

Report of the Panel appointed to undertake a review of the Quality Assurance Unit of the Flemish Council of Universities and University Colleges (VLUHR QA) for the purposes of renewal of full membership of the European Association for Quality Assurance in Higher Education (ENQA)

Final v2
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Foreword

The Quality Assurance Unit of the Flemish Council of Universities and University Colleges (VLUHR QA) has been operational since 1 January 2013. VLUHR QA is responsible for the coordination of the external assessments of professional and academic oriented programmes delivered by Flemish university colleges and universities.

It was established as a result of a merger of the Quality Assurance Units of the Flemish Inter-University Council (VLIR) (VLIR QAU) and the Flemish Council of University Colleges (VLHORA) (VLHORA QAU). VLUHR QA is their legal successor and builds upon the structure and procedures of the two former agencies. These predecessor agencies were given full membership of the European Association for Quality Assurance in Higher Education (ENQA) in 2000. Full ENQA membership of VLIR QAU and VLHORA QAU were reconfirmed on 7 September 2009 and 23 January 2009 respectively.

The ENQA policy on amalgamation of agencies requires that the newly established agency undergoes an external ENQA coordinated review within two years of the amalgamation being completed. This is therefore the report of a review of the VLUHR QA undertaken in June, 2014, for the purpose of determining whether VLUHR QA meets the criteria for full membership of the European Association for Quality Assurance in Higher Education (ENQA).

The report describes:

- the background and context for the review
- how the review was carried out
- the place of the Agency in the Flemish quality assurance structure for HE and the Agency's main functions
- the Panel's assessment of the engagement of the Agency with the ENQA membership provisions/European Standards and Guidelines and its conclusions
- the Panel's general observations and recommendations for development.

Glossary of terms	
ECTS	European Credit Transfer and Accumulation System
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
EQF	European Qualification Framework
ESG	European Standards and Guidelines for Quality Assurance in the European Higher Education Area
ESU	European Students' Union
EUA	European University Association
EURASHE	European Association of Higher Education Institutions
HEA	Higher Education Act
HEI	Higher Education Institution
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
NVAO	Accreditation Organization for the Netherlands and Flanders
PDCA	'Plan-do-check-act' cycle
SWOT	Strengths, weaknesses, opportunities, threats
VLHORA	Flemish Council of University Colleges
VLIR	Flemish Interuniversity Council
VLUHR QA	Quality Assurance Unit of the Flemish Council of Universities and University Colleges (Vlaamse Universiteiten en Hogescholen Raad Kwaliteitszorg)
website: http://www.vluhr.be	

Background and outline of the review process

1. The Statutes of ENQA require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they fulfil the membership provisions.

2. 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 (then) Regulations (now Statutes). Substantial compliance with the ESG thus became the principal criterion for membership of ENQA. The ESG were subsequently adopted at the Bergen ministerial meeting of the Bologna Process in 2005.

3. The third part of the ESG covers the approach to be taken to the cyclical external reviews of quality assurance and accreditation agencies. This external review of VLUHR QA was conducted in line with the process described in the ESG (third edition) and in the accompanying ENQA Guidelines for external reviews of quality assurance agencies in the European Higher Education Area and in accordance with the timeline set out in the Terms of Reference determined for this particular review.

Purpose and initiation of the review process

4. The Quality Assurance Unit of the Flemish Higher Education Council (VLUHR QA) has been operational since 1 January 2013. VLUHR QA is responsible for the coordination of external assessments of professional and academic programmes organised by Flemish university colleges and universities.

5. It was established as a result of a merger of the Quality Assurance Units of VLIR (VLIR QAU) and VLHORA (VLHORA QAU). VLUHR QA is their legal successor and builds upon the structure and procedures of the former agencies of VLIR and VLHORA. These predecessor agencies were given full membership of the European Association for Quality Assurance in Higher Education (ENQA) in 2000. Full ENQA memberships for both VLIR and VLHORA were reconfirmed on 7 September 2009 and 23 January 2009 respectively.

6. The ENQA policy on amalgamation of agencies requires that the newly established agency undergoes an external ENQA coordinated review within two years of the amalgamation being completed. This is therefore the report of a review of the VLUHR QA undertaken in June, 2014, for the purpose of determining whether the newly constituted VLUHR QA meets the criteria for full membership of the European Association for Quality Assurance in Higher Education (ENQA). The final report of this review will also be used by VLUHR QA to re-apply for registration in EQAR.

7. Following VLUHR QA's application to ENQA to initiate this process, ENQA established an evaluation Panel, the composition of which met standard ENQA guidelines.

Membership of the Panel

8. The members of the Panel appointed by ENQA to undertake the review were:

Christian Thune, (*Chair of the Panel*), independent Higher Education professional, former Executive Director of the Danish Evaluation Institute (EVA) and former President of ENQA, (Denmark)

Paul Mitchell, (*Secretary to the Panel*), independent higher education consultant and Director of Mega Mitchell Consulting Ltd., (UK)

Pedro Teixeira, Associate Professor, Faculty of Economics, and Director of the Centre for Research in Higher Education Policies (CIPES), University of Porto, (Portugal)

Andrée Sursock, (*EUA nomination*), Senior Advisor, European University Association (EUA), (Belgium)

Anouk Platteel, (*ESU nomination*), ESU Board member (2012 – 2013), MSc in Animal Sciences from Wageningen University and now PhD student at the University of Utrecht, (Netherlands).

(Notes:

1 By agreement with both the Panel and with VLUHR QA, **Anaïs Gourdin**, (Project & Finance Officer at ENQA), attended the site visit as an observer, in strict accordance with the ENQA protocol for observers.

2 With the agreement of ENQA and of VLUHR QA, the site visit itself was chaired by Paul Mitchell, due to the Chair's brief illness).

Terms of Reference for the Review

9. ENQA has identified two types of external review which may be undertaken for the purpose of seeking membership:

- **Type A** - the sole purpose of which is to fulfil the periodic external review requirement for ENQA membership
- **Type B** - a review which has a number of purposes, only one of which is to fulfil the periodic external review requirement of ENQA membership.

This review was a **Type A** review, and evaluates how, and to what extent, VLUHR QA fulfils the criteria for full ENQA membership and thus the Standards and Guidelines for Quality Assurance in the European Higher Education Area. The review was co-ordinated by ENQA itself at the invitation of VLUHR QA.

Approach and Procedure

10. The review was carried out using a process designed and managed by the Panel following established ENQA practice, independently of VLUHR QA. The Panel sought to conduct the review in a manner that was not only professional and courteous, but also constructively searching and challenging. VLUHR QA produced a self-evaluation report and the Panel also sought further supporting documentation following its initial analysis of the self-evaluation. The Panel conducted a site visit to explore further the content of the self-evaluation and to clarify points at issue. Finally, the review panel produced the present final report on the basis of the self-evaluation report, the site visit and its findings. As part of the process, the Panel has provided an opportunity for VLUHR QA to comment on the factual accuracy of the draft report.

11. In fulfilling the purposes of the review, the Panel has:

- considered the broad professional and political contexts within which VLUHR QA operates
- considered a self-evaluation document prepared by VLUHR QA, a range of supporting documents and web-based materials submitted in advance of the site visit (Appendix 2)
- considered additional documentation relevant to the Panel's lines of enquiry during the site visit (Appendix 2)
- conducted a two-day visit to VLUHR QA (23 – 24 June 2014), at VLUHR QA's headquarters in Brussels (Appendix 1)
- met a range of stakeholders (from categories selected by the Panel) (Appendix 1), and representative of VLUHR QA's operations, including:
 - Management team of VLUHR QA, including authors of SER
 - Chair and members of VLUHR Board
 - Chair and members of VLUHR QA Board
 - Representatives of Advisory Committee (including HEI, trades unions, and student representatives)
 - A sample of members of review panels, including students and international members
 - VLUHR QA staff
 - University and College representatives with experience of study programme assessment (as recipients)
 - Representatives of VVS (Flemish Student Organization)
 - Representatives of NVAO (Accreditation Organization)
 - Representatives of the Ministry of Education

Self-evaluation document

12. The self-evaluation document submitted by VLUHR QA (2014) comprised an account of the following principal areas:

- **Joint Preface** by Chair of VLUHR QA Board and Director of VLUHR QA
- **Part 1: Quality Assurance in Flanders**
 - The context
 - The Flemish higher education system
 - Evaluation of higher education
 - VLUHR QA
 - History of VLUHR QA
 - Structure and resources
 - Mission – vision – strategy
 - External quality assurance activities
 - International dimension
 - Internal quality assurance
 - SWOT
- **Part 2: Description and evaluation of Agency activity** against each of the ENQA membership criteria
- **Part 3: Closing Remarks**
- **Annexes**

- Annex 1: Higher Education Codex
- Annex 2:
 - Governance structure of VLUHR QA
 - Organization chart of VLUHR QA Team
- Annex 3: List of personnel comprising VLUHR QA Team
- Annex 4: First experiences from the new programme assessment round
- Annex 5: Follow-up from previous ENQA peer reviews

13. The document had been circulated widely in draft form and stakeholders confirmed that they had been able to make inputs during its preparation. The integration of the two quality assurance units has brought together two organisations with extensive experience of universities and university colleges. Overall, the Panel considered that the SER was sufficiently rigorous to allow the Panel to operate effectively. It contained full updates on the new Agency's responses to the previous ENQA reports on the two legacy agencies and contained a realistic SWOT analysis. The SER revealed a capacity for self-reflection, for meaningful analysis of the organisation's current position and an understanding of current challenges which will help the Agency to shape its future direction and strategy in a rapidly changing environment.

14. VLUHR QA (and its predecessors VLIR QAU and VLHORA QAU) have contributed strongly to the development of quality assurance in higher education in Flanders. It builds upon the extensive experience of VLIR and VLHORA in the field of external quality assurance since 1991. The Panel became aware that various higher education actors in Flanders have been lobbying for an external quality assurance system based solely on institutional-level accreditation (i.e. without study programme assessments). This would have a major impact on the future role and functions of VLUHR QA.

The Panel would urge the Agency to position itself at the centre of this debate on future approaches to QA; in the Panel's view, the Agency has much to offer the sector through its accumulated expertise, sector knowledge and accumulated institutional performance data (see para. 64 and recommendation).

The Flemish higher education system

15. VLUHR QA operates in Flanders. The Flemish Government, as one of the three Autonomous Communities of the Belgian federal state, is responsible for education in Flanders. The 'Higher Education Codex' provides the legal framework for higher education.

16. The Flemish Government has determined two types of higher education institution: statutory registered institutions and non-statutory registered institutions. As of March 2014, the group of statutory registered institutions comprises five universities ('universiteiten') and seventeen university colleges ('hogescholen'), along with a small number of institutes for post-initial education. These institutions are recognised by law and have a not-for-profit-status; overall they cater for some 95% of all higher education

students. VLUHR QA has no statutory role in relation to the non-statutory institutions.

Universities	Students	University Colleges	Students
Katholieke Universiteit Leuven	46,697	Artesis Plantijn Hogeschool Antwerpen	8,410
Universiteit Antwerpen	17,184	Arteveldehogeschool	11,764
Universiteit Gent	36,443	Erasmushogeschool Brussel	4,774
Universiteit Hasselt + transnationale Universiteit Limburg	5,153	Groep T – Internationale Hogeschool Leuven	841
Vrije Universiteit Brussel	10,658	Hogere Zeevaartschool	707
		Hogeschool Gent	12,852
		Hogeschool PXL	6,756
		Hogeschool West-Vlaanderen	5,419
		HUB-KAHO	10,483
		Karel de Grote-Hogeschool – Katholieke Hogeschool Antwerpen	11,355
		Katholieke Hogeschool Leuven	7,692
		Katholieke Hogeschool Limburg	5,942
		Katholieke Hogeschool Vives Noord	3,315
		Katholieke Hogeschool Vives Zuid	8,180
		LUCA School of Arts	2,419
		Thomas More Kempen	6,457
		Thomas More Mechelen-Antwerpen	6,423
(@31.10.13)	116,135	Total	113,789

17. Universities and university colleges are recognized by law and receive public funds. Universities also operate in the fields of scientific research and social and scientific services to the community. University colleges participate in scientific research, including research into the arts, within the framework of so-called ‘associations’. They also have a mandate to operate in the fields of project-based scientific research and, like universities, in the field of social and scientific services to the community. University colleges which organise degree programmes in Audiovisual and Fine Arts or in Music and Performing Arts have been assigned the additional mission of the development and practice of the arts.

An **association** is a separate legal entity for collaboration between one university and one or several university colleges. An important function of the associations is to optimise the collaboration between university colleges and universities in order to adopt academic standards i.e. embedding this education in scientific research – in academically oriented study programmes at the university colleges. In 2013, this process led to the integration of all academically oriented bachelor’s and master’s programmes into universities (involving 23,000 students), except those in the field of the arts and of nautical science. University colleges continue to offer professionally oriented bachelor’s programmes and education in the arts and

in nautical science. A new round of mergers of university colleges is currently taking place.

18. Other institutions can also offer higher education if they register formally with the Flemish Government. These are the non-statutory registered institutions. The registration procedure involves demonstrating financial solvency and drawing up collaboration agreements with statutory registered institutions guaranteeing student numbers and study programme continuity. Seven such institutions are currently registered: Vesalius College, Inno.com, College of Europe, University of Kent, Continental Theological Seminary, Flanders Business School and the von Karman Institute. These institutions do not receive funding from the Government. Together they offer education to about 1,000 students.

Study programmes

19. The structure of higher education in Flanders is defined by law through the Higher Education Codex. There are five types of study programme: associate degrees, academic bachelor's programmes, professional bachelor's programmes, master's programmes and doctoral programmes. These correspond respectively to levels 5, 6, 7 and 8 of the European Qualification Framework (EQF) and are congruent with the Dublin descriptors. Post-graduate teacher training programmes are not linked to the EQF. An overview of the higher education structure is shown below:

EQF	Academic higher	Professional higher	Adult education	ECTS
	Universities and university colleges	University Colleges	Centres for Adult Education and university colleges	
5		Higher vocational education (HBO 5)	Higher vocational education (HBO 5)	90-120
6	Bachelor (academic orientation)	Bachelor (professional orientation)		180
		Advanced bachelor		60
7	Master			60
	Advanced master			60
8	PhD			
	Post-graduate teacher training	Post-graduate teacher training	Post-graduate teacher training	60
	Post-graduate study programmes	Post-graduate study programmes		

20. All accredited bachelor's and master's programmes are listed in the Higher Education Register, which is managed by NVAO (www.hogeronderwijsregister.be). Higher education institutions enjoy full autonomy in designing a curriculum, but must take into account the requirements of the Higher Education Codex's provisions. The workload of study programmes is measured in credits. One credit represents 25 to 30 hours of workload. A full-time study programme amounts to 60 credits per year. Most

higher education in Flanders is delivered in Dutch. Strict language regulations are in place for bachelor's programmes (maximum 6% of the total offer of initial bachelor's programmes may be delivered in a language other than Dutch) and to a lesser extent for master's programmes (maximum 35% of the total content of Master's programmes may be delivered in a language other than Dutch). Every member of both teaching and academic staff must have an adequate level of competence in the language in which (s) he teaches a course; generally a minimum level of C1 of the Common European Framework of Reference for Languages is required.

Quality assurance in Flanders

21. In 1991, a system of independent peer review at study programme level was introduced into Flanders, first for universities and later for university colleges, a system which has since developed incrementally. From 2005 till 2013, the quality assurance system comprised peer review at study programme level, but with the addition of subsequent programme accreditation on the basis of consideration of the review report by the independent Accreditation Organization for the Netherlands and Flanders (NVAO). Study programme assessment focused on accountability, with a requirement for positive scores in six review elements (aims and objectives, curriculum, staff, services, internal quality assurance and results) to achieve a positive outcome.

22. In 2009, the Flemish Government requested VLIR and VLHORA to bring their quality assurance activities together into one organization; in 2013, a new system was announced comprising:

- institutional review, commencing in 2015
- procedures for the initial accreditation of new study programmes
- 8-yearly study programme assessments and accreditation, running to 2020.

Within this system, VLUHR QA is responsible solely for the delivery of study programme assessment.

23. The Flemish Government has chosen a three-layered system of quality assurance at study programme level.

- Institutions have prime responsibility for the organization of their internal quality assurance systems.
- Every eight years (reducing to six), an external peer review is organised by VLUHR QA at subject level. VLUHR QA is legally recognised to organise these assessments
- Programme accreditation by NVAO forms the third layer in the system, based on VLUHR QA's reports

24. The key features of the external quality assurance system for study programmes are:

- A cluster of cognate study programmes is evaluated within the same project period
- The process starts with a critical self-evaluation report, which the study programmes are required to prepare
- A panel of independent experts, visits the study programmes, discusses the quality of the study programme with all relevant stakeholders, forms a

judgement about the quality and formulates recommendations for improvement.

- The study programmes are assessed according to three generic quality standards, including different aspects of the study programme. The assessment report shows a study programme's quality profile.
- The study programme assessment is concluded with the publication of a public report. The reports include a comparative description and comparative tables.
- All criteria and procedures for the site visit and judgement are set out in the Manual for the External Quality Assurance in Flemish Higher Education
- The universities and university colleges meet the full cost of those assessments and the resulting assessment reports are used by them to apply for accreditation with NVAO.

25. From 2015 onwards, institutional reviews will be added to the accreditation system. Institutional review will be compulsory for all statutory registered institutions in Flanders and will be coordinated by NVAO. It is intended to be a periodic assessment of the policies and processes that are put in place by a higher education institution to guarantee that it is carrying out its educational duties to a high standard of quality. In 2015-2017 a first round of institutional reviews is being organised as a pilot phase. Reviews are expected to focus on the improvement function and will not have formal consequences. In 2019-2021, a second round of institutional reviews will be held, with formal consequences.

If a higher education institution wants to start a new degree programme within its approved area of competence, it needs an ex-ante accreditation. Ex-ante accreditation is a responsibility of NVAO.

26. At programme level, accreditation by NVAO forms the third layer in the system, in providing the mechanism for the state recognition of all programmes. The Accreditation Organization for the Netherlands and Flanders (NVAO) was established by the Dutch and Flemish Governments; it is an independent accreditation body, mainly funded by the Dutch and Flemish Governments. NVAO designed the overall accreditation framework and it can give advice on the composition of the VLUHR QA assessment panels. Based on the VLUHR QA assessment reports, NVAO takes the decision to nationally accredit a study programme. NVAO ascertains whether the assessment has been conducted correctly and whether the judgments of the panel are sufficiently substantiated for its own purposes. NVAO can take an accreditation decision or if necessary, can ask VLUHR QA or the institution for additional information, explanation and clarification.

VLUHR QA

27. VLUHR itself is a not-for-profit organization which has as its main goal the promotion of cooperation between Flemish Higher Education institutions and associations. Although VLIR and VLHORA continue to exist, VLUHR – as an umbrella organization of those organizations – has become the official counterpart for the Flemish Government. VLUHR also has specific roles in the fields of external quality assurance, international cooperation and development cooperation in the Flemish higher education system. For these activities VLUHR has the power to create independent entities. The first independent unit which has been created is VLUHR QA. VLUHR QA was established in 2013 under the

leadership of a newly appointed Director. The former VLIR QAU coordinator has been appointed as coordinator for academic study programmes and the former VLHORA QAU coordinator has been appointed as coordinator for professionally oriented study programmes. The staff members of the two quality assurance units continued to work on the same projects until summer 2013, when a first reorganisation of assignments took place. A sensitively managed programme of staff integration is currently in progress. VLUHR QA is responsible, under the leadership of the QA Director, for:

- coordinating and organising peer reviews of higher education programmes;
- monitoring developments in the area of quality assurance;
- participating in external projects in the area of quality assurance;
- providing services in the area of quality assurance to higher education institutions;
- preparing, implementing and monitoring decisions made by the VLUHR QA Board.

Governance structure

28. The **VLUHR Board** and the **VLUHR General Assembly** consist of representatives of universities, university colleges and associations of universities and university colleges. In accordance with the Constitution of that organization, decisions in relation to the overall headline budget and personnel policies of VLUHR QA are made by the VLUHR Board itself, on a recommendation from the VLUHR QA Board and/or the VLUHR QA Director.

29. The operation of the Agency is governed by the **VLUHR QA Board**.

The VLUHR QA Board was established in response to the suggestions of the previous VLIR QAU and VLHORA QAU reviews by ENQA relating to agency independence. It consists of seven national and international quality assurance experts. VLUHR has formally assigned the following powers to the VLUHR QA Board:

- to make recommendations on the operation and development of the quality assurance system in Flanders.
- the ratification and establishment of the review panels;
- execution and monitoring of the peer reviews and conformity of these with the 'Manual for the External Quality Assurance in Flemish Higher Education';
- participation in external projects in the context of quality assurance;
- external representation, in dealing for example with organizations such as ENQA, INQAAHE, EQAR.

The members of the VLUHR QA Board are appointed on the basis of their skills and have no demonstrable links to any higher education institution in Flanders.

30. The VLUHR QA Board sets the timetable, context and methodology for the review panels; it supervises the proper conduct of peer reviews in terms of procedure. The VLUHR QA Board may intervene if a review panel is not working in accordance with the rules. It may also intervene if a chair or member of the review panel, when working on peer reviews, acts in a way that is substantively and/or ethically incorrect (in the case of members this is done after consultation with the chair of the review panel).

The VLUHR QA Board does not influence the formation of the views and recommendations of the review panels themselves. The review panel itself is solely responsible for the content of the review report up to the time when this report is submitted for publication. At that time the VLUHR QA Board takes over responsibility for the external review report from the review panel and is responsible for monitoring any additional procedures.

31. The **VLUHR QA Advisory Committee** is a consultative body. Higher education institutions, students and social partners are involved in the activities of VLUHR QA through their representation on the VLUHR QA Advisory Committee. General and thematic topics are submitted to the VLUHR QA Advisory Committee for advice and recommendations. The VLUHR QA Advisory Committee is made up of 16 representatives of higher education institutions, who are allocated proportionally between the Associations in a 5/4/3/2/2 ratio, with 2 student representatives and 3 representatives of social partners. The VLUHR QA Advisory Committee is chaired by one of the experts from the VLUHR QA Board.

Internal organization of VLUHR QA

32. Staff are responsible, under the leadership of the Director, for coordinating peer reviews of study programmes; monitoring developments in the area of quality assurance; participating in external projects in the area of quality assurance; providing services in the area of quality assurance to higher education institutions; and preparing, implementing and monitoring decisions taken by the VLUHR QA Board. The Director is responsible for day-to-day management and is assisted in this by two coordinators. Together they form the management team of VLUHR QA. The Agency comprises 20 full-time and 3 part-time staff, including support staff. The management team meets weekly and the full team meets fortnightly. Ad hoc working groups are set up as required to prepare policy options on specific topics. The Panel found a wide range of consultative channels within the structure.

Financial resources

33. The total VLUHR QA budget consists of a general budget for its overall role as a quality assurance agency and a hypothecated budget line for programme assessments organised by VLUHR QA. The general budget is funded by all universities and university colleges, proportionate to their size and scale of activity. VLUHR QA uses a transparent system of allocated expenses per clustered assessment, approved by the General Assembly of VLUHR on 12th December 2012. The total budget amounts to €18,390,849 for the assessment cycle 2013-2020. The table below gives an overview of the planned budget.

The estimated annual budgets depend on the number of assessments which are planned in a certain year. In order to prepare for the peak in workload in 2013, four staff members were been appointed on a one year contract. VLUHR QA plans to attract additional resources from other forms of activity in the years where there is a lower income from study programme assessments, in order to keep the workforce stable.

Total VLUHR QA projected budget:

Year	2013	2014	2015	2016	2017	2018	2019	2020
Budget	1,999,242	2,876,986	2,422,376	2,477,078	1,976,397	2,379,778	2,344,199	1,914,793

Under pressure from HEIs and Government, attempts have been made to reduce the cost of external quality assurance in the current assessment round, particularly in regard to study programme assessments.

Physical resources

34. The Agency's dedicated office space is located in the city centre of Brussels. The premises are shared with staff from VLUHR, VLIR, VLHORA, Flanders Knowledge Area and EURASHE (the European Association of Higher Education Institutions). Five shared meeting rooms are available.

Mission, vision, strategy and strategic planning

35. The tasks and responsibilities of VLUHR QA have been legally defined in the Higher Education Codex. VLUHR QA and its principal bodies of governance have developed the following mission and vision for the new organization:

Mission

- VLUHR QA is an independent and external evaluation body in Flanders which contributes to safeguarding and continuous improvement of the quality of higher education.
- VLUHR QA is an essential partner in the development and stimulation of a quality culture in higher education, and as a trend-setting centre of expertise it provides services to all concerned parties.

Vision statement

36. This is:

- VLUHR QA and its partners construct a broadly supported and propagated quality culture in higher education. On account of the independence and expertise of the organization itself and of the review panels it composes and supports, VLUHR QA maintains a unique position towards the educational institutions which creates the possibility of taking a fresh, critical and constructive look at the study programmes. In regard to external evaluations, VLUHR QA uses a previously published protocol and collaborates with independent, skilled and authoritative peers. The organization is registered with EQAR and operates according to the European Standards and Guidelines (ESG).
- VLUHR QA works hand in hand with the institutions to guarantee and further develop a prime educational quality, with respect to the institutions' specific contexts and individual characteristics. If and when needed, it points out problems that require attention and challenges that might be taken up, as well as best practices which can serve as inspiration for others. VLUHR QA wants to confirm the trust of society at large in the quality of the study programmes and wants to stimulate and support the education and research institutions to achieve an internationally highly valued reputation.

- VLUHR QA takes part in the realisation of a higher education area in which institutions and organizations communicate efficiently and transparently, both internally in order to promote a smooth operation as well as towards the outside world. The latter is performed with an explicit attention towards the (potential) student, enabling him/her to make rational and informed choices on the one hand and involving him/her in the setup of the study programme on the other hand.
- With its experiences and expertise, VLUHR QA participates in both the scientific and the public debate and ensures a broad dissemination of valid information concerning quality assurance, learning and education.
- VLUHR QA is at once a critical mirror and a source and supporter of innovation and knowledge exchange. A first investment to this end by the organization is the development of each of its employees to be experts in their field and the cultivation of their professional skills. They are the most important capital of the organization and are challenged to reach their maximum potential, creating a high quality performance and a continuous growth of knowledge and experience within VLUHR QA. Secondly, the organization sets up sustainable collaborations with sound partners. In doing so, VLUHR QA profiles itself as a valued and reliable knowledge partner in the area of quality assurance.
- VLUHR QA represents involvement, expertise, independence, transparency and a constructive approach.

Five year strategic objectives

37. These are:

- VLUHR QA seeks to work in a way that maintains high quality and customer focus in its activities as a quality assurance agency.
- Acknowledging its role in society, VLUHR QA has a strong focus on providing information efficiently and effectively, for stakeholders in general and for (future) students in particular.
- VLUHR QA strives to achieve operational efficiency and an open and transparent organizational culture in which staff take responsibility and are given space to develop as professionals and to grow either within or outside the organization.
- Benefiting from its geographically central and strategic location within Europe, VLUHR QA wishes to continue the strategic development of its international network and to develop international collaboration with stakeholders in general and cross-border evaluations in particular
- Through knowledge acquisition and knowledge sharing (both within and outside the organization) VLUHR QA wishes to develop into a leading expertise centre so that it can provide services effectively to both society and stakeholders.

VLUHR QA aims at implementing the plan-do-check-act (PDCA) cycle in all its operations. With defining the mission and vision (next 10 years) and a

strategy (next 5 years) for the organization, a first step has been taken to implement the planning phase of the PDCA-cycle.

38. In shaping its five strategic objectives (SOs) VLUHR QA states that it has sought to achieve a balance between improving the quality of its current operations and preparing for the future. It wants to further improve the way it organises external assessments of higher education study programmes. By focusing on the core of education VLUHR QA hopes to contribute to the quality culture within the different study programmes (SO1). VLUHR QA believes that the results of these study programme assessments are also valuable to inform society about the quality of higher education. It therefore focusses in SO2 on communication of those results. To be able to run high quality operations and to prepare for the future, investing in a strong organization and investing in personnel is crucial (SO3). Besides the high quality implementation of study programme assessments VLUHR QA aims to closely follow international developments and to prepare for the future. VLUHR QA wishes to diversify its activities in order to be less dependent on the developments in relation to study programme assessments. It is likely that higher education institutions in Flanders will not be obliged to have their study programmes assessed externally by VLUHR QA after the end of this assessment round in 2020. VLUHR QA follows up international developments and is investigating options to become involved in projects such as cross-border evaluations (SO4). Finally, VLUHR QA wants to develop as a centre of expertise which plays a role in sharing expertise and experiences in developing quality and a quality culture in higher education in Flanders (SO5).

Update on previous Reviews

39. The 2008 and 2009 reviews of the VLIR and VLHORA quality assurance units highlighted a number of areas for development, including the areas identified during the course of the current review, as listed below. Generally, VLUHR QA has paid close attention to the earlier recommendations (**Appendix 3**) including the following:

- The new agency has re-positioned its governance so as to strengthen its autonomy, by defining more closely its operational autonomy versus its financial ownership by the Flemish higher education institutions;
- it has made some further progress in providing more accessible information for all stakeholders (including society at large) and is held back through resource constraints from making a more significant impact in this area;
- it is not part of its direct functions to maintain procedures for follow up, although this does take place following national programme accreditation by NVAO.

The criteria where less than full **compliance** has been achieved in the current review are:

ENQA criterion 1, sub-criterion (ESG 2.6): Follow-up procedures

ENQA criterion 1 (overall) (ESG 3.1): Use of external quality assurance procedures for higher education

ENQA criterion 3 (ESG 3.4): Resources

ENQA criterion 5 (ESG 3.6): Independence

ENQA Criterion 1, sub-criterion (ESG 2.8): System-wide analyses

These issues are discussed in more detail later in this report. **Overall the Panel believes that the Agency has made realistic progress with the previous recommendations, given the external constraints under which it operates.**

VLUHR QA compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area

ESG Part 2: European standards and guidelines for the external quality assurance of higher education

ESG 2.1 Use of internal quality assurance procedures (ENQA Criterion 1)

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.

Guidelines:

The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met.

If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

VLUHR QA compliance

40. The current external quality assurance system is based on the principle that the institutions themselves are responsible for – and permanently monitor – the quality of their educational activities (Higher Education Codex, Art.II.122). External assessment by VLUHR QA is intended to build on the self-evaluation carried out by the study programmes in question. Internal monitoring and periodic review is explicitly evaluated within the VLUHR QA assessment framework.

41. The Panel has confirmed that the starting point for VLUHR QA's review processes is based firmly on the institutions' self-evaluations of their own processes. The Panel has examined and explored VLUHR QA's institutional review processes, mapped against the ESG, and confirms that these are effective in testing and challenging institutions' internal quality assurance policies and their procedures for managing quality and standards.

The Panel therefore confirms that the external quality assurance procedures that VLUHR QA uses, take into account fully the effectiveness of the internal processes described in Part 1 of the ESG.

Panel judgement:

Fully compliant.

Panel Recommendations

None.

ESG 2.2 Development of external quality assurance processes
(ENQA Criterion 1 cont.)

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.

Guidelines:

In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used.

As external quality assurance makes demands on the institutions involved, a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

VLUHR QA compliance

42. The general aims and objectives of quality assurance processes are determined in law by the Flemish Government. Within this legal framework and the intermediate accreditation framework which has been established by NVAO, VLUHR QA has further developed the system, focusing on the design of procedures which are fit for purpose for the Flemish Higher Education institutions.

43. Evidence of extensive consultation both at the legislative level and then at the level of process design is fully evident. Extensive consultation on the initial approach and system had been organised by the Government and NVAO; VLUHR QA had then consulted further. Institutions were actively involved through a working group on the new accreditation system. Students were consulted in bilateral meetings and through their presence in several working groups. Employers' involvement was less marked, despite active attempts to involve them on the VLUHR QA Advisory Board. VLUHR QA also involved higher education institutions and students when developing the Manual for the External Quality Assurance in Flemish Higher Education.

44. The procedures for evaluation include clear descriptions of the different activities associated with each procedure and of the various participants involved at each stage. The procedures for external quality assurance developed by VLUHR QA are publicly available on the Agency's website. Whenever replacement or a significant revision of a procedure is proposed, this is first discussed with the higher education institutions, relevant sector organizations and experts in the field. Any significant adjustments to the criteria and procedures are normally discussed with the VLUHR QA Board and with NVAO.

Whenever changes are formally agreed, users are notified - by letter and copies of the relevant documents, so they can be aware of any changes. Officers of the Agency are expected to act in an advisory role to staff in higher education institutions, regarding all aspects of external evaluation and accreditation.

Panel judgement:

Fully compliant.

Panel Recommendations

None.

**ESG 2.3 Criteria for decisions
(ENQA Criterion 1 cont.)**

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.

Guidelines:

Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

VLUHR QA compliance

45. Evaluation activities are carried out in accordance with uniform criteria, which are published on the Agency's website. Within the programme accreditation framework there are three generic quality standards. For each generic quality standard, evaluation criteria have been defined, but with some capacity for panels to identify within the reporting structure any special features of individual programmes.

46. The Panel noted that overall there are sufficient safeguards in place to guarantee consistency of decision making. For each generic quality standard the panel has to record an evidenced judgement. The judgements have to be supported by analysis and example. The panel must make clear how it has reached its opinion, taking into account the criteria attached to the generic quality standard. In doing this, the panel takes into account any follow-up on the recommendations from the previous assessment panel and the programme's future plans. For each generic quality standard, clear evaluation criteria are formulated to guide the assessment panels in their judgement. For scoring ('unsatisfactory', 'satisfactory', 'good' and 'excellent') criteria and decision-making rules are also determined and published ('Manual for the External Quality Assurance in Flemish Higher Education', chapter 3.3.1). The VLUHR QA project manager plays an important role as a guardian of the procedures and criteria for decisions and in the moderation of outcomes.

47. Consistency in the interpretation and application of the criteria is achieved through:

- The training of expert groups,
- Professional support and oversight of expert groups by trained VLUHR QA staff
- Frequent VLUHR QA staff meetings where issues regarding the procedures for assessment of study programmes are discussed.

- Availability of clear guidance and rules, according to which the procedures for assessment and accreditation are carried out
- For expert teams, provision of methodological guidelines for the preparation of a report by the expert group
- The use of the detailed Manual for the External Quality Assurance in Flemish Higher Education.
- The organization of assessments in clusters, as a result of which the assessment panel is required to present its findings consistently and comparatively,
- A validated discipline-specific learning outcomes framework is established by field of study programme. The panel evaluates each study programme against this framework.
- Draft study programme reports are read by other VLUHR QA staff members for consistency of judgement.
- Both the draft study programme report and the draft comparative section are sent to the study programme for comment. The panel decides whether or not to take into account the study programme's remarks, but the panel has to explain the reasons for its response and justify any changes.

48. NVAO takes formal accreditation decisions on the basis of the assessment reports. NVAO independently checks, for its own QA purposes, whether the judgments in the VLUHR QA reports are based on the published criteria and are applied consistently. If NVAO finds this is not the case, NVAO can request additional information from the assessment panel or even request an additional assessment. In that sense, NVAO's scrutiny provides further quality assurance of the overall process.

VLUHR QA's procedures and criteria are well-documented. The VLUHR QA Board maintains an effective overview of its operations and has arrangements in place to ensure consistency.

Panel judgement:

Fully compliant.

Panel Recommendations

None.

**ESG 2.4 Processes fit for purpose
(ENQA Criterion 1 cont.)**

Standard:

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

Guidelines:

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.

VLUHR QA compliance

49. Under the new Flemish assessment cycle (since 2013), institutional reviews will provide the primary focus for reviewing institutional-level policies and procedures for quality assurance. This will reduce the burden of assessment at programme assessment level and re-balance the requirement for institutional-level procedures to be considered in depth as part of each programme engagement. This enables programme-level assessment to focus more explicitly on the core teaching and learning process (objectives, curriculum, and teaching staff), study programme facilities and achieved learning outcomes. This new approach should further increase the fitness for purpose of the external assessment process overall.

50. Within the quality assurance system, the procedures and processes which are used are characterised by:

- a single assessment framework which applies to all study programmes.
- an information session is held for programme providers at the beginning of each subject round, concerning the visit format, information and data needs and the structure for the involvement of the professional field in the assessment meetings
- institutions can nominate reviewers as part of the first phase of assessment panel selection. They suggest names of panel members with subject-level and educational expertise, audit and quality assurance expertise, international expertise and professional experience
- Panel members are selected according to the following specific criteria:
 - Credibility of the expert in the academic community

- Absence of any conflict of interest with the institution under review
 - Ability to integrate with the activities of the expert group
- VLUHR QA operates strict criteria relating to independence and conflicts of interest in the selection of panel members. A student member is nominated for each panel by VVS, the Flemish Student Union. The VLUHR QA Board has to agree the composition of a panel before panel members are invited. As soon as the panel is complete, NVAO also gives an opinion on the composition of the panel in terms of overall balance
- for every panel a preparatory session is organised, where panel members are trained and briefed for the assessment process. They are fully briefed about the Flemish higher education system and features of the study programmes under review.

51. The model of review adopted by VLUHR QA includes a self-evaluation report, an on-site visit, a report from the expert group a draft of which is shared with the Agency, an agreed Panel recommendation to the VLUHR QA Board and the identification of follow-up issues and recommendations for post-accreditation monitoring by NVAO (as the Flemish accrediting body) and publication of the report.

Whilst the VLUHR QA teams were operating in an overall satisfactory way at present, the Panel noted that recent budget cuts had reduced their number by one member. The Panel considered that the VLUHR QA teams were now operating at a knife-edge in terms of ensuring sufficient educational expertise was available for the review.

Panel judgement:

Fully compliant.

Panel Recommendations

That VLUHR QA keep under close review with their funders the operation of the subject Panels in terms of their strength and depth, their training and overall capacity to undertake their designated role.

**ESG 2.5 Reporting
(ENQA Criterion 1 cont.)**

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.

Guidelines:

In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership.

Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone.

In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations.

There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers.

Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

VLUHR QA compliance

52 The structure of reports follows the structure of the assessment framework itself. At the end of each study programme report, a summary of the suggestions for improvement is published to facilitate follow-up. According to the self evaluation, and the Agency's guidelines for the preparation of the report, there is a requirement that the main conclusions and analyses should be supported by the relevant facts and evidence. Reports are required to be written in a way that makes them accessible and understandable, direct and transparent - and not only for academic staff, but for other stakeholders. VLUHR QA believes that the outputs from study programme assessments should be intended to inform a broad readership - the study programme owners themselves, NVAO, and Government, current and prospective students, parents and employers.

53. All assessment reports and executive summaries are now available on the VLUHR QA website from the day of their formal release. In line with the recommendation from the previous ENQA review panel to VLHORA QAU, a separate executive summary has now been introduced for every study programme report, focusing more explicitly on the information needs of students, parents and to a certain extent also employers. This summary is intended to give insight in the profile of the programme, the educational approach, the facilities provided to students and information about employment prospects. A few days before release, a press release, in some cases with a copy of the report, is sent to a number of journalists under embargo. The Panel heard that an overview 'cluster' report is routinely prepared on completion of the review of an individual area of study.

The Panel noted that the Agency has made significant progress in making its reports more accessible and considers that it meets the threshold requirement. The Panel notes that the Agency is aware of the need for considerable further work in this area and that this represents a major plank of development in its 2014-15 action plan.

Panel judgement:

Fully compliant

Panel Recommendations:

None

**ESG 2.6 Follow up-procedures
(ENQA Criterion 1 cont.)**

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.

Guidelines:

Quality assurance is not principally about individual external scrutiny events: it should be about continuously trying to do a better job. External quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

VLUHR QA compliance

54. The Flemish Government has determined the route for ensuring follow-up on external assessment undertaken by VLUHR QA. The Higher Education Codex (Art. II.122) defines a clear division of tasks, under which **institutions** are deemed primarily responsible for their internal quality assurance processes, including follow-up on external quality assurance. Most institutions therefore, as part of internal QA arrangements, request that each study programme reports within a year following an external assessment on how it is following up the suggestions from that report. Several institutions also undertake mid-term additional progress reviews between two external assessments. The formal external requirement is for institutions to report annually to the Flemish Government in their annual report on how they have followed up on external assessments. In the context of institutional-level audit, NVAO checks internal quality assurance procedures, including a review of how the institution guarantees follow-up on external quality assurance reports.

55. Within the framework of this legal context, VLUHR QA has developed several measures to facilitate the process:

- It summarises all suggestions for improvement at the end of each study programme report
- Study programmes get the opportunity to comment on the report. They usually outline as a response to the report the improvement measures which they propose to implement
- Each study programme is requested to report in its next self-evaluation report in detail about the follow-up of all suggestions for improvement. Since 2013, this overview is an obligatory annex to the report.

56. After the assessment process has been completed, study programmes have to apply for accreditation with NVAO. NVAO decides whether or not to accredit the study programme based on the published VLUHR QA assessment report. NVAO may take three types of decisions; it may decide to grant or not to grant accreditation to a programme, or to grant it for a

limited period. In the event of a decision to grant accreditation for a limited period, the institution may have a new, external assessment carried out. The option to grant accreditation for a limited period has been added in the new accreditation cycle. In the case of a negative score against the generic quality standard, NVAO grants only a temporary accreditation for a maximum of 3 years. This temporary accreditation is subject to preparation of an improvement plan. At the end of the temporary accreditation an external peer review panel has to assess the achieved improvement.

57. The Panel reviewed the effectiveness of the monitoring of the action plans and discussed it with external representatives; despite the split responsibilities for the effective monitoring of follow-up, it believes that monitoring overall is effectively carried out. It would recommend however that the role of VLUHR QA should become more central to the process as the recipient of follow-up reports.

Panel judgement:

Substantially compliant

Panel Recommendations

That the responsible Flemish bodies consider whether full responsibility for consideration of follow-up reports should rest primarily with VLUHR QA as part of a more structured and transparent process.

**ESG 2.7 Periodic reviews
(ENQA Criterion 1 cont.)**

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.

Guidelines:

Quality assurance is not a static but a dynamic process. It should be continuous and not 'once in a lifetime'. It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

VLUHR QA compliance

58 The cycle of procedures for assessment is governed by the law on higher education and is clearly outlined. External study programme assessments are undertaken by VLUHR QA on a cyclical basis. Accreditation is generally awarded for 8 years. As study programme assessment reports are used as the basis for accreditation requests, these assessments are also planned in cycles of eight years. The deadlines (report publication date, accreditation application date and transitional accreditation expiry date) are clearly communicated to the study programmes and are defined at the beginning of every cycle. Both VLUHR QA, and the Higher Education Register provide complementary timetables for review and accreditation terms for every programme. The length of the cycle is driven by the belief that study programmes should have enough time to implement structural improvements based on the panel's suggestions and to document the results of these improvements in their next self-evaluation report.

The procedures used for the external assessments are described in the Manual for the External Quality Assurance in Flemish Higher Education, and are publicly available (see ESG 2.2).

Panel judgement:

Fully compliant

Panel Recommendations

None.

**ESG 2.8 System-wide analysis
(ENQA Criterion 1 cont.)**

Standard:

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

Guidelines:

All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work.

VLUHR QA compliance

59. VLUHR QA currently undertakes a limited number of activities in support of system-wide analysis, including:

- “cluster reports” whereby common issues arising from a generic study programme assessment are reported on in a single document. In every report of a clustered assessment, a separate chapter presents the comparative analysis of the assessed programmes. Although officially not required, VLUHR QA strongly advises review panels to include a policy-oriented chapter in the report. This has become prevalent in recent years, especially in respect of clustered assessments.
- VLUHR QA presents occasional papers on aspects of the quality assurance system on a system-wide level.

60. A previous ENQA review panel had suggested that VLHORA should analyse the annual reports higher education institutions submit to the Flemish Government. Based on an analysis of the publicly available annual reports, VLUHR QA had concluded that the level of detail did not allow for useful analysis at study programme level. The VLUHR QA Board had also determined that Agency resources were insufficient to undertake extensive activity in this area. VLUHR QA has now set up a working group to consider and propose options to make more accessible the results of external assessments, including the development of a database. This is an item within the VLUHR QA action plan for 2014.

61. The panel recognises that, given the intensity of the workload required to support its current assessment activities, VLUHR QA’s human capacity for system-wide analysis is severely constrained. Nevertheless this area of its activity was found to be markedly underdeveloped.

Panel judgement:

Partially compliant

Panel Recommendations

- That VLUHR QA consider how the outputs from its review activities can be further focused to support system-wide analysis and institutional quality improvement and enhancement.
- The Panel recognises the constraints currently faced by the Agency through significant financial pressures and the volume of procedure-driven activity. However, it is recommended that, to fully realise its potential, the Agency discuss with its stakeholders options to increase its resources for this purpose. The additional resource thus gained could then be directed to increase the volume of system-wide analysis and quality enhancement activity which VLUHR QA can undertake.

ESG Part 3: European standards and guidelines for external quality assurance agencies

ESG 3.1 Use of external quality assurance procedures for higher education (ENQA Criterion 1 cont.)

Standard:

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.

Guidelines:

The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions. The standards for external quality assurance should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

VLUHR QA compliance

62. The Panel's assessment of VLUHR QA's compliance with Part 2 of the ESG is described in detail in the preceding part of the report.

In making an overall evaluation it can confirm that VLUHR QA's processes and procedures are based on, and are substantially compliant with Part 2 of the ESG.

Panel judgement:

Substantially compliant.

Panel Recommendations

None.

**ESG 3.2 Official status
(ENQA Criterion 2)**

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.

VLUHR QA compliance

63. The roles and responsibilities of VLUHR with respect to the coordination of external assessments are established by Government decree (Higher Education Codex, Art. II.122 §3) and in the VLUHR Statutes.

In addition to this formal, legal recognition, the accreditation body (NVAO) also endorses the Manual for External Quality Assurance in Flemish Higher Education, devised by VLUHR QA, as a recognised instrument in direct support of its accreditation role.

Panel judgement:

Fully compliant.

Panel Recommendations

None.

**ESG 3.3 Activities
(ENQA Criterion 1 cont.)**

Standard:

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

Guidelines:

These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

VLUHR QA compliance

64. The main activity of VLUHR QA is the delivery of study programme assessments. All review activities are undertaken on a regular and cyclical basis. The overview of all assessments was made available during the site visit. In the current cycle (2013-2020), VLUHR QA will organise at least 114 clustered assessments, involving 987 study programmes. Criteria and methodologies for the operation of programme procedures have been developed, tested and implemented. They are applied consistently across all higher education institutions.

**Panel judgement:
Fully compliant**

Panel Recommendation

The Panel would urge the Agency to position itself at the centre of the debate on future approaches to QA; in the Panel's view, the Agency has much to offer the sector through its accumulated expertise, sector knowledge and accumulated institutional performance data. VLUHR QA operates a comprehensive and complex set of external quality assurance procedures at the programme level and a new institutional review method is being rolled out. It is open for discussion as to whether the combined weight of these procedures is really the optimum mechanism for the maintenance and enhancement of quality in Flemish HE. It is under discussion as to whether programme-level and institutional-level accreditation may in future be merged into a single process. It is recommended that VLUHR QA position itself in the centre of this debate with Government and HE stakeholders; it has much valuable experience and insight to offer in the debate.

ESG 3.4 Resources

(ENQA Criterion 3)

Standard:

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

VLUHR QA compliance

65. VLUHR QA is mainly funded by the Flemish higher education institutions. The Flemish Government sees quality assurance as well as its funding as the responsibility of the higher education institutions themselves. The available budget is sufficient to deliver the basic subject assessments. This has been achieved against a backdrop of savings measures prompted by an overall budget reduction of 15 per cent in the first year of operation. In consequence the number of panel members has been reduced, as well as the length of site visits. Based on the evaluation of the workload and the feedback from the first assessments within the new accreditation system, VLUHR QA will evaluate the effectiveness of the current budget in the autumn of 2014. At present it does not offer space for developing extra activities, such as sharing of good practices among institutions. Under pressure from higher education institutions, which see the impact of Government budget cuts on their own budgets, the budgets for external assessments have been reduced to a level that begins to challenge the high quality VLUHR QA aims for.

66. VLUHR QA results from the integration of the VLIR and VLHORA QA units, but the staff have remained largely on the payroll of VLIR and VLHORA. VLUHR QA hopes that the integration process will be completed by later in 2014. The Panel notes that the process is being handled sensitively, but would urge completion as quickly as possible, so as to confirm a sense of unity and purpose for the new organisation.

67. The Panel can confirm that VLUHR QA staff are highly skilled, have experience and expertise. The Panel heard that they provide strong support and guidance to the review panels, which is strongly appreciated. There is an attitude of professionalism, flexibility and mutual support. €21,000 per year is budgeted for the professional development of staff. The available budget for professional development is complemented by income from the active participation of staff members in external activities. In the light of current workloads, VLUHR QA plans a more detailed evaluation of the workload of staff members in the course of 2014. Competence management and a performance management review cycle are central to the developing personnel policy. Yearly evaluation and planning meetings with every staff member contribute to the continuous development of the staff, based on the Plan, Do, Check, Act approach. This policy is being developed and implemented during 2014

68. Besides the permanent staff, VLUHR QA engages external experts as members of the VLUHR QA Board and of its peer review panels. The members of

the QA Board receive a financial compensation for their work. Members of the peer review panels receive a compensation based on the expected amount of work.

69. The Agency rents appropriate and accessible accommodation in Brussels, which is well-serviced and appropriately fitted out.

70. VLUHR QA undertakes a full programme of accreditation at programme level which presents it with a heavy workload. The Panel concurs in the view that it has just sufficient resources to support its current operations in their current (already reduced) format. The Panel can also confirm VLUHR QA's commitment to the ongoing personal and professional development of its staff and reviewers, which are key resources.

71. The Panel would however suggest that the pressure on resources is severely limiting the capacity of VLUHR QA as an agent for change and as an engine for quality enhancement as evidenced by the lack of any significant sector-wide analysis. Further investment would allow it to make a significantly greater contribution to quality enhancement.

Panel judgement:

Substantially compliant.

Panel Recommendation:

That the full merger of staff into the new organisation be completed as soon as possible.

**ESG 3.5 Mission statement
(ENQA Criterion 4)**

Standard:

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

Guidelines:

These statements should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

VLUHR QA compliance

72. VLUHR QA has developed a mission and vision statement that holds explicit and clear goals and objectives as part of a broader strategic exercise to define the profile and the ambitions of VLUHR QA. A working group consisting of staff members drafted several proposals and several follow-up meetings were held with the whole quality assurance team. Based on this exercise, the management team subsequently finalised the mission and vision statement. These statements have been discussed with the VLUHR QA Board and the VLUHR QA Advisory Committee. The final statement is available on the VLUHR QA website.

Following completion of the mission and vision statement, strategic and operational objectives of VLUHR QA have been developed under the guidance of an external consultant. The Agency has now developed an annual operating plan. The Panel confirms that this maps appropriately to the mission and vision statements.

Panel judgement:

Fully compliant.

Panel Recommendation

None

ESG 3.6 Independence (ENQA Criterion 5)

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.

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.

VLUHR QA compliance

73. In response to the suggestions of the previous ENQA peer reviews of VLIR and VLHORA, additional steps have been taken to strengthen operational independence within VLUHR QA. VLUHR QA operates on the basis of 'balancing dependencies' through a structure intended to offer a good balance between independence from, and ownership by, the higher education institutions. The following arrangements are in place:

Organisational independence

- The Flemish Government creates the legal framework for the assessments organised by VLUHR QA, but does not have any formal link with the organization.
- The VLUHR Board, which is composed of representatives of higher education institutions, limits itself to long term financial and strategic decisions on quality assurance.
- In line with the suggestions of the former ENQA Panels which evaluated VLIR QAU and VLHORA QAU, a dedicated VLUHR QA Board has been established for VLUHR QA. Evaluation activities are the sole responsibility of the VLUHR QA Board and are thus now fully separated from the VLUHR governance structure.
- Most of the staff are still officially employed by VLIR or VLHORA. In February 2014, the VLUHR Board decided to transfer all VLUHR QA staff members during 2014. An independent personnel policy will be developed for VLUHR QA in the course of the year 2014.

Operational independence

- The division of labour between the VLUHR Board and the VLUHR QA Board is stated in a Governance Structure document. The VLUHR QA Board guarantees the operational independence of VLUHR QA. It guides VLUHR QA and ratifies the proposals for composition of all assessment panels.

Financial independence

- The Flemish Government does not fund any of VLUHR QA's activities. It sees the financing of external quality assurance as a sole responsibility of the higher education institutions. Direct financial independence from Government is thereby guaranteed.
- The higher education institutions fund the general budget of VLUHR QA and the direct costs of external assessments. A general agreement on the cost for the whole assessment cycle is signed with the involved institutions.
- Within VLUHR, VLUHR QA has a separate hypothecated budget, in order to keep finances clearly separated and ensure full accountability.

Independent assessments

- Panels of independent peers are responsible for the assessments. Whilst they are nominated by institutions, the Panel noted that great care is exercised by VLUHR QA and its procedures to ensure their independence of operation. Each panel is supported by a VLUHR QA staff member who is trained to be a neutral project manager during the whole assessment process. Each panel is fully independent within the operational framework of the Manual for External Quality Assurance in Flemish Higher Education. The panel consults all relevant stakeholders (staff, students, alumni and employers) during the assessment visit to the programme, but is fully autonomous in the formulation of its conclusions and recommendations.
- To ensure the independence of the assessment panels, safeguards are built into the entire appointment procedure:
 - The study programmes under evaluation are only involved in the first phase of the composition of the panel: they suggest candidate panel members and draw up a proposal for panel chairs.
 - The chair can propose additional candidate panel members.
 - The VLUHR QA Board has to confirm every proposal for the composition of a panel.
 - Incompatibility grounds are defined.
 - Candidate panel members are required to sign a statement of independence as a precondition for joining the panel. At the end of the assessment process, the panel members have to sign their statement of independence again, and have to declare that they have carried out the assessment in complete independence.
 - Before the panel can officially start its work, its independence is again checked by NVAO.

74. The universities and university colleges fund VLUHR QA's programme of work. The lines of communication across this relatively small sector are potentially very short. Despite this potential source of influence, the Panel agreed that VLUHR QA was successful in maintaining an operational 'firewall' around its activity. The Panel concluded that a high level of operational independence was in fact achieved by virtue of the Agency's legal status; through the overall structure of its governance; through its independence in developing its own

criteria and procedures and in the selection of experts; and through its independence in decision making. The Panel agreed that the VLUHR QA Board would need to continue to vigilant in maintaining this independence into the future.

75. The Panel noted that involvement of students and representatives of industry and professional bodies in VLUHR QA's Committees of Governance, (although meeting ENQA expectations), was relatively small and agreed that this could with advantage be reviewed.

Panel judgement:

Substantially compliant

Panel Recommendation

- That VLUHR QA consider a strengthening in the involvement of students and representatives of industry and professional bodies in its governance arrangements. Its stakeholder profile outside the higher education sector is limited.

ESG 3.7 External quality assurance criteria and processes used by the agencies (ENQA Criterion 6)

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, 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.

Guidelines:

Agencies may develop and use other processes and procedures for particular purposes. Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.

Agencies that make formal quality assurance decisions, or conclusions which have formal consequences, should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

VLUHR QA compliance

76. VLUHR QA's procedures involve:

- A subject self-evaluation report by a University or College, prepared in response to pre-defined criteria. Processes, criteria and procedures are described in the Manual for External Quality Assurance in Flemish Higher Education, which is publicly available. Information about the various steps and procedures in the process is also given to the study programme coordinators during the introductory workshop and to the assessment panels during the inaugural meeting
- An external evaluation by an expert group which includes a site visit.
- Assessment/external assessment by a group of experts, including a student member
- An evaluation report, which includes mandatory input from students (both from those attached to the Team and those from within the institution)
- The report is submitted to the University or University College for factual corrections
- The University or University College draws up a response
- On the basis of the evaluation, an accreditation decision is taken by the national responsible body (NVAO)
- Subsequent monitoring is carried out through post-accreditation monitoring and control procedures over defined periods.
- Reports are published on the VLUHR QA website and can be ordered via print-on-demand.

77. The Panel explored arrangements for submitting appeals against Panel decisions. The quality assurance units of VLIR and VLHORA had an internal appeal procedure from 2009. Between 2009 and 2013 the appeal procedure was used in seven cases. The current procedure allows an appeal against the final study programme report in the case of a negative generic quality standard score. An internal appeal committee then evaluates whether the assessment report is clear in its argumentation and whether the stated elements support the scores. The appeal committee can decide (1) that the appeal is unfounded, (2) that the panel should better substantiate its judgements, (3) that the panel should visit the study programme again in order to re-evaluate the relevant generic quality standard(s) again or (4) that a new panel should re-evaluate the relevant generic quality standard(s) again.

Within the new assessment round, direct experience of complaints and appeals has been limited to seven issues of varying complexity. Discussions are underway in the Agency's Appeals Committee to codify more precisely the circumstances in which a new review panel would be appointed to re-assess a unit of provision in whole or in part. Disagreement with the conclusions of the first review report would not in itself constitute justifiable grounds for appeal and review by a new panel.

The Panel has reviewed the operation of the developing appeals system and believes it to be operating effectively. The Panel concurs in the view that the grounds for appeal must be tightly defined and relate primarily to procedural defect.

Panel judgement:

Fully compliant.

Panel Recommendations

None.

**ESG 3.8 Accountability procedures
(ENQA Criterion 7)**

Standard:

Agencies should have in place procedures for their own accountability.

Guidelines:

These procedures are expected to include the following:

- 1 A published policy for the assurance of the quality of the agency itself, made available on its website.
- 2 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.
- 3 A mandatory cyclical external review of the agency's activities at least once every five years.

VLUHR QA compliance

78. With respect to peer review panel members, the institutions are asked to signal relationships and links with the proposed candidates. The panel members themselves sign a declaration of independence or a no-conflict of interest testimony, upon acceptance of the membership of the expert panel. Panel members are scrutinised by the project managers of VLUHR QA for any relations with the institutions under evaluation.

The expertise of the expert panels in terms of discipline related expertise and labour market expertise, audit expertise, international expertise, educational expertise and the student perspective is safeguarded by the profiles of the experts, who are brought together in the peer review panels.

The final composition of the panels is double-checked by the accreditation body (NVAO) against their criteria of independence and expertise. In the case of possible relationships, an additional screening is conducted before a final decision is taken about the inclusion of the expert in the panel.

79. VLUHR QA uses one sub-contractor (for the physical design of the assessment reports).

80. VLUHR QA is developing its internal quality assurance system. A description of this system is available on the VLUHR QA website. Various mechanisms are in place to register, discuss and interpret the findings and suggestions from all stakeholders. Following its establishment as a new

organization, a quality handbook has been developed to present internal quality assurance procedures in a coherent way; this was made available to the panel during the site visit. Stakeholders have a voice in evaluating how the review process is being conducted and has been perceived by the panels, the higher education institutions and the study programmes. They all have the right to comment on the processes and procedures and are actively probed for their recommendations for further improvement of VLUHR QA's functioning. The feedback mechanisms (internal as well as external) are oriented towards constant improvement of the processes and procedures and the functioning of VLUHR QA as an evaluation body. After the suggestions and recommendations have been discussed with the VLUHR QA Board and discussed with the VLUHR QA Advisory Committee, the improvement measures are included in the yearly action and improvement plan for internal quality assurance.

81. Internally, quality assurance is a regular topic at team meetings, at meetings of the management team, at the IQA working group and at the VLUHR QA Advisory Committee. Stakeholders are surveyed for their remarks and suggestions for improvement of the system.

82. In regard to the cyclical ENQA external review of quality assurance agencies, the Quality Assurance Unit of VLHORA (VLHORA QAU) underwent its first external audit in 2008; the Quality Assurance Unit of VLIR (VLIR QAU) underwent its first external audit in 2009. Since its merger in 2012, VLUHR QA, as the legal successor of VLIR QAU and VLHORA QAU, is now undergoing the external review process in June 2014.

83. The Panel has reviewed documentation indicating that:

- VLUHR QA's processes reflect very clearly its mission and objectives for quality assurance
- The Agency applies no-conflict-of-interest mechanisms with respect to the appointment and activities of external experts
- VLUHR QA maintains reliable training and updating mechanisms to ensure the quality of all activities performed by external experts
- VLUHR QA seeks feedback from reviewers, officers and higher education providers on the performance of reviewers during review
- VLUHR QA seeks internal feedback from officials and reviewers working within the agency
- VLUHR QA seeks feedback from institutions and other stakeholders

The Agency submits itself to cyclical external review at least once every five years through its ENQA membership.

Panel judgement:

Fully compliant.

Panel Recommendation

None.

ENQA Criterion 8

- 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 judgments and decisions are reached in a consistent manner, even if the judgments 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.

VLUHR QA compliance

84. The Manual for the External Quality Assurance in Flemish Higher Education and internal quality handbook guarantee a consistent approach to all assessments managed by VLUHR QA. Regular (two-weekly) staff meetings offer enough space for exchange between project managers and management team to discuss how to handle all aspects of the assessments. Where panels are operating simultaneously in the assessment of programmes within the same or similar field of study, frequent exchanges are organised between panel chairs and panel secretaries, to make sure judgments and decisions are reached in a consistent manner. VLUHR QA plans in its action plan for 2014 to undertake an evaluation of the chosen approach to parallel panels and plans an exchange of experiences with fellow quality assurance agencies on this topic.

85. Building on the long traditions in external quality assurance activities of VLIR and VLHORA, in the past year VLUHR QA has developed an own identity, a unified team, and the necessary structures to strengthen its role in promoting a quality culture in higher education in Flanders and abroad. The new VLUHR QA Board with international QA experts has started its task. VLUHR QA is actively involved in the ENQA network and has the ambition to continue to contribute actively to the aims of ENQA. VLUHR QA pays special attention to the international dimension of external quality assurance. Flanders is a small region. In order to get new and independent insights, international experts (often from the Netherlands) have been involved in external quality assurance processes since their start in 1991. Already in the 1990s common assessments have been organised with a Dutch counterpart VSNU (predecessor of QANU). Besides international input within assessment processes, VLUHR QA also highly esteems exchanges with other quality assurance agencies. Exchanges within ENQA and other international networks and projects allows for knowledge development and professional development for staff

86. The first partner region for international interactions has always been the Netherlands. VLUHR QA functions in a bi-national accreditation system for the Netherlands and Flanders, with the Accreditation Organization for the Netherlands and Flanders (NVAO) as a common accreditation organization. This system offers an international perspective on how the quality assurance system is built. Besides NVAO, VLUHR QA also maintains contacts with its counterpart of the French speaking part of Belgium and with its Dutch counterparts. VLUHR QA plays an active role within the ENQA structures and participates as much as possible in ENQA seminars and workshops. A VLUHR QA staff member is chair of the ENQA Working Group on KP3 (Knowledge on Part 3 of the ESG). VLUHR QA staff members are involved in ENQA-peer review panels which evaluate European QA agencies (European Chemistry Thematic Network Association – ECTNA, Unibasq – Spain and National Centre for Public Accreditation NCPA – Russia). In addition, staff members of VLUHR QA regularly give presentations about the Flemish quality assurance system at the European QA Forum (EQAF) and other seminars and conferences, as well as in response to requests from higher education institutions, NVAO and foreign delegations. VLUHR QA is a member of INQAAHE (International Network of QA Agencies in Higher Education). VLUHR QA aims to become more active in international projects. VLIR staff members have been involved in the definition of an assessment protocol and in the examination of the quality of education, research and management at the University of Luxembourg (Grand Duchy of Luxembourg). VLHORA staff members were involved in the setting up of an accreditation system in Bosnia-Herzegovina. Staff members also played an active role in the E-xcellence+ and E-xcellence NEXT-projects coordinated by the European Association of Distance Teaching Universities (EADTU) which developed quality assurance tools for distance education. Finally, VLIR QAU and VLHORA QAU were both registered in the European Quality Assurance Register (EQAR). EQAR has granted VLUHR QA provisional registration until 31/12/2014.

87. VLUHR QA's policies and procedures are described fully in its publications and it is governed by these procedures in all of its actions and decision-making processes; they provide the reference point for internal and external stakeholders alike. The Panel considers that VLUHR QA has in place robust internal quality control mechanisms which ensure that judgements and decisions are consistently made. The quality of its work is overseen and managed by professional staff.

Appeals procedure

The Appeals procedure is discussed under Standard 3.7.

Panel judgement:

Fully compliant.

Panel Recommendations

None

Aspects of good practice

88. In addition to examining VLUHR QA's compliance with the ESG, this review has also identified a number of commendable features of the Agency's work.

- Overall the Panel believes that the Agency has engaged purposefully and made realistic progress with the recommendations of the previous ENQA reviews of its legacy organisations, given the external constraints under which it operates
- The Panel was impressed by the energy and commitment of VLUHR QA's staff and its future ambitions
- The Agency's progress in and commitment to developing its own internal QA procedures

Summary of recommendations

89. The Panel makes a number of specific recommendations to VLUHR QA. These are:

- That VLUHR QA keep under close review with their funders the operation of the subject Panels in terms of their strength and depth and overall capacity to undertake their designated role.
- That the responsible Flemish bodies consider whether full responsibility for consideration of follow-up of reports should rest primarily with VLUHR QA as part of a more structured and transparent process.
- That VLUHR QA consider how the outputs from its review activities can be further focused to support system-wide analysis and institutional quality improvement and enhancement. The Panel recognises the constraints currently faced by the Agency through significant financial pressures and the volume of procedure-driven activity. However, it is recommended that, to fully realise its potential, the Agency discuss with its stakeholders options to increase its resources for this purpose. The additional resource thus gained could then be directed to increase the volume of system-wide analysis and quality enhancement activity which VLUHR QA can undertake.
- The Panel would urge the Agency to position itself at the centre of the debate in Flanders on future approaches to QA; in the Panel's view, the Agency has much to offer the sector through its accumulated expertise, sector knowledge and accumulated institutional performance data. VLUHR QA operates a comprehensive and complex set of external quality assurance procedures at the programme level and a new institutional review method is being rolled out. It is open for discussion as to whether the combined weight of these procedures is really the optimum mechanism for the maintenance and enhancement of quality in Flemish HE. It is under discussion as to whether programme-level and institutional-level accreditation may in future be merged into a single process. It is recommended that VLUHR QA position itself in the centre of this debate with Government and HE stakeholders; it has much valuable experience and insight to offer in the debate.
- That the full merger of staff into the new organisation be completed as soon as possible
- That VLUHR QA consider a strengthening in the involvement of students and representatives of industry and professional bodies in its governance arrangements. Its stakeholder profile outside the higher education sector is limited.

Summary of VLUHR QA's performance against the ENQA membership criteria

90. The criteria where **full compliance** has been achieved are:

ENQA criterion 1, sub-criterion (ESG 2.1): Use of internal quality assurance procedures

ENQA criterion 1, sub-criterion (ESG 2.2): Development of external quality assurance processes.

ENQA criterion 1, sub-criterion (ESG 2.3): Criteria for decisions

ENQA criterion 1, sub-criterion (ESG 2.4): Processes fit for purpose

ENQA criterion 1, sub-criterion (ESG 2.5): Reporting

ENQA criterion 1, sub-criterion (ESG 2.7): Periodic reviews

ENQA criterion 2, (ESG 3.2): Official status

ENQA criterion 1, sub-criterion (ESG 3.3): Activities

ENQA criterion 4 (ESG 3.5): Mission statement

ENQA criterion 6 (ESG 3.7): External quality assurance criteria and processes used by the agencies

ENQA criterion 7 (ESG 3.8): Accountability procedures

ENQA criterion 8 (miscellaneous)

The criteria where **substantial compliance** has been achieved are:

ENQA criterion 1, sub-criterion (ESG 2.6): Follow-up procedures

ENQA criterion 1 (overall) (ESG 3.1): Use of external quality assurance procedures for higher education

ENQA criterion 3 (ESG 3.4): Resources

ENQA criterion 5 (ESG 3.6): Independence

The criteria where **partial compliance** has been achieved are:

ENQA Criterion 1, sub-criterion (ESG 2.8): System-wide analyses

Conclusion

91. Progress has been, and continues to be made on the recommendations from the ENQA Reports on the two predecessor organisations.

In the light of the documentary and oral evidence considered by it, the Review Panel is satisfied that, in the performance of its functions, VLUHR QA remains in substantial compliance with the ENQA Membership Provisions.

The Panel therefore recommends to the Board of ENQA that VLUHR QA should have its Full Membership of ENQA confirmed for a period of five years.

APPENDIX 1

Site visit to VLUHR QA: 23 – 24 June 2014

Schedule of meetings

Venue: Ravensteingalerij 27 bus 3&6
B-1000 Brussels

Mon 23 th June

08.30-09.00	walk hotel-premises	<ul style="list-style-type: none"> Patrick Van den Bosch, staff member VLUHR QA
09.00-10.15	management team of VLUHR QA and writer SER	<ul style="list-style-type: none"> Maria Weymans, director VLUHR QA Marleen Bronders, coordinator VLUHR QA Klara De Wilde, coordinator VLUHR QA Pieter-Jan Van De Velde, staff member VLUHR QA and author SER
10:15-10:30	break	
10:30-11:30	chair and members of VLUHR QA Board	<ul style="list-style-type: none"> Nik Heerens, former Head of Sparqs (Student Participation in Quality Scotland), researcher at the Combined Universities in Cornwall (CUC), in combination with a PhD at the University of Exeter in the United Kingdom (Chair QA Board) Henning Dettleff, deputy Managing director of the Foundation for International Business Administration Accreditation (FIBAA) Bonn, Germany (member QA Board), former policy advisor for higher education at the Confederation of German Employers Martin Prchal, former Chief Executive at European Association of Conservatoires (AEC), Vice-Principal at the Royal Conservatoire, University of Arts The Hague, Netherlands (member QA Board) Frans van Steijn, secretary of the Rector's Conference, Association of Universities in the Netherlands VSNU (member QA Board)
11:30-11:45	break	
11:45-12:45	chair and members of VLUHR Board	<ul style="list-style-type: none"> Willy Claes, chair Association University-University colleges Limburg (chair VLUHR Board) Toon Martens, chair VLHORA Board and general director Leuven University college (Vice-chair VLUHR Board) Paul De Knop, chair VLIR Board and rector Vrije Universiteit Brussel (member VLUHR Board) Rosette S'Jegers, secretary-general VLIR
12:45-13:45	lunch	
13:45-14:00	visit to the premises	

14:00-15:00	representatives of Advisory committee (HEI, employees bodies, including student representative)	<ul style="list-style-type: none"> • Joke Claeys, quality assurance coordinator Ghent University (UGent) • An Faems, coordinator unit external quality assurance, Vrije Universiteit Brussel • Veerle Hulpiau, quality assurance coordinator, University of Leuven (KU Leuven) • Nora Laermans, quality assurance coordinator, Erasmus University College Brussels • Inge Lambrechts, coordinator quality assurance and Educational innovation, Artesis Plantijn University College Antwerp • Hilde Sels, quality assurance coordinator, Thomas More University College • Ilse Verachtert, domain coordinator quality assurance in education, University of Antwerp
15.00-15:15	break	
15.15-16:15	members of review panels, including students and international members	<ul style="list-style-type: none"> • Guido Cuyvers, former head of department Social Work, Thomas More University College, Belgium (member assessment panel Philosophy) • Ivan D'Haese, staff member Education development and Renovation University College Ghent (member assessment panel Midwifery) • Marinel Gerritsen, professor Intercultural Business Communication, Radboud University Nijmegen (member assessment panel Linguistics and Literature - re-assessment after negative accreditation) • Romain Hulpia, former advisor higher education, Department for Education and Training, Flemish Government (chair assessment panel Office management) • Ton Kallenberg, head of department, Education and Research, Erasmus University Rotterdam, the Netherlands (chair assessment panel Nursing) • Jan Kuijpers, professor Astronomy and Astroparticle Physics, Radboud University Nijmegen (member assessment panel Astronomy) • Hugo Marynissen, doctoral researcher, Cranfield University; managing partner, communication agency PM (member assessment panel Communication Management) • Kristof Muylaert, student professional bachelor in Nursery education, Leuven University College, Belgium (Student member assessment panel Nursery) • Eliane Schoonman, owner and consultant, Issues Management Institute; lecturer, Erasmus University Rotterdam (member assessment panel Communication Management)
16:15-16:30	break	
16:30-17:30	QA staff (incl. administrative staff)	<ul style="list-style-type: none"> • Peter Daerden, staff member VLUHR QA • Els Van Zele, staff member VLUHR QA • Filip, Lammens, staff member VLUHR QA • Jannes Motmans, staff member VLUHR QA • Jessica Martin, administrative assistant VLUHR QA • Anne-Sophie Seghers, staff member VLUHR QA • Patrick Van den Bosch, staff member VLUHR QA • Evelien Vandenhaute, staff member VLUHR QA
18:00	private panel diner	

Tue 24 th June

08:30-09:00	walk hotel-premises	
09:00-09:30	VLUHR MT to point out any missing information or documents	<ul style="list-style-type: none"> • Maria Weymans, director VLUHR QA • Marleen Bronders, coordinator VLUHR QA • Klara De Wilde, coordinator VLUHR QA
09:30-10:30	representatives of assessed study programmes	<ul style="list-style-type: none"> • Gisèle Broos, programme director Commercial Communication – Artesis Plantijn University College Antwerp • Thu Dang, vice-dean Preschool, Primary and Secondary Education – GROUP T – International University College Leuven • Veronique Graing'Orge, programme director Office management – University College HUB-KAHO • Prof. dr. Ann Heirman, quality assurance coordinator Department Oriental Languages and Cultures – University Ghent • Prof. dr. B. Raymaekers, dean, Institute of Philosophy – KU Leuven • Liesbeth Van Herck, programme director Nursing – University College Ghent
10:30-10:45	break	
10:45-11:45	representatives of VVS (Flemish Student Organization)	<ul style="list-style-type: none"> • Astrid Van Laere, Board member Education Flemish Student Union • Marthe Gousseau, staff member Educational Assessments Flemish Student Union
11:45-12:00	break	
12:00-13:00	representatives of NVAO (Accreditation Organization)	<ul style="list-style-type: none"> • Ann Demeulemeester, vice-chair NVAO Board • Lucien Bollaert, member NVAO Board
13:00-14:00	lunch	
14:00-15:00	representatives of Ministry/administration of Education	<ul style="list-style-type: none"> • Micheline Scheys, secretary-general, Department for Education and Training • Noël Vercruysse, senior Project Manager Internationalisation Higher Education, Department for Education and Training
15:00-17:00	private meeting to pinpoint preliminary findings	
17.00-17.15	feedback preliminary findings to VLUHR QA	
17.15	end of the peer review	

APPENDIX 2

DOCUMENTARY EVIDENCE
1. Documents submitted in advance
Self Evaluation Report (SER) dated 31 March, 2014
2. Further documents/information requested and provided in advance:
Compositions of VLUHR QA Board; VLUHR Board; Advisory Committee; expert panels by subject
Breakdown of annual budget (current and projected) by principal headings of income and expenditure (2013-2020)
Budget allocations at programme review level for 2013
Available analysis of stakeholders feedback
Sample agendas and minutes of VLUHR QA Management Team for 2014
Sample agendas and minutes of weekly staff meetings for 2014
Agendas and minutes for meetings of VLUHR QA Board 2013-2014
A brief description of NVAO's role
Examples of expert training material including training for student members
Outputs from staff survey (June 2013) and focus group (2014); from focus group meetings with HEIS (2013)
3. Further documents made available during visit:
Strategic and operational objectives and annual planning statement
Sample programme review reports
4. Website
www.vluhr.be/kwaliteitszorg

APPENDIX 3 RESPONSE TO PREVIOUS ENQA REVIEWS (Extract from VLUHR QA's SER)

ESG 2.1 – Use of internal quality assurance procedures		
VLIR	Fully complies	No suggestions
VLHORA	Complies	No suggestions
Follow-up		In the development process of the new assessment and accreditation framework, Part I of the ESG has been taken into account.

ESG 2.2 – Development of external quality assurance processes		
VLIR	Fully complies	The panel recommends a stronger involvement of stakeholders. This could be realised for instance by the formation of a specific advisory board or steering committee for the VLIR QAU, with sufficient representation of stakeholders. The panel recommends viewing stakeholders as much broader than solely employers and students; parents, trade unions, teachers, schools, guidance
VLHORA	Complies	Whilst the panel considers that VLHORA complies with standard 2.2, it recommends that constructive approaches to wider engagement with the process of embedding the master programmes of university colleges into research are sought, particularly with the rather short timescale within which the process is due to be completed.
Follow-up		<p>The establishment of VLUHR QA, the VLUHR QA Board and the VLUHR QA Advisory Committee guarantee a broader stakeholder involvement.</p> <p>VLHORA has undertaken the following actions in order to meet the recommendations of the panel: The academic bachelor and master programmes offered by the university colleges are in the process of converting into full academic programmes. These programmes must fulfil the academic standards by the end of the academic year 2012-2013. In the transitional period, the assessment of these programmes must take into account the potential interconnection between education and research. NVAO described the transition and the impact on the evaluation and accreditation in its accreditation framework that is an annex of the Manual for the external quality assurance in Flemish Higher Education. In order to ensure that the panel has sufficient information about the progress of the transition, VLHORA determined in detail which information is required in the self-evaluation report. The adaptation was discussed with the institutions on the one hand and with VLIR and NVAO on the other hand. The panel members who assessed the programmes in transition in 2008 were invited to discuss the profile of research of the university colleges and to specify which elements will be taken into account to assess the potential to fulfil the academic standards by 2012-2013. The results were used to draw up a guideline for the panels. The guideline was discussed first with the Working Group QA of VLHORA and was afterwards finalized after discussion with NVAO and VLIR. In November 2009, NVAO drew up a guideline for the accreditation of these programmes. In January 2010, VLHORA integrated the guideline of NVAO and her own guideline in one document that is available on the website (Dutch version). The assessment panels receive the guideline, which is amply discussed during the kick-off-meetings of the panels. VLHORA points out that the focus gradually shifts from the potential interconnection between education and research to the actual interconnection towards the end of the assessment cycle. Since the start of the academic year 2013-2014 these study programs are integrated in the universities.</p>

ESG 2.3 – criteria for decisions		
VLIR	Fully complies	<p>Programmes are assessed on the basis of 6 themes, 21 aspects, 50+ criteria and 100+ points of attention.</p> <p>The panel considers this is to be a very elaborate framework and also as not quite in line with the character of a peer review. Care should be taken that the QA process does not develop into a more or less mechanical audit process where long lists of criteria are ticked off.</p> <p>Whatever the number of criteria, it should be clear before the start of the process which criteria will (primarily) be used by the panel. It appears that sometimes panels make a selection of „points of attention“, but this is only communicated after the programmes have drawn up their self-evaluation report (but before the assessment visits). These „points of attention“ are not to be viewed or used as separate evaluation criteria, but any confusion about their status should be avoided by clarifying more explicitly to the study programmes under evaluation that the „points of attention“ are not meant to be evaluation criteria themselves.</p> <p>The position of the „master after master“ (Flemish: manama) programmes should be clarified; the development of specific criteria for assessment seems desirable. Furthermore, extra care should be taken to avoid that Manama programmes suffer from inadequate clustering in the assessment process.</p> <p>Review panels draw up a „referential framework“ (a discipline-specific frame of reference) as a concretisation of the theme „Aims and objectives of the programme“ of the NVAO accreditation framework. This referential frame-work is presented to the programmes before the visits, but after submission of their self-evaluation reports. The panel understands that it is difficult to do everything sequentially (as the duration of the total process is already substantial) but it would be preferable for the programmes to have the referential framework at their disposal earlier so as to be able to use it such (as a frame of reference) in the process of writing the self-evaluation report.</p>
VLHORA	Complies	No suggestions.
Follow-up		<p>The assessment framework has been simplified. Study programmes are evaluated on three generic quality standards.</p> <p>The number of master after master programmes has been reduced. It is clarified that these programmes have to fulfil the same standards as other master’s programmes.</p> <p>A discipline-specific learning outcomes framework has been introduced. In contrary to the previous system, this framework is to be developed by all involved study programmes in preparation of the external assessment.</p>

ESG 2.4 – processes fit for purpose		
VLIR	Fully complies	<p>The entire process, from initial preparation until the final accreditation decision can take up to three years. In a sense this leads to a system that produces „historical“ decisions. This has to do with several factors, some of which (like the clustered reviews) should not be discarded lightly while others (a very long process of panel formation, submitting accreditation applications late) might be reconsidered.</p>

VLHORA	Substantially complies	Within the legal framework in which VLHORA has to operate it is clear that the QA system 'works', however the panel recommends that VLHORA and its various key stakeholders reflect further on, and identify more clearly, the aims and objectives that it is seeking to achieve through its processes. This will be important as it moves into a further period of change with the amalgamation of VLHORA with VLIR.
Follow-up		The length of the total process has been reduced. The length between inauguration meeting and publication has been reduced to 1 year. Also the accreditation should be provided faster after the publication of the assessment report. Objectives of the system and the organization have been defined explicitly.

ESG 2.5 – Reporting		
VLIR	Fully complies	The panel strongly recommends making the relevant information in the panel reports more readily available to prospective students and other stakeholders. The VLIR QAU has drawn up a communication plan for this purpose. The panel recommends that this plan be executed. However, the panel is not recommending the construction of ranking tables based on the information.
VLHORA	Substantially complies	The panel recommends that VLHORA consider the introduction of a short summary, which would be a useful instrument for students and the interested public to obtain easy access to the most important findings about a specific programme.
Follow-up		<p>The issue of the readability of the assessment reports is met in the new assessment round with the introduction of a summary as a standard element of each assessment report.</p> <p>VLUHR QA is aware of the importance of communication, hence the establishment of a permanent working group Marketing and Communication. This working group discussed the framework of the summary. Follow up of the usefulness of the framework and exchange of experiences is scheduled for the staff meetings. Furthermore the satisfaction of the study programmes and the panels concerning the summaries is surveyed in the questionnaires. VLUHR QA plans to discuss the information value of the summaries in the annual meeting with VVS and with the Advisory Committee, where VVS and the social partners are represented.</p> <p>With communication as a strategic goal, VLUHR QA emphasizes furthermore its importance for the organization. Two operational goals are defined. VLUHR QA will develop a communication policy and will take into account the communication plan that VLIR QAU made, based on an analysis of the expectations of students, parents and student advisory organizations. In the context of the merger of VLIR's and VLHORA's QA activities, VLHORA QAU joined this project. The Boards of VLIR and VLHORA however decided to wait for the new accreditation round 2013-2020. The second operational goal concerns the publication of the results of the reviews. For 2014 two actions are planned, namely a policy for press releases and the preparation of a seminar.</p>

ESG 2.6 – follow-up procedures		
VLIR	Fully complies	Improvement of the quality of programmes is a central purpose of the system. It is evident that such improvements are taking place, but primarily at the discretion of the faculties or universities. Given the emphasis of all parties on the improvement function, one would expect some form of (external) monitoring of improvement, which is not the case. The panel recommends remedying this. One possibility, which does not exclude others, would be to give VLIR QAU a role in this.
VLHORA	Substantially complies	The review panel finds that these external measures are a suitable replacement for a specific and predetermined VLHORA follow up procedure. However a clearly defined follow-up procedure within the quality-assurance procedures of VLHORA is missing and thus the panel comes to the conclusion that VLHORA substantially but not completely complies with ESG standard 2.6. As a consequence the panel recommends that VLHORA introduces a clearly defined, predetermined follow-up procedure

Follow-up	<p>In accordance with the Higher Education Codex VLUHR QA is responsible for carrying out external quality assessments of study programmes in higher education. The follow up of the results of the assessments is a responsibility of the higher education institutions.</p> <p>In 2009, the quality assurance units of VLIR and VLHORA discussed with representatives from the higher education institutions whether additional follow-up measures would be useful. The higher education institutions clearly indicated that they don't see a need for additional follow-up.</p> <p>The previous peer review panel suggested VLHORA to analyse the annual reports higher education institutions submit to the Flemish Government. Based on an analysis of the publicly available annual reports, it is clear that institutions report on the follow-up of assessments, but the level of detail doesn't allow for a useful analysis on study programme level for VLUHR QA.</p>
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ESG 2.7 – periodic reviews		
VLIR	Fully complies	No suggestions.
VLHORA	Complies	The panel considered a cycle of eight year to be somewhat on the long side, particularly in comparison with other practices in Europe. This view was also shared by some of the interviewees but as the cycle is predefined by law the question was not investigated any further.
Follow-up		The Flemish Government has decided that in the current assessment round the length of the cycle stays eight years. It is foreseen that in a next round, the length of an assessment cycle will become six years.

ESG 2.8 – System-wide analyses		
VLIR	Substantially complies	The VLIR QAU has a wealth of information about university programmes at its disposal. That could and should be put to descriptive and analytical use. The VLIR QAU has developed plans to compile broader analyses. The panel recommends that these plans be realized.
VLHORA	Complies	No suggestions
Follow-up		On a system-level, VLUHR QA writes and presents occasionally papers in which it analyses aspects of the QA system on a system-wide level. VLUHR QA created a working group to analyse options to further disclose the results of external assessments. Next to initiatives to disclose the individual reports better, also an analysis of both suggestions for improvement and best practices is planned. Suggestions for improvement have always been summarised in the reports. Best practices will be described and recorded in a database to make them more accessible for further system-wide analyses. The development of this database is part of the VLUHR QA action plan for 2014.

ESG 3.1 – Use of external QA procedures for higher education		
VLIR	Fully complies	No suggestions
VLHORA	Complies	No suggestions
Follow-up		The procedures haven been adapted, in order to be in line with the new accreditation framework.

ESG 3.2 – official status		
VLIR	Fully complies	No suggestions
VLHORA	Complies	No suggestions
Follow-up		The Flemish Government has transferred the competence to organize external study programme assessments from VLIR and VLHORA to VLUHR QA.

ESG 3.3 – Activities		
VLIR	Fully complies	No suggestions
VLHORA	Complies	No suggestions
Follow-up		External study programme assessments are the core activity of VLUHR QA.

ESG 3.4 – Resources		
VLIR	Fully complies	No suggestions
VLHORA	Complies	No suggestions
Follow-up		Based on the evaluation of the workload mentioned under 2.2 Structure and resources and the feedback of the first assessments within the new accreditation system, VLUHR QA will evaluate the current budget in fall 2014.

ESG 3.5 – Mission statement		
VLIR	Fully complies	The VLIR QAU has described adequately what it does, but has no explicit statement about what it wants to achieve. In the Self-Evaluation Report, the intention is stated to formulate a true mission statement. The panel agrees that this certainly should be done. The Unit definitively has an expertise and overview that certainly warrants a broader contribution to the development of QA than only via its coordination function.
VLHORA	Substantially complies	The review panel recommends that VLHORA review its mission statement and include a description of the purposes, goals and objectives of its specific QA roles, as well as of the relationship with its relevant stakeholders and society.
Follow-up		As indicated in the self-evaluation report VLUHR QA has developed a mission and vision statement that holds explicit and clear goals and objectives as part of a broader strategic exercise to define the profile and the ambitions of VLUHR QA. A bottom-up development process has led to the mission statement as it stands. A working group consisting of staff members drafted several proposals and several follow-up meetings were held with the whole QA team. Based on this exercise, the management team subsequently finalised the mission and vision statement. These statements have been discussed with the VLUHR QA Board and the VLUHR QA Advisory Committee. The VLUHR Board adopted the mission statement on 12th February 2014. The final statement is published on the VLUHR QA website.

ESG 3.6 – independence		
VLIR	Fully complies	<p>The VLIR QAU is sufficiently independent. There is however a case for enhancing unambiguous operational independence without detracting from the VLIR's formal responsibility for the execution of the external QA in any way.</p> <p>Due to the intended merger of the VLIR and VLHORA the original plans to create an „operational bureau“ have been postponed. The panel would suggest that preparations continue so that the new structures can be implemented at the moment of the merger; there should be a clear implementation plan. The panel finally stresses that the „degree“ of independence must be wisely chosen to prevent loss of „ownership“ by the university sector. The ambition to engage more independently in policy preparation processes should be handled cautiously (Self-Evaluation Report, p. 36).</p> <p>There is no doubt about the independence of the panels. Although the process of panel formation is not entirely transparent, the panel considers the many safeguards that are built in as adequate. It is recommended though to make the process entirely transparent. One way to achieve this could be by making the VLIR QAU primarily responsible for the panel formation. Development of a pool of panel members by the VLIR QAU would also enhance possibilities for training panel members, and might also enlarge the number of international peers. This would not necessarily have to exclude faculties from the possibility of nominating candidates.</p> <p>A specific problem seems to be the availability of student panel members. The concept of a pool could be used here as well. The panel feels that it is not necessary for a student member to be enrolled for exactly the same programme as is under review. It would be sufficient if it is a related programme. This would enlarge the number of students that are available.</p>
VLHORA	Complies	<p>The review panel suggests that although the system is predefined by law and seems to work rather well, independence would be more secure if there were greater involvement of the external stakeholders in the different bodies of VLHORA. The review panel commends the establishment of the Advisory Board but recommends the introduction of a VLIR/VLHORA steering committee with external stakeholders as members. Also the review panel is of the opinion that the division between VLHORA as an umbrella organization and VLHORA the QA agency should be more explicit and be more clearly reflected in the statutes of VLHORA.</p>
Follow-up		<p>From 2009 on, the Flemish Government requested VLIR and VLHORA to bring their QA activities together in one organization, VLUHR. VLUHR therefore has been formally established by the Flemish universities, university colleges and associations on 20th December 2010. The operational implementation took until 2013 because of differences in the positions of the VLIR and VLHORA Boards on the strengthened cooperation and on the structure and the leadership of VLUHR and its QA unit.</p> <p>As soon as VLUHR QA was established, it created the independent VLUHR QA Board. This Board, consisting of seven national and international QA experts, took over decisions on the operations of VLUHR QA from the VLUHR Board and creates thus additional guarantees for the independent processes of VLUHR QA. The new structure fully separates the evaluation activities of the agency.</p> <p>In 2013 the operational integration of the two QA units was finalized under the leadership of a newly hired director QA. The higher education institutions, students and social partners are involved in the activities of VLUHR QA through their representation on the QA Advisory Committee. The QA Advisory Committee is made up of 16 representatives of higher education institutions, 2 student representatives and 3 representatives of the social partners.</p>

ESG 3.7 – external QA criteria and processes used by the agencies		
VLIR	Fully complies	No suggestions.
VLHORA	Complies	Whilst in a strict sense VLHORA does not have a follow-up procedure within its own activities it is the panel's view that the overall QA / legal framework in which VLHORA operates does provide an equivalent, and there is thus compliance with ESG 3.7. The panel recommends however that the annual reporting by the university colleges to the Committee is in some way integrated within VLHORA information gathering, thus 'closing the loop' more explicitly with regard to this standard.
Follow-up		Based on an analysis of the publicly available annual reports, it is clear that institutions report on the follow-up of assessments, but the level of detail doesn't allow for a useful analysis on study programme level for VLUHR QA. The quality assurance units of VLIR and VLHORA discussed in 2009 with representatives from the higher education institutions whether additional follow-up measures would be useful. The institutions clearly indicated that they don't see a need for additional follow-up.

ESG 3.8 – Accountability procedures		
VLIR	Fully complies	In general, the internal QA relies for a substantial part on relatively „soft“ instruments; is largely informal. Given the scale and the number of key persons and parties involved, this is feasible. The panel however, would welcome a more systematic approach: periodic reviews of the processes, an annual action plan et cetera. The panel regards the use of the electronic survey as a useful addition in this regard. The internal evaluation process of the Unit should also take stakeholders' views more into account.
VLHORA	Substantially complies	VLHORA clearly has procedures for its own accountability in place. The review panel finds that internal accountability is provided through different measures (surveys, IQA) but for full external accountability, although VLHORA is developing new processes (appeal system, advisory board) the structures are not in place yet and therefore full accountability is still to be achieved. The newly established Advisory Board is a first step but the review panel feels that VLHORA could and should consider being more open to external viewpoints. The panel is of the opinion that VLHORA would find it useful to reflect on the wider expectations of accountability, and identify the specific roles and responsibilities of each stage in its procedures. The simple question – 'Who is responsible for the VLHORA recommendation to NVAO?' did not meet with a single (or simple) answer from all involved in the various activities. Because of the above the panel finds that at this moment VLHORA is substantially, but not completely, in compliance with ESG 3.8.
Follow-up		Following its establishment as a new organization, VLUHR QA has developed its internal quality assurance system.