organizes formal hearings (in Flanders) or sends in a verification panel (in The Netherlands). This met with a lot of criticism in the meetings with umbrella organizations of institutions and quality assessment agencies. They experience criticism, remarks, additional questions and the rejection of assessment reports by NVAO as excessive 'independent' behaviour on the part of NVAO. In fact, their impression is that NVAO is 'redoing' the work of the panel.

NVAO, on the other hand, claims that its only aim is to ensure reports are unambiguous and well-founded, so that it can make substantiated decisions.

In fact, none of the parties the committee spoke, contests the right of NVAO to formulate an independent assessment. They do, however, consider the amount of interference sometimes as excessive and inefficient and complain that it is unpredictable in which case NVAO will ask which question to which party. Agencies say they are not able to detect any pattern therein.

This issue relates to 'consistency,' not of decisions but of process and procedure by NVAO. This might be related to the fact that NVAO does not produce and publish systematic analyses of their accrediting decisions and does not effectively guide the performance of the quality assessment agencies by issuing formal, public guidelines, policy updates, etc. designed to assist the assessment agencies and the institution in their quality assessment and accrediting related activities.

An extra complication is that said 'interference' often leads to additional questions by NVAO to agencies or to institutions. In the Dutch-Flemish system the institution is the owner of (and is responsible for) the panel report. This can lead to tensions between agencies and their clients, the institutions – especially in the free market part (Dutch universities of applied science).

A regrettable consequence of this is that panels or agencies tend to be reluctant to state criticisms or to formulate recommendations in the reports because they fear that NVAO might see this as substantial weakness, leading to questions, rejection of reports or even a negative accreditation decision. This has led to a certain erosion of the improvement function of the system; see also paragraph 5.6.2.

It may be that part of this has to do with a natural learning cycle in any starting system with different layers – although the learning cycle might then be considered a bit long (at least in the Dutch situation).

The committee feels that the problem has to do with an unclear positioning of the quality assessment agencies, a problem that is aggravated by the market situation, described in paragraph 4.2. Looking at it as an accrediting system, the quality assessment agencies ought to be the 'data collectors' for NVAO. Through the instruments of the frameworks and the procedure for recognition of agencies NVAO should in fact develop 'trust' in the (panel reports from) the agencies. The behaviour by NVAO suggests that this trust is absent and that agencies are perhaps not viewed as parts of the NVAO's accreditation system, but somewhat as an extension part of the institution (and therefore to be assessed together with the programme). Given the way the market situation was introduced in The Netherlands this is an understandable reflex (see also paragraph 4.2).

In fact there are two basic solutions to this problem:

- One solution (proposed by the two Dutch national unions of students) would be to remove the second tier. In a two tier system programmes would be obliged to hand in (just as is the case now) an external peer review report and NVAO would formulate an accreditation decision on the basis of an assessment of the report. Institutions would of course be free to hire external agencies to do the peer review but these agencies would not be a part of the system. One could argue that this is, formally speaking, the present situation. Given the more or less substantial amount of 'redoing' by NVAO, one could argue to skip the second tier. This would however not ensure that the quality assessment agencies are valid and reliable 'data collectors' for NVAO. Perhaps a more relevant alternative would be to turn the NVAO into an accrediting agency, similar to those in the US, which guides the institutions on the development of the self study, arranges

the external peer assessment, and also makes the final accrediting decision.

- The other solution would be to position the agencies clearly as part of the accreditation system. This could for instance be done by extending the recognition into a formal certification. Via this certification NVAO could more strongly than is now the case (where agencies are free to choose their own model and working methods) ensure that its 'data collectors' are doing the required job properly. This could mean that during the period that an agency is certified, NVAO only marginally assesses the panel reports of that agency. This formally would still keep intact the right of NVAO to form independent decisions.

In any case, this approach would necessitate some type of ongoing, formal relationship between NVAO and the accrediting agencies and would require that NVAO view the assessment activities of the accrediting agencies as one of NVAO's core processes. Note that there are a number of possible forms for such a relationship, including a contractual arrangement, licensing of agencies, etcetera.

To an extent, both solutions would tackle the criticism that accreditation causes an excessive administrative burden. Both solutions would also require more or less extensive legal reform in both The Netherlands as Flanders. A more minimal reform programme could also be considered and could include:

- A clear and formal policy on behalf of NVAO stating its relationship with the assessment agencies, developed in cooperation with these agencies.
- Clear and up to date formal communication.
- Guidance by NVAO to the agencies on how to perform their role via newsletters, policy briefs and system wide analysis of NVAO decision-making.
- A light system of review of the working of the assessment agencies by NVAO from a consultant's perspective.

4.4 Harmonizing in the bi-national context

The Netherlands and Flanders share a bi-national accreditation system. Due to political and legislative differences between the countries, some differentiation in the system is inevitable. The committee feels that in some respects greater harmonization would be preferable.

4.4.1 Protection of titles

The bachelor and master titles are protected by law in Flanders and dependent upon accreditation, while this is not the case in The Netherlands. This leaves the possibility open for the private sector to offer non-accredited bachelor or master programmes. Of course students and employers can check easily whether any programme is NVAO-accredited (which they generally don't do), but the committee feels that a legal protection of titles is desirable.

To secure and strengthen the 'sanitizing' effects of the accreditation system on the courses of commercial private providers, the Dutch government should now follow its Flemish counterpart and protect the bachelor and master degree titles. This should mean that bachelor and master degrees

may only be granted when a student has completed an NVAO-accredited programme: so the degree awarding power is (at least partly: as far as the programme and the student is concerned) to become part of the positive accreditation decision. This should make it impossible to offer degree programmes which are not accredited, which is desirable if only for the transparency of the higher education market from the consumer's point of view.

4.4.2 Improvement period with the right of enrolment

The committee supports the principle of unconditional accreditation. In the Dutch situation however the sanction in the case of a negative accreditation is too harsh. The programme loses the funding and may no longer enrol first-year students. This leads to various forms of risk-avoidance; it also puts pressure on the panels that may become reluctant to be completely frank out of fear for the consequences for the programme. The Flemish situation is evidently better. The committee recommends also for The Netherlands an improvement period including the right of enrolment in cases of negative accreditation.

4.4.3 Macro-efficiency check before the initial accreditation

In The Netherlands new programmes that apply for public funding have to be (initially) accredited before there is the so called macro-efficiency check that decides about funding. As only few programmes pass the macro-efficiency check, a lot of time, money and energy are in fact wasted in the process of initial accreditation. All parties the committee spoke to agree that the Flemish procedure (where new programmes must first pass the macro-efficiency 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.

4.4.4 Harmonization of cycles

The committee feels that in a bi-national system a harmonization of cycle durations would be preferable. The committee feels that the cycles should not be too short. Given short cycles, the incremental benefits of the system will rapidly decrease, the peer review system will suffer from burn out, and the bureaucratic overhead costs will continue to rise. This will especially be the case in a system of threshold accreditation as most programmes will be able to keep up to that standard. In fact, the committee thinks that it is highly unlikely that the given system could be continued unchanged after the first full cycle.

Initial accreditation on the basis of threshold quality will always be needed. The validity of an initial accreditation would need to have the duration of one full programme cycle, preferably with an extra year so as to be able to take the experience of the first alumni into account.

The committee suggests considering a variable period of validity of accreditation. For a particular programme NVAO could found its decision as to the validity of the given accreditation on such considerations as the track record of the programme, the degree of change in content and didactics of the programme and the proven rigour of the institution's internal quality assurance system. A cycle of up to ten years (as is common in the United States for both institutional and programme accreditations) could well be feasible. It would also be conceivable that given such a longer period of validity of

the accreditation, NVAO would demand a midterm review on the basis of outcomes of the internal quality assurance of the institution.

5. Findings ENQA/ESG compliance

In this chapter the committee presents the major findings according to the following format:

- Description of the information gathered – making reference to meetings or documentation explored.
- Analysis of that information in reference to the respective standard.
- Conclusion as to how compliant NVAO is with the standard.

5.1 ESG 2.1 Use of internal quality assurance procedures

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

5.1.1 Description

The internal quality assurance system is incorporated as a separate theme (theme 5) in the (initial) accreditation frameworks (both the Dutch and the Flemish versions). This theme contains three separate standards:

- Periodical evaluations;
- Measures for improvement;
- Involvement of staff, students, alumni and the professional field.

NVAO as a rule does not execute the actual quality assessments as there is a three tier accreditation system (see paragraph 3.7.2). The actual quality assessments are done by separate quality assessment agencies and their panels. These agencies have to adhere to the framework and NVAO checks this in the process of assessing the panel report (see paragraph 3.7.3). In the case of initial accreditation, the actual quality assessment is as a rule done by a NVAO panel (but in The Netherlands it is also possible that it is done by a panel from a quality assessment agency).

In the meetings the committee learned that the umbrella organizations of the higher education institutes and the quality assessment agencies have perceived a positive impact upon the implementation and/or development of internal quality assurance systems and procedures within the institutes. Student representatives agreed with this observation, but remarked that they still perceive shortcomings in internal quality assessment systems within the institutions.

5.1.2 Analysis

Both the documentary and orally presented evidence is convincing. The committee has understood that the inclusion of theme 5 in the frameworks especially (but by no means exclusively) has had a positive influence upon the private institutions offering programmes that formerly (in the period before the accreditation legislation) were not – as the public funded institutions - subject to any form of formal programme assessment.

The committee considers the increased attention for internal quality assurance within the institutes as a positive outcome of the accreditation system

executed by NVAO in The Netherlands and Flanders. The remarks of students, that they still perceive shortcomings, underline the importance of this aspect.

The extent to which the accrediting processes assess the effectiveness of the internal quality assurance systems with regard to actual learning outcomes, is however unclear. NVAO states the following: "The differences between the concepts 'competences', 'learning outcomes', and subject 'contents' are not always clearly understood in daily practice. In addition, some consider the frameworks to be too focussed on the processes of the programme and not enough on its content. Another criticism refers to the attention given to learning assessment. This only receives comparatively marginal attention, instead of a standard; some claim this should be a theme." (SER, p. 38) The experience in other countries suggests that the effective assessment of student learning outcomes is a critical weakness and challenge for all systems of internal quality assurance in higher education. The means by which programmes assess student learning outcomes may need to be further clarified/emphasized in the NVAO frameworks if the accrediting process is to validly evaluate the effectiveness of the internal quality assurance systems. It was not possible for the committee to ascertain the extent to which the current accreditation process addresses and/or improves the overall institutional internal quality assurance system rather than the programme level systems.

In all meetings (including meetings with NVAO board) it has been brought to the committee's attention that certain aspects of the accreditation system might hinder a full development of the quality improvement function of the accreditations system. While this does not regard ESG 2.1 (as ESG 2.1 states that the effectiveness should be taken into account, but does not stipulate a measure of effectiveness), it does merit discussion by the committee; see paragraph 4.1.

5.1.3 Conclusion

NVAO fully complies with ESG 2.1.

5.2 ESG 2.2 Development of external quality assurance processes:

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

5.2.1 Description

The aims and objectives of the external quality assurance processes under the responsibility of NVAO have been determined in a legislative process (separately in The Netherlands and in Flanders), in the course of which there has been input from and/or consultation of various parties.

Subsequently the Dutch and Flemish (initial) accreditation frameworks have been developed after extensive consultation with representatives of institu-

tions and other stakeholders. Experts involved in assessment procedures were also consulted.

There is documentary evidence of this involvement; moreover the relevant parties have confirmed this in their meetings with the committee.

The aims and objectives of the quality assurance processes and the frameworks containing the standards have been published and are easily available for the parties involved and the general public (available online on NVAO's website or as hard copy upon request).

5.2.2 Analysis

In the evaluation of this standard, the fact that accreditation in Flanders and The Netherlands is regulated by law, has to be taken into account. The relevant stakeholders have been consulted, but the aims and objectives have been determined in a democratic process by legislation and the frameworks have been determined by the respective ministers. In this process the frameworks that were developed by NVAO have been accepted unchanged.

The fact that all parties concerned have played a role in the process of developing the aims and objectives of quality assurance processes does of course not rule out that they voice now (as happened in the meetings), after a few years of experience, various comments and criticisms. These will be discussed by the committee in the context of the relevant ENQA/ECA standards/codes.

5.2.3 Conclusion

NVAO fully complies with ESG 2.2.

5.3 ESG 2.3 Criteria for decisions

Any formal decisions made as a result of an external quality assurance activity should be based on explicit, published criteria that are applied consistently.

5.3.1 Description

NVAO's formal decisions are based on explicit and published criteria. These are contained in the various frameworks and are easily available for the parties involved (institutes and quality assessment agencies) as well as the general public. The decisions themselves (as well as the underlying panel reports) are also published and are available online on NVAO's website. In these decisions NVAO explicitly refers to standards in the relevant framework. This is conducive to consistency.

The process of decision making within NVAO is steered by handbooks, templates and a software programme specifically designed to process the many accreditation applications in a systematic way. Each application is handled from entry by a combination of a staff and an executive board member. In many cases three or four people are involved in a single application. Every draft decision is carefully scrutinized by a lawyer and all executive board members dispose of the relevant documents in the meeting where the deci-

sion is taken. All these measures promote consistency in the decision making process.

In various meetings the topic of inconsistency was raised. Both umbrella organizations of institutes and quality assessment agencies have complained about a certain lack of consistency in the procedure of evaluating the panel reports by NVAO, but it has not been reported that this has led to inconsistencies in the ultimate decision making.

This topic has been amply discussed by the committee with the NVAO executive board. NVAO has explicitly adopted a 'pro-active attitude' as stated in the Self Evaluation Report. NVAO does not just 'rubber stamp' the conclusions of the panel reports, but forms its own conclusions on the basis of that report. If NVAO has any doubt about the motivation of the assessment of a certain standard or perceives inconsistencies in the report, NVAO will ask for more information or for an elaboration of the motivation. Ultimately NVAO can – in a Flemish case – organize a formal 'hearing' or can even – in a Dutch case – send its own verification panel for a new site visit. In the Self Evaluation Report all these actions are labelled as 'interference'.

None of the parties contests the right of NVAO to make autonomous decision. What they do criticize is the amount of interference and – as it was several times called – the unpredictability as to when (in which cases, given which shortcomings) and how (telephone, email, letter, meeting, hearing, verification) NVAO will 'interfere' in the direction of which party (panel, agency, institution).

NVAO explained that they 'read between the lines'; look for inconsistencies in reports and also take into account the track record of institution and quality assessment agency.

Programmes from private institutions can be certain of extra scrutiny, as perceived by their umbrella organization.

In the Self Evaluation Report NVAO identifies in chapters 10 two points of attention of the accreditation system with regard to standard 2.3:

- 'Interference' resulting from the layering of the assessment system (SER, par. 9.4.2). Absence of clustered assessments of programmes at universities of applied science, only in The Netherlands (SER, par. 9.4.3).

The Self Evaluation Report also identifies in chapter 10 two weaknesses of NVAO:

- Realising consistency in decision-making (SER, par. 9.6.1).
- 'Interference' as a result of NVAO's pro-active attitude (SER, par. 9.5.1).

5.3.2 Analysis

It is clear that there is interference due to the layering of the assessment system (three tier system). The Self Evaluation Report in par. 9.4.2 relates this interference especially to the free market situation in The Netherlands. Although there is logic in this, the committee notices that there are complaints about interference also in the Flemish situation where there is no free market. The issue of 'interference' warrants discussion, but not with regard to standard 2.3, because while there are inconsistencies in the process of gathering additional information by NVAO while evaluating panel re-

ports (the above mentioned 'unpredictability'), there are no indications that this interference has led to inconsistency in the final accreditation decisions. Given the fact that NVAO accredits on the basis of 'threshold quality'¹⁸ inconsistent decisions are anyhow less likely. Also the description of the process and the number of people involved (see paragraph (5.3.1) seems geared to promoting consistency.

The committee concludes that the issue of interference and 'unpredictability' of NVAO refers only to the process of NVAO investigating the work of the agencies and does not refer to inconsistency in the decision making (even though NVAO relates the issue of interference to standard 2.3) and so does not refer to standard 2.3. The committee discusses this matter in paragraph 4.3.

There is indeed absence of clustered assessments of programmes at universities of applied science in The Netherlands. While the committee agrees with NVAO in considering this a weakness, there is no indication that absence of clustered assessments leads to inconsistency in the accreditation decisions. Given the fact that NVAO accredits on the basis of 'threshold quality' inconsistent decisions are anyhow less likely. The committee concludes that the absence of clustered assessments does not imply non-compliance with standard 2.3.

The Self Evaluation Report states in chapter 10 that 'Realising consistency in decision-making' is a weakness, referring to paragraph 9.6.1. That paragraph identifies consistency in decision making however as a 'point of attention' given the very large number of programmes that have yet to be accredited, and not as a weakness. The committee agrees that consistency should be a point of attention, but this fact does not imply non-compliance with standard 2.3. Furthermore, NVAO has taken various measures to enhance and secure consistency in decision making, internally¹⁹ and externally.²⁰

There is evidence of interference due to NVAO's 'pro-active' attitude, although in the view of the committee and in the experience of the institutes and quality assessment agencies the difference with interference due to the 'layering' of the system is not great. As said before, the parties involved do not contest NVAO's validation role during decision making; they wish more predictability in the process and that more would be done to bring in an element of 'trust' in the process. The committee dwells further upon this in paragraph 4.3, and concludes here that there is no indication that said pro-active attitude in fact leads to inconsistency in the accreditation decisions.²¹

¹⁸ The SER uses the term 'generic quality' which in the opinion of the committee is not an adequate translation of the Dutch term 'basiskwaliteit'; the committee therefore uses the term threshold quality.

¹⁹ E.g. the use of handbooks and the four eyes principle.

²⁰ E.g. the Protocol for Quality Assessment Agencies.

²¹ It could be argued that in the case of *initial* accreditation (where there are far more negative decisions) the risk of inconsistency might be greater. On the basis of the meetings the panel concludes that 'interference' and 'pro-activity' are even

5.3.3 Conclusion

NVAO fully complies with ESG 2.3.

5.4 ESG 2.4 Processes fit for purpose

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

5.4.1 Description

The Self Evaluation Report describes in great detail the processes. It is a system consisting of three layered steps. First, the institution writes and a self-evaluation report (in the case of accreditation) or a programme dossier (in the case of initial accreditation). Then there is the actual site visit and the assessment of the programme by an independent panel, composed by the quality assessment agency (not being the NVAO²²). The third step is the decision-making by NVAO on the basis of the panel report submitted to them by the institute. At any moment during the course of this process, the institution can decide to withdraw its application. If NVAO takes a negative accreditation decision, the institution will be granted an improvement period. In case new programmes want to receive public funding, the initial accreditation procedure will (in The Netherlands) be followed by a macro-efficiency check by the government. In Flanders this check precedes the initial accreditation.

Various internal instruments and procedures have been developed to handle the great amount of accreditation applications in a consistent way and as efficiently as possible. These were demonstrated to the committee.

In all the meetings parties told the committee that they are of the opinion that the NVAO does a good job within the given system. At the system level however they perceived some elements that make the system less fit for purpose. Two problems were identified:

- The consequences of a negative decision for programmes in The Netherlands are very harsh: the programme is not definitively terminated (as the institution is granted a two year improvement period) but the programme is no longer funded and can no longer enrol first-year students. In Flanders, a negatively accredited programme can be granted (by the Flemish government) a statutory repair period during which funding is continued and students may still be enrolled. In various meetings parties pointed out that the Dutch system leads to high insecurity and to various strategies of risk reduction, not only by the institutions but also by the assessment panels who may be reluctant to stress negative points or to formulate recommendations for fear that these might be viewed by NVAO as grounds for extra validation or verification or even lead to a negative decision. In fact, the NVAO executive board admits (in the Self

more common in cases of initial accreditation but there is no evidence of inconsistency in the decision making.

²² Only in most cases of initial accreditation the site visit and programme assessment is done by a panel from NVAO; in all other cases this is done by panel from separate agencies.

- Evaluation Report and confirmed this in discussion to the committee) that they indeed had this perception in the first period.
- In The Netherlands new programmes that apply for public funding have to be initially accredited before the so called macro efficiency check to decide about the funding. As only a small proportion of programmes pass the macro efficiency check, and many of the proposed programmes cannot be offered without public funding, this procedure obviously leads to a substantial waste of time, energy and money in the preliminary process of initial accreditation. All parties the committee spoke to agree that the Flemish procedure (where new programmes must first pass the macro-efficiency 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.

5.4.2 Analysis

From the discussions in the meetings it is evident that the lack of a repair period (without the loss of funding and the right to enrol students) is indeed not fit for purpose. These consequences are too harsh and do indeed – as is confirmed by umbrella organizations of institutions and by quality assessment agencies – lead to risk avoiding behaviour and at least to some extent to mitigation of criticism and recommendations in the panel report. There is however no indication that this reluctance to formulate recommendations in the report could lead to false positives in the accreditation decisions.

All concerned parties (NVAO executive board included) definitely have the impression that the lack of a repair period weakens the improvement function. NVAO has discussed this with agencies and umbrella organizations and would like to see more attention paid to recommendations in the panels' reports, but the committee perceived that there is still hesitation to take this step. The committee considers possible underlying mechanisms in paragraph in paragraph 4.1 and 4.3.

As the accreditation system in The Netherlands and Flanders is basically an accreditation system with threshold quality as central criterion, this shortcoming is formally speaking acceptable. Furthermore the shortcoming is not to the effect that there is no or hardly any improvement period. Therefore this issue does not imply non-compliance with standard 2.4

It is fairly evident to the committee that the position of the macro-efficiency check in the whole process is not optimal. It leads to a waste of time, energy and money. However, as the position of the macro-efficiency check in the HE system in The Netherlands is regulated by law and NVAO has no role in this check, this cannot weigh negatively upon the assessment of standard 2.4.

5.4.3 Conclusion

NVAO fully complies with standard 2.4

5.5 ESG 2.5 Reporting

Reports should be published and should be written in a style that is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

5.5.1 Description

Both the (initial) accreditation reports and the underlying panel reports are all published and available for the general public on the NVAO website. Publication occurs only when the decision is finalized. Institutions can appeal (internally and externally) and during this period neither the intended decision nor the underlying panel report is published. Students have remarked in the meeting with the committee that they would like to see this information published as it could be valuable information in the process of deciding which programme to follow.

Representatives of both students and umbrella organizations of institutions have the very strong impression that the decisions and panel reports are not widely read outside the circle of managers within the institutions. In their view this follows from the fact that all funded programmes available for study must be accredited by law and, therefore, students could come across a non-accredited programme in the private sector only. It was mentioned that students very rarely check the accreditation status of a programme before they register.

The system relies furthermore on threshold accreditation, so there is relatively little (or even no) comparative information available in the published documents with regard to differentiation in quality.

The committee has heard no complains about style and accessibility of panel reports and accreditation decisions.

The accreditation decisions have legal consequences and can be contested in court. All draft decisions are carefully scrutinized by a lawyer before they are finalized. Therefore the decisions are characterized by a rather formal style. Because of legal requirements, decisions regarding Flemish programmes are relatively more elaborate and legalistic.

5.5.2 Analysis

All reports and decisions are easily available to the general public. The students wish to have information about intended, negative decisions. The committee understands that this is formally impossible and not feasible given the negative consequences that publication of such a decision may have in case an appeal procedure is lodged and leads to overturning the initial accreditation decision.

The formal and even somewhat legalistic nature of the accreditation decisions is not conducive to NVAO's public information function, but the committee understands that there is hardly any possibility to change that.

5.5.3 Conclusion

NVAO fully complies with standard 2.5.

5.6 ESG 2.6 Follow-up procedures

Quality assurance processes which contain recommendations for action or which require a subsequent action plan should have a predetermined follow-up procedure that is implemented consistently.

5.6.1 Description

The accreditation system in Flanders and The Netherlands consists of threshold accreditation. This implies unconditional and dichotomous (positive – negative) decisions. Therefore, the decisions contain no recommendations for action and require no action plan that has to be executed as a condition for a subsequent positive accreditation. There is just a negative accreditation decision and the institution can be entitled to an improvement period during which the institution can improve the programme.²³ An institute can of course benefit from the panel's motivations (and sometimes recommendations) concerning the standards that are negatively assessed.

An element in the accreditation procedure is that in the self evaluation report the institution accounts for what has been done regarding shortcomings and recommendations recorded in the panel report of the last visitation/accreditation.

There have been however remarks (by umbrella organizations of institutions and by the quality assessment agencies) that there is – especially in the Dutch situation, due the harsh sanctions in case of a negative accreditation – some hesitation to formulate non-essential criticism and recommendations given NVAO's 'interference' and 'pro-activeness'.

5.6.2 Analysis

Given the principle of threshold accreditation there is logic in unconditional and dichotomous accreditation decisions. This does certainly not have to exclude the possibility of repair during an improvement period, but in the given system NVAO is not responsible for making recommendations or for developing, authorizing or implementing action plans. The responsibility for improvement lies solely with the institution; after the improvement period a new site visit will be held, leading to a new decision.

Strictly speaking there are no quality assurance processes in terms of standard 2.6 under responsibility of NVAO. Therefore NVAO cannot act in contradiction to this standard and so must be considered compliant.

The committee treats the element of 'interference' and 'pro-activeness' also in paragraphs 4.3 and 5.3. Suffice it to state here that there is indeed (as was also confirmed by NVAO) some erosion of the improvement function, but not to the point where it would be obsolete; furthermore, the standard does not refer directly to this matter.

There is however the matter of recommendations in the panel reports. One of the problems frequently mentioned to the committee is the negative incentives in the current NVAO system for accrediting agencies to provide

²³ As said earlier the regulations differ between Flanders and The Netherlands.

recommendations for improving/strengthening programmes to the institutions. The committee refers to reports of NVAO interpreting improvement recommendations as weaknesses, to the use of side letters to avoid arousing the suspicion of the NVAO, and to the overly legalistic format of the reports that reportedly discourage peers from offering suggestions for improvement.

This is relevant with regard to this standard, because if such recommendations appeared in the published accreditation reports they would permit future panels accrediting the same programme to follow up on the extent to which these recommendations were implemented and thereby help the overall accreditation process to better meet this standard.

It should be noted though, that the panel recommendations in no case have a conditional character as accreditation must always – in the Dutch and Flemish system – be unconditional. Therefore, the matter of the recommendations does not imply a less than full compliance to standard 2.6.

See also the discussion and recommendation of the committee in paragraph 4.1.

5.6.3 Conclusion

NVAO fully complies with ESG 2.6.

5.7 ESG 2.7 Periodic reviews

External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

5.7.1 Description

(Initial) accreditation within The Netherlands and Flanders is undertaken on a cyclical basis. The length of the various cycles differs. Accreditation takes place once every six years in The Netherlands and once every eight years in Flanders. In the case of new programmes, the accreditation is valid for six years (The Netherlands) and four years (Flanders) after the beginning of the programme. These cycles are clearly stipulated in Dutch and Flemish legislation and were published in advance

In the Self Evaluation Report NVAO advocates a harmonization of the cycles as follows: four year duration for an initial accreditation and six year cycle for accreditation.

The topic of harmonizing the cycles was discussed in various meetings. Umbrella organizations of institutions are generally in favour of longer cycles in order to reduce costs and administrative burden.²⁴

5.7.2 Analysis

Compliance is evident.

²⁴ In fact the committee understood that this was the reason in Flanders not to adopt the Dutch six year cycle for accreditation.

The committee feels that in a bi-national system a harmonization of cycles terms would be preferable. The committee elaborates on this matter in paragraph 4.4.4.

5.7.3 Conclusion

NVAO fully complies with ESG 2.7.

5.8 ESG 2.8 System-wide analyses

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments, etc.

5.8.1 Description

The Self Evaluation Report lists a number of activities of the NVAO with regard to this standard: visits to institutions, participation at conferences and workshops, publication of newsletters. Also is mentioned that there are many clustered assessments leading to comparative description and analysis (by the panels that execute the assessment – not directly by NVAO). In the week of the site visit NVAO presented the findings of a Research master review that investigated the significance of research master programmes for the universities in The Netherlands. A similar conference on the development of professional master courses in The Netherlands was scheduled shortly after the Committee's site visit.

In the meetings standard 2.8 has not explicitly been discussed, but the parties expressed their opinions about the outcome in terms of added information about programmes individually and in comparative respect.

The umbrella organizations of institutions and the student representatives mentioned that this outcome is somewhat meagre. Representatives of institutions argued that threshold accreditation has little extra information value as the overwhelming majority of the (publicly funded) programmes are above threshold level. They would prefer a system leading to more transparency about quality levels or characteristics *above* threshold level and about differentiation between programmes – though they oppose an evolution in the direction of (international) ranking. Students also stated that they wanted more differentiating information.

Another topic raised in the meetings with umbrella organizations of institutions and with the quality assessment agencies, was that NVAO does not (publicly) reflect upon the experience of the 1.350 accreditations that have been conducted to date. There appear to be no regular, formal publications of updates, guidelines, or recommendations with regard to the interpretation and operational aspects of the NVAO processes and procedures to help guide the actions of the accrediting agencies. Instead there were reports of many individual and uncoordinated contacts between the NVAO staff and the accrediting agencies as a means of conveying procedural information. While one might expect transparency and consolidation to increase over time, there appeared to be no perceivable improvement with regard to the amount and type of 'interference' and 'pro-activity' (see paragraph 5.3).

5.8.2 Analysis

As the description shows, NVAO contributes to the goals underlying standard 2.8. The substantial contribution however seems to stem from the comparative descriptions and analyses in reports from clustered assessments. Clustered assessment is the rule for all programmes in Flanders and for the university programmes in The Netherlands. Of course there is no need for NVAO to duplicate activities, but NVAO could fill the lacuna with regard to the programmes of the Dutch universities of applied sciences (where no comparative clustered assessments are done) and could draw up meta-analyses on the basis of clustered assessments.

The committee feels that NVAO could (and should) do more with regard to this standard. The extensive NVAO report on the Research Masters does provide evidence of a relevant capacity for system-wide analysis within the NVAO, but also raises the question of strategic priorities – why is so much time and effort being spent on this supplementary, less immediate issue, when so little effort appears to have been given to date on learning from and providing information to the agencies and institutions on means of improving the core processes of accreditation?

In discussion with the committee the NVAO executive board stated that NVAO would gladly produce system-wide analyses *if asked to do so by the government*. The reluctance to produce system-wide analyses was related to a hesitation to participate in the public debate given NVAO's role as a public decision maker. This fits in with NVAO perceiving itself primarily as an executive body, working upon instruction of the government. However, the standard requires agencies to produce system-wide analyses irrespective of a government instruction to do so. NVAO's attitude in this regards surprises the committee somewhat given their pro-active orientation in other respects. In the Self Evaluation Report NVAO does (rightly so, according to the committee) state that its 'informative role in respect of students, the labour market and society' is a point of attention. The committee is convinced that more attention for system-wide and comparative analyses would be beneficial for this information function, especially since umbrella organizations of institutes and of students have made remarks in that direction.

The committee considers here also the various complaints heard about NVAO's 'interference' (see also paragraph 5.3) and the fact that the relationship between NVAO and quality assessment agencies is characterized by certain tensions (see also paragraph 4.3). This also would warrant a system-wide analysis – as NVAO in fact touches upon in the Self Evaluation Report.

The committee however takes into account that NVAO is a relatively young agency, that the system is only a few years in operation and therefore has not produced much evidence for general analysis, that NVAO has a stated intention to embark on this kind of analysis in the years to come and that NVAO takes steps (e.g. the Research master project) to comply more to this standard.

5.8.3 Conclusion

NVAO partially complies with ESG 2.8.

5.9 ESG 3.1 (and section 2)/ENQA criterion 1: Use of external QA procedures

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

5.9.1 Description

There are – except in most cases of initial accreditation²⁵ – always two layers of external quality assurance:

- The external review of the programme by a panel from one of the quality assessment agencies.
- The external validation of the panel report by NVAO.

By means of the various accreditation frameworks and the *Guidelines for recognition of Quality Assessment Agencies*, and given its own validating role in the process, NVAO warrants that effective external quality assurance processes are present.

In none of the meetings the committee has heard any remarks to doubt the full compliance with this standard.

5.9.2 Analysis

See the analyses on the standards of Part 2 of the European Standards and Guidelines in paragraphs 5.1 up to and including 5.8.

Although the committee has made critical remarks with regard to standard 2.8, this is no reason to withhold the judgement of full compliance.

5.9.3 Conclusion

NVAO fully complies with ESG 3.1.

5.10 ESG 3.2/ENQA criterion 2: Official status

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

5.10.1 Description

The position of NVAO is explicitly and formally regulated in the legislation of both countries.²⁶

²⁵ As a rule the assessment is done by a NVAO panel; in The Netherlands it is however possible that an institution contracts one of the quality assessment agencies to assess the new programme.

²⁶ In The Netherlands, the tasks of NVAO are based on the Law regarding Higher Education and Research which, in short, comes down to: the accreditation of higher education programmes that are already offered in The Netherlands, initial accreditation of new programmes and giving advice on other matters concerning higher education policies.

From the meeting with representatives from the Committee of Ministers, and also from all the other meetings, it is evident that NVAO is regarded by all parties as a competent public authority.

The Self Evaluation Report makes it clear that NVAO strives to comply as fully as possible with the various legal requirements that may apply. In meetings with the executive board and NVAO staff, it became evident that lawyers play a significant role in this process.

In the Self Evaluation Report NVAO describes its involvement and contributions within the European Higher Education Area.

5.10.2 Analysis

That NVAO operates on a clear legal basis can easily be established.

The committee has not consulted other public authorities in the European Higher Education Area but it is evident from the description in the Self Evaluation Report (and individual members of the committee can attest to that) that NVAO is internationally regarded as an agency with responsibilities for external quality assurance.

There have been remarks (in meetings with the executive board and the umbrella organizations of institutions) that legal requirements (especially because institutions can appeal in court) tend to somewhat dominate, leading to more formalistic and legalistic decision documents and perhaps also distracting from a more content- and improvement-oriented approach. Although this issue is not pertinent to the evaluation of standard 3.2, it merits further discussion by the committee; see paragraph 4.1.

5.10.3 Conclusion

NVAO fully complies with ESG 3.2.

5.11 ESG 3.3/ENQA criterion 1: Activities

Agencies should undertake external quality assurance activities (at the institutional or programme level) on a regular basis.

5.11.1 Description

It is evident that NVAO undertakes external quality assurance activities on a regular basis and that is its core business, as evidenced by the 1.350 programmes that have been accredited so far. Within the current system, these are focused on the programme rather than the institutional level – although it follows from the various accreditation frameworks that aspects of institutional quality are considered in programme assessments.

5.11.2 Analysis

In a vast majority of cases the actual programme assessment is not directly being executed by NVAO but by panels from independent quality assess-

In Flanders, the operation of NVAO is established by the Law regarding the Higher Education Structure. This provides the legal basis for an international treaty that appoints the body that grants accreditations and carries out initial accreditation procedures. It stipulates that bachelor and master's programmes can only be offered by recognised institutions and if they have been (initially) accredited.

ment agencies. NVAO validates these assessments, not just in a formal and marginal way, but on the basis of an independent judgment. In parallel, there are a number of assessments that are done by NVAO panels. This concerns a substantial number of initial accreditations. Recently NVAO has executed the assessment and accreditation of associate degree programmes, which may be offered by Universities for applied science/University Colleges in The Netherlands during an experimental period. Because of the specific, layered system in The Netherlands and Flanders, NVAO is perhaps not a typical external quality assurance agency, which will be reflected in the range and division of assessment and accreditation activities, but its core business definitely consists of external quality assurance activities.

5.11.3 Conclusion

NVAO fully complies with ESG 3.3

5.12 ESG 3.4/ENQA criterion 3: Resources

Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

5.12.1 Description

NVAO is financed both by The Netherlands and Flanders (60% by The Netherlands and 40% by Flanders) and has an annual budget of approximately € 6 million. The total work force is about 35 fte. NVAO has four full time members of the executive board. The office is located in The Hague.

The committee was favourably impressed by the NVAO office and the facilities. The quality of the Self Evaluation report, the perfect organization of the site visit and the support given to the committee all attest to quality of the staff. The committee also saw a demonstration of the tailor made software application NVAO uses (together with several procedural handbooks) for a controlled processing of all accreditation applications.

In all meetings the discussion partners of the committee have stated that the quality of the staff is good to excellent and that the NVAO generally does quite a good job in handling the applications. Of course there is criticism at the system but this needs not be taken into account with regard to present standard.

One relevant criticism that has been made by umbrella organizations of institutions but also by NVAO in the Self Evaluation Report is that timeframes are regularly exceeded. In annex 3 of The Self Evaluation Report NVAO provides an analysis of the exceeding of time limits.

Finally many remarks have been made about the total costs of the system. This pertains not directly to this standard, but it is relevant to weigh the NVAO resources against the contribution by quality agencies and the institutions.

5.12.2 Analysis

The fact that time limits are transgressed is not due to shortage of resources; in periods of peak loads NVAO hires additional staff.²⁷

The reason is that the processing takes time, especially if additional information is needed. There is a relationship here with the issue of 'interference' and 'pro-activity' by NVAO as is shown in the analysis in the Self Evaluation Report.²⁸ The committee discusses that elsewhere (see paragraph 4.1 and 4.3). The analysis provided in the Self Evaluation Report shows that there are also other reasons (lying outside of NVAO).²⁹

Another reason for exceeding time limits lies in the fact that the Dutch applications (so far the overwhelming majority of cases) are not spread evenly over the year; most of these are handed in the month December, leading to a substantial peak burden.

This criticism about the time limits and its analysis in the SER are based on the Dutch experience since at the time of drafting the SER only less than 40 accreditations had been performed in Flanders. There is however a double discrepancy between the Dutch and Flemish legislation when it comes to time limits. Firstly, art. 5a.9, 4 of the Dutch Law on HE and scientific research imposes a time limit of 3 months, while art. 60, §1 of the Flemish decree concerning the restructuring of HE imposes a time limit of 4 months. Secondly, the time limits in the Dutch law are of what is called an orderly nature ("ordeterminen"). This means that they only give an indication about the time frame within which a decision has to be reached by NVAO. If NVAO exceeds the time limit there are no sanctions. In the corresponding article in the Flemish decree the time limits are of what is called a decay nature ("vervaltermijnen"). If the NVAO exceeds the time limit, there is a sanction and this sanction is the automatic extension of the earlier accreditation decision for a certain period. It is clear that this makes for a bigger stimulus for the NVAO to respect the time limits in Flanders.

The committee feels that a harmonization of (the character of) the time limits is advisable, in order to avoid that Flemish applications are structurally processed more quickly than Dutch applications.

²⁷ Applications for accreditation are not evenly spread over the year; about 60 percent of the Dutch applications are handed in in the month December.

²⁸ The following reasons for exceeding the time limit can be related to the issue of 'interference' and 'pro-activity':

- additional questions after the content analysis.
- additional assessments were requested.
- reports were rejected and the applications had to be resubmitted later with a new quality assessment agency report; the committee remarks that this of course can also be caused by inherent weaknesses in the quality of the report
- hearings.
- verification committees.

²⁹ This regards the following reasons for exceeding the time limit:

- file was not complete, additional information requested.
- substantive comments from the institution about the intended decision
- clustered processing of applications.
- reports were rejected and the applications had to be resubmitted later with a new quality assessment agency report.
- quality assessment agency reports submitted later than the application.

Not directly related to this standard, but relevant to mention is that the umbrella organizations of the institutions complained extensively about the total costs. They refer to the costs of the quality assessment agencies and their panels and to the internal costs (implementing quality assurance systems, drawing up of self evaluation reports, organising panel visits).

The committee could not get a reliable picture of the total costs, but institutions mentioned an amount of € 50.000 per programme (costs of agency and internal costs). This must be related to the validity (6 year in The Netherlands and 8 years in Flanders) and of course also to the number of students in the programme. It follows that in particular for small (master) programmes accreditation can be relatively expensive).

The debate of the (division of the) costs could be related to the layering of the system; see also paragraph 4.3. For the present standard this is without consequences.

5.12.3 Conclusion

NVAO fully complies with ESG 3.4.

5.13 ESG 3.5/ENQA Criterion 4: Mission statement

Agencies should have clear and explicit goals and objectives for their work, set down in a publicly available statement.

5.13.1 Description

The complete text of the NVAO mission statement is as follows: "The Accreditation Organization of The Netherlands and Flanders (NVAO) independently ensures the quality of higher education in The Netherlands and Flanders by assessing and accrediting programmes and contributes to furthering this quality. In addition, NVAO contributes to raising quality awareness within higher education and advancing the position of higher education in The Netherlands and Flanders in the national and international context."

The mission statement is not explicitly discussed in the meetings; however in none of the meetings (including the discussion with the representatives from the Committee of Ministers) remarks have been made that would suggest criticism of the mission statement or a transgression of the mission statement by the actual activities of NVAO.

5.13.2 Analysis

The mission statement is publicly available and is consistent with the goals and objectives set for the NVAO in the accreditation legislation of both countries.

5.13.3 Conclusion

NVAO fully complies with ESG 3.5.

5.14 ESG 3.6/ENQA Criterion 5: Independence

Agencies should be independent to the extent that they have both autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

5.14.1 Description

Legislation grants NVAO an independent and autonomous position. Of course NVAO has to operate within the system as it is given in the legislation. The Committee of Ministers supervises the functioning of NVAO, but has no power over NVAO operations or decision-making.

In Flanders the Minister has the authority to overrule a NVAO decision, but this does not affect the decision itself; it is an act *after* NVAO had made its decision.

Representatives of the Committee of Ministers have confirmed to the committee that NVAO is an independent executive body and not a government body subject to direct political influence on decision making in individual cases.

NVAO employs rules that board and staff members will not be involved in the processing or decision making of applications from institutions that they have been associated with in any form over a certain period.

In none of the meetings was hinted at a possible lack of independence or at any indication of third party influence upon NVAO decision making.

5.14.2 Analysis

The committee is convinced that autonomy and independence are adequately guaranteed.

Given the procedures the possibility of third part influence can effectively be ruled out:

- The processing of the applications is for instance highly formalized; all steps are controlled and archived by the software application NVAO uses.
- Every application is handled from the start by a team of a policy advisor and an executive board member, who both should have had no association with the applying institution for a number of years. Often one or two others persons are involved in the period before the application is scheduled for discussion in the executive board.
- At least at one point in the process there is a careful check by a lawyer.
- Every decision is discussed at least once in the executive board (four members, disposing of all relevant documentation) and every decision is validated by the general board.

Even if there were at any stage a certain amount of influence, it is highly improbable that it effectively could lead to a false positive.

5.14.3 Conclusion

NVAO fully complies with ESG 3.6.

5.15 ESG 3.7/ENQA Criterion 6 & 8: External quality assurance criteria and processes

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:

- A self-assessment or equivalent procedure by the subject of the quality assurance process.
- An external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
- The publication of a report, including any decisions, recommendations or other formal outcomes.
- A follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

5.15.1 Description

Processes, criteria and procedures used by NVAO are predefined and publicly available; this has already been established in 5.2 and 5.3.

In the (initial) accreditation procedure the first three steps mentioned in the standard can clearly be distinguished:

- The first step is the writing and submission of the self-evaluation report (in the case of accreditation) or the programme dossier (in the case of initial accreditation) by the institution.
- The second step is the actual site visit and the assessment by an external panel of a quality assessment agency.
- The third step is the decision-making by NVAO on the basis of the panel report. Report and decision are made public.

The fourth step (follow-up procedure) is not present as conditional accreditations are not possible within the Dutch and Flemish system. The committee has already discussed this in paragraph 5.6.

Student representatives have remarked that they would like to see a student member in panels for initial accreditation, which is now not the case. In cases of regular accreditations there is always a student member in the panel. NVAO executive board has explained that there is no student in initial accreditation panels as there is not yet a running programme with students enrolled.

5.15.2 Analysis

The committee refers to paragraph 5.2, 5.3 and 5.6.

The committee has no strong feelings about the student position in initial accreditation panels (in the sense that it might be considered a weakness), but points to the fact that the function of initial accreditation is to lead to a programme that will have students and that students could very well comment sensibly on various standards of the framework in a panel for initial accreditation. In this regard, the committee refers to the situation in Flanders where there is a student member in the Recognition Commission which performs the macro-efficiency check on behalf of the Flemish government. The macro-efficiency check in Flanders is the first step in the procedure by

which a HEI can be granted the right to organize a new programme leading to a legally recognised bachelor or master degree. Initial accreditation is the second step. If students are included in the first step, why then not include students in the following concrete assessment of the potential quality of the proposed new programme?

5.15.3 Conclusion

NVAO fully complies with ESG 3.7.

5.16 ESG 3.8/ENQA Criterion 7: Accountability procedures

Agencies should have procedures in place for their own accountability.
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5.16.1 Description

Both in The Netherlands and Flanders, institutions can lodge an appeal against (initial) accreditation decisions taken by NVAO. The appeal procedures are stipulated by law. There is the possibility of internal appeal (appeal at NVAO) and external appeal (appeal at court). Regulations and procedures differ between Flanders and The Netherlands. There have been a relatively small number of internal and external appeals.

From the outset, NVAO has developed a system for its internal quality assurance. Only recently this has taken on a more structured and cyclical character as one might expect for this type of agency. In fact this system only became operational in 2007 and must still prove itself.

Accountability is also determined by the way in which the various stakeholders are involved. In the structure of the NVAO the Advisory Council is of importance. This council consists of eleven members who represent NVAO's stakeholders. The Advisory Council's primary task is to provide advice – solicited or unsolicited – to NVAO on the general policy of NVAO. The Advisory Council meets twice a year on average. The Dutch members of the Advisory Council are appointed on the recommendation of the following organizations: The Netherlands Association of Universities of Applied Sciences (HBO-raad), the Dutch National Students Association (ISO), the National Union of Students (LSVb), the Platform of recognised private institutions (PAEPON) and the Association of Universities in The Netherlands (VSNU). The Flemish members of the Advisory Board are appointed on the recommendation of: the Flemish Interuniversity Council (VLIR), the Council of Flemish University Colleges (VLHORA), the National Union of Students in Flanders (VVS) and the Flemish Social and Economic Council (SERV).

The committee has had a meeting with this council.

Several statements made in other meetings (especially with the umbrella organizations of institutions) point to the fact that – although both board and staff members are open and accessible – NVAO seems somewhat 'insulated' when it comes to more formal communication about various aspects of the processes and operations.

The committee has for instance already mentioned the fact that 'great vagueness and uncertainty' were reported by some of the smaller agencies about the when, why and how of 'interference' (see paragraph 5.3).

5.16.2 Analysis

The committee considers the appeal procedures in balance with the interests that are at stake for the institutions. The committee has received no indication of any flaw in the appeal system. In the meeting with student organizations the criticism was mentioned that information about intended negative accreditation decisions ought to be public. In the present situation only final decisions are made public. The committee has touched upon this issue already in paragraph 5.5.

Experience with the internal quality assurance and evaluation system is understandably scarce, given the fact that it became operational in 2007. Nevertheless, there is a structured and differentiated system. From the presentation the committee received during the visit, the impression is that it is a rather 'heavy' and all-embracing system. The system should be granted the time to prove itself, but in the process a strategic priority on the core processes might be sensible.

The NVAO Quality Assurance Protocols show that NVAO is developing an approach to internal quality assurance that could help address some of the reported weaknesses, particularly with regard to the improvement of relationships with the accrediting agencies. The committee notes the following stated objectives in the Protocol with regard to quality assurance in accreditation:

"6. In 2006, the 'reduction of the accreditation burden' will take shape.

Measures will be developed to make the interaction between the various internal and external actors involved more efficient, more reliable and more transparent.

7. In 2006 and 2007, the procedures and actions will be examined internally to improve consistency, communication and the burden of tasks."

That said the committee still has some remarks to make. The documents suggest internal Quality Assurance activities were underway during 2006, but the committee heard little evidence of this. Furthermore the Quality Assurance Protocols all appear to have been recently approved (April 2007), although the referenced dates may represent recent actions taken on policy documents adopted at an earlier time.

Furthermore, the listed performance indicators for Accreditation emphasize 'satisfaction' with the process by the various parties. The public interest in accreditation (as well as the stated mission of NVAO), is not that relevant parties are satisfied, but that the process actually helps assure and improve academic quality. The test to NVAO of identifying performance indicators to measure such improvement is challenging, but no more challenging than what NVAO is asking of the institutions.

Finally, these Protocols, similar to the related internal Quality Assurance discussion in the SER, appear to give equal weight or importance to all internal Quality Assurance processes: initial accreditation, accreditation, international activities, management processes, etc. It should be obvious that internal QA on the accreditation processes is the highest and most immediate priority. Logically, strategic priorities should be established in implementing these internal QA processes, with the less important processes being phased in at a later point in time. The committee saw little evidence of this type of strategic priority setting during the visit and in the materials presented.

The committee has discussed the position of the Advisory Council to some length. Strictly speaking the discussion reflects more than just the topic of accountability and touches also upon the topic of governance. Given an executive board of four full time members meeting weekly and a general board of twelve members (including the executive board members) meeting once a month, the stakeholders in the Advisory Council (consisting of nine members and meeting two to three times a year) are in a rather weak and detached position and – such was the committee’s impression – is primarily reacting to an agenda set by the executive board.

The Advisory Council members have no clear relationship with the respective stakeholders’ parties and do not effectively function as a communications channel in that direction.

The committee strongly feels that NVAO might benefit more from a stronger and better positioned Advisory Council. More formal lines of communication with stakeholders are in order.

In this respect the question was raised whether it might not be helpful to have stakeholder members on the General Board. Especially student representatives made a point of this in the meeting with the committee.

In discussion with the committee the executive board strongly opposed this suggestion upon the grounds that it would affect the independency of the board and might lead to undesirable forms of influencing in specific cases. The arguments put forward by the executive board do not convince the committee as there are well known procedures to safeguard influencing (procedures NVAO in fact practices already in cases that might involve a conflict of interest given former positions of board and staff members). Furthermore, the committee feels that board positions for stakeholder parties might very well contribute to a greater support and to a more active participation in the development of the system which may be a serious issue given the risk of substantially decreasing benefits in a heavy system of programme accreditation based on threshold quality. (This risk is mentioned by the committee in paragraph 6.16.2). The committee deems this a potential weakness, and therefore cannot conclude that NVAO complies fully with this standard.

The review panel advises the ministers and the NVAO to include relevant stakeholders that are not yet represented, in the General Board, especially students. The inclusion of students in the board is an international good practice to which moreover the ministers responsible for higher education adhered to in their 2003 Berlin Communiqué.

Finally, the committee comments upon the quality of the panel members as deployed by the quality assessment agencies). The committee learned that there is not much serious peer training by the agencies. Generally there is not much more than an orientation or a short training of chairs. This requires attention from NVAO.

5.16.3 Conclusion

NVAO substantially complies with ESG 3.8.

5.17 Active contribution to ENQA aims

12. The agency is willing to contribute actively to the aims of ENQA (ENQA membership criterion).

5.17.1 Description

See also paragraph 6.11.

NVAO is an active member of various international networks in accreditation and quality assurance. NVAO participates in the annual General Assembly and as a rule is present at ENQA Workshops. In the last few years NVAO has participated in the Transnational European Evaluation Project II (TEEP II) and organized the meeting of the General Assembly of 2006 in Brussels. One of NVAO's Executive Board members is also an ENQA board member.

5.17.2 Analysis

As stated in paragraph 6.11 it can be firmly established that NVAO plays an active role on an international scale. Committee members, active within ENQA, confirm the active contribution of NVAO with regard to the ENQA aims.

5.17.3 Conclusion

NVAO fully complies with this ENQA membership criterion.

6. Findings ECA Code of Good Practice Compliance

In evaluating NVAO compliance with the ECA code of good practice, the committee will – to avoid redundancy and repetition often refer to related ENQA standards.

6.1 The accreditation organization has an explicit mission statement

See paragraph 5.13.

Conclusion: NVAO fully complies with ECA code of good practice 1.

6.2 The accreditation organization is recognised as a national accreditation body by the competent public authorities

See paragraph 5.10.

Conclusion: NVAO fully complies with ECA code of good practice 2.

6.3 The accreditation organization must be sufficiently independent from government, from higher education institutions as well as from business, industry and professional associations

See paragraph 5.14.

Conclusion: NVAO fully complies with ECA code of good practice 3.

6.4 The accreditation organization must be rigorous, fair and consistent in decision-making

See paragraph 5.3 and 5.4.

Conclusion: NVAO fully complies with ECA code of good practice 4.

6.5 The accreditation organization has adequate and credible resources, both human and financial

See paragraph 5.12.

Conclusion: NVAO fully complies with ECA code of good practice 5.

6.6 The accreditation organization has its own internal quality assurance system that emphasises its quality improvement

See paragraph 5.16.

Conclusion: NVAO fully complies with ECA code of good practice 6.

6.7 The accreditation organization has to be evaluated externally on a cyclical basis

NVAO is cyclically being evaluated by an external review committee to comply with ENQA and ECA membership regulations. This report is the first external evaluation of NVAO since it was established. It is expected that NVAO will undergo cyclical evaluations as required.

Conclusion: NVAO fully complies with ECA code of good practice 7.

6.8 The accreditation organization can demonstrate public accountability, has public and officially available policies, procedures, guidelines and criteria

See paragraph 5.1, 5.2 and 5.3.

Conclusion: NVAO fully complies with ECA code of good practice 8.

6.9 The accreditation organization informs the public in an appropriate way about accreditation decisions

See paragraph 5.5.

Conclusion: NVAO fully complies with ECA code of good practice 9.

6.10 A method for appeal against its decisions is provided

See paragraph 5.16.

Conclusion: NVAO fully complies with ECA code of good practice 10.

6.11 The accreditation organization collaborates with other national, international and/or professional accreditation organizations

6.11.1 Description

It will not come as a surprise that a bi-national agency as NVAO will have an explicit international dimension. The Treaty signed by the Dutch and Flemish governments by which NVAO was set up explicitly refers to the international dimension. An explanatory note underlines the importance of international transparency and independent quality assurance by stating that "a well functioning and internationally recognised accreditation system is a prerequisite to advance international comparability in higher education". The importance of the international dimension of NVAO has been stressed by the representatives of the Committee of Ministers in their meeting with the committee. The choice for co-operation between The Netherlands and Flanders fits with this international perspective. The Self Evaluation Report sums up the five major objectives NVAO has formulated as its international policy and describes the various activities undertaken by NVAO.

In all meetings parties stressed (to a greater or lesser extent) the importance of NVAO as a bi-national organization (as a first – albeit small – concretisation of the concept of a common higher education area). Sometimes it was expressed that an expansion with one or even more countries would be welcomed (although at the same time it was understood that the level of complexity would rise). The general feeling however in the meetings (those with NVAO board and staff excluded) was that the actual added value for institutes, student and labour markets is still relatively small.

6.11.2 Analysis

It goes unchallenged that NVAO is (fairly if not very) active in the international field. Committee members can attest to that on the basis of their own personal experience in the international field.

The committee is strongly of the opinion that it is valuable to have an effectively working bi-national agency. Despite certain shortcomings and even if the treaty would not be expanded or if the model would not be followed elsewhere, valuable lessons are to be learned from this Dutch-Flemish initiative.

It is easy to understand why the added value seems rather small to many of the discussion partners. Traditionally there has always been a relatively great cooperation between higher education institutions in The Netherlands and Flanders and there is already some mobility of students (though mostly one-way from The Netherlands to Flanders).

Another factor seems to be the fact that the system is based upon threshold accreditation. Most programmes meet these criteria and as only accredited programmes are on (publicly funded) offer there is as yet a limited impact for the general public and the labour market. The fact that there is a definite impact upon new programmes (via initial accreditation) is not readily obvious to the general public as this has no perceivable effect (because non-accredited programmes simply will not be started).

There is one area where the accreditation has a great impact and that is the private sector in The Netherlands. There is however no (substantial) private sector in Flanders offering bachelor and master programmes so this evident benefit of the system has no real bi-national relevance.³⁰

Of course these reflections do not detract from the ambition and contribution of NVAO in the international domain as are central in this element of the ECA code.

6.11.3 Conclusion

NVAO fully complies with ECA code of good practice 11.

6.12 Accreditation procedures and methods must be defined by the accreditation organization itself

6.12.1 Description

See paragraph 5.14.

6.12.2 Analysis

The aims and goals of the accreditation system are established by law. The formal establishment of the frameworks was done by the Dutch and Flemish ministers separately. The actual accreditation frameworks, procedures and methods have been developed by NVAO, within the boundaries of the two legislations. There has been no external political intervention in this process.

The committee feels that the way accreditation procedures and methods were defined is not in contradiction with the intention behind this element of Code of Good Practice.

6.12.3 Conclusion

NVAO fully complies with ECA code of good practice 12.

6.13 Accreditation procedures must be undertaken at institutional and/or programme level on a regular basis

See paragraph 5.7.

Conclusion: NVAO fully complies with ECA code of good practice 13.

³⁰ The extent of the private sector in Flanders is unknown, since until the decree of 2003 there was no registration procedure or tracking device. Since 2003 the degree titles of bachelor and master are legally protected and private HEI's wishing to grant them, have to be registered via a legal procedure and their programmes have to be accredited. At this moment there are only four registered HEI's.

6.14 Accreditation procedures and methods must include self-documentation/-evaluation by the higher education institution and external review (as a rule on site)

See paragraph 5.15.

Conclusion: NVAO fully complies with ECA code of good practice 14.

6.15 Accreditation procedures and methods must guarantee the independence and competence of the external panels or teams

See paragraph 5.14.

Conclusion: NVAO fully complies with ECA code of good practice 15.

6.16 Accreditation procedures and methods must be geared at enhancement of quality

6.16.1 Description

The committee refers to paragraph 5.1 and 5.4. There the committee concluded that procedures and methods are geared to the enhancement of quality. In the meetings with umbrella organizations of institutions and with quality assessment agencies it was confirmed that there is a positive influence upon the development of systematic internal quality assurance within the institutions. Furthermore there is agreement about the effect upon the quality of new programmes that institutions consider to offer. Despite remarks about 'interference' and 'pro-activeness' none of the parties present was of the opinion that NVAO is unduly harsh in the assessment of new programmes. Thirdly there is significant impact of the accreditation system upon the private sector.³¹ The quality enhancement function of the accreditation system is clearly visible in what is no less than a cleanup of a great many sub-standard programmes (many of which are withdrawn without even applying for accreditation) and in the enhancement of quality of the programmes on offer. There is ample evidence – as stated by the umbrella organization of the private sector and quality assessment agencies – of repair activities before and during the accreditation process.

Many parties (NVAO executive board included) however state that the improvement function for the majority of accredited programmes in publicly funded institutions is rather limited – which in the meetings was mostly blamed on the fact that the system is one of threshold accreditation. The committee doubts whether the quality improvement effects of the system will outlive the first round if this remains unchanged.

6.16.2 Analysis

There is evidently a positive effect of the accreditation system upon the (improvement of the) quality of the higher education programmes. Unfortunately the added value is not very visible, because it appears in a 'negative' way: new programmes that are not started, private programmes that are withdrawn, the implementation and development of internal quality assurance systems in the background.

³¹ This applies mostly to The Netherlands as in Flanders the private sector offering bachelor and master programmes is only marginal.

There is definitively some impact on the quality of existing programmes, but that impact is limited due to the threshold character of the accreditation. Pruning 'bad' programmes is fine, but what is done to improve the quality of all the other programmes? For many institutions the ambitions rank higher than merely offering programmes just above threshold quality. And in the same vein students (and labour market parties) would prefer more comparative positioning of programmes vis-à-vis one another on different scales of quality although the representatives of the Flemish national union of students clearly stated that this should not lead to any sort of ranking. These ambitions are to be praised and deserve support, but the committee feels that it is somewhat unfair to dismiss the initial impact on programme quality too quickly as only marginal.

This being said, the committee also has the strong feeling that the system as it has been set up will show strongly diminishing results after the first cycle. In the mid-long term, a system based on threshold-based (relatively short) cyclical programme accreditation is bound to yield decreasing benefits relative to the high costs over time (see also paragraph 5.16.2). As already stated, this does not mean that it is a 'wrong' system. More probable, this is a quite logical first phase in a developing process. It encourages institutions to establish sophisticated internal quality assurance systems; it clearly defines the threshold level and it effectively and quickly 'eliminates' sub-threshold programmes. These are certainly no insignificant benefits, but they are not sufficient in the long run. After the first accreditation cycle, all programmes will be up to standard and from then on the evolution of the programmes is no longer served by a 'negative' system (discouraging the offering of sub-threshold programmes) but will probably need a positive approach (promoting the continuous improvement of programmes). This requires attention to institution-wide quality assurance (which the current programme-oriented accreditations do not emphasize). It also requires that NVAO analyses the initial accreditations as well as the programme accreditations it has thus far completed and publishes information on lessons learned including identifying good and bad practices. Such information would serve the public and should be shared by NVAO. These types of structured enhancement activities would help benefit and improve the entire higher education system, public and private. The committee saw relatively little evidence of structured enhancement activities by NVAO and this was reflected in the lack of systematic analysis of the accreditation processes that might be used to inform and improve the activities of institutions and quality agencies.

With regard to the element of the code under discussion, the committee evaluates NVAO on the basis of the stage the development of quality assurance in the two countries is in.

The committee has a few times pointed out that the principle of 'threshold accreditation' is in some respects not very conducive to the improvement function. This does not mean, however, that the procedure is merely formal and not at all content-oriented. In this respect the committee points for instance to the fact that in all cases (except of course initial accreditation), as was understood from the quality assessment agencies, panel members read

and assess a number of student theses which is of course a strong content oriented assessment activity.

6.16.3 Conclusion

NVAO fully complies with ECA code of good practice 16.

7. Conclusions

In the letter of appointment to the members of the committee a fourfold assignment was given:

- "The review should establish that NVAO meets the criteria for full membership as laid down in Part 2 and 3 of the European Standards and Guidelines in Quality Assurance (ESG) in the European Higher Education Area, adopted by ministers in Bergen in 2005; part 1 being not applicable to NVAO."
- "The review should establish that NVAO meets the standards of the ECA Code of Good Practice."
- "NVAO is unique in being a bi-national accreditation organization. This implies that NVAO operates in two legislative contexts as a consequence of which various procedures and practices differ. We would welcome reflections of the review committee about the procedural and practical differences as well as any suggestions for further adjustments."
- "Both in The Netherlands and in Flanders an evaluation of the functioning of the accreditation legislation is foreseen. The findings of the review committee will then also be taken into account. This does not imply, however, that the review committee should review accreditation on a system level. The review only bears on the functioning of NVAO within the system, but we would welcome if the committee could dwell upon what we consider the most important function of the accreditation legislation, namely the enhancement of transparency and of public trust (on a national and international scale) in our systems of higher education."

In this final chapter the committee formulates the conclusions and recommendations for each of the four assignments.

7.1 NVAO compliance with ENQA/ESG

In the light of the documentary and oral evidence considered by it, the review committee is satisfied that, in the performance of its functions, NVAO is in compliance with the *ENQA Membership Regulations* and in substantial compliance with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area*. The Panel therefore recommends to the Board of ENQA that NVAO should have its Full Membership of ENQA confirmed for a further period of five years.

7.2 NVAO compliance with ECA Code of Good Practice

In the light of the documentary and oral evidence considered by it, the Review Panel is satisfied that, in the performance of its functions, NVAO is in compliance with the *ECA Code of Good Practice*.

7.3 Bi-nationality

NVAO is indeed a unique bi-national organization. The committee views the Treaty and the NVAO accreditation as a first example of a supranational higher education area. Of course it is not yet the envisaged European higher education area, but it is a step towards it and a step from which all European countries may learn.

The major lesson learned is that, notwithstanding all the legislative, political and cultural differences between two countries, it is possible to develop a

common accreditation system that is working quite efficiently in actual fact, thereby enabling, in principle, effective mutual recognition of programmes and diplomas.³²

It may be true that impact and effects are for the time being greater on each national scale. These impacts are substantial:

- Further implementation and development of adequate internal quality assurance systems within institutions
- Rigorous application of the criterion of threshold quality, leading to a 'weeding out' of sub-threshold programmes - with notable effects upon the programmes offered by private institutions.
- The benefits programmes receive from cyclical peer review that go beyond the level of mere threshold quality.
- The significantly raised quality of proposals for new programmes.

It may be also true that impact and effects are for the time being less impressive on the bi-national scale. There was already much cooperation between Dutch and Flemish institutions and the common accreditation system does not add very much to that. There was also already some student mobility between both countries and there is no visible effect that this is being increased by the common accreditation system.

This however is not surprising as we are talking about a system based on threshold quality and given the fact that the overwhelming majority of (publicly funded) programmes are (well) up to that standard.

The committee feels that the added value of a common system might be increased if it were more geared towards a more clustered approach and towards quality enhancement above threshold level. While in the present system all programmes are in a certain sense made equal (i.e. of threshold quality) this would allow for more differentiation within the accreditation process. Also there is a need for analyses that would identify common issues and challenges.

In the meetings umbrella organizations of institutions and student representatives were largely in favour of such a development.

The committee has already stated that it is not very likely that the current system can be effectively continued as is after a first full cycle (see paragraph 5.16). In this respect it is somewhat unfortunate that the first cycle will end earlier in The Netherlands than in Flanders.

The committee has understood that there are various legislative, political and cultural differences between the two countries that should be taken into account. There seems, however, to be some room for more harmonization:

- In Flanders there is a legal protection of titles that is absent in the Dutch situation. The committee considers protection of titles a necessary pre-

³² The Netherlands and Flanders have not yet made full use of the potential the joint accreditation system has. Neither in The Netherlands nor Flanders the degrees of the other country are automatically recognised. Graduates still have to file a request with the relevant authorities and have to go through a recognition procedure. It is for the moment unclear whether the status of accredited programme will make recognition easier and smoother.

- requisite for an accreditation system, certainly given the presence of private institutions offering HE programmes. See also paragraph 4.4.1.
- Sanctions in the case of a negative accreditation differ between the two countries. There is unanimous agreement among all parties consulted that the Flemish system (of a statutory repair period) should also be implemented in the Dutch system. See also paragraph 4.4.2.
 - In The Netherlands new programmes that apply for public funding have to be (initially) accredited before there is the so called macro-efficiency check. As only few programmes pass the macro-efficiency check, a lot of time, money and energy are in fact wasted in the process of initial accreditation. All parties the committee spoke to agree that 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 (validity of accreditation) differs between Flanders and The Netherlands. There appears to be no clear ground for this 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. For a more elaborate treatment of these suggestions see chapters 4.4.4 and 7.5.
 - Except for the sector of the Universities of applied science in The Netherlands, accreditation is based on clustered assessment. The committee is generally in favour of clustered assessment, because it adds valuable comparative information to the system of threshold accreditation. This however is not possible given the market situation in The Netherlands. Effective clustered assessment presupposes a monopoly situation as exists in Flanders and in The Netherlands for the universities. See also the reflection of the committee in paragraph 4.2. Although NVAO is bi-national, the quality assessment agencies are in fact organized on a national scale. The committee feels that the outcome of the system would benefit if there were clustered assessments on a bi-national scale.
 - Different time limits apply for the Flemish and Dutch applications; also the sanctions (in case NVAO does not adhere to the time limit) vary. This could lead to a situation in which NVAO pays more attention to Flemish applications. A harmonization could prevent this. See also paragraph 5.12.2.
 - External appeal differs between the two countries. If the Dutch and Belgian highest administrative courts were to take different positions regarding appeals, this could pose operational problems for the functioning of the accreditation system in practice and could enlarge rather than bridge the differences between the regulatory systems in both countries. A 'joint venture' could prevent this.

There is some disparity between the two countries. The Dutch HE system is substantially larger; the system was implemented at an earlier stage in The Netherlands and the NVAO office is located in The Hague. The committee feels that it is important to pay attention to such - politically sensitive - dif-

ferences. It would be important for NVAO to pay special attention to the Flemish stakeholders who need to feel as much part of the organization as their Dutch counterparts.

7.4 Enhancement of transparency and public trust

The accreditation system should lead to more transparency with regard to the quality of programmes and to an enhancement of public trust in higher education. The system certainly contributes to these goals, but only to a limited degree:

- Institutions see by and large not much of added value in a system of threshold quality. They would prefer a system that can differentiate in quality *above* that level.
- Owing to the system all programmes that are offered are of threshold quality. There is therefore not really a need for students to consult reports and decisions as there is little differentiating information. Student representatives told that they have the impression that students hardly ever consult the NVAO register of accreditation programmes. They stated that the system would improve if more comparative and differentiating information were available. Dutch student representatives would welcome rankings; the Flemish student representatives oppose this.
- The committee had the impression that the system is welcomed by employers (organizations), though not many representatives were present in the meetings. Threshold quality is certainly important for them.
- In The Netherlands there is an extra benefit that the system extends to the private sector. This is important both for students and employers. The committee however was surprised to learn that the bachelor and master titles are not protected by law in The Netherlands. Therefore the private sector can still offer non-accredited bachelor or master programmes. Of course students and employers can check whether any programme is NVAO-accredited, but the committee feels that a legal protection of titles is in order.

With regard to 'trust' the committee wants to address not only public trust in the system, but also the use of the element 'trust' within the system. There has been much discussion in the meetings about 'interference' and 'pro-activity'. Nobody challenges the position of NVAO to do more than just rubber stamping the panel reports. The impression however is one of rather low trust between NVAO, quality assessment agencies and institutions. This is not confined to the domain of the 'free market' (where it would perhaps be more understandable).

Agencies are – or at least should be – an element of the accreditation system: it is their task to produce independent panel reports. Given their independence they cannot and should not be viewed as part of the institution. The agencies are the 'data collectors' for the NVAO and not a public relations instrument of the institutions. To the extent that this is indeed the case (and it is the task of NVAO to make sure it is and to make the agencies collect the data NVAO needs), there should be trust in the working of the system. Of course not an unconditional trust but this trust should not as a rule be established in each case.

This could amongst other things imply that agencies should in no way help or consult institutes (to avoid that agencies later have to assess the quality

of their own consultancy). The committee did not delve deep into this matter, but the impression is that it is a thin line that is sometimes overstepped.

Paradoxically, as explained in paragraph 4.2, the Dutch market system seems more 'vulnerable'.

7.5 Further development of the system

The Committee has stressed the positive impact of the accreditation system in its first cycle: stimulating the awareness of the need for systematic quality control, inducing institutions to install systems of internal quality control, defining criteria for basic (threshold) quality which are internationally validated, getting rid of a large number of non-existent or sub standard programmes from commercial private institutions etc.

To secure this positive impact the governments should move to further develop the system in the following way.

Institutions that prove to have installed solid internal quality assurance systems (which should, in order to be solid, include some sort of independent peer review at programme level) could at the discretion of NVAO be given a longer duration of the validity of their accreditation at threshold level. In this respect an institution will then for some of its programmes for some longer period of time be 'self-accrediting'.

As far as threshold quality is concerned, NVAO should have the power to grant certain institutions for certain clusters of programmes, on the basis of strict criteria (e.g. the quality of internal quality assurance) and after a solid positive accreditation, a period of up to ten years of validity of the accreditation. It could also be decided that during these up to ten years the institution is for the programmes mentioned 'self-accrediting' and should give proof of this. For instance the institution could be obliged to present to NVAO after six years a 'mid-term review', organized by itself but including a peer review by an independent panel, or NVAO could do a mid-term review itself focussing on the state of the internal quality assurance system. The introduction of a well defined status of 'self-accrediting institution' may have very positive effects on the administrative burden and the inefficiency of the threshold quality system.

It would furthermore add to the flexibility institutions of higher education need if they are to more effectively serve society and the economy. They require the flexibility to respond to social demands by creating new programmes more quickly and efficiently than is now possible under the current accreditation regime. Many of the most distinguished universities in the world are self-accrediting institutions, including private and some public universities in the US as well as the universities in the Westminster countries (Australia, Canada, UK, etc.). These institutions thereby possess a competitive advantage over EU universities in their ability to develop innovative academic programmes. The EU Rectors increasingly recognize this disadvantage and are seeking comparable authority and flexibility in academic programme development. As EU national governments seek greater international visibility for their institutions of higher education, this problem will become more obvious, and is clearly related to the design of the accreditation system.

For this reason, the committee suggests that NVAO initiates a project to attempt to define the framework conditions (i.e. internal institutional accrediting/quality assurance system) that would be necessary for an institution of higher education to achieve self-accrediting status as well as the type of external assessment that would be necessary to award and assure such a status over time. While the creation of such an institutional status would be a political decision, by investigating the feasibility of formally defining such a classification as well as designing a process to assure appropriate public accountability for such a status, NVAO could make an invaluable contribution to likely future public policy debates. Establishing such an institutional status would obviously not preclude as now the state from requiring accreditation or special approvals for academic programmes in fields critical to the public interest such as medicine, veterinary medicine, teacher education, etc.

Creating such an institutional status and awarding it selectively following a suitably rigorous assessment, would create a powerful incentive for all institutions of higher education to develop effective internal quality assurance systems that would encourage the continuous improvement of academic programmes. Over time, such a classification could also help reduce the need for external accreditation of academic programmes.

The foregoing proposal of the committee does not imply abolishing the current subject-oriented accreditation system using peers. That characteristic of the current system is a vital one. Nor is the committee of the opinion that there are no other ways to improve the current system. Paragraph 4.3 has sketched a reform programme that would legally be less demanding. It would be however a missed opportunity if the concept of self accreditation would not be the subject of a feasibility study by NVAO.

8. Annexes

8.1 Glossary of acronyms

ECA	European Consortium for Accreditation in higher education
ENQA	European Association for Quality Assurance in Higher Education
ESG	European Standards and Guidelines
ISO	Dutch National Students Association
LSVb	National Union of Students (Netherlands)
NQA	Netherlands Quality Agency
NVAO	Accreditation Organization of The Netherlands and Flanders
QANU	Quality Agency Netherlands Universities
VHLORA	Council of Flemish University Colleges
VLIR	Flemish Interuniversity Council (Flanders)
VVS	National Union of Students (Flanders)

8.2 Members of the review committee

Helmut Konrad, Chairman

Former chairman of the Austrian Accreditation Council, former Board member ENQA, professor University of Graz.

Frans Leynse, committee member

Former chairman of the 'HBO-raad' (the Association of Universities of Applied science), member of the House of Lords of The Netherlands, Professor at the Open University in The Netherlands, Lector at the 'Hogeschool van Utrecht' (a University of Professional Education).

Marcel Crochet, committee member

Former rector of the University of Louvain-la-Neuve, advisor of the Minister of Higher Education of the French Community of Belgium.

Andrée Sursock, committee member

Deputy Secretary General in charge with quality assurance of European University Association (EUA).

Caroline Campbell, committee member

Director at the Quality Assurance Agency in higher education (QAA).

David Dill, committee member

Professor of Public Policy, University of North Carolina at Chapel Hill; Director of the Research Programme on Public Policy for Academic Quality.

Stephan Neetens, committee member

Student appointed by the Dutch and Flemish Student Unions.

Carlo Hover, committee secretary

Independent expert in quality assurance in higher education, The Netherlands.

8.3 Schedule of the site visit

Date	Time	Subject	Group	Participants
June 5	15.00 – 18.30	Preparatory meeting at NVAO	Review committee only	-
	19.00 – 21.00	Diner meeting	Review committee only	-
June 6	9.00 – 10.30	Committee interview	Executive Board NVAO	Mr. Karl Dittrich (NL: chairman NVAO) Mr. Marc Luwel (FL: vice-chairman NVAO) Mr. Guy Aelterman (FL: board member NVAO) Mr. Leendert Klaassen (NL: board member NVAO) Mr. Rudy Derdelinckx (FL: managing director NVAO)
	10.45 – 12.15	Committee interview	Staff NVAO	Mr. Henri Ponds (NL: policy advisor) Mrs. Michèle Wera (FL: policy advisor) Mr. Wim de Boer (NL: policy advisor) Mrs. Nancy Van San (FL: policy advisor) Mrs. Mirjam Woutersen (NL: policy advisor) Mr. Mark Frederiks (NL: international policy advisor)
	12.30 – 13.00	Committee interview	General Board NVAO	Prof. drs. J. Weitenberg (NL: board member NVAO) Mr. E. Derycke (FL: board member NVAO)
	13.00 – 14.00	Informal lunch meeting at NVAO	General and Executive Board NVAO	Mr. Karl Dittrich (NL: chairman NVAO) Mr. Marc Luwel (FL: vice-chairman NVAO) Mr. Guy Aelterman (FL: board member NVAO) Mr. Leendert Klaassen (NL: board member NVAO) Mr. Rudy Derdelinckx (FL: managing director NVAO) Prof. drs. J. Weitenberg (NL: board member NVAO) Mr. E. Derycke (FL: board member NVAO)
	14.00 – 14.30	Demonstration of NVAO handbooks and Xelion	Staff member NVAO	Mr. Rudy Derdelinckx (FL: managing director NVAO)
	14.30 – 15.30	Committee interview	VLIR and VLHORA (umbrella organizations Flanders)	Prof. dr. Joke Denekens (deputy vice-chancellor University of Antwerp, member VLIR)

Date	Time	Subject	Group	Participants
				Prof. dr. Ludo Melis (coordinator of educational policy Catholic University of Leuven, member VLIR) Mrs. A.-M. De Jonghe (managing director VLIR) Mr. Luc Van de Velde (secretary-general VLHORA) Mr. Frank Baert (managing director Catholic University College Sint-Lieven, board member VLHORA) Mrs. Flora Carrijn (managing director Lessius hogeschool, member general assembly VLHORA)
	15.45 – 16.45	Committee interview	VSNU (umbrella organization Netherlands)	Mr. Sybolt Noorda (chairman VSNU) Mr. Roelof de Wijkerslooth (vice-chairman VSNU)
	17.00 – 18.00	Committee interview	Paepon (umbrella organization Netherlands)	Drs. J.M. Winkelman (board member PAEPON) Drs. A.J.M. Bakker (managing director PAEPON)
	18.00 – 19.00	Committee interview	HBO-raad (umbrella organization Netherlands)	Mrs. Joke Snippe (board member INHOLLAND) Mr. Erwin van Braam (head general policy affairs HBO-raad)
June 7	9.00 – 10.30	Committee interview	NQA, Hobéon, Certiked and QANU (quality assessment agencies Netherlands)	Mr. Eus Schalkwijk (managing director NQA) Mrs. Nel Göbel (panel secretary NQA) Mr. Luuk van de Veen (panel secretary NQA) Mr Rob Stapert (panel secretary Hobéon) Mr. Jan Veldhuis (chairman QANU) Mr. Chris Peels (managing director QANU) Mr. Frank Wamelink (education coordinator QANU and panel secretary QANU)
	10.45 – 12.15	Committee interview	VLIR and VLHORA (quality assessment agencies Flanders)	Dr. Steven Van Luchene (staff member quality assessment department VLIR) Mrs. Magalie Van Lishout (staff member quality assessment department VLIR) Mr. Pieter-Jan Van de Velde (staff member quality assessment department VLIR) Mrs. Veerle Hulpiou (staff member quality assessment department VLIR)

Date	Time	Subject	Group	Participants
				Christiane Vanvinckenroye (coordinator Quality Assurance VLHORA) Floris Lammens (staff member Quality Assurance VLHORA) Paul Garré (managing director Education and Quality Assurance European University College Brussels (EHSAL), member steering committee Quality Assurance VLHORA)
	12.30 – 14.00	Lunch meeting at NVAO	Advisory council NVAO	Mr. P. Verboven (FL: VOKA - Chambers of Commerce and Industry) Prof dr. P. Geerlings (FL: VUB - Vrije Universiteit Brussel) Mr. T. Martens (FL: Leuven University College) Mr. J. Mijs (NL: LSVB - National Union of Students in The Netherlands)
	14.15 – 15.30	Committee interview	Dutch and Flemish student organizations	Mr. Sebastiaan den Bak (NL: chairman ISO) Mr. Bart Buijs (NL: board member ISO: educational quality) Mrs. Fabienne Hendricks (NL: newly appointed board member ISO: educational quality) Mrs. Inger de Bruin (NL: board member LSVB) Mrs. Lisa Westerveld (NL: newly appointed board member LSVB) Mrs. Joanneke Krämer (NL: newly appointed vice-chairman LSVB) Mr. Jan Fabry (VL: Member VVS) Mr. Geert Noppe (VL: Member VVS)
	17.00 – 18.00	External visit	Haagse Hogeschool	Mrs. E. Verhoef (executive board member Haagse Hogeschool) Mrs. M. v.d. Werke (director Academy of Health) Mr. G. de Ruiter (director Academy of ICT & Business Information Technology) Mr. M. Wiersma (director Academy of Masters) Mrs. F. Brouwer (staff member)

Date	Time	Subject	Group	Participants
	18.00 – 19:00	External visit	Haagse Hogeschool	Mr. S. van Leeuwen (student) Mrs. M. de Keijzer (student) Mr. M. Gravesteijn (student) Mr. G. Nijhuis (teacher) Mr. R. v.d. Lans (teacher)
	19.00 – 20.00	Defining final clarification issues	Review committee	
	20.30 – 22.00	Diner meeting	Ministry of Flanders and The Netherlands	Mr. Dirk Van Damme (FL: Director of Cabinet of the Flemish Minister of Work, Education and Training) Mr. Noël Vercruysse (FL: Senior Policy Advisor Flemish Ministry of Work, Education and Training) Mr. Frans de Zwaan (NL: Senior Policy Advisor Department Governance)
June 8	9.00 – 13.00	Formulating report and preliminary findings	Review committee only	
	13.00 – 14.00	Lunch and final clarification issues	Executive board NVAO	Mr. Karl Dittrich (NL: chairman NVAO) Mr. Marc Luwel (FL: vice-chairman NVAO) Mr. Guy Aelterman (FL: board member NVAO) Mr. Leendert Klaassen (NL: board member NVAO) Mr. Rudy Derdelinckx (FL: managing director NVAO)
	14.00 – 15.00	Presenting preliminary findings	Executive board and staff NVAO Ministry of Flanders and The Netherlands	Executive board and staff NVAO Mr. Noël Vercruysse (FL: Senior Policy Advisor Flemish Ministry of Work, Education and Training) Mr. Frans de Zwaan (NL: Senior Policy Advisor Department Governance)