

Report of the Panel of the external review of NVAO
September 2012

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Summary

Having assessed various documents and oral evidence through a site visit, the Panel is convinced that NVAO acts in compliance with the ENQA membership regulations and is in substantial compliance with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area*. The Panel therefore recommends to the Board of ENQA that NVAO's Full Membership of ENQA be confirmed for a further period of five years.

The Panel concludes that NVAO fully complies with the ENQA membership criteria 2, 3, 4, 5, 6, 7 and 8 and substantially complies with the ENQA membership criterion 1.

A list of the recommendations of the Panel is provided in section 5.2 but, in short, the main areas for further improvements relates to public information in various senses and to the formulation of explicit and public criteria about how NVAO reaches its accreditation decisions in relation to the programme assessments in all cases.

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

1 Background and outline of the review process

ENQA's regulations require all full member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they fulfil the membership provisions. In November 2004, the General Assembly of ENQA agreed that the third part of the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) should be incorporated into the membership provisions of its regulations. Substantial compliance with the ESG thus became the principal criterion for Full membership of ENQA.

This is the report of the review of NVAO undertaken in June 2012 for the purpose of determining whether the agency meets the criteria for full membership of ENQA. The process in general, including the structure of the present report, was run in accordance with the *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area*.

The present review of NVAO has been coordinated by ENQA. This is the second external review of NVAO according to the ESG. The first review took place in 2007.

The Panel for the 2012 external review of NVAO, appointed by ENQA, was composed as follows:

- Tove Blytt Holmen, Director of the Department of Quality Assurance, NOKUT, Norway (Chair)
- Signe Ploug Hansen, Director of Methodology, EVA, Denmark (Secretary)
- Julian Tobias Hiller, Student at Leibniz University of Hannover, Germany
- Elie Milgrom, Emeritus professor, consultant in professional development of teaching staff, Belgium
- Dr. Norma Ryan, Director of the Quality Promotion Unit, University College Cork, Ireland

The Panel was provided with ENQA's Terms of Reference (ToR), including a suggested timeline (see annex A). A short presentation of the Panel members is provided in annex B.

NVAO produced a self-evaluation report (SER) which, together with the attachments to it, provided a substantial portion of the evidence that the Panel used for its analysis and to reach its conclusions. The Panel conducted a site visit to validate the statements made in the self-evaluation report, to clarify any points at issue, and to obtain further relevant documents. For an overview of assessed documents, see annex C. Before finalising the report, the Panel provided an opportunity for NVAO to comment on the factual accuracy of the draft report.

The Panel confirms that it was given access to all the documents it requested and to all people it wished to consult with throughout the review.

2 Glossary of acronyms

ECA: European Consortium for Accreditation in Higher Education

ENQA: European Association for Quality Assurance in Higher Education

EQAR: European Quality Assurance Register for Higher Education

EVA: The Danish Evaluation Institute

ESG: Standards and Guidelines for Quality Assurance in the European Higher education Area

HEI: Higher Education Institution

NOKUT: Norwegian Agency for Quality Assurance in Education

NVAO: The Accreditation Organisation of the Netherlands and Flanders

QANU: Quality Assurance Netherlands Universities

SER: Self-evaluation report

ToR: Terms of Reference

VLHORA: The Flemish Council of University Colleges

VLIR: Flemish Interuniversity Council

3 Introduction

i. Purpose(s) of the review

In its SER dated April 16th 2012, NVAO describes its “main objectives” for the review as follows:

1. Renewal of NVAO’s full membership of ENQA and extended EQAR-registration.
2. A first external reflection on the new accreditation system in the Netherlands.
3. Contribution to NVAO’s internal quality monitoring.

ENQA’s ToR, dated February 2012, identifies the review of NVAO to be a type A review. However, the ToR also stated: *“In addition to ... the review aims to give a first external reflection on the new accreditation system in the Netherlands.”*

When asking ENQA for clarification on its mandate, the Panel received the following answer: *“... NVAO would like to know from the Panel whether the new system is fit for the purposes NVAO wants to achieve, in accordance with the ESG/ENQA membership criteria and which advice could be given to improve it ...”*

Furthermore: *“... There are no particular expectations on the Panel for n.3 as this is not part of the purposes agreed between ENQA and NVAO. ... what is meant by “Contribute to NVAO’s internal quality monitoring” is that the overall result of the review, all Panel’s recommendations will contribute to the agency’s quality monitoring.”*

The Panel understands its mandate was to conduct a type A review where the focus has to be upon the current status and not upcoming developments (as per *“Guidelines for external reviews ...”*), i.e. it should investigate programme accreditation in Flanders and the new approach in the Netherlands combining institutional audit and programme accreditation. The Panel’s reflections around the new system in the Netherlands will concentrate upon whether the system supports the ESG or whether it incorporates elements that are in contradiction with the ESG.

The Panel finds it important to point out that it has decided to rely upon the assessments made in the first ENQA review of NVAO in 2007 in relation to those general characteristics that have not changed between 2007 and 2012.

Being the accreditation organisation for both Netherlands and Flanders, NVAO is the body which makes all the accreditation decisions. However, the assessments of existing programmes on which the programme accreditation decisions of NVAO are based are carried out by other quality assurance bodies. Some of these are members of ENQA as a result of evaluations similar to the present one. The Panel has noted that VLHORA, VLIR and QANU have all undergone independent external reviews (in 2008, 2009 and 2010 respectively) and have been reviewed specifically with regard to their alignment and compliance with the ENQA membership criteria and thus the relevant sections of the ESG. The Panel has decided not to re-visit these assessments or to question the evidence presented in those assessments but to accept the decisions of the review panels that conducted those assessments. Thus in those topics of relevance to this Panel in its review of NVAO, the Panel took as read the compliance of these agencies

and accepted the credentials and expertise of these agencies in relation to the quality assurance activities undertaken.

As regards the relation between NVAO and the quality assurance agencies the Panel finds it important to note that the agencies are not perceived as subcontractors to NVAO neither by NVAO, nor by the agencies themselves, nor by the Panel. In various dictionaries a subcontractor is generally defined as an individual or in many cases a business that signs a contract to perform a part or all of the obligations of another's contract. In its decision making of existing programmes, NVAO has to build upon quality assurance performed by other agencies as regulated by law and the assessments undertaken by the agencies are thus not based on a contract with NVAO. In case of assessments of new programmes and institutional assessments NVAO performs external quality assurance by its own panels.

ii. The place of NVAO in the quality assurance structure of its jurisdiction

This subsection and subsection iii are largely based on the background information provided in the SER of NVAO. All external stakeholders interviewed during the site visit expressed the view that the SER provides a reliable and adequate presentation of NVAO and the systems of external quality assurance in the Netherlands and Flanders and the Panel is thus confident that the information provided in the SER is fully reliable.

NVAO, the Accreditation Organisation for the Netherlands and Flanders [*Nederlands-Vlaamse Accreditatieorganisatie*] was formally established by the Dutch and Flemish governments as a bi-national organisation on February 1st 2005. NVAO is thus the official, public and bi-national accreditation organisation in the Netherlands and Flanders. NVAO covers all types of higher education institutions (HEI) within its geographic domain. By law accreditation is the model for quality assurance.

The primary assignment of NVAO is defined in the Treaty between the Dutch and Flemish Education ministers of 2003, which is described as:

The primary assignment of NVAO is to accredit existing programmes in higher education (accreditation) and to assess new programmes (initial accreditation) in the Netherlands and Flanders. NVAO can be requested to carry out additional tasks by the Ministers of higher education in both countries if these assignments support or supplement NVAO's primary assignment.

In the Netherlands, the first accreditation system was operational from 2003 to 2010, in Flanders from 2005 to 2012. So the Netherlands has already made the transition to the new system and it is expected that Flanders will follow in 2013 for programme accreditation, while implementing institutional reviews in 2015.

Until the end of 2010, the accreditation system both in the Netherlands and Flanders was based exclusively on (initial) **programme** accreditation. In Flanders, this system is still current, at least until the end of the academic year 2012 – 2013 (what will happen later depends on pending legislation). Since January 1st 2011, a new accreditation system based on **institutional** audit

combined with (initial) programme accreditation was introduced in the Netherlands.

iii. The main functions of NVAO, its current main areas of responsibility and work, including the review methods it uses

(Initial) programme accreditation

Programme assessment and accreditation is the core of both the accreditation system still in place in Flanders and the new system in the Netherlands.

The framework for assessments of existing programmes still in place in Flanders comprises six themes. The six themes are subdivided into 21 standards that are assessed on a four-point scale (excellent, good, satisfactory and unsatisfactory). For assessing at theme level a dichotomous scale is used (satisfactory or unsatisfactory), as is the case for the final assessment. A very similar assessment framework is applied for accreditation of new programmes. In case of negative decisions of existing programme accreditation a recovery period of maximum 3 years is possible.

In the new system in place in the Netherlands the final judgement of a programme is based on a four-point scale (Excellent, Good, Sufficient and Insufficient); this scale is applicable both on the level of a study programme and on the level of the separate standards of the framework. The number of standards depends on the framework applied (cf. below)

The new system for programme accreditation in the Netherlands contains a recovery period and an elaborated procedure for initial accreditation; if a new programme is approved, NVAO can restrict the duration of the initial accreditation and subject it to conditions that have to be met within one year. In case of accreditation the recovery period is limited to two years.

The new institutional audits in the Netherlands

The new institutional audits in the Netherlands concern the assessment of an institution's quality assurance system and ultimately lead to a judgment about whether an institution is in control of the quality of its education programmes.

These audits comprise five standards and can have three possible outcomes: satisfactory, conditionally satisfactory and unsatisfactory. A final conclusion that is either 'satisfactory' or 'conditionally satisfactory' means that the assessment of the programmes follows the framework of the so-called 'limited programme assessment'. This framework contains only three standards.

If an institution fails the institutional audit or if it does not want to participate in it for specific reasons (for example, the limited size of an institution), the programmes will be assessed on the basis of the framework of the so-called 'extensive programme assessment' which contains more standards than the framework of 'limited programme assessment' and strongly resembles the framework for programme assessment in place in the Netherlands before 2011 and still in place in Flanders.

The role of NVAO

NVAO performs all processes related to the institutional audits in the Netherlands and initial programme accreditation in both the Netherlands and Flanders. NVAO

also has the authority to make all the accreditation decisions for existing programmes, both in Flanders and in the Netherlands. Accreditation decisions on existing programmes are made upon quality assessments and reports from quality assurance agencies, some of which are also ENQA-members.

The role of NVAO, the division of labour between NVAO and the quality assurance agencies and the details of the review methods used are presented in various sections of chapter 4.

iv. NVAO's engagement with the ENQA membership provisions/ ESG

In its assessment frameworks, NVAO explicitly states that its standards have been developed in accordance with the ESG.

NVAO also has an active internationalization policy and real engagement regarding higher education and quality assurance promoting ENQA, ECA and ESG in many ways.

v. Methods employed by the Panel

The Panel was appointed in May 2012 and received the Self Evaluation Report (SER) of NVAO at the same time. The SER and its attachments were analysed by each of the Panel members before the site visit and the Panel discussed the individual findings during its preparatory meeting, the day before the site visit. The site visit took place on June 26th and 27th 2012 in the NVAO offices in The Hague. NVAO drew up the programme for the site visit in close cooperation with the chair and secretary of the Panel. The programme included interview sessions with 36 people, including the chairman and members of the NVAO Executive Board and General Board, the NVAO managing director and a number of staff members, representatives of the Advisory Council of NVAO, representatives of umbrella organisations of higher education institutions, representatives of student organisations, representatives of quality assurance agencies and representatives of Dutch and Flemish ministries of higher education. The management of NVAO informed the Panel that the external stakeholder interviewees were selected by the organisations they represent and that the NVAO staff interviewees were selected according to the criteria provided by the Panel. All those interviewed had read the SER and most stakeholders had been given the opportunity to comment on a draft version of it.

The SER contains valuable insights and statements. The Panel would, however, have appreciated to have been provided before the site visit with more factual, detailed evidence e.g. linking NVAO's standards and procedures more explicitly with the ESG.

The SER, its attachments and added documentation constituted the frame of reference for the interviews during the site visit, which in turn provided further oral evidence related to the written documentation.

The Panel appreciates the fact that a number of relevant documents, originally in Dutch, were provided in an English translation and also notes that the assessment and accreditation reports (to be found on NVAO's web site) and several additional documents provided during the site visit were available in Dutch only. In order to assess the content of specific reports available only in Dutch, these reports were read and described to the Panel by the sole Panel member who understands the language.

After the second day of the site visit, the Panel held an internal meeting where it agreed on the preliminary conclusions related to level of compliance of NVAO in relation to each of the standards in part 2 and 3 of the ESG. The secretary of the Panel then drafted the report in cooperation with the rest of the Panel. The draft report was submitted to NVAO for factual verification on August 27th, 2012 and with reference to ENQA standards NVAO was given two weeks to comment on the report. The final report was submitted to ENQA on September 28, 2012.

In relation to its conclusions, the Panel finds it important to note that it has assessed NVAO's level of compliance with the standards and also taken into account NVAO's practice in relation to some of the indicators listed in the guidelines. It has also provided a number of recommendations. It is the ambition of the Panel that this approach reflects the new policy for external reviews of agencies decided by the ENQA board which came into effect on July 1st, 2011. The policy states (among other things) that the enhancement aspect of the reviews shall be strengthened in the second round and the agency thus be given more recommendations for further development than in the first round of reviews.

The panel has decided to present its understanding of the main points of the standards and/or the guidelines in the subsections labeled "key elements" in chapter 4.

vi. The national (and international) context of the review

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

Acknowledgement

The Panel would like to thank formally all those that engaged in the process, including all stakeholders who were generous with their time, feedback and insights. The hospitable and open approach by the management and staff of NVAO was very much appreciated by the Panel.

4. Compliance with the ENQA membership criteria linked to the relevant European Standards and Guidelines (ESG)

4.1 ENQA criterion 1 - Activities (ESG 3.1, 3.3)

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis. 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. *The external quality assurance activities may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.*

Key elements

Concerning the key elements "quality assurance activities", "a regular basis" and "core function" they are concrete and perceived in the same way by all. They are fully met by NVAO's accreditation through the 6/8 year cycle and the fact that NVAO either conducts the quality assurance exercise itself and makes the accreditation decision (institutional audits in the "new" system in the Netherlands, initial programme assessments in both NL and FL) or makes decisions on the basis of the quality assessments performed by quality assurance agencies (assessments of existing programmes in both NL and FL).

The second paragraph: "... should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the ESG" refers to ESG Part 2 (8 standards), which again refers to ESG Part 1 (7 standards), each standard having a variable number of guidelines.

Evidence and analysis

NVAO's compliance with these standards was considered as fully met in the ENQA review of 2007. The Panel relied upon the assessment made in this first ENQA review of NVAO in relation to general characteristics that have not changed. Where relevant, the Panel has also taken into account the ENQA reviews of QANU, VLHORA and VLIR.

Reporting on the level of compliance by NVAO with the ESG Part 2 in the following section is structured in accordance with each of the standards 2.1 to 2.8: sections 4.1.1 to 4.1.8 below contain these assessments. NVAO's level of compliance with ESG 3.1 is linked to compliance with ESG 2.1 – 2.8.

Recommendations

The recommendations of the Panel are presented at the end of each main section of chapter 4. The first set of recommendations is thus listed at the end of section 4.1

4.1.1 ESG 2.1 Use of internal quality assurance procedures

Standard

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.

Key elements

“the effectiveness of internal quality assurance processes”, “described in Part 1”.

Evidence

Assessment of the HEI’s internal quality assurance is a major focus in the Dutch framework for institutional audits (standards 3, 4 and 5). Internal quality assurance processes are also incorporated as a separate theme (theme 5) in both the Flemish (initial) accreditation frameworks and in the Dutch framework for extensive (initial) programme accreditation.

Each of the quality aspects included in the standards contained in the Part 1 of the ESG are included in at least one of the frameworks for assessment. The frameworks are complementary to each other.

NVAO is responsible for all processes in relation to the new institutional audits in the Netherlands and the assessment of new programmes in both the Netherlands and Flanders. In both the Netherlands and in Flanders, NVAO is also responsible for accreditation decisions on existing programmes as well as for specifying frameworks for assessment to be applied by the quality assurance agencies and their panels. These frameworks are formulated by NVAO in consultation with, among others, these quality assurance agencies. In the process of assessing the reports related to assessments of existing programmes, NVAO checks according to the SER and interviews during the site visit whether the agencies truly adhere to the frameworks.

The conclusion reached in the reviews of QANU, VLHORA and VLIR are that these agencies fully comply with ESG 2.1

Analysis

Both the documentary and orally presented evidence are convincing.

Besides the frameworks for assessments of which the ones in use in the Netherlands contain explicit references to the ESG, the Panel has been provided with tables showing the relationship between the focus in each of the different forms of assessments and the ESG Part(s) 1 (and 2). During the site visit, both the executive board of NVAO and staff members stressed that the new Dutch system for external quality assurance has been developed specifically to be aligned with the ESG. It was confirmed that institutional audit examines the quality assurance within each HEI as a whole.

Indications for the effectiveness of the focus on internal quality assurance of HEIs is provided by the fact that representatives from the Dutch ministry expressed the view that one of the main achievements of the new system for external quality assurance in the Netherlands is that it contributes to the improvement of the internal quality assurance within institutions. The General

Board expressed the view that there is an increasing emphasis on development of a quality culture in all HEIs, and similarly the umbrella organisations of the HEIs in the Netherlands expressed the view that the institutional audits are useful in encouraging debate within institutions regarding the overall mission, strategic directions etc.

With respect to Flanders, the Panel considers that the fact that VLIR and VLHORA both have been accepted as full ENQA members is sufficient proof that they pay due attention to Part 1 of the ESG in their own processes and thus provides further support to the conclusion reached by the Panel.

Conclusion

NVAO fully complies with ESG 2.1.

4.1.2 ESG 2.2 Development of external quality assurance processes

Standard

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.

Key elements

Developing aims and objectives of quality assurance processes involving stakeholders, “published with a description of the procedures to be used”, no unnecessary interference with normal work (the latter is from the guidelines).

Evidence

According to the SER presented by NVAO and confirmed by those interviewed during the site visit, both the frameworks still in use in Flanders and the new frameworks for accreditation and institutional audit in use in the Netherlands were designed in consultation with representatives of institutions, quality assurance agencies and other assessment experts. Moreover, the new frameworks used in the Netherlands were designed with reference to a thorough evaluation of the previous system, followed by various forms of discussions with external stakeholders and a subsequent pilot-test among a number of higher education institutions and study programmes in both the Netherlands and Flanders.

The frameworks were then discussed in parliament and after being decided upon they were published online on NVAO’s website well before the start of the implementation of the systems in both countries. The frameworks include a description of the procedures to be used. The frameworks for the Netherlands also contain a very short and general description of the aims and objectives of the processes, but a similar description is not part of the current Flemish frameworks. The aims and objectives of the processes in both the Netherlands and Flanders are described indirectly, but not specifically, in NVAO’s new Strategic Policy Statement, which has been published on NVAO’s website after the Panel’s visit.

According to both the SER and those interviewed during the site visit, an explicit ambition of the new system, and something NVAO has committed itself to

achieve, is that it should lead to a 25% reduction of the administrative burden involved in programme assessments. The idea is that this reduction is to be achieved by the way limited programme assessment and IA complement each other. Process oriented aspects that programmes have in common or which are organised at a higher level, such as facilities and systems of internal quality assurance, are (NL) or will be (FL) assessed once in the institutional audits and not repeated at programme level anymore.

Analysis

The impression of the Panel is that all relevant stakeholders, including HEIs, have indeed been involved in the development of the assessment frameworks. As noted in the external review of NVAO of 2007, the evaluation of the level of compliance in relation to this standard has to take into account the fact that accreditation in Flanders and The Netherlands is regulated by law. This implies that the global aims and objectives have been determined in a democratic process by legislation and that the frameworks have been approved by the respective ministers. In this process the impression from the SER and the interviews during the site visit is that the frameworks that were developed by NVAO do take into account comments made by the stakeholders.

The fact that the frameworks do not contain explicit statements of the aims and objectives of the assessment processes surprises the Panel and is a shortcoming, but since the aims and objectives are presented elsewhere (albeit not very publicly) and since all relevant stakeholders have been involved in the design of the processes, the Panel does not find this to be a critical issue in relation to the overall assessment of NVAO's level of compliance with ESG 2.2 in itself. However, NVAO has an improvement potential in presenting aims and objectives in basic introductory parts to each of their frameworks: What kind of effects (control and/or enhancement) are aimed for connected to each accreditation procedure. Such an element would also facilitate the understanding of the design of the processes (section 4.1.4)

In its SER, NVAO demonstrates that it is aware of the fact that it may take some time before the 25% reduction of administrative burden will be achieved as the implementation of the new frameworks implies that institutions and programmes have to get used to the new information files and self-evaluation reports. But by having set this ambition and committed itself to achieve it and play an active role in monitoring whether the aim will be achieved, the Panel is convinced that NVAO does what it can to ensure that the demands on institutions are no greater than what is necessary for the achievement of the objectives of the new system.

Conclusion

NVAO substantially complies with ESG 2.2.

4.1.3 ESG 2.3 Criteria for decisions

Standard

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

Key elements

“formal decisions”, “explicit published criteria”, “applied consistently”.

By “formal decisions” the Panel understands this to refer to the accreditation decisions that are executed by NVAO on the basis of their own assessments (institutional audits in the Netherlands and initial programme assessments in the Netherlands and Flanders) and assessment reports produced by quality assurance agencies (assessments of existing programmes in the Netherlands and Flanders).

“Explicit published criteria” are understood as

1. criteria that underpin quality as the backbone of the assessments performed by the experts/peers
2. in the context of decision-making: criteria/procedural elements regulating the appointment and work of experts and also explaining the process from the presentation of an assessment report to the subsequent accreditation decision
3. criteria for judging consistency containing indicators for deciding on any threshold values in use and their consequences.

Evidence

The frameworks contain standards for the different types of quality assessments and accreditations.

The frameworks contain descriptions on the composition of Panels and on assessment processes. Regarding the use of threshold values (“scores”), the frameworks instruct the use of three or four levels dependent on the activity being undertaken. Chapter 8 in the assessment frameworks in the Netherlands gives examples illustrating the use of the assessment scales for programme assessments. Chapter 9 describes how the judgments of the Panel in relation to individual standards must affect the overall judgment of the programme in case of programme assessments and the overall judgment of the institution in case of an institutional audit.

Whereas the framework for the institutional audits in the Netherlands contains a description of the consequences of the different possible outcomes (a positive, a conditional positive and a negative judgment) of an audit (section 2.5), the corresponding sections in the frameworks for (initial) programme assessments in the Netherlands only present the different possible conclusions that NVAO can reach.

In its SER, NVAO states that it checks the quality of the assessment procedure and the quality of the programme by means of an analysis of the assessment report. If the report raises questions, NVAO requests additional information from the panels. Finally NVAO (the Executive Board) makes the accreditation decision. Concerning the process starting from the submission of an assessment report to an accreditation decision, the assessment frameworks for Flanders contain a description of the rules governing accreditation decisions (FL section 2.4.2). The Panel did not find evidence of a similar procedural description in the Dutch frameworks.

The SER states that NVAO has put in place several measures to ensure the consistency of the evaluation of assessment reports produced by panels, including:

- The use of detailed manuals for the evaluation of reports, which are updated on a regular basis.
- Frequent staff meetings where issues regarding the evaluation of assessment reports are discussed.
- Each application is evaluated by a policy advisor and a board member. If the evaluation necessitates this, the NVAO asks other staff members or board members for a second opinion. A final decision on an application is taken by all board members in a joint session on the basis of a detailed recommendation.

The representatives of the General Board of NVAO interviewed during the site visit further noted that the General Board looks at consistency of decisions made by the Executive Board.

Analysis

When NVAO underwent a similar review in 2007, the quality assurance activities and criteria were alike for the Netherlands and Flanders. Today, NVAO states that the regulations are still the same in Flanders as it was then. In 2007 the assessments at this point concluded with “fully compliant”. This Panel relies upon the conclusion made in 2007 concerning the Flemish situation since no change has been made yet. In the present assessment the Panel focused on the new Dutch system that was introduced in 2011.

Whereas the assessment frameworks for Flanders contain precise descriptions of the rules that NVAO’s formal accreditation decisions are based on, the assessment frameworks for the Netherlands do not contain similar descriptions. Since the assessments of existing programmes are executed by the Dutch quality assurance agencies and thus not by NVAO, the Panel finds it critical that it is not made clear how NVAO reaches its accreditation decisions. In other words, it was unclear to the Panel which criteria NVAO uses, if any, for deciding whether to follow or deviate from the conclusions reached by a quality assessment panel and how NVAO assures consistency in this respect. NVAO did not clarify this issue during discussions with the Panel during the site visit. It is important that NVAO respects the assessments made by the panel experts and that NVAO makes its considerations and ultimate accreditation decision in a manner and based on clear evidence that is completely transparent in all cases to all the involved parties.

In practice, however, the internal procedures/the mechanisms within NVAO appear to promote consistency in the decision making process and the site visit revealed no strong feelings on this matter.

Nevertheless, the Panel noted, during the site visit, a view that there is still a possibility for improvement regarding the consistency of accreditation judgments reached. NVAO also appears to be aware of the challenges regarding consistency as “the points of attention” raised in relation to ESG 2.3 in its SER are both concerned with the issue of consistent application of criteria. Furthermore, one of the 6 issues NVAO list as those it should pay attention to in the next years in order to improve its operation and the operation of the accreditation system in

the Netherlands and Flanders is: The large number of applications necessitates permanent attention to consistency in decision making, where criteria and mechanisms are closely connected.

Conclusion

NVAO partially complies with ESG 2.3.

4.1.4 ESG 2.4 Processes fit for purpose

Standard

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

Key elements

This standard is in itself wide and abstract and therefore may be subject to many different interpretations. However, it is followed by quite extensive guidelines. In order to establish a common understanding of quality related to this standard, the Panel has included the guidelines as a starting point of its analysis:

“Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes. Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance.

Amongst these elements the following are particularly noteworthy:

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task;
- the exercise of care in the selection of experts;
- the provision of appropriate briefing or training for experts;
- the use of international experts;
- participation of students;
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached;
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review;
- recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality.”

In addition to the bullet points above, the Panel is concerned with the length of time that elapses from presenting the assessment report until an accreditation decision has been made. When time is unpredictable and/or running too long, it is a challenge for the involved parties to keep up an interest in the result and a motivation for action upon it. This is especially essential to support the aim of quality enhancement.

Evidence

The following subsections focus exclusively on the presence and characteristics of the elements of the processes that are listed in the guidelines to ESG 2.4.

Characteristics of the panels

The panels' required competencies are described for all activities in the various assessment frameworks.

NVAO appoints the panels for institutional audits (NL) and for initial programme assessment in both the Netherlands and Flanders. In terms of the assessment of existing programmes in the Netherlands, the panels are nominated by the HEIs, and the final composition is determined by the quality assurance agencies. Final approval of the composition of the panels is made by NVAO.

According to the representatives of the Dutch quality assurance agencies interviewed during the site visit, approximately 25% of the suggested panel members are queried by NVAO. In Flanders panels for the assessment of existing programmes are decided by the Flemish quality assurance agencies and approved by the Recognition committee, an independent external body that checks the independence of proposed members of review panels, before the assessment takes place.

All of the Dutch assessments frameworks include a section describing how the independence (both actual and perceived) of the panel members is secured and the requirements that the panels must meet. In all cases requirements with regards to the skills and competences of the panel members are specified. For all types of assessment in the Netherlands it is also (among other things) a requirement that the panels include a student and a member with international expertise. Requirements concerning the composition of panels are described in the Flemish accreditation decree and in the NVAO rules about quality assurance agencies and both VLIR and VLHORA have requirements about student participation and international expertise in their panels.

Training of panel members

Student members of the panels for initial programme assessments (both NL and FL) and potential chairs for the institutional audits in the Netherlands are trained by NVAO. The training for institutional audit lasts two days and includes, among other things, role play. Panel members participating in the assessments of existing programmes in the Netherlands and Flanders are instructed or trained by the quality assurance agencies, but NVAO offers a "Train the trainer module" for programme assessment.

For all types of the assessment panels in the Netherlands, those secretaries who are not panel members are trained by NVAO. When the site visit of NVAO took place approximately 200 secretaries had been trained. The training focuses on the assessment frameworks, how to use them, how to guide the panel members etc. Furthermore, secretaries participate in two reflection days per year at NVAO.

Provision of adequate evidence

The frameworks for assessments describe the review procedures in detail and include sections stressing the importance of providing adequate evidence to support the findings and conclusions reached.

Whether findings and conclusions are supported by adequate evidence is also the main focus when NVAO assesses the reports produced by the quality assurance agencies – and the main reason for sometimes asking for more information.

The use of self-evaluation/site visit/draft report/published report/follow-up model of review

Self-evaluation, site visit, draft report and published report all form parts of all the assessment processes in the Netherlands and Flanders. Follow-up is part of a process in the assessment of existing programmes if a recovery period has been granted. For initial programme assessments and for institutional audits, a follow-up review takes place only where positive decisions are made subject to conditions.

Recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality

According to the SER, the new accreditation system in the the Netherlands heralds a new approach. The SER describes the new system as challenging the institutions to set higher targets for their programmes and their quality work in general and thus improving quality. Furthermore, it is stated in the SER that the new frameworks encourage the development of quality assurance and of a quality culture within the entire institution and that the new system allows for a more thorough discussion about systematic quality assurance and quality culture at institutional level and the quality of content and learning in individual programmes. Staff interviewed noted that reports are directed towards curriculum development and improvement.

Time from submission of report until decision has been made

Interviews revealed that the time from presentation of assessment report until decision has been made by NVAO is of varying length and, in some cases, exceeds one year. The interviewees not employed at NVAO did not know why the delay is so unpredictable. Some also expressed the opinion that, in some cases, conditions within the HEI had changed substantially between the time of the site visit and the receipt of the review report and that the decision and recommendations were no longer truly relevant. The interview with staff revealed that NVAO is challenged by the fact that most of the HEI's apply for accreditation at the same time of the year which means that there is a great imbalance over the year in the amount of applications that NVAO has to handle.

Analysis

The impression of the Panel from reading the SER and the assessment frameworks is that most processes are fit for purpose. This impression is further strengthened by the fact that none of those interviewed during the site visit questioned or criticised the processes, except for some overly long delays in delivery of the final report.

As the description above reveals, the processes include all elements listed in the guidelines to ESG 2.4. Interviews during the site visit gave the impression that the panels are considered to be competent and doing a good job. In the interview with the Dutch quality assurance agencies, the view was raised that for those secretaries who have already been trained by a quality assurance agency, the NVAO training may be felt as a waste of time; the quality of the training

provided by NVAO was also questioned, but this view was not raised in any other interviews.

Furthermore, the Panel has noted that in the reviews of VLIR and VLHORA the composition of the panels for the assessment of the Flemish programmes and the training of these panel members, as well as the assessment processes in Flanders in general, have been positively assessed and approved.

The issue of the delay to decision-making is not specifically addressed in ESG. The Panel considers this issue as being a part of its considerations of “fit for purpose”, which is illustrated by the information during interviews as given above. There is, however, no reason to believe that there are too many cases of unpredictable and inappropriate long timelines, but in the view of the panel the delays are still a critical issue.

Generally, the impression of the Panel is that the new system in the Netherlands and not least the inclusion of institutional audits and the possibility for granting a recovery period do indeed promote more focus on quality improvement and enhancement than the previous system did. This impression is supported by the SER which, based on an evaluation of the first institutional audits, concludes that the assessed institutions consider the audit a valuable learning experience that will positively affect the quality of the programmes they offer and causes staff to reflect more intensively on internal quality assurance at an institutional level. At the same time the Panel finds that the lack of focus on recommendations for improvement in the decision reports in case of positively accredited programmes in the Netherlands suggests that the focus on quality improvement and enhancement can still be further strengthened.

Conclusion

NVAO substantially complies with ESG 2.4.

4.1.5 ESG 2.5 Reporting

Standard

Reports should be published and should be written in a style which 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.

Key elements

“Intended readership”, “readily accessible”

Evidence

As regards assessments of existing programmes, in Flanders, the institution applies for accreditation of a programme with NVAO, submitting the assessment report of the panel produced and published by the evaluating agency. In the Netherlands, the assessment report is published after completion of the accreditation procedure.

In both cases the reports have a summary, which NVAO can use to provide information to the public. NVAO requires the summary to be very concise in order to inform interested readers at a glance about the most relevant characteristics of the programme. In addition, every assessment report contains

a scoring table and a separate paragraph with recommendations. The staff interviewed during site visit stated that NVAO is the primary intended readership for the programme assessment reports, HEIs the second one and the general public the third one. The staff also stated that summaries have been introduced primarily for the benefit of students and external stakeholders.

The NVAO accreditation decision reports are based on the assessment reports and contain a summary of the findings and discussions contained in these reports (the summary and the scoring table are integral part of the decision document), followed by the formal decision of NVAO.

For all types of assessments, the reports and decision documents have a fixed and structured format with the purpose of increasing readability. In 2012, NVAO started an evaluation project to investigate how well the new reports respond to the needs of the intended readers.

Both NVAO's decisions and the panel assessment reports are made public on NVAO's website (www.nvao.net). The site is equipped with a search tool to find information about a specific programme or an institution. NVAO's website lists all programmes in the Netherlands and Flanders which were submitted for accreditation.

Analysis

The reports produced and published by the Flemish quality assurance agencies have generally been positively assessed in the external reviews of VLHORA and VLIR. In the case of VLHORA, some criticism was raised (in 2008) about the clarity with regard to the intended readership and the lack of a summary which led to an assessment of VLHORA as being "only" substantially compliant; a recommendation to include a summary in the report was made. Since the Flemish reports - like the new Dutch reports - now have to include a summary, but have not otherwise been affected by the introduction of the new system in the Netherlands, the Panel rests its assessment of the Flemish reports on the external reviews of VLIR and VLHORA, leaving aside only the issue regarding the summary.

Regarding the reports related to Dutch programmes, NVAO states in its SER that, with the introduction of the new system, NVAO agreed with the quality assurance agencies to improve the readability of the programme assessment reports. NVAO feels that the first results in the Netherlands are promising. NVAO expects that the main findings and conclusions of a report will be easier to read for students, employers and other involved groups.

More specifically, NVAO finds, according to its SER, that, as a result of the introduction of limited programme assessment and extended programme assessment, the first panel reports produced in the new format are more informative and transparent than previous reports.

During the site visit, the relevant external stakeholders were questioned about their view on the quality of the new Dutch reports. Both the representatives of the Dutch Ministry of Education, the Dutch umbrella organisations, the Dutch student organisation and the Advisory Board expressed a generally positive appreciation of the first reports and that the reports are good and have been

improved with the new system, but that there is still room for improvement (or a complete implementation of the new guidelines). The summaries were highlighted as a new and very positive element in the reports, not least in terms of making the reports more accessible to a wider audience including students. The main critique raised by the representatives mentioned above was that the intended readership of the reports is too narrow and (as a consequence) the reports are too technical to be easily read by the general public.

In the course of the review, the Panel has looked into and assessed a number of the reports that have been published after the introduction of the new system in The Netherlands. The conclusion in relation to the reports following the new institutional audits as well as the ones for the revised form of (initial) limited and extended assessments is that they faithfully follow the relevant assessment framework of NVAO and that the structure is more or less identical across assessments within the same framework. All include a summary and are structured to cover description, analysis (including relevant evidence), conclusions and some forms of recommendations. They also contain sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in reaching conclusions. The criteria used in making decisions are not explained in the NVAO accreditation decision reports (Cf. section 4.1.3 for an assessment of this). The writing style is literary with a few other steps to enlightening major issues or main findings.

As for the accessibility the Panel finds that, despite the fact that the search facility of NVAO's web site makes it rather hard to find a specific assessment report, the assessment reports contain what NVAO needs to be able to reach an accreditation decision and thus fit the primary intended readership of the reports as defined by NVAO. Despite the introduction of a summary, the Panel is, however, not convinced about the general readability for other stakeholders and agrees with the external stakeholders who during the site visit characterised the reports as being too technical – and maybe also too verbose – to read for the general public, including (prospective) students. Thus the panel also agrees with the stakeholders that the intended readership of the reports defined by NVAO is too narrow.

Having said this, The Panel has positively noted that NVAO has recently started an evaluation project to investigate how well the new reports respond to the needs of the intended readers besides NVAO itself.

Conclusion

NVAO substantially complies with ESG 2.5.

4.1.6 ESG 2.6 Follow-up procedures

Standard

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

Key elements

"recommendations for action", "a predetermined follow-up procedure"

"The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged." (Guideline)

Evidence

The programme assessment reports contain a scoring table and a chapter with recommendations. The institutional audit reports also contain a chapter with possible improvements/recommendations listed. When a conditional accreditation decision is reached in relation to an institutional audit or an initial programme assessment, a subsequent action plan is required. In case of the application of a recovery period in relation to an assessment of an existing programme, the institution is required to present a convincing recovery plan before the recovery period is granted.

NVAO states, in its SER, that a formal follow-up procedure is not included as an overall obligatory part of the accreditation system.

At the same time, the SER makes clear that a recovery period has been part of the programme accreditation system in Flanders since 2005 and is part of the new procedure for programme accreditation in the Netherlands. More importantly, it is stated that in the case of the application of a recovery period, the institution needs to present a convincing recovery plan before the recovery period is granted and that, at the end of the recovery period, the achieved improvements have to be assessed positively by an assessment panel before accreditation can be granted.

Similarly, NVAO now has the authority to take a conditionally positive decision in the procedures of initial programme accreditation and institutional audit. In the case of a conditional decision in the Netherlands, a NVAO panel must follow-up and assess whether the programme or the institution meets the conditions within the set conditional period.

In the case of an unconditionally positive decision, there is no follow-up about the extent to which the institution and/or the programme management implement the recommendations of the assessment panel. In these cases, the follow-up on these recommendations will be assessed in the subsequent accreditation procedure (after 6 to 8 years).

In the 6 to 8 year period between being subject to an accreditation procedure, the Panel learned from the site visit that more and more programmes and institutions voluntarily engage in some forms of other reviews and publish reports based on these.

Analysis

In its SER, NVAO states: *"An official follow-up procedure, as meant here in the ESG guideline, is not a part of the accreditation system either, but two measures introduce elements that provide equivalent functionality to a follow-up procedure ..."*

The panel finds that follow-up procedures have been strengthened in the Netherlands through the introduction of a recovery period similar to what has been in place in Flanders since 2005.

It is now only in the case of an unconditionally positive decision that a follow-up procedure is not applied. As ESG 2.6 states that quality assurance processes which contain recommendations for action or which require a subsequent action plan should have a predetermined follow-up procedure which is implemented consistently, and as unconditionally positive accreditation decisions do not contain recommendations or require a subsequent action plan the standards does not apply to this part of the quality assurance processes of NVAO. Therefore the view of the Panel is that NVAO's level of compliance with ESG 2.6 is adequate. Moreover the Panel is convinced that the objective of ESG 2.6, as expressed in the guidelines to the standard, "to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged" is fulfilled.

Conclusion

NVAO fully complies with ESG 2.6.

4.1.7 ESG 2.7 Periodic reviews

Standard

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.

Key elements

"Cyclical basis", "review procedures", "clearly defined", "published in advance"
From the guidelines: "demands on institutions should not be greater than are necessary"

Evidence

The accreditation period of programmes in the Netherlands is six years, in Flanders it is eight years. After an initial accreditation, reassessment of the programme and reaccreditation should be finalized within six years (in the Netherlands) and within the length of the programme and two years (in Flanders). These cycles are mandated by Dutch and Flemish legislation.

The Dutch HEI's are subject to an institutional audit every six years.

Analysis

The description above clearly reveals that external quality assurance in both the Netherlands and Flanders are undertaken on a cyclical basis and that the length of the cycle and the review procedures are clearly defined and published in advance.

Conclusion

NVAO fully complies with ESG 2.7.

4.1.8 ESG 2.8 System-wide analyses

Standard

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

Key elements

“from time to time”, “summary reports”, “describing and analysing general findings”

Evidence

In the previous review in 2007, NVAO was considered only partially compliant with ESG 2.8 and was advised to give more attention to the production of system-wide and comparative analyses.

In the past years, NVAO completed a number of comparative analyses within clusters or domains. The analyses are mentioned in the SER and are listed and described in the attachments to it. An evaluation of the former accreditation system and of the pilots undertaken in order to develop the new system are other examples of system-wide analyses mentioned in the SER, but these have not been included in the list in the attachments and at the time of the review it was therefore unclear to the Panel whether they resulted in any form of reports or what kind of results they produced.

In relation to the future, NVAO’s new strategic policy underlines the importance of comparative and system-wide analyses and, according to the SER, NVAO recruited a new staff member assigned to do quantitative and qualitative research to underpin the analyses and a number of different system-wide analyses have been planned.

Analysis

From reading the description and analysis of the last external review of NVAO which led to the conclusion that NVAO only partially complied with ESG 2.8 as well as the present SER and list of comparative analysis published by NVAO since 2007, the Panel finds that NVAO has substantially improved its practice in relation to ESG 2.8.

The Panel notes, however, that NVAO itself is relatively critical about its achievement so far. In its SER, it states that despite its substantial effort regarding comparative analyses, it did not have a clear policy on this issue in recent years. It is further stated that in the new Strategic Policy Statement (2012 - 2016) the NVAO task of system-wide and comparative analyses is emphasized and should result in a clear agenda on this topic for the coming years and “that NVAO has to work on implementing its new policy regarding system-wide and comparative analyses”. Finally it concludes that one of its points of attention is to implement a clear policy and activities regarding system-wide analyses through yearly planning.

Some of the stakeholder representatives interviewed during the site visit expressed the view that they would like NVAO to do more system-wide analysis. Issues such as internationalisation, student experience and comparative analysis

of how the quality assurance agencies in Flanders and the Netherlands work were mentioned in this regard. This may require NVAO to adopt a more cluster-based approach than is currently the case.

As the Panel is informed, the situation is different in Flanders and in the Netherlands: the Flemish agencies operate on clusters of similar programmes within all HEIs which the Panel believes facilitates system-wide comparisons, while in the Netherlands – despite cluster assessment of university programmes since 2003 the process is geared more towards assessments of single institutions or single programmes.

In its assessment of NVAO's level of compliance with ESG 2.8, the Panel has given the critical self-assessment contained in the SER of NVAO a high weighting.

Conclusion

NVAO substantially complies with ESG 2.8.

4.1.9 ESG 3.1 Use of external quality assurance procedures for higher education

Standard

The external quality assurance 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.

Key elements

This standard is understood holistic in its full text, there are no key words as such in this formulation.

Evidence and analysis

In section 4.1.1 to 4.1.8 the Panel has assessed the NVAO's level of compliance with ESG 2.1 to 2.8 and thus with Part 2 of the European Standards and Guidelines. The outcome is that NVAO is considered fully compliant with ESG 2.1, 2.6 and 2.7, substantially compliant with ESG 2.2, 2.4, 2.5 and 2.8 and partially compliant with ESG 2.3.

Conclusion

Based on its assessment of NVAOs level of compliance with ESG 2.1 to 2.8, the Panel concludes that NVAO substantially complies with ESG 3.1

4.1.10 ESG 3.3 Activities

Standard

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

Key elements

This standard is understood as holistic in its full text, there are no key words as such in this formulation.

Evidence

The tasks of NVAO are described in the Treaty. They are further stipulated in the Netherlands in the Dutch Act on higher education and research and can be summarized as the (initial) accreditation of programmes of institutions of higher education and the assessment of these institutions (Institutional audit). In Flanders, the Flemish Act of 4 April 2003 forms the legal basis for (initial) accreditation in higher education and stipulates that the responsibility for (initial) accreditation of programmes is assigned to NVAO. Since it was established in 2003, NVAO has processed nearly 5000 applications for accreditation.

NVAO can be requested to carry out additional tasks by the Ministers of higher education in both countries if these assignments support or supplement NVAO's primary assignment.

Analysis

The Panel finds that the description above as well as sections 4.1.1 to 4.1.8 clearly illustrates that NVAO undertakes external quality assurance activities on a regular basis.

Conclusion

NVAO fully complies with ESG 3.3.

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Conclusion ENQA criterion 1

Based on its assessment of NVAOs level of compliance with 3.1 (including ESG 2.1 to 2.8) and 3.3, the Panel concludes that NVAO substantially complies with the ENQA membership criterion 1/ESG 3.1 and 3.3

Recommendations

With reference to the evidence and analysis provided in section 4.1.1 to 4.1.10 the Panel recommends that NVAO:

- makes the link between the NVAO standards and ESG Part 1 more explicit in the assessment frameworks;
- refines the descriptions of the aims and objectives, ensures that they are prominent in the frameworks and show how the various elements of the frameworks contribute to the aims and objectives;
- formulates explicit and public criteria about how it reaches its accreditation decisions in relation to the programme assessments in all cases;
- establishes a clear procedure on how to handle cases where the conclusions in the assessment report are not accepted by NVAO;
- strengthens the predictability of the timeframe and efficiency of its decision-making process;
- further strengthens the focus on quality improvement and enhancement of the HEI's;
- clarifies a) the purpose of every kind of report, b) the readership and c) the needs of the various kinds of readers in order to enhance the readability;
- gives a high priority to: a) the identification of the interested parties for system-wide analyses and of their needs; b) the definition of a realistic

schedule of system-wide analyses; and c) the production of system-wide analyses corresponding to the needs which were identified.

4.2 ENQA criterion 2 / ESG 3.2: Official status

Standard

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.

Key elements

This standard is understood holistically in its full text, there are no key words as such in this formulation.

Evidence

NVAO is the official, public and bi-national accreditation organization in higher education in the Netherlands and Flanders. Its structure and duties are described in a bi-national Treaty (2003) and in both national legislations. NVAO reports to the Dutch and Flemish Parliaments via their Ministers of (Higher) Education. NVAO's annual report is used for accountability purposes.

Analysis

From the description in the SER and the legal documents it refers to it is evident to the Panel that NVAO has an established legal basis and is formally recognised as required by ESG 3.2

Although the Panel did not explicitly ask about it during the site visit, the fact that no one raised any points which could suggest that NVAO does not comply with requirements of the legislative jurisdictions within which it operates leads the Panel to conclude that NVAO fully complies in this respect. The fact that all external stakeholders expressed a general satisfaction with the work of NVAO and that NVAO was considered fully compliant with ESG 3.2 in the 2007 review, supports this assessment.

Conclusion

NVAO fully complies with ENQA criterion 2 / ESG 3.2.

4.3 ENQA criterion 3 / ESG 3.4: Resources

Standard

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, procedures and staff.

Key elements

This standard is understood holistically in its full text, there are no explicit key words as such in this formulation. However, the operationalization of the standard: that is, what evidence should be presented and how it should be analysed by the Review Panel, is more of a question.

Evidence

NVAO has an annual budget of approximately € 6 million, which is financed jointly by the Netherlands (60%) and Flanders (40%). Each year, NVAO draws up a budget which is then decided upon by the Committee of Ministers and both Parliaments. In the Netherlands and Flanders, NVAO applies fixed rates by law. The rate for an application for initial accreditation is maximum € 15,000 in the Netherlands and € 5,000 in Flanders. For an application for accreditation the rate is € 750 in the Netherlands and € 500 in Flanders. In the case of additional tasks and assessment assignments abroad, NVAO charges cost-covering fees. NVAO has agreed with both ministries in the Netherlands and Flanders that additional tasks assigned by the ministries will be organized and budgeted on a project basis. NVAO informs the ministries in advance about the expected costs. The latter can decide whether to continue the project initiative or not.

Since 2005, NVAO is located in the Parkstraat in The Hague, near the city and the Dutch parliament and the Dutch ministry of education. Several meeting rooms for smaller and larger groups are available for the organisation of conferences, seminars and meetings. Presentation and IT-facilities are up-to-date. In November 2011, a new information system was introduced to optimize the work-flow.

The workforce of NVAO consists of 56 people (53FTEs): four executive Board members, one managing director, 30 policy advisors, one Dutch and one Flemish legal advisor (together 29FTEs) and 20 other (partly supporting) staff (19 FTEs). Four policy advisors are available for international assignments. The staff composition includes policy, legal and communication advisors and supporting staff (policy secretariat, finances and personnel, records department and general services).

All academic staff hold a master's degree, with three members holding a PhD degree. The acquired professional experience of NVAO's staff is varied. All board members and the director have a longer career in (higher) education in board or management positions. Most staff acquired substantial work experience in higher education as teacher, developer, manager, researcher, inspector for higher education, or policy advisor before being employed by NVAO. A small group of junior staff was recruited to fulfill a kind of traineeship before being fully employable in NVAO's work processes. NVAO has defined core competencies of its staff.

Each member of staff participates in a performance review once a year. On this occasion staff have the opportunity to ask for further training if they find it relevant.

Analysis

According to its SER, NVAO has been funded sufficiently by both governments for its primary tasks in recent years and has received appropriate additional funding for the additional tasks that were assigned to the organization. Despite the fact that NVAO, like all public organizations, is currently subject to budget cuts, NVAO states that these cuts have not affected its operations up to now. As the critical issue related to respecting deadlines does not appear to arise (primarily) from a lack of resources (cf. section 4.1.3) the impression of the Panel from the interviews during the site visit matches the self-assessment of NVAO.

In its SER, NVAO concludes that good facilities are available at its location and, having visited and used these, the Panel fully agrees with that.

The SER states that, over the years, NVAO has developed a good quality of staff with varied competences and work experiences. With reference to a recent benchmark study of staff development among five members of ENQA, including NVAO, it concludes that compared to similar members within the ENQA network, NVAO staff is on par. The positive assessment of the competences of staff was not questioned by any of those interviewed during the site visit. On the contrary, the representatives of the General Board, for example, expressed the belief that the quality of the staff of NVAO is one of the primary reasons for the credibility and respect with which NVAO is held in the community.

The impression from the Panel's interview with NVAO staff is that they are satisfied with the possibilities offered for further training or other forms of competence development activities. On the job training and a mentoring system were mentioned by staff as some of the important forms of activities, particularly for newer members of staff.

NVAO finds, in its SER, that further development of expertise of staff on specific themes in higher education should be improved and thus that it should invest in further development of specific, theme-oriented, higher education expertise of its staff. Although it may be a relevant priority for NVAO, the Panel does not in any way find that it is needed for the purpose of being fully compliant with ESG 3.4.

Conclusion

NVAO fully complies with ENQA criterion 3 / ESG 3.4.

4.4 ENQA criterion 4 / ESG 3.5: Mission statement

Standard

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

Key elements

“clear and explicit”, “publicly available” and from the Guidelines: “the division of labour with relevant stakeholders in higher education” “documentation to demonstrate how the statements are translated into a clear policy and a management plan”

Evidence

In the “Strategic Policy Statement NVAO 2012 – 2016”, NVAO has defined its mission as follows:

NVAO is the independent and authoritative accreditation organisation set up by the Flemish and Dutch governments, whose primary goal it is to provide an expert and objective judgement of the quality of higher education in Flanders and the Netherlands. NVAO does this with a constructive, critical attitude, respecting the autonomy of institutions and their primary responsibility for the quality of their education, and with an open eye for the growing international context. NVAO is open, clear and transparent towards society and all concerned, especially the institutions of higher education and the students.

At the time of the review the new Strategic Policy Statement was not published on the website of NVAO, but the mission statement was presented on the website.

The new Strategic Policy Statement includes a section describing the context of the work assigned to NVAO; the division of labour with relevant stakeholders in higher education is described. NVAO states that it considers institutions to be primarily responsible for quality assurance and quality improvement. NVAO is required to assure that programmes meet the required standards and to stimulate the quality debate, giving account of its procedures, disseminating ‘good practices’ and visiting institutions and their programmes.

In relation to this the mission statement lists the three main tasks of NVAO as being:

1. Assessing and assuring the quality of Dutch and Flemish higher education.
2. Promoting the quality of higher education by promoting a culture of quality, aimed at regular assessment and continuous quality increase.
3. Putting Dutch and Flemish sectors of higher education (institutions, programmes) on the map and strengthening their position by means of international cooperation.

The Strategic Policy Statement also includes sections that translate the mission (and values and positioning) into a number of strategic goals and a strategic agenda for NVAO for 2012 to 2016.

Analysis

It is evident from the description above that NVAO has clear and explicit goals and objectives for its work. The mission statement is published on NVAO's website.

A description of the cultural and historical context of the work of NVAO is included in the separate context section. The Strategic Policy Statement clearly demonstrates the translation of the mission statements into a clearly formulated policy and management plan. The division of labour with relevant stakeholders in higher education is also described in the statement. The list of the main tasks of NVAO as well as other parts of the statement make clear that external quality assurance processes are major activities of the agency. The assessment frameworks confirm that NVAO employs a systematic approach to achieving its goals and objectives.

Conclusion

NVAO fully complies with ENQA criterion 4 / ESG 3.5.

4.5 ENQA criterion 5 / ESG 3.6: Independence

Standard

Agencies should be independent to the extent both that they have 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.

Key elements

“Autonomy”, “independence”

The Panels finds this standard is thoroughly described in the following guidelines. An agency will need to demonstrate its independence through measures, such as:

- its operational independence from higher education institutions and governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts);
- the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence;
- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Evidence

NVAO was granted the status of an autonomous administrative body with legal rights according to Dutch legislation. NVAO is accountable to the Committee of Ministers, which approves its budget, the annual report and the annual accounts. In accordance with the Treaty, the Committee of Ministers can only intervene in case of serious neglect by NVAO of its (initial) accreditation task, threatening the execution of that task. The Committee of Ministers can thus only intervene in the functioning of NVAO, but not in NVAO's decision-making. From the start of the accreditation system in the Netherlands and Flanders (2004, NL – 2005, FL) NVAO has been fully independent regarding decision making.

Members of NVAO's Executive and General Board are mandated for four years by the Committee of Ministers. They are appointed in a strictly personal capacity and not as representatives of any organisation.

In order to guarantee the independence of board and staff members, NVAO has ruled that members of both categories cannot participate in applications from institutions or programmes they have been associated with in any form during the previous five years. Members of the Board have to be completely independent in making decisions. If there is a specific application where this independence cannot be guaranteed, the member of the Board will withdraw from the decision-making process for the programme concerned.

The legally binding assessment frameworks formulated by NVAO in consultation with relevant stakeholders define the standards which the assessments have to

refer to, the possible judgements in relation to each of the standards and the general conclusion that they may result in and how this conclusion should be reached (assessment rules), requirement regarding the composition of panels, the assessment processes and the decision-making by NVAO. The assessment frameworks for (initial) programme assessments also include a list of the documents that the programmes need to provide and guidance as regards the “threshold levels” for the different possible judgement that can be reached by an assessment panel. Finally the assessment frameworks include a chapter in which NVAO outlines the rules laid down by implementing regulations regarding conditional decisions and granting of improvement periods.

Analysis

The view of NVAO expressed in its SER is that the official status offers NVAO a good formal structure to guarantee its independence and it states that its independence is recognised by different stakeholders. The interviews with stakeholders during the site visit confirmed this statement.

It is also evident to the Panel that NVAO has autonomous responsibility for its operations and its operational independence from higher education institutions and governments is guaranteed in official documents.

The very detailed and legally binding assessment frameworks (as well as the continuous monitoring of the level of adherence to them) ensure that the appointment of external experts and the determination of the outcomes of the quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence. They also ensure that the conclusions and recommendations made in the reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders and that the final outcomes of the quality assurance processes (the accreditation decisions) remain the sole responsibility of NVAO.

Since the assessments of existing programmes are not carried out by NVAO, the Panel finds that the independence of the quality assurance agencies carrying out these types of assessments needs to be considered as part of the assessment of the operational independence of NVAO. In this regard, the Panel has noted that in the external assessments of both VHLORA and VLIR these agencies have been assessed as being fully compliant and the Dutch agency QANU as being substantially compliant with ESG 3.6 Independence and so do not raise questions as regards the independence of the processes carried out by these agencies. The situation is less clear regarding the other Dutch quality assurance agencies which were not (yet) vetted by ENQA, but NVAO explicitly requires their panel members to adhere to a Code of Conduct and to sign an independence and confidentiality declaration.

Conclusion

NVAO fully complies with ENQA criterion 5 / ESG 3.6.

4.6 ENQA Criterion 6 / ESG 3.7 External quality assurance criteria and processes used by the members

Standard

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;
- 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.

Key elements

The standard is self-contained, with the guideline adding on the need to ensure professional management and consistency and an appeals procedure.

Evidence

The standards (criteria), processes and procedures used by NVAO and the quality assurance agencies in the Netherlands and Flanders are defined in the publicly available assessment frameworks.

All types of assessments include some form of self-assessment, an external assessment by a group of experts, including a student member, site visits and the publication of a report including the recommendations of the panel and (in a separate report) the decision by NVAO.

A follow-up procedure is applied in some cases, in others not. The issue of follow-up is thoroughly described, analysed and concluded upon in section 4.1.6 and will therefore not be repeated in this section and not influence the conclusion either.

For the programme assessments carried out by the quality assurance agencies NVAO checks, as described in section 4.1.3, the quality of the assessment procedure based on the information provided in the assessment report and if this report leaves questions unanswered, NVAO requests additional investigation.

To handle appeals NVAO has set up appeals commissions for the Netherlands and Flanders (competencies not given in the SER) that provides NVAO with advice on which NVAO can make a decision. NVAO is pleased with this set up although it reports further adjustments. If the decision on an internal appeal is negative, the institution can pass the appeal on to independent ministerial body in either the Netherlands or Flanders.

Analysis

The standards (criteria), processes and procedures used by NVAO and the quality assurance agencies in the Netherlands and Flanders are pre-defined and publicly

available and the processes all include the elements expected by standard 3.7 except a follow-up procedure which is not applied in all cases. Based on the numerous references to the assessment frameworks in the SER and not least in many of the interviews during the site visit, the Panel is convinced that NVAO and the quality assurance agencies pay careful attention to the declared principles of the different forms of assessment and that NVAO does its utmost to ensure both that the requirements and processes are managed professionally and that the conclusions and decisions are reached in a consistent manner. In relation to the issue of consistency the Panel wishes to point out what was mentioned in section 4.2.8 about clusters as clustering of assessments may also be beneficiary to consistency in assessments and decision making. Moreover, it is clear to the panel that NVAO is aware of the fact that as it is processing some 600 applications every year a constant attention to the consistency of the decision making is needed.

The Panel relies upon the description of the appeals procedures. An appeals commission is mainly there to secure the rights of an institution. The judgements of the appeals commission may of course also tell something about the quality assurance and professionalism of NVAO. However; the Panel is in line with ESG and regards the appeals procedure as a part of ESG 3.7 (even if it is only given in the guidelines and not in the standard itself).

Conclusion

NVAO fully complies with ENQA criterion 6 / ESG 3.7.

4.7 ENQA Criterion 7 / ESG 3.8: Accountability procedures

Standard

Agencies should have in place procedures for their own accountability.

These procedures are expected to include the following:

- i. A published policy for the assurance of the quality of the agency itself, made available on its website;
- ii. Documentation which demonstrates that:
 - the agency's processes and results reflect its mission and goals of quality assurance;
 - the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts;
 - the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties;
 - the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and
 - an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.
- iii. A mandatory cyclical external review of the agency's activities at least once every five years which includes a report on its conformity with the membership criteria of ENQA.

Key elements

This standard is understood in its full text, there are no explicit key words as such in this very comprehensive formulation. However, the meaning of "subcontractor" is not made clear by ENQA. In various dictionaries a subcontractor is generally defined as an individual or in many cases a business that signs a contract to perform a part or all of the obligations of another's contract. In its decision making NVAO has to build upon quality assurance performed by other agencies as regulated by law. As far as the Panel sees it, ENQA's practise until now has not been to regards these as subcontractors, neither do we.

Evidence

- i. A published policy for the assurance of the quality of the agency itself, made available on its website

The "NVAO Quality Statement" of 2006 contains a section (section 4) presenting among other items NVAOs "policy" for its own internal quality assurance and the policy is also available on NVAO's website.

- ii. Documentation on specific issues

As described in section 4.1.4, all of the Dutch assessments frameworks include a section describing how the independence (both factual and perceived) and also how the "no-conflict of interest" of the panel members is secured. The

mechanisms comprise different kinds of documents that each of the panel members and the secretary must sign. The Flemish frameworks do not contain anything similar.

NVAO does not report that it uses subcontractors in the ordinary sense. Section 4.1 describes how NVAO ensures the quality of the activities and material produced by the cooperating quality assurance agencies. To supplement these descriptions, it can be mentioned here that NVAO in its SER describes that it gives feedback to the quality assurance agencies and secretaries concerning the quality of the reports they produced on a regular basis. At the interviews during the site visit, the quality assurance agencies in both the Netherlands and Flanders confirmed that NVAO provides formal and informal feedback to them.

The internal feedback and reflection mechanisms contain both written and verbal activities. In the SER, NVAO highlights the periodic meeting with the Advisory Council (three times a year), an extensive survey of the staff's satisfaction in 2011 and yearly staff meeting to discuss the realisations of previous objectives and plans and formulate the objectives of NVAO's internal quality assurance.

External feedback mechanisms comprises for instance regular meetings with the relevant ministerial representatives in the Netherlands and Flanders, the quality assurance agencies and different written evaluation of the procedures for initial accreditation

- iii. A mandatory cyclical external review of the agency's activities at least once every five years

The documents governing the work of NVAO do not contain any requirements concerning external reviews of NVAOs activities, but with the 2007 review and the present 2012 review NVAO has so far been subject to an external evaluation every five years.

Analysis

A published policy for the assurance of the quality of NVAO exists and is available on the website of NVAO.

The assessment frameworks for the Netherlands clearly reveal that NVAO has in place, and enforces, a no-conflict-of-interest mechanism in the work of the panels. The reviews of VLHORA and VLIR leaves the Panel convinced that a no-conflict-of-interest mechanism in the work of the panels is also in place and enforced in the assessments in Flanders.

The quality assurance of the work of the quality assurance agencies is convincing and so are the internal and external feedback mechanisms.

In general it is the impression from the SER and the site visit that NVAO has had a strong focus on developing its internal quality assurance since the external review in 2007 where critical points were raised. NVAO seems to have strengthened internal quality assurance, specifically the level of dialogue with stakeholders which was identified as a "weak" point in 2007, now seems to have developed and have become a "strong" point. During the site visit, a good

dialogue with stakeholders was repeatedly mentioned by external stakeholders as one of the characteristics of NVAO.

Conclusion

NVAO fully complies with ENQA criterion 7 / ESG 3.8.

4.8 ENQA criterion 8: Miscellaneous

- i. The Agency pays careful attention to its declared principles at all times, and ensures both that its requirements and processes are managed professionally and that its judgements are reached in a consistent manner, even if the judgements are formed by different groups.
- ii. If the Agency makes formal quality assurance decisions, or conclusions which have formal consequences, it should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of the Agency.
- iii. The Agency is willing to contribute actively to the aims of ENQA.

Key elements

"consistent manner", "appeals procedure", "willing to contribute to the aims of ENQA"

By "willing to contribute to the aims of ENQA" the Review Panel has looked upon the following two dimensions:

1. Inwards: being a good role model by an active follow up of the recommendations given by the review panel in the previous review in 2007
2. Outwards: actively promoting ENQA/ESG on the European Arena for Higher Education

Evidence and analysis

Section 4.6 deals with the issues of "consistent manner" and "appeals procedures" and the analysis and conclusions related to these issues will not be repeated here but just form part of the frame of reference for the conclusion in relation to NVAOs level of compliance with ENQA membership criterion 8.

The recommendations from the review in 2007 (September) was presented in that report, chapter 1.5 Recommendations. Two years later, in a letter to the ENQA-board, dated December 21, 2009, NVAO gives their response to the recommendations that they consider relevant for the organisation. NVAO SER of April 2012 contains a chapter 9 "Overview of actions taken since the previous external review 2007". Here NVAO deals both with recommendations regarding NVAO and recommendations regarding the system. Without going in details, it seems that NVAO has had a fairly good approach to this kind of follow up. The recommendation on developing the relationship between NVAO and the quality assessment agencies is dealt with on several occasions in the present report.

It is the Panel's impression from the SER as well as its general knowledge about the international activities of NVAO, that NVAO has been actively engaged in the European arena and in that work actively contributed to the aims of ENQA. Just to mention: at present NVAO has an ENQA Board member, previously NVAO was the initiator for ECA, NVAO has been hosting several international conferences and a driving force behind international joint-projects. In short: NVAO is holding a high international profile.

Conclusion

NVAO fully complies with ENQA criterion 8.

5 Conclusion and recommendations

5.1 Conclusion

In the light of the documentary and oral evidence considered by it, the Panel is satisfied that, in the performance of its quality assessment 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's Full Membership of ENQA be confirmed for a further period of five years.

The Panel concludes that NVAO fully complies with the ENQA membership criteria 2, 3, 4, 5, 6, 7 and 8 and substantially complies with the ENQA membership criterion 1.

5.2 Recommendations

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

- makes the link between the NVAO standards and ESG Part 1 more explicit in the assessment frameworks;
- refines the descriptions of the aims and objectives, ensures that they are prominent in the frameworks and shows how the various elements of the frameworks contribute to the aims and objectives;
- formulates explicit and public criteria about how it reaches its accreditation decisions in relation to the programme assessments in all cases;
- establishes a clear procedure on how to handle cases where the conclusions in the assessment report are not accepted by NVAO;
- strengthens the predictability of the timeframe and efficiency of its decision-making process;
- further strengthens the focus on quality improvement and enhancement of the HEI's;
- clarifies a) the purpose of every kind of report, b) the readership and c) the needs of the various kinds of readers in order to enhance the readability;
- gives a high priority to a) the identification of the interested parties for system-wide analyses and of their needs b) the definition of a realistic schedule of system-wide analyses and c) the production of system-wide analyses corresponding to the needs which were identified.

Annexes

A: Terms of Reference (ToR)



External review of the Accreditation Organisation of the Netherlands and Flanders (NVAO) by the European Association for Quality Assurance in Higher Education (ENQA)

Annex I: TERMS OF REFERENCE February 2012

1. Background and Context

NVAO independently ensures the quality of higher education by assessing the quality control of higher education institutions in the Netherlands and accrediting higher education programmes in Flanders and the Netherlands. In addition, NVAO encourages quality awareness within higher education institutions and advances higher education in its national and international context.

The organisation was established in 2005 by treaty between the Netherlands and Flanders as an independent quality assurance agency.

NVAO was reconfirmed Full membership of ENQA on 20 December 2007 as a result of a review coordinated at national level.

2. Purpose and Scope of the Evaluation

This is a type A review, as defined in the *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area*. It will evaluate the way in which and to what extent NVAO fulfils the criteria for the ENQA membership and thus the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will also provide information to the ENQA Board to aid its consideration of whether NVAO should be reconfirmed Full Member of ENQA. The review panel is not expected, however, to make any judgements as regards granting NVAO Full Membership in ENQA.

In addition to analysing NVAO compliance with the ENQA membership criteria, and thus with the ESG, the review aims to give a first external reflection on the new accreditation system in the Netherlands.

3. The Review Process

The process is designed in the light of the *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area*.

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-evaluation by NVAO including the preparation of a self-evaluation report;
- A site visit by the review panel to NVAO;

- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the Review Committee of the ENQA Board;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow-up of the panel's and/or ENQA Board's recommendations by the agency.

3.1 Nomination and appointment of the review team members

The review panel consists of five members: Four external reviewers (one or two quality assurance experts, representative(s) of higher education institutions, student member) and a review secretary. Three of the reviewers (including the review secretary) are nominated by the ENQA Board on the basis of proposals submitted to ENQA by the national agencies, and are drawn from senior serving members of Board/Council or staff of ENQA member agencies. The fourth external reviewer is drawn from a nomination provided by the European University Association (EUA). The nomination of the student member is asked from the European Students' Union (ESU). One of the panel members serves as the chair of the review.

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

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

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

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

- Self-evaluation is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-evaluation report is broken down by the topics of the evaluation: background description of the current situation of the Agency; analysis and appraisal of the current situation; proposals for improvement and measures already planned; a summary of perceived strengths and weaknesses;
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which NVAO fulfils its tasks of external quality assurance and meets the criteria for the ENQA membership and thus the ESG. The report is submitted to the review panel a minimum of four weeks prior to the site visit.

3.3 A Site Visit by the Review Panel

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

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

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

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under article 2. It will also provide a clear rationale for its findings with regards to each ENQA membership criteria. A draft will be submitted for comment to NVAO within two months of the site visit for comment on factual accuracy. If NVAO chooses to provide a statement in reference to the draft report it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter the review panel will take into account the statement by NVAO, finalise the document and submit it to NVAO and ENQA.

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

4. Follow-up Process and Publication of the Report

NVAO will consider the expert panel's report and inform ENQA of its plans to implement any recommendations contained in the report. Subsequent to the discussion of the evaluation results and any planned implementation measures with ENQA, the review report and the follow-up plans agreed upon will be published on the NVAO website.

5. Budget

NVAO shall pay the following review related fees:

- Chair: 5,000 EUR
- Review secretary: 5,000 EUR
- Other panel members (3,000 EUR for each of the three panel members): 9,000 EUR
- Administrative overhead for ENQA Secretariat: 5,000 EUR
- Travel and subsistence expenses (approximate): 6,000 EUR

This gives a total indicative cost of 30,000 EUR for a review team of 5 members. In the case that the allowance for travel and subsistence expenses is exceeded, NVAO will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and subsistence expenses in the limits of the planned budget, and will refund the difference to NVAO if the travel and subsistence expenses go under budget.

6. Indicative Schedule of the Review

The duration of the evaluation is scheduled to take about 10 months, from January 2012 to October 2012:

NVAO begins self-evaluation	October 2011
Agreement on terms of reference and protocol for review	January 2012
Appointment of review panel members	February 2012
Preparation of site visit schedule and indicative timetable	March 2012
NVAO self-evaluation completed	end April 2012
Briefing of review panel members	end May 2012
Review panel site visit	end June 2012
Draft of evaluation report to NVAO	August 2012
Statement of NVAO to review panel if necessary	August 2012
Submission of final report to NVAO and ENQA	September 2012
Consideration of the report by ENQA and response of NVAO	September 2012
Publication of report and implementation plan	October 2012

B: Members of the review Panel

Tove Blytt Holmen

Chair of the Panel

Director of Department of Quality Assurance, NOKUT (Norwegian Agency for Quality Assurance in Education)

Member of Advisory Council, PKA, Poland
Member of appeals and complaints committee of ENQA

2005	Audit for the Irish Agency HETAC, member of Expert Panel
2004	Institutional Accreditation and accreditation of Master in Hydrogeology, Chairing the Expert Panel commissioned by OAQ, Switzerland
2002	International Comparative Evaluation of BSc programmes in Agricultural Science. Commissioned by The Danish Evaluation Institute. Chair of Panel.

Signe Ploug Hansen

Secretary of the Panel

Director of Methodology and coordinator of IQA (internal quality assurance) at EVA (the Danish Evaluation Institute)

Member of the Advisory Board of the evaluation unit at Malmö Höghskola, Sweden.

2012	External review of the National Agency for Higher Education in Sweden. Panel member
2007-2011	Initiator of the ENQA Internal quality assurance group (the IQA group) and leading member of its steering group
2002	International Comparative Evaluation of BSc programmes in Agricultural Science. Secretary of the panel.

Julian Tobias Hiller

Student member of the Panel

Student of Mechanical Engineering at the Leibniz University of Hannover, Germany. Integrated Studies, now at a Masters level.

Member of the Accreditation Council of Germany
Member of the Board of the Agency for Quality Assurance Austria (AQ Austria)
Member of the Experts Pool for Quality Assurance of the European Students Union

2012	External Review of the Lithuanian Quality Assurance Agency SKVC, conducted by ENQA
2009	Training on the ESG by ESU and CoE in Strasbourg

2008 – 2010 Several Reviews (11) on Program level with several German QA Agencies

Elie Milgrom

Member of the Panel

Emeritus professor, now consultant in professional development of teaching staff (getting professors to know enough about learning and teaching in order to improve the quality of higher education).

1972-2006: professor of computing science and engineering at the Université Catholique de Louvain (Belgium)

2009-2012: member of an external review panel for VLIR: assessment of the informatics/computer science university programs in Flanders

2011-2012: member of an external review panel for AEQES: assessment of the informatics/computer science programs in the French-speaking part of Belgium

2011-2012: member of an AEQES working group in charge of proposing new criteria for quality assessment in the French-speaking part of Belgium.

2009: founding member of FA2L srl (<http://www.FA2L.be>): a spin-off company of Université Catholique de Louvain

Norma Ryan

Member of the Panel

Director of the Quality Promotion Unit, National University of Ireland Cork - University College Cork, Ireland

- Member of the Irish Universities Association Quality Committee
- Member of the Irish Higher Education Quality Network
- Member of the Irish National Bologna Experts Team

2012: Representative of the EUA and Chair of the Steering Committee for the European Quality Assurance Forum

2008: External review of Letterkenny Institute of Technology, Ireland. Panel Member.

2010: External institutional review of Tallaght Institute of Technology, Ireland. Panel Member.

2011: external institutional review of American College Dublin, Ireland. Panel Member.

2011: Review of Academic Programmes, KTH, Stockholm, Sweden: external reviewer

2011: Institutional review of St Augustine Catholic University, Tanzania. Panel Secretary

2011: Institutional review of Weill Bugando Medical College, Mwanza, Tanzania. Panel Secretary

C: Documents considered during the review

(Listed in order of importance for the assessment)

- Self-evaluation report NVAO 2012
- Self-evaluation report NVAO 2012 – Attachments
- Report of the committee for the review of the Accreditation Organization of The Netherlands and Flanders (NVAO) (September 2007)
- The Dutch website of NVAO: <http://www.nvao.net/>
- The English website of NVAO: <http://www.nvao.net/>
- Letter from the Chairman of NVAO to the president of ENQA about The follow-up of NVAO on recommendations included in the external review review of NVAO 2007 (December 21 2009)
- The NVAO Quality Statement of 2006 (handed out at site visit)
- Diagram illustrating the different forms of assessments within the new accreditation system in the Netherlands and the relations between these forms (handed out at site visit)
- Tables containing comparisons between the accreditation framework in Flanders and the Netherlands and the ESG (handed out at site visit)
- Report of the External Review of the Flemish Council of University Colleges (VLHORA) (October 2008)
- Report of the committee of the review of The VLIR Quality Assurance Unit (May 2009)
- External review of the agency Quality Assurance of Universities in the Netherlands (QANU) (October 2010)