
ENQA AGENCY REVIEW: QUALITY ASSURANCE NETHERLANDS UNIVERSITIES (QANU)

MARIA E. WEBER, VINCENT WERTZ, HERMANN BLUM
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EXECUTIVE SUMMARY

This report analyses the compliance of Quality Assurance Netherlands Universities (QANU) with the standards 2.4, 2.7, 3.1 and 3.4 of the ESG¹. The report is based on a partial external review conducted between September 2018 and April 2019 for the purpose of QANU's renewal of registration in the European Register of Quality Assurance Agencies (EQAR). The review was coordinated by the European Association for Quality Assurance in Higher Education (ENQA).

QANU has been awarded ENQA membership after an external review in 2016. The decision on membership was taken by ENQA Board in November 2016, based on the review panel's report. The Board concluded that QANU has complied with the ESG and listed a series of recommendations aiming to support the further enhancement of QANUs' work.

At the same time, QANU used the 2016 review report for a renewal of its registration on EQAR. However, EQAR's Register Committee rejected QANU's application in November 2017, stating that the agency only achieved partial compliance with a number of standards and thus failed to meet some key requirements of the ESG. In early 2018, QANU submitted an appeal to EQAR's Appeals Committee. On 11 May 2018, the Appeals Committee decided to reject QANU's appeal and confirm the Register Committee's decision to reject QANU's application. Following this, the Board of QANU decided, at its meeting in June 2018, to accept EQAR's conclusion and apply for a focused review, since such a possibility was laid down in EQAR's rejection letter. According to EQAR's Procedures for Applications, QANU had the right to undergo a focused review addressing those issues that led to rejection of application, and reapply within 18 months from the date the rejection letter was issued. The Board of QANU decided to commission ENQA for the coordination of such focused review. Opposite to a full review, a focused or partial review (following ENQA's terminology) addresses solely the ESG that were assessed by EQAR's Register Committee as partially compliant and therefore led to rejection of application². In August 2018, QANU, ENQA and EQAR agreed on the Terms of Reference³ of the partial review, following ENQA Rules and Procedures and the requirements of EQAR. In line with the Terms of Reference (ToR), the review panel for the partial review was asked to analyse to what extent QANU is compliant with the following ESG (the issues that were raised by EQAR as particularly critical are listed in the brackets next to each standard):

- ESG 2.4 Peer-review experts (involvement of students as the expert panel members in the case of assessments of research units/PhD programmes)
- ESG 2.7 Complaints and appeals (lack of the appeals procedure for the assessment of research programmes units / PhD training programmes; lack of the possibility to issue a compliant for assessment of degree programmes; handling of complaints in the case of assessments of research units/PhD programmes and appeals in the case of assessments of degree programmes by the Board),
- ESG 3.1 Activities, policy and process for quality assurance (involvement of stakeholders (e.g. students) in the governance of QANU)
- ESG 3.4 Thematic analysis (systematic approach in the production of thematic analyses).

In addition, the appointed review panel analysed any eventual changes and developments in the agency (since the last review) beyond the standards listed under the scope of this partial review.

¹ Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

² Opposite to ENQA's four-scaled assessment scheme (full, substantial, partial, non-compliant), EQAR applies a three-scaled scheme. The individual standards are assessed only as "compliant", "partially compliant" or "non-compliant".

³ See annex 3 of this review report.

The review panel for the partial review of QANU was composed of the following members:

- **Maria E. Weber** (chair, quality assurance professional, ENQA nominee), Head of Department of Accreditation & International Affairs, Agency for Quality Assurance and Accreditation Austria (AQ Austria), Austria,
- **Vincent Wertz** (academic representative, ENQA nominee), professor at UCLouvain, Belgium,
- **Hermann Blum** (student representative, ESU nominee), student at ETH Zürich, Switzerland.

The review panel conducted a site visit on 18 January 2019 and concluded that QANU complies with the above-mentioned ESG. The review panel's conclusions and recommendations in relation with each relevant ESG are the following:

Standards and guidelines for quality assurance in the European Higher Education Area (ESG 2015)	ENQA review panel 2019 conclusions	Recommendations & Suggestion
2.4 Peer-review experts	Substantially compliant	The review panel <i>recommends</i> QANU to continue playing an active role in the future in order to ensure that student members become a constituent element in the new Standard Evaluation Protocol.
2.7 Complaints and appeals	Fully compliant	The review panel <i>suggests</i> QANU to publish its complaints and appeals procedure on its website.
3.1 Activities, policy and processes for quality assurance	Substantially compliant	The review panel <i>recommends</i> QANU to further expand its own Board with a wider stakeholder involvement from the field of the labour market/employers.
3.4 Thematic analysis	Fully compliant	/

The review panel noted progress towards full compliance across the relevant ESG mentioned above.

The review panel believes that QANU presented itself as an agency willing to strive actively towards implementation of developments and changes made since the full review in 2016. The panel noted progress on all above-mentioned standards and found the agency compliant with the ESG. Nevertheless, procedures and policies have been only developed and have not been yet put in practice in all cases. In short, these developments are: a new policy towards a systematic approach for producing thematic analyses; a revision of the agency's complaints and appeals procedure towards the inclusion of research units/PhD programmes; a change towards the stakeholder involvement in the agency's governing body; a distinction between the agency's consultancy activities and assessment procedures and reflection of QANU's mission statement in the agency's day-to-day operation; and last, but not least, an inclusion of a student member in panels for the assessment of research units/PhD programmes. In conclusion, the review panel is convinced that the implementation of procedures and policies developed, will support further enhancement and improvement of quality regarding QANU's activities and operations.

INTRODUCTION

Background of the review and outline of the review process

BACKGROUND OF THE REVIEW

QANU reconfirmed its membership with ENQA in 2016, when the agency underwent its second review against the ESG. Next to renewing its membership with ENQA, the agency used the review report as a basis for the registry on EQAR.

In November 2017, EQAR's Register Committee rejected QANU's application for the renewal of registration in the Register. The agency was first informed that EQAR's Register Committee disagrees with some of ENQA's review conclusions, and therefore, that the Committee is undecided whether QANU qualifies for a renewal of its inclusion on the Register. Following this, QANU was invited to submit additional information on issues subject to rejection. However, the additionally provided documentation did not convince the Register Committee and the application was finally rejected in November 2017. QANU decided to submit an appeal and received a rejection letter by EQAR's Appeal Committee in May 2018. The letter stated that the initial decision of EQAR's Register Committee from November 2017 was confirmed.

At its meeting in June 2018, the Board of QANU discussed the final decision of EQAR and concluded that the inclusion on the Register was still to be considered as a core objective of the agency. Therefore, QANU decided to undergo a focused review in line with EQAR's rules and regulations and address the areas that led to QANU's rejection. According to EQAR's Procedures for Applications (see Article 21), QANU had the right to undergo a focused review addressing those issues that led to rejection of application, and reapply within 18 months from the date the rejection letter was issued. The Board of QANU decided to commission ENQA for the coordination of such focused review. In August 2018, QANU, ENQA and EQAR agreed on the Terms of Reference⁴ of the review, following ENQA Rules and Procedures and the requirements of EQAR. From this point onwards, ENQA's methodology and terminology for the review was applied (naming the review a partial review instead of a focused review). Opposite to a full review, this partial (or focused) review addressed solely the ESG that were assessed by EQAR's Register Committee as partially compliant and therefore led to rejection of QANU's application. EQAR judged all the below listed ESG as partially compliant, which led the agency to be rejected from the registry on EQAR. Under each of the listed ESG, EQAR asked several issues to be carefully analysed in the partial review:

- ESG 2.4 Peer-review experts: Involvement of students as the expert panel members in the case of assessments of research units/PhD programmes;
- ESG 2.7 Complaints and appeals: Lack of the appeals procedure for the assessment of research programmes units / PhD training programmes; lack of the possibility to issue a compliant for assessment of degree programmes; handling of complaints in the case of assessments of research units/PhD programmes and appeals in the case of assessments of degree programmes by the Board;
- ESG 3.1 Activities, policy and process for quality assurance: Involvement of stakeholders (e.g. students) in the governance of QANU);
- ESG 3.4 Thematic analysis: Systematic approach in the production of thematic analyses.

⁴ See annex 3 of this review report.

In addition, the appointed review panel was asked to analyse any eventual changes and developments in the agency (since the last review) beyond the standards listed under the scope of this partial review.

MAIN FINDINGS OF THE 2016 REVIEW FOR THE ESG 3.1, 3.4, 2.4 AND 2.7

In line with the evidence provided in the 2016 review, the ENQA review panel concluded that QANU was in compliance with the ESG. The observations, analysis and conclusions of the review panel in the 2016 review report aimed to be used by QANU to further enhance and improve quality regarding its core activities. The assessments and recommendations for the ESG 3.1, 3.4, 2.4 and 2.7 from 2016 are summarized in the table below.⁵

ESG	Judgement	Recommendations from 2016
3.1	Partially compliant	<p>The review panel recommends QANU to fine-tune its mission and to clearly strive for translation of it into its day-to-day operation. The review panel recommends working on an organizational chart, which, as a starting point, could also support visibility of the mission statement within the agency as such.</p> <p>The review panel recommends using the mission statement in place for further development of strategic planning approaches, including stakeholder opinions in a formalized way.</p> <p>The review panel recommends considering and expanding its own board to ensure a wider stakeholder involvement in its own governance. QANU should in particular strive for inclusion of student representative members in its board. In addition, QANU should impact, as a stakeholder, the inclusion of students (PhD candidates) in the experts' panels in the SEP.</p>
3.4	Partially compliant	<p>The review panel recommends QANU to take up a pro-active and formalized role with regard to thematic analysis.</p> <p>The review panel recommends especially using the experience of project coordinators gained from various assessment procedures in order to conduct the thematic analysis in the narrow sense.</p> <p>The review panel recommends QANU to intensify exchange of experiences with other stakeholders, such as NVAO, the Ministry and universities, on a systematic basis, in order to further jointly develop the system of external quality assurance.</p>
2.4	Substantially compliant	<p>The review panel recommends QANU to explicitly strive in its role, as a stakeholder, for the inclusion of students (PhD candidates) in panels in the assessment of research units (incl. PhD programmes). In addition, the review panel recommends that international experience should also be represented in the assessment panel.</p> <p>The review panel recommends formalizing the process of convening a panel, supported by written documentation and guidance concerning potential causes for conflict of interest.</p>

⁵See https://enqa.eu/wp-content/uploads/2016/12/ENQA-Agency-Reviews_QANU-final-report.pdf

		The review panel recommends intensifying cooperation, concerning the training of panel chairs jointly with NVAO.
2.7	Substantially compliant	The review panel recommends QANU to reflect on the complaint and appeal procedure for the assessment of research units (incl. PhD programmes). The review panel recommends QANU to publish its complaints and appeals procedure concerning the assessment of study programmes on its website.

REVIEW PROCESS

The partial review of QANU was conducted in line with the process described in the Guidelines for ENQA Agency Reviews and in accordance with the timeline set out in the Terms of Reference.

The review panel is of the opinion that the partial review was scheduled in a narrow timeline (i.e. between September 2018 and April 2019). However, according to EQAR's rules and regulations, an applicant agency has to submit a new application on the basis of a focused review 18 months after the Register Committee's original decision. Therefore, QANU had to submit its reapplication for inclusion on the Register before 22 May 2019.

The review panel for the external review of QANU was appointed by ENQA and composed of the following members:

- **Maria E. Weber** (chair, quality assurance professional, ENQA nominee), Head of Department of Accreditation & International Affairs, Agency for Quality Assurance and Accreditation Austria (AQ Austria), Austria,
- **Vincent Wertz** (academic representative, ENQA nominee), professor at UCLouvain, Belgium,
- **Hermann Blum** (student representative, ESU nominee), student at ETH Zürich, Switzerland.

Following the Terms of Reference, QANU produced a self-assessment report (SAR) that provided evidence for the review panel to draw its conclusions. Prior to the site visit, each panel member was encouraged to use the ESG mapping grid, supplied by ENQA, for identifying evidence provided in SAR and to support conducting the site visit. Findings from the individual mapping exercise were aligned to the areas of inquiry, which, in consequence, were linked to the specific interview sessions. Decisions of the panel were reached collectively, led by the Chair. The review panel produced the final report on the basis of the SAR, oral evidence given during the site visit, as well as based on additionally provided documentation during the site visit. QANU had the opportunity to comment on the factual accuracy of the draft report.

The review panel confirms that it was given access to all documents and interview partners it considered necessary to be consulted during the review process. Additionally, the panel paid additional attention to the areas pinpointed by EQAR's Register Committee when assessing QANU's compliance with the ESG.

Self-assessment report

Following the decision to apply for a partial review in August 2018, the agency started with the drafting of the SAR. The document provided an outline on the developments of the system of external quality assurance in the Netherlands, the description of changes in the internal organisation of QANU since

2016, and informed the review panel about the measures QANU had taken as a response to the conclusions of EQAR's Register Committee on each of the standards under review.

The SAR was submitted together with the follow-up report of the agency on the recommendations of the review panel from the 2016 ENQA review⁶. The two reports were submitted as one document, but clearly separated: part I included the SAR for the purpose of this partial review, whereas part II was a follow-up report aimed at ENQA's Board.

The review panel learned that QANU's staff has been involved in the whole process of drafting the SAR by various means. The involvement was not only based on writing and discussions on the SAR, but also on the development of e.g. new documents and policies as mentioned before. The panel found out that QANU took a lot of efforts during the past months in order to show that the progress towards the compliance on the standards under this review has been made.

Site visit

The site visit was conducted on 18 January 2019 and took place in QANU's offices in Utrecht, the Netherlands. Prior to the site visit, the panel held a preparatory kick-off meeting on 17 January 2019. The panel decided to invite the managing director of QANU for a pre-visit meeting. The aim of this pre-visit meeting was to learn about the developments regarding the system of higher education and external quality assurance in the Netherlands, and to inform itself about the changes and developments in the agency.

The agenda for the site visit was prepared with the support of QANU's managing director. The review panel was able to interview the key stakeholders relevant for the scope of this partial review. Besides the meetings with QANU's staff members, the management and members of QANU's Board, the review panel also interviewed a member of Accreditation Organisation of the Netherlands and Flanders (NVAO), a member of the Association of Research Universities (VSNU) and few representatives from universities who had experience with the assessment of research units/PhD Programmes coordinated by QANU⁷.

At the end of the one-day site visit, the review panel held an internal debriefing with the aim to formulate its preliminary conclusions regarding the level of compliance of QANU with the above-listed ESG.

The review panel would like to thank QANU's Secretariat for taking care of all the catering and support provided during the site visit.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM AND QUALITY ASSURANCE - CHANGES SINCE 2016

External Quality Assurance - higher education institutions/degree programmes (Bachelor/Master)

QANU is a part of a two-tier system of the external quality assurance system introduced in the Netherlands in 2002. Since 2002, the Accreditation Organisation of the Netherlands and Flanders (NVAO) has obtained the legal power to award accreditation to study programmes that fulfil the conditions laid down in the Act on Higher Education and Scientific Research (adopted by the Dutch Parliament in 1993 and amended several times, including the change in 2002 to include accreditation).

⁶ QANU's self-assessment report from November 2018 is available here: <https://enqa.eu/index.php/external-review-report-of-qanu-2/>

⁷ The agenda for the site-visit (including the list of participants) can be found in Annex 2.

The NVAO's decisions are based upon the assessment panels' reports submitted by the higher education institutions themselves, after an assessment has been conducted. For this purpose, the higher education institutions might appoint a quality assurance agency (such as QANU), to conduct the assessment, whereas the NVAO is responsible for the development of assessment frameworks, adhering to the national legislations, and for deciding whether the (existing) study programmes are (re-)accredited. QANU, one of the quality assurance agencies in the Netherlands, conducts study programme evaluations mostly for the research universities.

ENQA review of QANU in 2016 focused on the assessment framework⁸ for study programmes that was set in 2014. Since then, the framework has been changed twice. As stated in the SAR⁹ of QANU for this partial review, the first amendment in 2015 to the above-mentioned act led to a revised version of the NVAO's framework from 2014. The core changes were in the introduction of the assessment groups and the division of a single standard on assessment and achieved learning outcomes into two separate standards: one focusing on the system of assessment and the other focusing on the assessment of the acquired learning outcomes. It was also stated in SAR that the revision of the framework starting in 2015 intended to reduce the perceived administrative burden. In order to do so, the framework for the extensive programme assessment was reduced from 16 to 11 standards and the maximum number of pages to be used by the higher education institutions for their critical reflections should not exceed 15 pages for programmes undergoing a limited assessment, and 20 pages for programmes undergoing an extensive assessment. The framework was finally approved by the competent Ministry in November 2015 and entered into force on 1 January 2017.

As outlined in the SAR of this partial review and further explained by the managing director in the pre-visit meeting, in February 2017, the competent Minister sent a proposal to conduct a pilot assessment exercise with institutional accreditation and a lighter programme accreditation plan to the parliament. At the core of this proposal was the idea that higher education institutions are to participate in the pilot assessment/project to receive institutional accreditation by law. Also, in early 2017, the Inspectorate of Education of Netherlands started an investigation of the functioning of the overall accreditation system in higher education in the Netherlands. QANU took part in an advisory group of this investigation project. The focus of the investigation was the NVAO's framework from 2014. The conclusion of the investigation led to recommendations to the competent Ministry, the NVAO and acting agencies regarding the assessment of study programmes. Most of these recommendations were, as stated in the SAR, included in the bill "Accreditatie op Maat"¹⁰ that was sent to the Parliament in June 2017. The bill led to new proposal to amend the above-mentioned Act and according to the evidence provided to the panel, the Act has elaborated on issues that were discussed by the relevant stakeholders over the past years. During the pre-visit meeting, the review panel learned that QANU took the chance and commented on the bill in writing. QANU argued, as stated in the SAR, for the replacement of the four-scale assessment (unsatisfactory - satisfactory - good - excellent) to a binary assessment scale (comply - does not comply) and also for a more structured and systematic assessment of quality assurance agencies - preferably on the basis of the ESG. The House of Representatives discussed the Act in February 2018, reflecting also on the recommendations derived from the above-mentioned investigation. A series of amendments of the Act on Higher Education and Scientific Research were agreed upon. They are, as outlined in the SAR:

⁸ Assessment frameworks for the higher education accreditation system of the Netherlands, as of 19 December 2014 (NVAO).

⁹ See: <https://www.qanu.nl/nl/node/85>

¹⁰ See: <https://www.nvaio.net/nl/procedures/nederland>

- the position of the secretary of a panel (and, in particular, the required independence) that is now explicitly laid down in the Act; this is in line with the current practice, so the change has no practical consequences;
- the training of secretaries that is now laid down in the Act explicitly; additional explanations to a certificate that the secretaries should acquire;
- the differentiated assessments (unsatisfactory – satisfactory – good – excellent) are replaced by binary assessments (comply – does not comply);
- programmes that choose to adopt another teaching language than Dutch are expected to explain why they made this choice and how they ensure that their teachers have a sufficient proficiency of the language used for teaching.

The Act has been finally approved in summer 2018. Consequently, NVAO has been working on the revision of its assessment framework¹¹. By February 2019, the new framework will have entered into force. Therefore, QANU has not yet conducted an accreditation procedure in line with this new framework.

The review panel learned that QANU is, similar as in the review 2016, conducting a large share of programme assessments for research universities in line with NVAO's assessment framework for limited programme assessments. This assessment framework is focusing on four standards (intended learning outcomes, teaching and learning environment, assessment, achieved learning outcomes). In comparison to NVAO's framework for extensive programme assessment (with eleven standards), the framework for limited programme assessment is not taking internal quality assurance per se into consideration.

External Quality Assurance - research units/PhD programmes

In addition to the assessment of study programmes, QANU also implements the assessment of research units/PhD programmes. The association of research universities (VSNU), jointly with the Royal Academy of Sciences (KNAW) and the Netherlands Organisation for Scientific Research (NWO), developed the so-called Standard Evaluation Protocol (SEP) for the assessment of research units. Since its introduction, the SEP has been revised several times. The 2016 SEP, which is still valid, is the fifth version; it has been valid since 2015 and the validity shall last until 2021. As stated in the SAR, a revision of the current version of the SEP has now started. The aim of assessments of research units/PhD programmes is, as stated in the SEP, primarily, "to reveal and confirm the quality and the relevance of the research to society and to improve these where necessary"¹². The core object of such an assessment is a research unit. A research unit is considered to be a research group, a research institute, a research cluster or all the research carried out within a faculty. The assessment is based upon three criteria: research quality, relevance to society and validity. Additionally, if a research unit/faculty offers PhD training programmes, the following aspects are taken into consideration: PhD training programmes, research integrity and diversity. According to QANU research integrity and diversity are assessed whether the unit has a PhD training programme or not. As part of an assessment, a research unit/faculty needs to produce a self-assessment report, including a reflection on its PhD training programmes and on how supervision for its PhD candidates is provided. An assessment considers the institutional context of the PhD training programmes (selection and admission procedures, programme content and structure, supervision and effectiveness of the

¹¹ Beoordelingskader Accreditatietelsel Hoger Ondervijds Nederland, as of September 2018 (NVAO). Available only in the local language at the time of the site-visit.

¹² See: <https://vsnu.nl/files/documenten/Domeinen/Onderzoek/SEP2015-2021.pdf>

programme and supervision plans, quality assurance, guidance of PhD candidates to the job market, duration, success rate, exit numbers and career prospects).

Following the guidance of the SEP, it is important for panels assessing the research units (incl. PhD programmes) to be familiar with the recent trends and developments in the research area. The board of an institution is responsible for setting up the procedure to assemble an assessment panel. The board and the research unit should ensure that the panel members' overall profile matches the research unit's research and societal domains. The research unit is asked to nominate a candidate chairperson and candidate members for the assessment panel. Before appointing the committee members, the board, once again, submits the final composition of the committee to the research unit. The unit indicates whether it agrees with the board that the committee will be capable of adequately assessing the unit's work in that particular composition. The panel incorporates solely academic members; no student members are formally foreseen.

ENQA review panel from 2016 recommended to QANU to strive in its role, as a stakeholder, for the inclusion of students (PhD candidates) in the panels for the assessment of research units/PhD programmes. During the site visit of this partial review, the panel learned that QANU has had intensive meetings with the VSNU, KNAW and NWO on the review of the SEP. While doing so, it was agreed in December 2018 that, as a pilot exercise, a student (a PhD candidate) will be included in the upcoming reviews. At the time of the site visit, the panel found that no such assessment (i.e. an assessment that would include a PhD candidate) has been implemented so far.

QUALITY ASSURANCE NETHERLANDS UNIVERSITIES

QANU IN A NUTSHELL

QANU, formally founded in 2004, is a non-profit foundation. The director of QANU explained during the pre-visit meeting that it is the QANU's Board who is ultimately responsible for QANU's activities. In accordance with the agency's Statute, the Board has mandated a director for the daily management and operation.

Furthermore, QANU has formulated its mission in accordance with the Statute of the agency. QANU is a quality assurance agency that provides services to research universities in the Netherlands. QANU is to be considered as a facilitator organisation, providing services related to (external) quality assurance to universities in the Netherlands, such as the accreditation of study programmes within the framework of limited degree programme accreditation of the NVAO. QANU is also providing services related to the assessment of research units/PhD programmes in line with the SEP, based upon the request of a research unit/faculty. With regard to the agency's funding, QANU is fully dependent on the revenues from assessments and other externally funded projects. QANU does not receive funding from the competent Ministry, nor from the NVAO, VSNU or other institutions. The review panel learned that QANU currently has 17 employees and works in addition with approximately 10 freelance secretaries.

QANU'S BOARD CHANGES SINCE 2016

As stated in the SAR, compared to the full ENQA review from 2016, QANU's Board underwent only one change. The panel considers this change as a direct follow-up to the 2016 review. QANU expanded its Board with a seventh member, a representative of students. The Board member was nominated by two main student organisations in the Netherlands, the Dutch Student Union (LSVB) and the National Student Union (ISO).

The panel found out during the site visit (and as stated in the SAR) that most of the Board members were appointed for a third and final term of office, which means that QANU will start looking for new Board members in the near future.

QANU'S STAFF CHANGES SINCE 2016

According to SAR, the composition of QANU's staff has changed significantly since the review in 2016 (see the elaboration in the following paragraph). In parallel, the panel learned that QANU has also fine-tuned its internal structure and redefined its tasks and assignments. The changes applied have been made visible in a fine-tuned organisational chart. Back during the 2016 review, QANU provided the panel with a preliminary sketch. This preliminary organizational chart has been further elaborated with a profiling of functions and organisational outlines. By doing so, the chart is reflecting on changes introduced since 2016.

During the late 2016 and in early 2017, the experienced QANU project coordinators, who have also served as project coordinators in the area of assessment of study programmes and research units/PhD programmes, left the agency. It was explained to the review panel that since June 2016, when the previous site visit for the ENQA review took place, QANU hired 12 new staff members due to the fact that 10 staff members had left the agency. As it is mentioned in the SAR, some of the former staff members continued supporting the work of QANU as freelance secretaries. The panel learned on several occasions during the site visit that QANU was able to find new dedicated, committed, enthusiastic and hard-working staff. It was underlined to the panel that the new colleagues enrich the diversity of QANU in terms of age, experience and professional background. All of this, according to the SAR and as highlighted during the interviews, has a positive effect on the agency as a whole. Intentionally and as an experiment, during 2017, QANU's director decided to redefine the tasks of the previous project coordinators that worked on the assessment of study programmes and split their tasks over to two project coordinators. As stated in the SAR, one type of a project coordinator is now involved in the planning of the assessments jointly with the director and the coordinator of the assessment of research units/PhD programmes. The other type of a programme manager is responsible for producing, maintaining and updating important internal documents that support the reviews. As an example, the SAR refers to the Guideline for producing a self-evaluation report¹³, where it is described that the second type of a project coordinator supports the director mainly with the HR related issues, e.g. development and maintenance of the introductory programme for new staff members and supervision of new staff members. Already in the autumn of 2016, QANU's director decided to appoint a project assistant as well. The role of the project assistant is to support project coordinators in their work, e.g. work with the review panel members, such as assistance on practicalities and monitoring on whether the composition of the review panel is in line with NVAO's requirements. As the review panel could learn during the site visit, the project assistant is an important support to the project coordinators. Additional changes, applied in QANU in the course of 2018, were that QANU's director decided to appoint an operations assistant in order to strengthen the QANU's operational management as a whole.

OTHER CHANGES IN QANU SINCE 2016

The review panel learned about a series of feedback and reflection sessions, organised by QANU aimed at discussing and reflecting mission-related issues. The session where attended by a core group of staff members, representing the organization as a whole (and including the director, three project

¹³ QANU Guideline for writing a self-evaluation report for limited programme assessment EN (November 2017). Handed out during site-visit.

coordinators, a project assistant and a secretary). The reflection sessions were partially supported by the external consultancy. In 2017, a core group of staff members dealt intensively with discussions and reflections on mission-related issues. The review panel learned that, due to increasing competition among agencies for performing assessments in the Netherlands, the staff wanted to clarify the agency's profile and identity. While the agency did not change its mission as such, it decided to put more attention to the various aspects of QANU's own approach to assessments. During the site visit, QANU underlined its understanding of being a customer-oriented agency, upholding its standards related to independency and professionalism. As part of the taken measures following the agency's reflection on its mission, QANU decided to strengthen its internal quality assurance. As stated in the SAR, QANU translated its mission into its day-to-day operation more visibly and explicitly through the new Quality Handbook¹⁴ that was developed after the ENQA review in June 2016. The review panel learned that the Quality Handbook is organised in line with the QANU's core activities - assessments of study programmes and assessments of research units/PhD programmes. The review panel was provided with explanation that, opposite to 2016, the new Quality Handbook compiles all measures in place into an *integrated* quality manual. All activities and tasks derived and are supported with formalized written documentation, guidance and templates, etc. The main author of the Quality Handbook was the director of QANU, however, various staff members supported the development of the document. Overall, in the opinion of the review panel, the Quality Handbook, due to its integrated approach is supporting QANU's mission and thereof derived activities being translated into day-to-day operation. The Handbook is support QANU's staff in all procedures applied with written documentation and supporting templates.

As stated in the SAR, QANU's work has additionally benefited from the introduction of a new electronic work environment that was introduced in the agency in the course of 2018. The panel learned through the site visit that a large number of projects acquired by QANU as well as the new administrative requirements, e.g. the introduction of the General Data Protection Regulation, caused the agency to struggle with its available administrative capacity, for which purpose a new electronic work environment was introduced in QANU.

To sum up, the review panel would like to state that the abovementioned changes with regard to the redefinition of tasks and new responsibilities of the staff, as well as the Quality Handbook, are to be considered as an active contribution towards enhancement and improvement of quality regarding QANU's activities and operations.

¹⁴ QANU Kwaliteitshandboek NL (version 1.0, 3 October 2018)

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

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE

Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

Evidence

QANU's mission statement, published on the agency's website, has not changed since 2016. The mission underlines that QANU contributes to further improvement of the quality of scientific education and research in the Netherlands. Furthermore, the mission states that QANU utilises its expertise and experience in European and international projects and networks within scientific education and research as well as within other sectors outside scientific education and research.

QANU's core activity is the conduct of assessments of degree programmes, while following the framework provided by the NVAO, as well as to conduct assessments of research units (including PhD programmes) offered by research universities in the Netherlands. With regard to the assessments of research units/PhD programmes, QANU is following the SEP, developed by the VSNU, KNAW and NWO. QANU is conducting these assessments on a regular basis based upon request by research universities. Whereas the framework of the NVAO has changed since the review in 2016¹⁵, the SEP has not changed since then. The review panel learned during the site visit that QANU still holds, like in 2016, a large share in the assessments of degree programmes compared to the other quality assurance agencies in the Netherlands.

The review panel additionally learned during the site visit that all QANU staff members have shown high awareness in avoiding any conflicts of interest and ensuring QANU's independence in its activities. The review panel was told, that in case a project coordinator offers consultancy services to a higher education institution, this project coordinator is not allowed to act as a secretary in the assessment procedures for a period of five years after the consultancy activity took place. All members of the management have shown high awareness in avoiding any conflicts of interest and ensuring QANU's independence in its various activities. Nevertheless, the panel found out that the activities, described by the agency as consultancy activities (such as the follow-up, trainings and stakeholders' involvement in QANU's processes) are not to be considered as *consultancy*, according to the evidence gained during the site visit and following the panel's definition of this term. The panel believes that such activities can rather be considered as providing *advice* regarding assessment procedures or *delivering guidance* or *briefing/training* of experts.

¹⁵ See chapter *Higher education system and quality assurance – changes since 2016* in this report.

In 2017, QANU held a series of sessions aimed at discussing and reflecting the agency's mission. The session was attended by a core group of staff members, representing the organization as a whole (including the director, three project coordinators, a project assistant and a secretary). As stated in SAR QANU was supported in this reflection session by an external consultancy. With the support of the external consultant QANU tried to find the answers on mission related issues that were raised on the one side by the ENQA review panel in 2016 (e.g. fine-tuning of the mission, translation of the mission into its day-to-day operation), but also tried to address the increased competition in the conduction of assessments in the Netherlands on the other side. The sessions were aimed at finding answers related to the profile and identity of QANU - while not necessarily changing the mission and vision in place. As stated in the SAR and underlined during the site visit, the result was the decision that QANU should become more strongly customer-oriented, but also uphold its standards regarding independence and professionalism. The agency decided that quality should remain in the core of QANU's work and that QANU should not become a commercial organisation primarily satisfying demands and wishes of customers.

The review panel heard during the site visit that QANU put a lot of effort, since 2016, into drafting the Quality Handbook. The Quality Handbook is not solely a tool defining, assuring and enhancing the quality and integrity of QANU, but it also supports the translation of the agency's mission into day-to-day operations. With the Quality Handbook, QANU has grouped former individual measures into one coherent document that strengthens the internal quality assurance policy of the agency. With the Quality Handbook QANU has developed a document that supports all relevant processes in place. The Quality Handbook is therefore to be considered as a core pillar of an integrated quality management system of the agency, serving the enhancement of the quality and integrity of QANU's activities. The document was drafted by the director with the support of various colleagues and supports QANU in assuring a standardised and shared approach to the agency's work, which is in line with QANU's mission, vision and values. As stated in the SAR and confirmed during the site visit, the Quality Handbook aims at further enhancing the uniformity and consistency of QANU's working methods for assessments in both agency's external quality assurance activities. In addition to the further development of the agency's Quality Handbook, QANU has also fine-tuned its organizational chart since the last ENQA site visit in 2016. The panel learned that the new chart provides a better presentation of the agency's internal structure. As explained in chapter "*QANU's staff changes since 2016*" of this report, QANU hired 12 new staff members since the autumn 2016, as core staff members left the agency. Following such large turnover of staff, QANU faced the need to discuss its internal structure and profiles of employees, which resulted in a new organisational chart. The chart, approved by QANU's Board, has been developed with the involvement of QANU's staff. As stated in the SAR, the organisational chart reflects a profiling of functions and organisational outlines and refers to - and supports the translation of - the mission of the agency.

With regard to a more formalised stakeholder approach in the agency's governance, QANU has made a progress since the 2016 review. As a recent development, the panel learned, QANU formally appointed a new member at its Board meeting in December 2018. The new- Board member represents students in the agency's governing body. Prior to this, the Board invited the LSVB and ISO, the two main student organisations in the Netherlands, to nominate a candidate for this position in the Board. The Board and the student organisations argued that a candidate with relevant experience and expertise in the area of quality in higher education should be nominated. As stated in SAR, in order to include a student member in the Board, the Statutes of the agency have been amended. The student member has been appointed for a period of two years, whereas other Board members are

appointed for three years. The appointment of the student member cannot be prolonged, whereas other Board members can be appointed for two additional periods of two years. This difference was introduced to ensure that the student representative has current student experience. As stated in the SAR, such specific condition for the membership of a student representative now derives from QANU's Statutes.

The review panel found that even a broader stakeholder involvement - towards representatives from the labour market/employers - was discussed in the agency, however, the Board decided not to introduce a wider change of its Statutes. The Board, as outlined in the SAR and emphasised during the site visit, decided against including representatives from the labour market/employers, partly because such a Board member would represent only a fragment of the labour market and, in addition, as stated in the SAR, the size of the Board could not be expanded any further (the Statutes provide for a maximum of seven Board members). The SAR additionally states that the Board of QANU is convinced that it can, as a whole, take relevant perspectives of sectors outside higher education. The Board namely felt that the labour market/employers' interests have been sufficiently taken into account through the competences, knowledge and expertise on labour market of the various Board members.

Finally, as stated in the SAR, the Board agreed that its' members should describe their involvement in the sectors outside the higher education more explicitly. The review panel was provided with an overview of QANU's Board members' experience and qualifications outside the higher education. Nevertheless, the collected evidence refers mostly to experience with regard to research and educational sector. The review panel also learned that if the Board concludes, based on the performed evaluations, that the knowledge and expertise of sectors outside the higher education need to be strengthened in the Board's composition, then the Board decides to look for a successor of one of the current Board members with a different profile.

Analysis

QANU undertakes external quality assurance activities as defined in Part 2 of the ESG on a regular basis.

QANU is concerned, first and foremost, with the assessment of degree programmes and research units (incl. PhD programmes), whereas other activities are not in a very narrow scope. As an acting external quality assurance agency in the Netherlands, QANU is formally bound by frameworks defined and adopted by other parties (NVAO and VSNU, KNAW, NWO).

As far as a distinct of consultancy activities from assessment activities is concerned QANU has a sound policy in place. In the case when a project coordinator is involved in the consultancy activities of the agency, he or she is not allowed to act as a secretary in the future assessments of that particular programme/research unit of the higher education institution concerned for a period of five years.

QANU has put efforts into discussing and reflecting on translating its mission into its day-to-day operations. As an outcome, the Quality Handbook, presented above, is not solely supporting the professional approach towards the agency's internal quality assurance, but is also a means to support the agency's external quality assurance activities. Additionally, QANU worked on its organisational chart, which, as considered by the panel, also provides sufficient visibility of the agency's mission being translated into day-to-day operations and reflects on the fine-tuning of the agency's structure and functions.

Concerning the structure of governance, the panel notes that the composition of QANU's Board still shows that the majority of the Board members are academics or with a professional background in academia. Additionally, due to the change in the agency's Statutes, QANU has opened its Board to a student representative. The perspective of labour market/employers is reflected in the governance of QANU through competences, knowledge and experience of the individual Board members. The panel concluded therefore that a systematic field-of-work involvement is at the time being only reflected indirectly through expertise from Board members. In order to strive forward towards a more systematic involvement of the expertise from labour market/employers a further change of Statutes would be needed, as it happened in the case of the student involvement.

Recommendations

The review panel recommends the agency to further expand its Board (governance) to a wider stakeholder involvement from the field of the labour market/employers.

Panel conclusion: substantially compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

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

Evidence

The review panel learned that QANU has revised its policy for analysing and sharing the outcomes of assessments implemented by QANU. The Board has approved the new policy in October 2018. The review panel was told that the policy was to be considered as a confirmation and formalisation of QANU's current policy for thematic analysis. The new policy defines explicit aims and objectives for various types of publications. As stated in the SAR, the starting point for the new policy is that QANU acquires a lot of information in its assessments that are useful and interesting at an aggregate level. The new policy defines in detail the various sorts of reports to be produced, published and shared by the agency, i.e.:

- At least one short article should be published per year, dealing with various aspects of assessments based on the knowledge and experience acquired by project coordinators.
- At least one policy paper should be published every two years. A policy paper needs to deal with current issues related to and fitting within the discussions about the further development of the (overall) accreditation system.
- QANU will continue with its practice of organising the expert meetings. The themes and topics for these meetings will be derived from the assessments on QANU's conduct. The reports produced afterwards will be shared with the participating stakeholders and published on the agency's website. QANU aims to organize at least one such meeting every two years.
- QANU will also continue its practice with regard to the state of the art reports. These reports aim to describe the state of affairs in a specific discipline assessed by QANU, i.e. when the agency assesses all programmes in a specific discipline (cluster assessments). State of the art reports are produced at the request of research universities participating in the cluster assessments and are published on the agency's website after the institutions participating in the cluster assessment have explicitly approved the publication.

As it was stated during the site visit QANU follows the approach that there is no project coordinator specifically assigned for producing the thematic analysis. QANU rather decided to follow a bottom-up

approach - each analysis is assigned to a different staff member. At the agency's bi-weekly meetings, staff members can bring up possible topics for thematic analysis for the discussion. If a topic is considered to be of an interest to the agency's stakeholders, one staff member is assigned to the task, whereas all other staff members are asked to actively contribute to the analysis by supporting the colleague with material, ideas and reflections. The panel additionally learned during the site visit that the so-called 'heidag' (to be considered as an annual joint study day of QANU's staff outside the offices) has been dedicated on many occasions to reflect on aspects of day-to-day operations and work of the agency. Furthermore, 'heidag' is an opportunity to support the reflection on issues worth to be analysed in depth in the form of the agency's thematic analysis.

The agency shared a concern with the panel that publishing the thematic analysis might assist the agency's competitors, since QANU works in a highly competitive quality assurance environment. Nevertheless, QANU's staff underlined the importance of publishing thematic analysis and overturned the concerns into opportunities to share the agency's expertise with the public. Due to the quality of QANU's work, the thematic analysis is seen as a means to advertise the professional work and gained insights from various assessments. Even more, it was clearly stated to the panel that QANU felt responsible for producing thematic analysis not only because the agency holds the biggest share in the assessment of Dutch research universities and the information gained in the various assessments should be widely used (e.g. for analysis of developments in higher education and scientific research), but also to help in particular the sector of research universities in the Netherlands (e.g. and their (external) quality assurance). For QANU, it is of vital importance that the analysis produced contributes to the reflection on and the further development of the system of external quality assurance for study programmes and research units/PhD programmes.

Analysis

Following the provided evidence, the panel notes that QANU has reconsidered its approach to thematic analysis since 2016 and developed a feasible and systematic approach towards producing such analysis. The review panel has met the committed staff members open to share experience collected during the agency's assessments. According to the information provided QANU has conducted a significant part of programme assessments (NVAO) as well as of assessments of research units/PhD programmes in the last years. QANU demonstrated capacity to use experiences gathered, to reflect on, to share it and to publish outcomes through thematic analysis frequently. The panel believes that the agency's commitment to thematic analysis is supported with a realistic and formalised approach.

The review panel is convinced that QANU strives for an active implementation of thematic analyses and will ensure the sustainability of its new policy through the bottom-up approach in assigning the staff members and well as by defining the themes and topics in the bi-weekly staff meetings. Moreover, since QANU is a rather small agency, the proposed frequency of publishing outcomes of various kinds is to be considered realistic.

Panel conclusion: fully compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

Evidence

QANU conducts assessments of study programmes and research units/PhD programmes that are based on a peer review principle. For study programme assessments, QANU follows the framework provided by NVAO, whereas for the assessments of research units/PhD programmes, QANU follows the SEP.¹⁶

The panel learned that the recent changes in the NVAO's assessment framework did not have an impact on the procedural steps applied by QANU for the assessment of study programmes. Higher education institutions have the responsibility to compose and to constitute the assessment panels (as of the given framework). Furthermore, a higher education institution can also appoint a secretary and present the proposal of a panel to NVAO for approval. It is a higher education institution that needs to provide data on the expertise and independence of the panel members and the secretary to NVAO as stipulated by NVAO's regulations. Nevertheless, a higher education institution can delegate this task to QANU, but which has to follow the same guidelines of NVAO regarding the composition of a panel, since the final approval of a panel is always done by NVAO. NVAO's assessment framework require that the panel needs to include a student member and one member with international experience.

As for the assessment of research units/PhD programmes, the SEP states that experts need to be familiar with recent research trends and developments of an evaluated research unit/PhD programme. The Board of an institution to be evaluated is responsible for constituting an evaluation panel. Therefore, it is up to the Board of an institution and the research unit/PhD programme to ensure that the panel members' experiences are matches with the particular research and societal domains. The current SEP foresees only academics as members of the evaluation panels, whereas student members are not foreseen. However, QANU has put a lot of efforts since the last review to actively strive for an inclusion of a student member to such panels. In September 2018, the presidents of VSNU, KNAW and NWO, the institutions responsible for the current SEP, agreed that a student member (a PhD candidate) would be involved in the panels, starting from January 2019 on. Since the current SEP remains in place until 2021, the inclusion of a student member is foreseen as a pilot scheme. At the time of the site visit, no evaluation started under this scheme. Currently, a new version of the SEP is under preparation. VSNU, KNAW and NWO will evaluate the pilots (once implemented) and decide whether the inclusion of a PhD student should become a permanent requirement for the panels under the new SEP.

The panel additionally learned during the site visit that further practicalities for the involvement of a student panel member need to be discussed by all involved parties, as it was of a concern to some of the parties that the specific role of a student panel member in such assessments was unclear. QANU staff and the representatives of research universities and VSNU explained that PhD students are

¹⁶ See chapter *Higher education system and quality assurance – changes since 2016*; and chapter on ESG 3.1 in this report.

mostly employees of research units/universities. This stated, the interviewees expressed a concern that a perspective of a student panellist might be more the one of an employee rather than that of a student. The pilots should therefore better detect the role of a student panel member in the panels and search for a solution to be included in the new SEP. The interviewees expressed, during the site visit, that with the inclusion of students in the assessments of research units/PhD programmes, the PhD programme as such might need to attain a more prominent role in the future version of the SEP. According to the SEP in place, the assessment is based upon three criteria: research quality, relevance to society and validity. In case a research unit offers PhD programmes, two additional criteria apply: research integrity and the PhD training programme. For such a case, the research unit also needs to reflect on how a supervision of its PhD candidates is provided. With an inclusion of PhD candidates' in the future the reflection of supervision of PhD candidates' might become a more prominent factor in the assessment.

Last, but not least, QANU applies tailor-made approaches for briefings of panel members, as learned by the panel during the site visit. First and foremost, QANU tries to address the needs of each specific assessment by providing the briefings that pay attention to the criteria and standards, assessment scales, outlook on the assessment reports and general expectations of that particular assessment. Various steps are explained in the QANU's Quality Handbook¹⁷ to support project coordinators in such endeavour. Ultimately, a project coordinator in charge of an assessment ensures that the panel is familiar with the assessment framework of the NVAO or the SEP. To conclude, QANU pays specific attention to the preparation of secretaries and chairs for conducting the procedures on QANU's behalf by ensuring the regular attendance of its staff at the NVAO's trainings.

Analysis

Based on the provided evidence and inquiry during the site visit, that QANU works within the given frameworks. QANU has a well-defined role and responsibility in selecting and appointing the panel members, unless a university under the assessment delegates the task of convening a panel to QANU. QANU supports the panels with adequate tailor-made briefings and ensures that they conduct the assessments professionally.

QANU has played an active role towards the inclusion of students (PhD students) in the assessment of research units/PhD programmes. The agency managed to agree with the VSNU, KWNA and NWO to include students in the assessments, even though only in the form of a pilot exercise for the time being. The review panel further points out that the practicalities for the inclusion of students are not yet set. The review panel is convinced that after a thorough analysis of the pilot exercise, the involvement of students in the assessment panels of research units/PhD programmes will be a constituent feature in the new SEP.

Recommendations

The review panel recommends QANU to continue playing an active role in ensuring that a student panel member becomes a constituent element in the new SEP.

Panel conclusion: substantially compliant

¹⁷ QANU Kwaliteitshandboek NL (version 1.0, 3 October 2018)

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

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

Evidence

During the site visit, QANU underlined that it has never received any formal objection to its work (assessment of study programmes and research units/PhD programmes) during the last 15 years. Nevertheless, the agency took the recommendation of the 2016 review and the arguments of EQAR seriously and revised its complaint and appeal process. As stated in SAR, QANU's Board approved, at its meeting in October 2018, a strongly revised procedure for complaints and appeals¹⁸. The revised procedure covers a procedure for complaints and appeals in the case of assessments of study programmes and research units/PhD programmes.

As stated in the SAR and outlined during the site visit, institutions can submit an appeal against the two above-mentioned external quality assurance activities of QANU. The appeal will be assessed by a newly established Appeals Committee that was installed by the Board of QANU but is independent from it. The Committee has two permanent members, both with legal and academic expertise. Additionally, the QANU's Board will appoint a third member on a case-by-case basis. The third member has to have an expertise in the discipline covered by the study programme or the research unit/PhD programme under review. As a rule, the Appeals Committee decides whether an appeal is justified and whether it should be accepted. In the case the appeal is accepted, the Appeals Committee asks the review panel in charge of the particular review, to reconsider the assessment taken, taking into consideration the Appeals Committee's decision. The Appeals Committee can specify the overall process in its own guidelines. As for the time of the site visit, the Appeals Committee was not formally appointed yet and this will follow in April 2019. However, the review panel learned that all the members of the Committee have already agreed to take over the responsibility.

With regard to the complaints procedure, the SAR states (and as confirmed during the site visit) that anyone participating in an assessment procedure carried out by QANU can submit a complaint if he or she notes the misconduct during any quality assurance activity of QANU, be it that such misconduct was done –by QANU's project coordinator, secretary, member of the review panel, QANU's director or a Board member. Complaints can be submitted with a specific form. QANU stated that a complaint will be treated within five working days after submission. If more time is needed for its handling, such information will be duly provided to the complainant. As stated in the SAR, a complaint about the behaviour of a staff member of QANU is processed by the director; a complaint about the director is processed by the chair of the Board; a complaint about a Board member is processed by QANU's Appeals Committee; and a complaint about a member of a review panel is processed by the director in consultation with the chair of the Board. Additionally, it is the chair of the Board and the director that process the complaints about QANU's work.

The review panel heard, during the meetings with stakeholders from the universities, that they do not understand the necessity of providing an appeal option at QANU. The interviewees stated that the higher education institutions would appeal - in the case of the assessment of study programmes - directly to NVAO rather than QANU, since it is the NVAO that takes the decision. In case of complaints, Interviewees stated during the site visit that the process defined in case of complaints is clear and

¹⁸ The procedures for complaints/for appeals for assessments supported by QANU was part of SAR.

comprehensible. It was underlined during the site visit that first and foremost, the first one to be called in the case of a complaint in practice would be the director of QANU. Nevertheless, the processes as such are communicated to the institutions, even though that the processes are not yet published on the website of QANU. All in all, the newly established complaints procedure for the assessment of research units/PhD programmes was seen as positive by the interviewees. Similar was stated by the same group of interviewees about the newly established Appeals Committee.

At the time of the site visit, the complaints and appeals procedure was not published on the QANU's website. The review panel was told that the procedure will be published jointly with the new framework of NVAO in February 2019.

Analysis

QANU has taken the efforts to revise its complaints and appeals procedure in line with the ESG. The procedure currently in place was revised towards the inclusion of the complaints and appeals for the assessments of research units/PhD programmes. With the Appeals Committee in place, QANU has provided for an independent body to deal with the appeals of the agency. Nevertheless, as it was stated by QANU during the site visit, the Appeals Committee members will only be appointed in April 2019. Regarding the complaints procedure, QANU offers a possibility to institutions to express their dissatisfaction about the conduct of the external quality assurance activity carried out by QANU and/or misbehaviour of people acting on behalf of the agency. The review panel is convinced that, regardless of whether a complaint or an appeal has been issued so far, QANU's professional work will be further supported by the revised complaints and appeals procedure.

The panel believes that QANU should guarantee the revised process to be easily accessible on the agency's website and that the stakeholders of the research units/PhD programmes, as well as the agency's review panel members, are adequately informed about the revision.

Suggestion

The review panel recommends QANU to publish its complaints and appeals procedure on the agency's website.

Panel conclusion: fully compliant

CONCLUSION

The review panel has no further additional observations to be reported on. The review panel noted the progress and developments on all ESG under the scope of this review. The review panel concludes that QANU is compliant with the ESG. QANU presented itself as an agency committed to strive to the continuous enhancement and improvement of quality in its daily work and operations.

SUMMARY OF RECOMMENDATIONS

ESG 3.1 Activities, policy and processes for quality assurance – substantially compliant

The review panel recommends the agency to further expand its Board (governance) to a wider stakeholder involvement from the field of the labour market/employers.

ESG 3.4 Thematic analysis – fully compliant

No recommendation.

ESG 2.4 Peer-review experts - substantially compliant

The review panel recommends QANU to continue playing an active role in ensuring that a student panel member becomes a constituent element in the new SEP.

SUMMARY OF SUGGESTIONS

ESG 2.7 Reporting – fully compliant

The review panel suggests QANU to publish its complaints and appeals procedure on the agency's website.

ANNEXES

ANNEX 1: A COMPARATIVE OVERVIEW OF THE FINDINGS OF ENQA'S FULL REVIEW IN 2016 AND THE PARTIAL REVIEW IN 2019 (FOR THE ESG 2.4, 2.7, 3.1, 3.4)

ESG	Level of compliance 2016	Recommendation(s) 2016	Level of compliance 2019	Recommendations/Suggestion 2019
ESG 2.4 PEER-REVIEW EXPERTS	Substantial	<p>The review panel recommends QANU to explicitly strive in its role, as a stakeholder, for the inclusion of students (PhD candidates) in panels in the assessment of research units (incl. PhD programmes). In addition, the review panel recommends that international experience should also be represented in the assessment panel.</p> <p>The review panel recommends formalising the process of convening a panel, supported by written documentation and guidance concerning potential causes for conflict of interest.</p> <p>The review panel recommends intensifying cooperation, concerning the training of panel chairs jointly with NVAO.</p>	Substantial	The review panel recommends QANU to continue playing an active role in ensuring that a student panel member becomes a constituent element in the new SEP.

<p>ESG 2.7 COMPLAINTS AND APPEALS</p>	<p>Substantial</p>	<p>The review panel recommends QANU to reflect on the complaint and appeal procedure for the assessment of research units (incl. PhD programmes).</p> <p>The review panel recommends QANU to publish its complaint and appeal procedure concerning the assessment of study programmes on its website.</p>	<p>Full</p>	<p>The review panel suggests QANU to publish its complaints and appeals procedure on the agency's website.</p>
<p>ESG 3.1 ACTIVITIES, POLICY AND PROCESSES FOR QUALITY ASSURANCE</p>	<p>Partial</p>	<p>The review panel recommends QANU to fine-tune its mission and to clearly strive for translation of it into its day-to-day operation. The review panel recommends working on an organisational chart, which, as a starting point, could also support visibility of the mission statement within the agency as such.</p> <p>The review panel recommends using the mission statement in place for further development of strategic planning approaches, including stakeholder opinions in a formalised way.</p> <p>The review panel recommends considering and expanding its own board to ensure a wider stakeholder involvement in its own governance. QANU should in particular strive for inclusion of student representative members in its board. In addition QANU should impact, <i>as a</i></p>	<p>Substantial</p>	<p>The review panel recommends the agency to further expand its Board (governance) to a wider stakeholder involvement from the field of the labour market/employers.</p>

		<i>stakeholder</i> , the inclusion of students (PhD candidates) in the experts' panels in the SEP.		
ESG 3.4 THEMATIC ANALYSIS	Partial	<p>The review panel recommends QANU to take up a pro-active and formalised role with regard to the thematic analysis.</p> <p>The review panel recommends especially using the experience of project coordinators gained from various assessment procedures in order to conduct the thematic analysis in the narrow sense.</p> <p>The review panel recommends QANU to intensify exchange of experiences with other stakeholders, such as NVAO, the Ministry and universities, on a systematic basis, in order to further jointly develop the system of external quality assurance.</p>	Full	/

ANNEX 2: PROGRAMME OF THE SITE VISIT

TIMING	TOPIC	PERSONS FOR INTERVIEW
18.00-18.30	Review panel's kick-off meeting and preparations for interview sessions	
18.30-19.30	Pre-visit meeting with the agency contact person to clarify elements related to the overall system and context	Sietze Looijenga (director)
19:30-19:45	Review panel's kick-off meeting and preparations for interview sessions	
20:00	Dinner for the panel	
TIMING	TOPIC	PERSONS FOR INTERVIEW
8.45 - 9.00	Review panel's private meeting	
9.00 - 9.30	Session 1 : Meeting with the CEO and the chair of the Board (or equivalent)	Sietze Looijenga (director) Arie Nieuwenhuijzen Kruseman (board member) Paul Rullmann (board member) Josephine Verstappen (board member, nominated by LSVB and ISO) Jaap Zwemmer (board member, vice chair and treasurer)

9.30 - 10.00	Session 2: Meeting with representatives from the Senior Management Team	Sietze Looijenga (director) Alexandra Paffen (staff member, coordinator HR) Fiona Schouten (staff member, coordinator assessments of degree programmes and planning) Anna Sparreboom (staff member, coordinator assessments of research units and planning)
10.00 - 10.15	Review panel's private discussion	
10.15 - 11.00	Meeting with staff from universities that have undertaken recently QANU assessment of research units/PhD programmes	Petra Rudolf (University of Groningen, Faculty of Science and Engineering, participated in assessment of research units and PhD programmes of this faculty) Elske Gerritsen (University of Amsterdam, Faculty of Humanities, participated in assessments of research units and PhD programmes within this faculty)
11.00 - 11.15	Review panel's private discussion	
11.15 - 11.45	Meeting with staff from the Senior Management Team/staff member – responsible for internal quality assurance	Trees Graas (staff member) Sietze Looijenga (director) Alexandra Paffen (staff member, coordinator HR) Anna Sparreboom (staff member, coordinator assessments of research units and planning)

11.45 - 12.30	Meeting with staff members - responsible for thematic analysis	Irene Conradie (staff member) Trees Graas (staff member) Peter Hildering (staff member) Marijn Hollestelle (staff member)
12.30 – 13.15	Meeting with staff from the Senior Management Team involved in follow-up on ENQA recommendations	Peter Hildering (staff member) Sietze Looijenga (director) Alexandra Paffen (staff member, coordinator HR) Anna Sparreboom (staff member, coordinator assessments of research units and planning)
13.15 – 14:00	Review panel's private discussion and panel's lunch	
14.00 - 14.30	Meeting with staff from VSNU and NVAO	Elke van Cassel (VSNU, policy advisor research) Luit Kroes (NVAO, director Netherlands)
14.30 - 15.00	Meeting with director to clarify pending issues	Sietze Looijenga (director)
15.00 - 15.45	Review panel's private discussion	
15.45 - 16.15	Final debriefing and departure of review panel	Sietze Looijenga (director) Fiona Schouten (staff member, coordinator assessments of degree programmes and planning) Anna Sparreboom (staff member, coordinator assessments of research units and planning)

		Irene Conradie (staff member) Trees Graas (staff member) Peter Hildering (staff member) Marijn Hollestelle (staff member) Josephine Verstappen (board member, nominated by LSVB and ISO)
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ANNEX 3: TERMS OF REFERENCE OF THE REVIEW

Annex I: Terms of Reference of the external partial review of Quality Assurance Netherlands Universities (QANU)

This proposal for a partial review of QANU by ENQA is to agree on Terms of Reference (ToR) that address the request of the agency for a partial review for the purpose of EQAR registration renewal.

Chapter 1: Request of QANU

The application for the renewal of registration by the Quality Assurance Netherlands Universities (QANU) was rejected by EQAR Register Committee, following the decision of 16 November 2017. The EQAR Register Committee judged the agency only achieved partial compliance with a number of standards and thus failed to meet some key requirements of the ESG. Following this decision, QANU decided to undergo a focused review (following EQAR's terminology) addressing issues that led to its rejection, in accordance with article §3.21 of EQAR Procedures for Applications. The review (called 'the partial review' from this point on, following the terminology of ENQA) will be coordinated by ENQA, as requested by the agency on 20 August 2018.

For this purpose, QANU will prepare a report that has two aims: serving as a self-assessment report that the review panel will use as preparation for the partial review (part one of the report), and as a follow-up report as requested by ENQA's Guidelines for ENQA Agency Reviews (and primarily aimed at the Board of ENQA; part two of the report). According to these Guidelines, each agency is requested to submit a follow-up report usually within two years of the Board's positive decision on membership. In case of QANU, such positive decision was given on 30 November 2016, when ENQA membership was reconfirmed.

Regarding the ENQA follow-up procedure, the 'Guidelines for ENQA Agency Reviews' state the following:

"(6.5.1) An agency is requested to submit a follow-up report usually within two years of the Board's positive decision on membership.

The follow-up report is expected to address the recommendations from the ENQA Board and from the review panel. In addition, the agency may also highlight other developments or changes in the agency's activities and processes that may be relevant in view of its ESG compliance." (Guidelines for ENQA Agency Reviews, article 6.5.1, p. 23).

Furthermore, according to §3.21 of the EQAR 'Procedures for Applications', the agency has the right to undergo a focused review addressing those issues that led to its rejection, and to reapply within 18 months based on that focused review (see EQAR Rejection of the Application by QANU – Quality Assurance Netherlands Universities (QANU) for Renewal of Inclusion on the Register, ref. RC20/A40, point 13).

Chapter 2: Content

The following activities of QANU have to be addressed in the partial review:

1. Assessments of degree programmes
2. Assessments of research programmes.

EQAR Register Committee decided in November 2017 to reject QANU registration renewal, judging that the agency only achieved partial compliance with a number of standards and thus failed to meet some key requirements of the ESG, with the following specific mentions:

ESG 2.4 Peer-review experts

- In considering assessment of research units/PhD training programmes the panel remarked that the group of external experts do not include a student member. The panel explained that QANU does not assume responsibility for the nomination and selection of expert panel members, but that this is done by the higher education institution concerned.
- In its decision for inclusion (14/05/2011), the Register Committee flagged for attention QANU's selection criteria for assessment committee members. Considering this matter the panel noted that QANU does not have any guidance or formalised procedure concerning the process for the selection and composition of panels.
- The Register Committee formed the view that QANU has not addressed the flag and underlined that the agency has not met one requirement of the standard, namely including a student member in the assessment of research units/PhD training programmes.
- The agency explained in its additional representation that in the selection and composition of panels for degree programmes QANU refers, when necessary, to the NVAO procedure. The requirements for the composition of panels are included in the framework for limited programme assessment, which is used for all assessment programmes in the Netherlands. QANU did not see the need to introduce separate guidelines so as to avoid confusion. The Register Committee considered that there is a consistent approach in the selection of panel members for limited programme assessment and that the framework is in line with the requirement of the standard.
- In the assessment of research units QANU explained that was unable to assume responsibility for the nomination and selection of panel members as the formal framework placed the responsibility with other organisations. While QANU is part of the working group that revises the Standard Evaluation Protocol (SEP) and had argued for including a PhD candidate in the evaluation panels, the requirement was not endorsed. The current version of the SEP will be valid from 2015 to 2021.
- While the Register Committee took note of the explanation provided in the additional representation and acknowledged the attempts made by the agency to introduce students in the assessment of PhD training programmes, the current version of the SEP does not make provision for the involvement of students.

→ Some aspects or parts of this ESG standard have not been met. The reasons listed above lead to a finding of partial compliance with ESG 2.4 by EQAR Register Committee.

ESG 2.7 Complaints and appeals

- QANU has a formal procedure in place in case of appeals and complaints regarding the assessment of degree programmes. The panel noted that the board of QANU decides whether an appeal is justified and whether it leads to a revision of the panel's report.
- In case of assessment of research units/PhD programmes the panel noted that QANU has not developed any complaints and appeals procedures. The agency explained that it only saw itself providing a supportive role and that 'institutions are owners of the assessments of research units'.
- The Register Committee was not persuaded by the agency's explanation (see additional representation by QANU) and underlined that a complaints and appeals procedure should be in place, as per the requirement of the standard, for all external quality assurance activities carried out by the agency, therefore also for the assessment of research programmes units / PhD training programmes.
- In its additional representation the agency added that it did not find appropriate to develop an appeals' procedure as the assessments of research units and PhD training programmes do not lead to decisions by QANU. Nevertheless a complaints procedure was developed by the Director for the assessment of research programmes units / PhD training programmes and published by the agency following its external review.
- While the Register Committee noted the newly published complaints for assessment of research units/PhD training programmes, the Committee underlined that the possibility to issue a complaint is

not available for assessment of degree programmes and that the new procedure has yet to be externally reviewed by a panel.

- The Committee also underlined the possible conflict of interest in having complaints (in the case of research units/PhD training programmes) and appeals (in the case of assessment of degree programmes) handled by the Board of QANU, instead of an independent complaints and appeals committee.

→ Some aspects or parts of this ESG standard have not been met. The reasons listed above lead to a finding of partial compliance with ESG 2.7 by EQAR Register Committee.

ESG 3.1 Activities, policy and processes for quality assurance

- In its decision of initial inclusion, the Register Committee flagged for attention the consistent publication of a concise mission statement. While QANU has revised and updated its mission statement the panel found that the mission had not always been systematically translated into action that can guide the agency's daily activities. The Committee therefore concluded that the flag was only partially addressed.

- The panel further noted that stakeholder involvement is not fully ensured as QANU's governing board is mainly formed by academics. Students and employer representatives are not represented in the board.

- In its eligibility confirmation, the Register Committee asked QANU and the review panel to address how the agency ensures a clear separation between its consultancy activities and the agency's assessment procedures. The panel noted that QANU provides consultancy services and writing of critical reflections in order to support its midterm reviews (p. 16-17). The Register Committee was unclear if QANU had policies in place to avoid carrying out consultancy activities and later assessments for the same degree programmes, and have therefore asked the panel to clarify this matter.

- In its clarification response, the panel explained that the agency had no formal, financial or personal connections with any of the institutions it conducts assessment for. While the panel did not refer to any specific regulation or policy on how QANU ensures a distinction between its external quality assurance activities and its other fields of work, the panel was satisfied to learn from its interviews with the agency that there were no overlaps between consultancy and external QA activities.

- In its additional representation QANU stated that its new quality policy will help better connect the mission to the agency's regular activities.

- Considering the involvement of stakeholders in its governance and work, QANU stated its intention to invite representatives of students and employers in one of the Board's annual meetings and that it also considers involving employer representatives in QANU's different activities.

- The agency further explained that its consultancy activities were separated from its regular formal assessments, i.e. the agency would not accept assignment for consultancy activities if there is an assessment of the degree programme; staff involved in the degree programme assessment sign a declaration of independence which ensures that if they had been previously involved in a midterm review of a programme they could not act as a secretary in the assessment of the same programme.

→ EQAR Register Committee found that progress in involving stakeholders has not been significant. The intended changes were still in development and they yet have to be implemented and externally reviewed by a panel. The Register Committee therefore decided that QANU is only partially compliant with standard 3.1.

ESG 3.4 Thematic analysis

- In its decision for inclusion, the Register Committee flagged QANU's systematic approach to system-wide analyses.

- While QANU has not produced thematic analysis in its strict sense, the panel noted that the agency published reports at the request of research universities and state of the art reports for programmes

that are assessed in clusters. The panel noted that QANU did not have a systematic approach towards producing thematic analysis and that the agency views this activity to remain mainly in the responsibility of NVAO.

- In its additional representation, QANU's underlined that its core activity is to conduct assessments, and due to its limited size, financial resources and scope QANU's ability to conduct thematic analyses in a systematic way was limited. The Board of QANU had nevertheless considered the recommendations of the panel and stated that it would adapt its approach to thematic analysis.

→ Some aspects or parts of this ESG standard have not been met. The reasons listed above lead to a finding of partial compliance with ESG 3.4 by EQAR Register Committee.

To summarise, the following areas will be addressed in the partial review:

- Expert panel composition in assessment of research units/PhD training programmes, including nomination and selection processes (involvement of students, existence of guidelines)
- Complains and appeals procedure
- Stakeholder involvement in QANU's governing board, separation of QANU's consultancy activities and the assessment procedures, translation of mission statement into the agency's daily activities
- Agency's approach to thematic analyses.

The focus of the partial review shall be therefore the following:

1. ESG 2.4 Peer-review experts
2. ESG 2.7 Complains and appeals
3. ESG 3.1 Activities, policy and processes for quality assurance
4. ESG 3.4 Thematic analysis.

The agency is expected to produce a self-assessment report on these points indicating in particular the changes that have taken place since the last full review (in 2016), and addressing specifically to concerns raised in EQAR Register Committee letter on Rejection of the Application by QANU – Quality Assurance Netherlands Universities (QANU) for Renewal of Inclusion on the Register, ref. RC20/A40. In addition, the agency will indicate any eventual changes and developments beyond those listed under the criteria under scrutiny.

The report by the reviewers will concentrate on the same criteria and assess how the compliance has evolved since the last full review (in 2016). It will also assess any eventual changes that have been brought to the attention of the panel in the self-assessment report.

Further to the points listed above, the partial review is expected to discuss all other standards on which the review panel and/or the ENQA Board has made recommendations, demonstrating how the agency has decided to address them. Also, any other significant changes or developments in the agency or its area of operation should be described briefly. The points mentioned under this paragraph should be described in a separate chapter (part two of the report), clearly marking its' purpose for the follow up report for ENQA. The review panel is not expected to give its judgements on compliance on the follow up part of the review.

Chapter 3: Panel

The Board will nominate external reviewers to complete the task. The composition of the panel for the QANU full review in 2016 was as follows:

Henrik Toft Jensen	Chair (EUA nominee), academic
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Maria E. Weber	Secretary (ENQA nominee), quality assurance professional
André Vyt	Panel member (ENQA nominee), academic
Simona Dimovska	Panel member (ESU nominee)

The proposal is to use one member of the panel which carried out the last full review in order to ensure consistency, sufficient background knowledge on the agency, and the external trust in the outcomes (independent of the Board). The two other panel members should be selected so to complement the panel with altogether three viewpoints, that of a student, an academic and a quality assurance professional.

Maria E. Weber	Chair (ENQA nominee), quality assurance professional
Vincent Wertz	Panel member (ENQA nominee), academic
Hermann Blum	Panel member (ESU nominee)

The proposal is to employ:

One of the two members (the academic or the student) will be appointed as a secretary by the Chair.

The panel members will be asked whether they are willing and able to carry out the work within such timelines (see below).

Chapter 4: Timeline

Terms of Reference and agreement with QANU	By September 2018
Appointment of partial review panel members and agreement on reviewer contracts, setting date for the site visit	September 2018
Completion of partial review SAR	Early December 2018 (with pre- screening in November 2018)
Site visit	End-January 2019
Draft of report to QANU	Late February 2019
Completion of report and submission to ENQA	March 2019
Consideration of the report by ENQA Board and decision	April 2019

Chapter 5: Cost

ITEM	COST
Expert fee chair	€ 2 000
Expert fee	€ 1 500
Expert fee	€ 1 500
Coordination fee ENQA	€ 2 500
Travel and subsistence costs (estimate, full actual cost to be covered by the agency)	€ 2 500
TOTAL	€ 10 000

ANNEX 4: GLOSSARY

ENQA	European Association for Quality Assurance in Higher Education
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015
EHEA	European Higher Education Area
EQAR	European Register of Quality Assurance Agencies
HE	Higher Education
HEI	Higher Education Institution
ISO	National Student Union
KNAW	Royal Academy of Sciences
LSVB	Dutch Student Union
NAO	Dutch Accreditation Organisation
NVAO	Accreditation Organisation of the Netherlands and Flanders
NWO	Netherlands Organisation for Scientific Research
QA	Quality Assurance
QANU	Quality Assurance Netherlands Universities
SAR	Self-Assessment Report
SEP	Standard Evaluation Protocol (for Research Units)
VSNU	Board of the Association of Universities in the Netherlands

ANNEX 5. DOCUMENTS TO SUPPORT THE REVIEW

Documents provided prior to the site visit

- QANU self-assessment report for the partial review - final version (version 0.2, 6 December 2018) including the following appendixes:
 - Standard Evaluation Protocol - Protocol for Research Assessments in the Netherlands 2015-2021, (21 March 2014) (VSNU, KNAW, NOW)
 - Assessment framework NVAO 2018 NL (September 2018)
 - Assessment Framework NVAO 2016 EN (September 2016)
 - Letter ENQA to QANU (December 2016)
 - ENQA Review Panel Final Report (October 2018)
 - Letter EQAR to QANU on outcome appeal (May 2018)
 - EQAR Appeals Committee Decision (May 2018)
 - Letter from QANU to EQAR (February 2018)
 - Appeal QANU against Register Committee Decision (February 2018)
 - EQAR RC to QANU Rejection Decision (November 2017)
 - EQAR RC Rejection Decision QANU (November 2017)
 - Letter QANU to EQAR (September 2017)
 - Additional representation for EQAR (September 2017)
 - Letter EQAR to QANU Additional Representation (June 2017)
 - EQAR RC Deferral Application QANU (July 2017)
 - QANU Self-evaluation Report ENQA Review May 2016

Documents provided during the site visit

- List of attendees for the site visit on 18 January 2019

- QANU in a nutshell (hand-out for the discussion)
- Developments in the system of external quality assurance in higher education (hand-out for the discussion)
 - Most important changes in the NVAO's assessment framework 2016
 - Most important changes in the NVAO's assessment framework 2018 (note: the framework came into force on 1 February 2019)
- The system of external quality assurance in a nutshell (degree programmes) EN (hand-out for the discussion)
- The system of external quality assurance: relation between stakeholders (degree programmes) EN (hand-out for the discussion)
- The system of external quality assurance in a nutshell (research units) EN (hand-out for the discussion)
- The system of external quality assurance: relations between stakeholders (research units) EN (hand-out for the discussion)
- Competences (knowledge and expertise) of the member of QANU's Board EN (not confirmed by the Board)
- QANU Guideline for writing a self-evaluation report for limited programme assessment EN (November 2017)
- QANU Kwaliteitshandboek NL (version 1.0, 3 October 2018)
- QANU De ontwikkelingsfunctie in het nieuw kader - Een inventarisatie NL (October 2018)
 - QANU Synopsis of the thematic analysis on the development dialogue EN
- QANU Checklist for the training of panel chairs EN (version 2.0, 13 May 2018)
- QANU Checklist externe secretaris NL (version 1.0, 29 May 2018)
- QANU Longlist Kandidaat Penelleden NL
- QANU Specificatie vergoeding werkzaamheden als panellid NL
- QANU Samenstelling boeordelingspanel NL
- Stichting Quality Assurance Netherlands Universities gevestigd te Utrecht, Afschrift statutenwijziging NL (16 August 2012)
- NVAO Formulier onafhankelijkheid en geheimhouding NL



THIS REPORT presents findings of the ENQA Agency Review of the Quality Assurance Netherlands Universities (QANU), undertaken in 2019.



2019 ENQA AGENCY REVIEW