

ENQA TARGETED REVIEW

# ACCREDITATION ORGANISATION FOR THE NETHERLANDS AND FLANDERS (NVAO)

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## EXECUTIVE SUMMARY

This report analyses the compliance of the Accreditation Organisation for the Netherlands and Flanders (Nederlands-Vlaamse Accreditatieorganisatie NVAO) with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). The review was performed according to the methodology described in the Guidelines for ENQA Targeted Reviews. It is based on an external review conducted from November 2021 to July 2022 with the on-line site visit from 28.03.2022 to 30.03.2022. This report should be read together with the external review report of the agency's last full review against the ESG in 2017.

This review will be used for the renewal of NVAO's ENQA membership as well as the renewal of NVAO's registration in EQAR.

The Accreditation Organisation of the Netherlands and Flanders (NVAO) is a quality assurance agency that safeguards the quality of higher education in the Netherlands and Flanders, in an expert and independent manner, and that fosters the quality culture pursued within the higher education institutions in the Netherlands and Flanders. It accredits existing programmes in the Netherlands and Flanders and assesses the quality assurance of higher education institutions in the Netherlands and Flanders.

This report addresses the ESG standards where NVAO was judged as partially compliant by the EQAR Register Committee during the previous full review, namely ESG 2.6.

Since the last full review against the ESG in 2017, NVAO has also reported the following substantial changes to EQAR:

- Change in the scope of the activity assessment of Quality Agreements (activity offered in the Netherlands)
- Update of the assessment framework for the higher education accreditation system in September 2018 (the Netherlands)
- Development of the assessment of transnational education in April 2018 (activity offered outside the Netherlands).

The above changes relate to ESG 2.1 to 2.7, due to introduction of new external QA activities, as listed below. Therefore, this review addresses the standards of the ESG Part 2 for the following activities:

- Institutional review in Flanders
- Assessment of transnational education programmes
- Assessment framework for the higher education accreditation system.

According to the Terms of Reference for this review, ESG 3.1 has also been affected by other types of substantive changes, namely how the agency clearly separates between its activities that are within and outside the scope of the ESG, in particular considering the "Assessment of Quality Agreements in the Netherlands" and the "Assessment of the quality of Training Schools." Moreover, the panel identified the agency's challenges related to performance of thematic analyses, thus an evaluation against ESG 3.4 is included in the review report as well.

Finally, the agency's self-selected enhancement area ESG 3.6 has been addressed by the review panel as well.

The panel judged the agency's compliance with the ESG as listed in the table below:

### Summary of agency's compliance with the ESG (Parts 2 and 3)

ESG	Compliance according to the targeted review <sup>1</sup>	Compliance transferred from the last full review <sup>2</sup>  (judgement of the 2017 review panel → judgement of the EQAR Register Committee)
2.1	Compliant	
2.2	Compliant (for new or changed QA activities only)	
2.3	Compliant (for new or changed QA activities only)	
2.4	Compliant (for new or changed QA activities only)	
2.5	Compliant (for new or changed QA activities only)	
2.6	Compliant (for new or changed QA activities only)	
2.7	Compliant (for new or changed QA activities only)	
3.1	Compliant	
3.2	N/A	Fully compliant → Compliant
3.3	N/A	Fully compliant → Compliant
3.4	Compliant	
3.5	N/A	Fully compliant → Compliant
3.6	N/A	Substantially compliant → Compliant
3.7	N/A	Fully compliant → Compliant (by virtue of applying)

Based on NVAO's compliance with the ESG standards presented above and based on the review panel's analysis provided in this report, the review panel considers that NVAO is overall in compliance with the ESG.

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<sup>1</sup> Compliance refers to the focus areas that were evaluated in depth and are part of the Terms of Reference, i.e., standards that were deemed to be only partially compliant with the ESG during the last full review, ESG Part 2 for newly introduced or changed QA activities of the agency, ESG 2.1 for all QA activities and any standard affected by substantive changes since the last full review. If any of the standards of Part 2 of the ESG are covered due to the newly introduced or changed QA activities, a remark "for new or changed QA activities only" is added in brackets to the compliance assessment.

<sup>2</sup> Compliance refers to the last EQAR Register Committee decision for renewal of inclusion on the Register, or in a case when an agency is not renewing its registration in EQAR, compliance refers to the last ENQA Agency Review report and should its judgement differ from that of the panel, the judgement of the ENQA Board, as stipulated in the membership decision letter by the ENQA Board. Compliance refers to the QA activities of the agency that were reviewed during the previous full review.

# INTRODUCTION

This report analyses the compliance of the Accreditation Organisation for the Netherlands and Flanders (Nederlands-Vlaamse Accreditatieorganisatie NVAO) with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It is based on an external review conducted from November 2021 to August 2022 and should be read together with the external review report of the agency's last full review against the ESG in 2017. This is not a full review of NVAO. It is a targeted review focusing on areas as defined in the related terms of reference. Consequently, the review is not elaborating on all standards of the ESG and is therefore more compact than a full review. For a full understanding of the agency's context, this review should be read in conjunction with the 2017 review.

This review report will be used for the renewal of NVAO's ENQA membership as well as NVAO's registration in EQAR.

## BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

### BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

Registration on EQAR is the official instrument established by the European Higher Education Area (EHEA) for demonstrating an agency's ESG compliance. An external review is a prerequisite for initial registration and such registration must be renewed every five years.

As NVAO has undergone at least two successful reviews against the ESG Parts 2 and 3, it is eligible and has opted for a targeted review. The purpose of a targeted review is to ensure the agency's compliance with the ESG by covering standards that were found partially compliant during the agency's last renewal of registration in EQAR (in 2017) and on standards that could have been affected by substantive changes<sup>3</sup> that have taken place during the past five years while at the same time further strengthening the enhancement part of the review.

### SCOPE OF THE REVIEW

In general, NVAO conducts activities according to its legal tasks and activities linked to that. These can be divided into four categories:

- **Legal tasks**, includes (initial) accreditation of programmes and institutions in higher education
- **Linked to legal tasks**, includes drafting and maintaining frameworks for accreditation, approving of panels for programme assessment and producing thematic analysis
- **General activities connected to assessments**, includes publishing assessment reports, institutional audits, training of panel chairs and secretaries
- **Advisory work and decision making**, such as advising the Ministry of Education and deciding on the changes of names of programmes and degrees.

However, the scope of this targeted review is limited to an in-depth evaluation of NVAO's ESG compliance in the following areas:

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<sup>3</sup> e.g., organisational changes, the launch of new external QA activities.

- new or changed EQA activities and other substantive changes that could impact on compliance since the last full review in 2017 (in the case of NVAO these new activities are: Institutional review in Flanders, Assessment of transnational education programmes);
- standards which were not found to have been “fully compliant” in the 2017 ENQA review or have not been found “compliant” by the EQAR Register Committee in 2017;
- matters subject to third party complaints since 2017;
- any issues that might come up during this targeted review;
- standard ESG 2.1 and one ESG standard selected by NVAO for enhancement.

According to the above and the Terms of reference (Annex 2) this review focuses on the following standards:

- 2.1 Consideration of internal quality assurance
- 2.2 Designing methodologies fit for purpose
- 2.3 Implementing processes
- 2.4 Peer-review experts
- 2.5 Criteria for outcomes
- 2.6 Reporting (‘partially compliant’ in 2017)
- 2.7 Complaints and appeals
- 3.1 Activities, policy, and processes for quality assurance (substantive changes)
- 3.4 Thematic analysis (added by the panel during the review)
- 3.6 Internal quality assurance and professional conduct (selected enhancement focus)

## MAIN FINDINGS OF THE 2017 REVIEW

The last full ENQA review of NVAO took place in 2017. It resulted in a renewal of registration by the EQAR Register Committee as detailed in Table 1.

Table 1. In its 2017 Renewal of Registration the EQAR Register Committee concluded that NVAO demonstrated compliance with the ESG as follows

<b>ESG standard</b>	<b>Status</b>
3.1 Activities, policy, and processes for quality assurance	Compliant
3.2 Official status	Compliant
3.3 Independence	Compliant
3.4 Thematic analysis	Compliant
3.5 Resources	Compliant
3.6 Internal quality assurance and professional conduct	Compliant
3.7 Cyclical external review of agencies	Compliant (by virtue of applying)
2.1 Consideration of internal quality assurance	Compliant
2.2 Designing methodologies fit for purpose	Compliant
2.3 Implementing processes	Compliant

2.4 Peer-review experts	Compliant
2.5 Criteria for outcomes	Compliant
2.6 Reporting	Partially compliant
2.7 Complaints and appeals	Compliant

The main challenges leading to a “partially compliant” judgement on ESG 2.6 were delays in the publication of reports, the lack of a specific report format, heterogeneous character of report contents and a poor readability for a broader readership.

## REVIEW PROCESS

The 2022 external targeted review of NVAO was conducted in line with the process described in the Guidelines for ENQA Targeted Reviews (2021), the EQAR Procedures for Applications, and in accordance with the timeline set out in the Terms of Reference. The panel for the targeted review of NVAO was appointed by ENQA and composed of the following members:

- Dr. Padraig Walsh (Chair, nominated by ENQA), Chief Executive of Quality and Qualifications Ireland (QQI);
- Dr. Tadej Tuma (Secretary, nominated by EUA), full professor at the University of Ljubljana, Slovenia;
- Liv Teresa Muth, (Member of the European Students Union Quality Assurance Student Experts Pool, nominated by ESU and PhD student at Ghent University, Belgium).

Goran Đaković (Reviews manager at ENQA), acted as the review coordinator.

Soon after its nomination in November 2021 the panel started a regular email exchange. The SAR from NVAO was received in January 2022. After an initial screening of all documents the panel held its first Zoom meeting on 7 February 2022. After a discussion on the overall portfolio of NVAO's activities, the panel decided on the next steps of the review. Since this is a targeted review focusing only on certain areas, the panel members did not divide the workload among themselves by individual standards but opted for a holistic approach where all members study all aspects of the review. They agreed to research NVAO's application individually and identify issues by filling in a shared mapping grid. Due to the nature of a targeted review, it was essential that panel members familiarised themselves with the findings and recommendations in the 2017 review report. They also decided to conduct a set of dynamic interviews with NVAO stakeholders during the site visit, based on well elaborated focus areas and areas of development by the agency, rather than setting up a rigid questionnaire-style spreadsheet.

The panel immediately recognised the specific binational nature of NVAO, instructing the secretary to structure the visit schedule accordingly. In early March, the schedule (Annex I) was agreed upon between the panel and the agency and a first Zoom meeting with NVAO's binational management members was scheduled for 16 March 2022. After an introduction, the panel was given an overview of significant developments since the agency's last review and details of the site visit were discussed.

The online visit was scheduled at the end of March 2022 as described below.

Following the visit, the secretary compiled a first draft of the report based on all documents and the minutes from the individual meetings. By the end of May the panel had revised the draft report and



submitted it to ENQA for screening. The final draft was then submitted to the agency for a factual check, and to the ENQA Agency Review Committee for its final validation.

### **Self-assessment report**

According to the Terms of reference, the 2022 SAR focussed on specific areas flagged by the last full review in 2017. Therefore, it is essential to study the 2022 SAR together with the 2017 ENQA review report.

Due to the binational character of NVAO, all self-assessment reports as well as all ENQA reviews of NVAO so far reveal a distinct division of the agency into a Dutch and a Flemish part. In some sections NVAO is described as a whole, but most often there is a Dutch section followed by a Flemish one. Throughout this review two respective acronyms are therefore used: NVAO-NL and NVAO-FL, respectively.

The SAR as received by the panel was clearly structured. After a general background covering the agency developments since 2017 there are two chapters describing the follow-up on the 2017 recommendations for ESG Part 2 and 3. Next two chapters are dedicated to the selected enhancement area (ESG 3.6) separately for NVAO-NL and NVAO-FL, both including a comprehensive (yet separate) SWOT analysis.

The panel was pleased to find a compact SAR befitting a targeted review which focussed on certain areas only. At the same time, the SAR was not missing any key details. The SAR was supplemented with a comprehensive series of annexes providing copious detail on the NL and FL accreditation frameworks for the different QA processes, in addition to the current NVAO strategy and details about the complaints and appeals systems, and a comprehensive mapping of NL and FL procedures against ESG 2.1 was also provided in separate annexes.

### **Site visit**

Due to the prevailing pandemic circumstances the visit to NVAO was conducted online according to the prearranged schedule (see Annex I). Day 1 (28 March 2022) was dedicated to eight meetings with NVAO staff members. On Day 2 (29 March 2022) the panel met with the agency's external stakeholders in eight more sessions. The visit concluded on Day 3 (30 March 2022) with a clarifying session and a final debriefing of all stakeholders.

All meetings were held online with a prearranged Zoom link. In each session the first 5 minutes allowed for the setup of connections. Most attendees joined the sessions from their homes. From the technical point of view there were only a few small difficulties causing minor delays. The streaming quality was adequate. The meetings were conducted in English - no interpretation was needed at any point. Except for session 11, the Zoom chat feature was available but not used. All sessions started and ended according to the schedule listed in Annex I within a tolerance of a few minutes.

In parallel to the Zoom meetings, the panel members maintained internal communication through a share file system on Google docs as well as through their WhatsApp group. The panel secretary kept minutes of the meetings.

### **Day1: NVAO staff**

The panel conducted eight sessions with the following interviewees:

- Session 1, General Management and Executive Board members (NL and FL)
- Session 2, General Board members, including student members (NL and FL)
- Session 3, Enhancement area ESG 3.6. Staff involved in internal QA (NL)

- Session 4, Enhancement area ESG 3.6. Staff involved in internal QA (FL)
- Session 5, Key staff members involved in external QA (NL)
- Session 6, Key staff members involved in external QA (FL)
- Session 7, Department key body members (NL)
- Session 8, Department key body members (FL)

Due to sudden health problems the panel student member could not attend sessions 7 to 16. In order to reduce the burden on the remaining two panel members, ENQA's review coordinator took over the task of recording minutes from session 7 onwards.

## **Day2: External stakeholders**

The following eight meetings were held:

- Session 9, Representatives of the Dutch Ministry of Education, Culture and Science and Representatives of the Dutch Inspectorate of Education
- Session 10, Representatives of the Flemish Ministry of Education, Culture and Science
- Session 11, Representatives of the Dutch Universities of Applied Science (VHS) and Dutch Universities (VSNU)
- Session 12, Representatives of Dutch private institutions for higher education (NRTO)
- Session 13, Representatives of Flemish professional education (VLIR) and Universities (VLHORA)
- Session 14, Representatives of Dutch and Flemish assessment agencies
- Session 15, Members of the Dutch and Flemish reviewers' pool including international members
- Session 16, Other stakeholders, representatives of students and employers from NL and FL.

The interviewees in session 11 were very proactive and used the Zoom chat feature extensively to further share their views on collaboration with NVAO. They also asked the panel for permission to submit a written annotation for the external review purposes. The chat protocols as well as the annotation have been included in the panel minutes. Although the student member was not present for the sessions on Day 2, the questions pre-prepared by the student member in the shared document were picked up by the remaining panellists.

## **Day3: Conclusions**

The visit was concluded on Day 3 with two final sessions, which were also attended by a much recovered student member of the panel:

- Session 17, Clarification with General Management and Executive Board (NL and FL)
- Session 18, Final de-briefing meeting with NVAO staff (over forty people attending).

In the panellists' opinion the site visit to NVAO was productive, professional and at the same time pleasant. The agency staff were well prepared, forthright and engaged. At this point the panel wishes to thank them for their engagement and positive contribution in all discussions. Finally, the panel wishes to emphasise that the student panel member contributed to all discussions and meetings, following the implementation of the site visit.

## CHANGES WITHIN THE AGENCY

### HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM

#### NVAO-NL

– **Extra funding of HE in the Netherlands.** In 2015, the study grant for higher education students in the Netherlands was replaced by a loan system with the intention to invest the money saved in the quality of education at publicly-funded institutions. The Ministry of Education, associations of the institutions and student unions agreed on the frameworks that determined how the institutions should invest the extra funds ('quality agreements'). These funds are to be spent on one of the following six topics: more intensive and small-scale education; more and better guidance for students; study success; educational differentiation; fitting and adequate educational facilities; and/or further professionalisation of teachers. All publicly funded HE institutions have developed their own plans for the period 2019-2024, in consultation with their participation councils in order to involve students and faculty in the improvement of their own education.

– **Associate degree programmes in the Netherlands.** The formal status of the short-cycle associate degree programmes has changed in the Dutch higher education system. These programmes started in 2006 as a pilot, to stimulate life-long learning among professionals with a vocational degree. Since 2013, associate degrees were part of bachelor programmes at universities of applied sciences and often consisted of an adaptation of the first two years of the related bachelor programme. As of 2018, associate degree programmes have an independent status. Figures show great interest in this type of programme. If desired, graduates may continue studying in the bachelor programme after obtaining an associate degree, without much delay.

– **Number of students in the Netherlands.** Over the last couple of years, the number of students in Dutch higher education has risen to more than 800,000 students in all types and variants of programmes. Due to the outbreak of the COVID-19 pandemic, the number of students increased even more in the academic year 2020-2021. This growth is the result of an increase in the number of Dutch students. At the same time, the number of international students has also increased every year, presumably in the wake of Brexit as explained by the representative of the Ministry of education during the visit.

– **Programme re-accreditations in the Netherlands.** Programme accreditation no longer expires automatically after six years. NVAO periodically determines whether or not the accreditation can be maintained on the basis of an assessment report supplied by the institutions. NVAO sets the deadlines by which clusters of similar programmes are to submit the panels' assessment reports. New programmes receive accreditation for a set period of six years.

– **Accreditation outcomes.** The grading of outcomes was found to be ambiguous and was changed accordingly. The details are discussed later under ESG 2.3 and ESG 2.5.

– **Transnational education related to the Dutch higher education system.** Before 2018, students who studied at a foreign campus of a Dutch institution had to spend at least 25% of their programme on Dutch soil in order to receive a Dutch degree. A change in the Higher Education Act now allows Dutch institutions to provide an entire programme at a foreign campus, on the condition that the programme offered abroad is largely similar to the accredited programme in the Netherlands. The protocol for the assessment of transnational education came into effect in 2018. The assessment of Dutch programmes that are offered at a campus abroad is now connected to the regular procedure for programme assessment. Institutions provide a regular self-evaluation report, which is updated and supplemented with information about the programme's foreign campus. The programme indicates which aspects differ from the programme offered in the Netherlands. Assessment panels pay specific attention to staff, the location, the services, and the examination board

because these are likely to vary across campuses. The panel issues a judgement for the transnational programme as a whole.

- **Use of the English language in higher education in the Netherlands.** In line with the decade old social debate on the added value of providing teaching in higher education programmes through the medium of the English language, a specific provision has been included to safeguard the quality of programmes being taught in a language other than Dutch. This provision stipulates that the programme must justify its choice of language and that its teachers must be capable of teaching in that language. This also applies to programmes that bear a foreign language name.

- **Panel secretaries.** The new frameworks specify the expertise required of panel secretaries, who write assessment reports on behalf of assessment panels. Starting from January 2022, NVAO-NL will perform a yearly check to see whether the secretaries in its register still meet the requirements.

- **The COVID-19 pandemic.** From March to June 2020, all education in NL and FL had to be organised online, and after a restart of educational activities on site in September 2020, institutions closed again mid-December 2020. The government and institutions took multiple measures to limit the possible negative consequences for all students: secondary school pupils were exempted from taking national exams in 2020, students were allowed to start a successive programme while finishing their previous degree, and the binding recommendations on continuation of studies were postponed or made less strict. The pandemic has given a boost to digital innovation and the effects of the changes brought on by the pandemic are still visible today, with institutions providing more online and hybrid education than before. The outcomes of institutional audits and accreditation procedures in the previous years show a stable positive quality standard. These figures do not yet reflect any impact of the COVID-19 pandemic on the quality of education. In 2020, the agency was making accreditation decisions based on on-site visits from before the outbreak of the pandemic and was expecting the pandemic to be over by the end of the year. So, the plan was to wait until on-site visits would become possible and then make up for the lost time. However, since the outbreak did not die down as expected, NVAO-NL started implementing on-line visits as late as 2021, causing a considerable backlog.

## **NVAO-FL**

- **Institutional reviews.** Since the last ENQA Review in 2017, the results of the then ongoing pilot resulted in a new legal framework for the QA system. The underlying methodology was already considered in the review in 2017. The legal framework was approved unanimously by the Flemish parliament in 2018. The QA system came into force in September 2019 and is now being applied. Further details are discussed throughout this review.

- **The COVID-19 pandemic.** In Flanders, the outbreak of the pandemic did not cause any delays in their external quality assurance procedures. On-line methods were promptly adopted in March 2020 guaranteeing a smooth transition.

- **Reviews of Luxembourg HEI.** The cooperation that NVAO Flanders had sporadically with Luxembourg has become more structured in recent years. The responsible ministers of Luxembourg, The Netherlands and Flanders agreed in 2021 to formalise the collaboration between NVAO and Luxembourg on accreditation of Luxembourg HEI. These activities in Luxembourg are, however, not new for the Flemish department; the same methodologies as defined and practised by NVAO-FL are applied in Luxembourg as in Flanders. Since 2016, NVAO-FL has undertaken fifteen assessments of institutions and programmes in Luxembourg. For each of these, NVAO-FL presented the appropriate assessment framework in its proposals and made sure the procedures align with the ESG. For NVAO-FL, this has been a unique opportunity to build on their previous work within the Benelux framework and to apply some of their methodologies in a different context.

## NVAO'S ORGANISATION/STRUCTURE

The general outline of the organisational structure as described in the 2017 ENQA review report is still valid. The organisation is structured as follows:

NVAO is governed by a General Board consisting of thirteen members, four of whom form the Executive Board. In the Executive Board two members are from The Netherlands and two from Flanders. All members of the General Board are appointed by the Flemish and Dutch Ministers of Education. The organisational structure within NVAO consists of two departments, a Flemish one and a Dutch one, each headed by a general manager. The Flemish team comprises of 8.8 fte, the Dutch team of 20.8 fte. A team of support services, serving the Board and the two departments comprises of 11 fte and consists of IT services, financial services, HRM services, Legal support, and secretariats for the Board and Management Team, including a position of HRM Manager of 0.6 fte.

In 2020, a debate started about designing a new organisational structure for NVAO ('NVAO 2.0'), following the 15th anniversary of the treaty between the Netherlands and Flanders. The current organisational structure was evaluated to assess whether it was still fit for purpose and was found to be too restrictive in some respects (there is no definitive consensus on this, so the panel decided not to pursue details). To better respond to the different needs in Flanders and the Netherlands, the Ministers requested NVAO to develop a new structure that provides greater organisational independence for the Netherlands and Flanders while still having the benefits of the existing added value for cooperation and the good reputation of NVAO. The future model is still a topic of discussion, but no changes are expected before the end of 2023.

## NVAO'S FUNDING

Basic funding of the Dutch as well as the Flemish side of NVAO have remained the same since 2017.

## NVAO'S FUNCTIONS, ACTIVITIES, PROCEDURES

The changes in the higher education and quality assurance system as described above have caused several changes in NVAO's functions, activities and procedures. These are now presented in brief, whereas further details can be found later in this document under ESG Part 2 and 3.

- **The COVID-19 pandemic.** In consultation with stakeholders, NVAO-NL designed a special arrangement for the accreditation of new programmes (prolonging terms), which started again online in Summer 2021. NVAO-NL initiated a joint analysis with the Inspectorate of Education to investigate the effect of COVID-19 on higher education in the Netherlands and on the accreditation system. A report was due to be delivered in early 2022.
- **Accreditation outcomes of NVAO-NL.** New procedures and detailed instructions for NVAO-NL panels were put in place to enable more consistent reports according to the new grading system, replacing the old four grades ("unsatisfactory," "satisfactory," "good" and "excellent") with three grades ("meets the standard," "partially meets the standard" or "does not meet the standard"). More details are discussed in section ESG 2.5.
- **Institutional reviews of NVAO-FL.** In Flanders new procedures have been adopted to support the introduction of institutional accreditation. The related methodology has already been evaluated against the ESG in 2017 and the panel observed no changes to what was already reported in the external review report.

- **Internal quality assurance of the overall organisation.** NVAO-NL as well as NVAO-FL have improved their IQA procedures (see ESG 3.6). This topic has been selected as the enhancement area of the targeted review.

# FINDINGS: COMPLIANCE OF [AGENCY] WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG) WITHIN THE SCOPE OF THE REVIEW

## 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.

#### 2017 Review recommendation

The 2017 review panel concluded the agency to be in ‘substantial compliance’ on this standard.

The panel’s conclusion of ‘substantial compliance’ with standard 3.1 was partially based on the assessment of ESG Part 2 as described and analysed under standard 2.7 Complaints and appeals.

Importantly, the 2017 review recommended under ESG 3.1 that NVAO prepares coherent development plans on the future short-term and long-term development of accreditation processes in the Netherlands and Flanders, on the basis of comprehensive evaluation of the NL and FL pilots.

#### Evidence

According to the SAR and discussions during the visit, NVAO also conducts activities outside the scope of the ESG, advising the Minister of Education about other applications. In recent years, these applications included transnational education, flexible education (admission to the Experiment Learning Outcomes), quality agreements, and teacher training schools. The last mentioned is conducted on the basis of an assessment by independent panels of peers but is not considered to be within the scope of the ESG as it consists of evaluating the organisation of the collaboration between schools for primary and secondary education and institutions for teacher training (e.g., universities and universities of applied sciences) and does not deal directly with teaching and learning in higher education as such. The assessment of quality agreements is, in fact, an institutional financial audit, focusing on how institutions spend the so-called study advance grants, which again falls outside the scope of the ESG.

The panel interprets the 2017 review recommendation as requiring the agency to incorporate short-term and long-term developments into its strategic development, as evidenced in any new strategic plan. Since the last review, the principal development has been the introduction of the institutional review process in Flanders. The institutional review framework for FL is comprehensively described in Annex 9.6 of the SAR and relates to the agency’s strategic developments, as described below.

The move to a greater institutional responsibility for the management of quality assurance is consistent with the NVAO’s strategy of placing a strong emphasis on the autonomy of higher education institutions. The move from programme-level to institutional-level reviews in the Netherlands has not

proceeded at the same pace, for reasons that will be outlined in this report. The panel did not, however, in the course of their discussion with NVAO, the Dutch higher education institutions, students' representatives or representatives of the Dutch government, detect any principles-based reluctance for such a move.

The previous review encompassed the NVAO strategy 2017-20. In normal circumstances, the present review would have taken place in the context of a new strategy covering the period 2021-24. Due to the COVID-19 pandemic, the development of a new strategy was put on hold. It is anticipated that the new strategy will await possible changes in NVAO's organisational model.

Although the main education structures in the Netherlands and Flanders remain the same since the last review, there has been new legislation in both jurisdictions regarding accreditation of higher education programmes and institutions, and new accreditation frameworks have come into effect. It is not anticipated, however, that the primary processes operated by NVAO will be influenced by any structural changes in the higher education system.

## **Analysis**

According to the evidence regarding NVAO's activities outside the scope of ESG, the panel has concluded that there is a clear separation between these activities and those in scope for ESG. Indeed, they are not explicitly mentioned on NVAO's webpage.

The targeted nature of the present review expected from the panel to analyse NVAO's compliance with standards 2.1-2.7 in respect of any of the new procedures that have been introduced since the last review - in the case of NVAO this is the Institutional Review process in Flanders. The related detailed analysis can thus be found in chapters below. In particular, the panel wished to ascertain whether the new methodology is aligned with NVAO's mission, values and strategy as regards ESG 3.1.

The panel found that the development of the institutional review process in FL clearly aligns with the NVAO strategy 2017-20 (Annex I of the SAR) of providing the institutions in FL with greater autonomy to demonstrate quality themselves. It was clear to the panel from its discussions with the institutions that had undergone the review process that they very much appreciated the approach of providing them with this increased level of autonomy and responsibility for quality.

The panel's further evaluation of compliance in relation to the institutional review process in Flanders, the follow-up of the recommendations in the 2017 review and any commentary related to any other matters that persist from the 2017 review (even where they did not lead to explicit recommendations therein) are included in the analysis against the individual Part 2 standards below.

The NVAO Strategy 2017-20 (Annex I) recognises that the Dutch and Flemish higher education sectors have now gained significant experience in external quality assurance and accreditation and that 'the institutions deserve the trust to substantiate and demonstrate quality themselves' recognising that 'such trust is the foundation on which the institutions can build their own quality culture' and that 'NVAO wants to give the institutions greater autonomy and strengthen the involvement of students and staff'.

Furthermore, the SAR clearly outlines that NVAO is 'in favour of introducing a system of institutional accreditation for all recognised institutions (public and private) in higher education and feel that such a system may meet the need for more authority and autonomy to be given to institutions. The panel notes that the agency does not expect that institutional accreditation will decrease the actual administrative burden, but that it may have a positive effect on the experienced burden because the actors feel a greater ownership in the process.



Following on from the example of a successful implementation of the institutional review process in Flanders, in line with NVAO's current strategy and as emphasised in the SAR, the panel believes that there is an opportunity to further institutional autonomy in the Netherlands by developing an appropriate institutional review process for that jurisdiction also.

On the basis of its discussions with the institutions, student representatives and government representatives the panel believes that such a move would command broad support from these stakeholders.

### **Panel suggestions for further improvement**

Following on from the successful implementation of the institutional review process in Flanders, the panel suggests the agency to embark on an opportunity to further institutional autonomy in the Netherlands by developing an appropriate institutional review process for that jurisdiction also.

### **Panel conclusion: 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.

### **2017 review recommendation**

In 2017 the ENQA review concluded the agency to be “substantially compliant” on this standard recommending that “NVAO reviews the approach to thematic analyses and in consultation with stakeholders, identifies a common purpose and a means to regularise processes and priorities in this area.”

The EQAR Register Committee ruled “compliant” on Standard 3.4 “Thematic analysis” but also reminded NVAO in their Confirmation of Eligibility on the following: “We further confirm that while the following activities are separate external quality assurance activities they might be relevant in relation to a number of the ESG standards as follows, [...] producing thematic analyses or evaluations on the basis of assessments could be relevant in relation to ESG 3.4; [...]”.

According to the Terms of reference for this review, ESG 3.4 has not been identified as a focus area. However, this matter had been already discussed in the 2012 ENQA review and the review in 2017 again touched on this topic. Since the agency's stakeholders reflected on this issue during the site visit as well as representatives of the Universities of the Netherlands (UNL) in their written annotation, the panel decided to include this standard into the reporting for this targeted review.

### **Evidence**

The panel learned about, and commended NVAO-FL for having done a system-wide analysis in connection with their institutional review pilot programme. This is outlined in Annex 9.8 of the SAR. However, on the other hand the panel learned that NVAO-NL only engages in thematic analyses when explicitly requested by any governmental authorities. During the site visit and through discussions with the agency's stakeholders it became evident that NVAO-NL does not consider thematic analyses a priority, since NVAO-NL has no related formal procedures in place. The agency expressed its contention that it is the Dutch Inspectorate of Education that has responsibility for quality assessments

of the education system as a whole. A counterargument coming mostly from HE institutions pointed out that the Inspectorate is publishing thematic analysis from a different (legal) point of view. However, following the requirements of ESG 3.4, NVAO-NL not only has an obligation under this standard to provide meaningful thematic analyses of its external QA processes, but in the view of the panel also an opportunity to spread its future vision for the HE system through such analyses.

### **Analysis**

The 2022 SAR of the agency lists a number of specific thematic analyses done on the Dutch side of NVAO together with intentions to do more by sharing good practices and providing insights into larger processes, by analysing accreditation reports and by publishing an analysis of processing times, opportunities for success, dos and don'ts. While all this is most welcome and useful the panel recognises that most stakeholders, especially HE institutions, feel they are missing an annual system wide overview giving NVAO-NL's broader vision to a general public. During the visit it became clear to the panel that NVAO-NL considers itself responsible for specific on-demand analysis whereas systemic thematic analyses are left to the Dutch Inspectorate of Education. In general, NVAO cooperates with the Inspectorate through formal meetings, but even though both organisations are consulting the Ministry of Education they differ in culture. Consequently, the Inspectorate's reports are focusing more on legal aspects.

In this regard, NVAO-FL has a different perception of ESG 3.4. This part of the agency does publish reports providing a general overview to stakeholders (see Annex 9.8 of the SAR), which gives added value and serves as an inspiration to Flemish institutions and programmes, as confirmed to the panel by the agency's stakeholders.

### **Panel commendations**

NVAO-FL has published an excellent first annual system wide analysis, commended by and commented on by many stakeholders.

### **Panel recommendations**

NVAO-NL should rethink their approach to thematic analysis and embrace the opportunity to actively contribute to educational policies in the Netherlands using their authority and knowledge. Reports targeting a broad public readership could influence the social and even political debate of the higher education system in the Netherlands.

### **Panel conclusion: compliant**

## **ESG PART 2: EXTERNAL QUALITY ASSURANCE**

### **ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE**

Standard:

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

### **2017 review recommendation**

In 2017 the ENQA review concluded the agency to be “fully compliant” on this standard and the EQAR Register Committee judged it “compliant”. Additionally, ENQA commended NVAO “on the systematic coverage of the ESG Part I standards in all frameworks that are presently in use.”

Since 2017, the agency introduced a new external QA activity that still needs to be judged against the ESG. For these purposes, the below chapters reflect on this activity in relation to its compliance with standards 2.1 to 2.7. In addition, the chapters reflect on the assessment of transnational education programmes, and the assessment framework for the higher education accreditation system, as applicable.

## Evidence

### Mapping in general

There are minor differences between the Dutch and the Flemish frameworks in terms of coverage of ESG 2.1. As stated above, the agency was found to be fully compliant on this standard in 2017 and was commended on. The Flemish part of the agency now introduces a new activity that still needs to be judged against this standard. The panel below includes a brief mapping of the standards of Part I of the ESG of both agency departments for comparison reasons.

### NL frameworks

The NVAO-NL frameworks are determined by legislation and laid out in the Higher Education and Research Act. Part I standards of the ESG are addressed in the frameworks for the institutional audit and for accreditation for new and existing programmes. Assessment agencies or HE institutions that organise accreditation procedures for new and existing programmes must follow NVAO's assessment frameworks, and by doing so they comply with the ESG. This practice has not changed since the previous ENQA review in 2017.

The NVAO-NL assessment framework consists of a number of standards which can be mapped against the ESG Part I standards as described in Annex 5 and Annex 6 of NVAO's Self-Assessment Report 2022. Table 2 contains a brief summary.

Table 2. Mapping of the standards ESG Part I against the NVAO-NL framework 2018

ESG Part I standards	Institutional audit standards (also covering *)	New and existing programme accreditation	
		Limited framework standards	Extensive framework standards
I.1 Policy for quality assurance	1, 2	*	9
I.2 Design and approval of programmes	1, 2	1, 2	1, 2, 3, 4, 9
I.3 Student-centred learning, teaching and assessment.	1, 2	1, 2, 3, 4	1, 2, 3, 4, 10, 11
I.4 Student admission, progression, recognition and certification	2	1, 2, 4	1, 2, 5, 9, 11
I.5 Teaching staff	2	2	6
I.6 Learning resources and student support	2	2	7, 8
I.7 Information management	3, 4	*	9
I.8 Public information	2	2	8

I.9 Ongoing monitoring and periodic review of programmes	3, 4	*	9
I.10 Cyclical external quality assurance	3, 4	*	9

The 2018 NVAO-NL framework consists of three parts as depicted in the heading of Table I.

- **Institutional audit (4 standards).** (1) Philosophy and policy. The institution has a broadly supported educational philosophy and pursues a corresponding policy focused on the internal quality assurance of its education. (2) Implementation. The institution realises its educational philosophy in an effective manner, which is demonstrated by appropriate policy actions and processes, particularly relating to staff, student assessment, services and facilities, and students with a functional impairment. (3) Evaluation and monitoring. The institution systematically evaluates whether the intended policy objectives relating to educational quality are achieved. Relevant stakeholders are involved in this process. (4) Development. The institution has a focus on development and works systematically on the improvement of its education.
- **Limited programme assessment (4 standards).** (1) Intended learning outcomes. The intended learning outcomes tie in with the level and orientation of the programme; they are geared to the expectations of the professional field, the discipline, and international requirements. (2) Teaching-learning environment. The curriculum, the teaching-learning environment and the quality of the teaching staff enable the incoming students to achieve the intended learning outcomes. (3) Student assessment. The programme has an adequate system of student assessment in place. (4) Achieved learning outcomes. The programme demonstrates that the intended learning outcomes are achieved.
- **Extensive programme assessment (11 standards).** (1) Intended learning outcomes. The intended learning outcomes tie in with the level and orientation of the programme; they are geared to the expectations of the professional field, the discipline, and international requirements. (2) Curriculum orientation. The curriculum enables the students to master appropriate (professional or academic) research and professional skills. (3) Curriculum content. The contents of the curriculum enable students to achieve the intended learning outcomes. (4) Curriculum learning environment. The structure of the curriculum encourages study and enables students to achieve the intended learning outcomes. (5) Intake. The curriculum ties in with the qualifications of the incoming students. (6) Staff. The staff team is qualified for the realisation of the curriculum in terms of content and educational expertise. The team size is sufficient. (7) Facilities. The accommodation and material facilities are sufficient for the realisation of the curriculum. (8) Tutoring. The tutoring of and provision of information to students are conducive to study progress and tie in with the needs of students. (9) Quality assurance. The programme has an explicit and widely supported quality assurance system in place. It promotes quality culture and has a focus on development. (10) Student assessment. The programme has an adequate student assessment system in place. (11) Achieved learning outcomes. The programme demonstrates that the intended learning outcomes are achieved.

As can be seen in the above table and as the panel verified, there is a clear link between the institution's internal and the NVAO's external quality assurance procedures.

During the interviews, several stakeholders confirmed that there was a significant delay in some programme reviews due to the outbreak of the Covid-19 pandemic causing a significant backlog of about 6 months. The main reason was identified as the nationwide lockdown in the Netherlands. The panel learned that after respective on-line procedures had been implemented the backlog was reduced. On the contrary, the Flemish side did not experience these kinds of difficulties. The respective HE institutions confirmed to the panel that transition to on-line reviews has been seamless.

## FL frameworks

The NVAO-FL legal framework as described in Annex 10 of the NVAO's Self-Assessment Report 2022 is based on Quality features, which can also be directly mapped against the ESG Part I standards. More details on the mapping are explained in Annex 11 of the SAR. Table 3 contains a brief summary.

Table 3. Mapping of the standards ESG Part I against the NVAO-FL quality features

ESG Part I standards	Quality features
I.1 Policy for quality assurance	*
I.2 Design and approval of programmes	1, 2
I.3 Student-centred learning, teaching and assessment.	3, 5, 6
I.4 Student admission, progression, recognition and certification	4, 7
I.5 Teaching staff	3
I.6 Learning resources and student support	4
I.7 Information management	7, 8
I.8 Public information	7, 8
I.9 Ongoing monitoring and periodic review of programmes	8
I.10 Cyclical external quality assurance	7

\* ESG I.1 is implemented by the **Codex Higher Education**, art. 11.122, §1. HE institutions are legally obliged to ensure the quality assurance of their educational activities. This includes permanent monitoring and the involvement of internal and external stakeholders and external, independent experts in their quality assurance processes. Each procedure starts here.

According to the legal framework the eight **Quality features** in heading of table 3 are defined as follows. (1) The programme's learning outcomes constitute a transparent and programme-specific interpretation of the international requirements regarding level, content, and orientation. (2) The programme's curriculum ties in with the most recent developments in the discipline, takes account of the developments in the professional field, and is relevant to society. (3) The staff allocated to the programme provide the students with optimum opportunities for achieving the learning outcomes. (4) The programme offers the students adequate and easily accessible services, facilities, and counselling. (5) The teaching and learning environment encourages the students to play an active role in the learning process and fosters smooth study progress. (6) The assessment of students reflects the learning process and concretises the intended learning outcomes. (7) The programme provides comprehensive and readable information on all stages of study. (8) Information regarding the quality of the programme is publicly accessible.

In the previous ENQA review the Quality features as well as the mapping matrix were found to be fully compliant. However, the fact that for a well-defined number of programmes, programme accreditations had been put on hold during the process of an Institutional review pilot was commented on during the site visit. Since this period has ended and the Institutional review has been successfully adopted the panel confirms that ESG Part I is again systematically incorporated into the evaluation process. The institutional review pilot that was being developed at the time of the 2017 review is now

fully operational and described in Annex 9.6 of the SAR. The mapping of ESG Part 2 for the Institutional Review process is detailed in Annex 13 of the SAR.

## **Analysis**

For the institutional review process in Flanders, the panel learned from the self-assessment report and triangulated with information from the discussions with the HE institutions that ESG Part I has been incorporated into the evaluation process. All outstanding programme accreditations, as mentioned in the previous ENQA review, have also been caught up with.

## **Panel conclusion: compliant**

## **ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE**

Standard:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

## **2017 review recommendation**

In 2017 the ENQA review panel concluded the agency to be “fully compliant” on this standard and the EQAR Register Committee judged it “compliant”. There were no recommendations provided to the agency.

## **Evidence**

In the absence of any recommendations in the previous review the panel has focused in this targeted review on substantial changes in this standard since 2017. On the Flemish side, a new Institutional Evaluation process has been introduced together with system-wide analyses (see ESG 3.4) firmly embedded in the Flemish regulatory framework. For several reasons (as explained below), the Dutch side is, in this respect, one step behind their counterparts in Flanders.

## **NVAO-FL**

In the wake of the pilot described in the 2017 review, a systematic Institutional Evaluation process was introduced in Flanders. The Quality Assurance System still focuses on the quality of individual programmes and programme accreditation is mandatory for all programmes. However, the quality is now accounted for in two processes, depending on the institutional type:

- By means of an institutional review and internal QA procedures of the HE institution for existing programmes and external QA procedures at programme level for new programmes. This option applies to all universities and university colleges.
- By means of external QA procedures at programme level for all programmes, conducted by an external evaluation body. This option applies to all other institutions in Flanders.

In other words, universities and university colleges now have the additional “institutional option.” External, independent experts participate in every assessment of educational quality, either by the institution itself or by a panel appointed by NVAO or by an evaluation body.

During the interviews with different stakeholders, it became clear to the panel that the Institutional Evaluation process was designed to ensure that the higher education institutions actually can

demonstrate their responsibility for the quality assurance of their programmes. The institutions that have participated in the process so far were very appreciative of the flexibility of the so-called “appreciative approach.” They felt that this gave the institutions significant space to demonstrate their accountability while also permitting an enhancement approach to quality. The HE institutions understood the move from programmatic to institutional evaluation does not necessarily reduce the workload involved but transfers more autonomy and responsibility to the institutions. Some institutions explicitly stated that since the accreditations of their programmes now comes within their domain the quality has improved. In their opinion, external programme reviews are more prone to periodic “window dressing” than internally-organised reviews.

Since 2018, system-wide analyses have been embedded in the Flemish regulatory framework. They aim at identifying and sharing good practices among higher education institutions and programmes. They stimulate collaborative learning among institutions, particularly regarding themes related to educational policy and educational quality. System-wide analyses are organised by NVAO-FL on a yearly basis focusing each time on one theme. Overall, these analyses will contribute to the quality culture within the QA system and within institutions, and therefore implicitly, to the quality of programmes. The panel would particularly like to commend the first system-wide analysis that was undertaken, which was very much appreciated by the participants.

In the panel’s meeting with a representative from the labour market, a basic desire to become involved in quality assurance was expressed but it was indicated that the higher education institutions may need to take responsibility for this engagement. The agency confirmed to the panel the requirement for representatives from the labour market to be involved in the evaluation process but there may be a need for the agency to communicate this more widely to the public and other stakeholders.

## **NVAO-NL**

In the Netherlands institutional reviews are also seen as an important topic and there has been an ongoing discussion about this for quite some time. Even before 2017 many stakeholders maintained that existing frameworks for improvement of programme accreditation were no longer fit for purpose, especially where those programmes have already been evaluated multiple times.

The panel investigated the current situation at the forefront of institutional accreditation. When talking to NVAO-NL management and staff involved in external QA, some reticence became evident. In their perception, applied science HE institutions, students as well as employers have yet to be fully convinced on the benefits of institutional accreditation. Also, recent changes in the Dutch Ministry of Education, Culture and Science are viewed as a potential source of non-determinism.

Currently NVAO-NL is running a pilot to test the implementation of institutional review procedures on a selected number of HE institutions. In principle, research-oriented HE institutions are in favour of institutional accreditation, but their participation in the pilot is low - the panel got a sense that they did not see the framework as providing the anticipated reduction in the administrative burden. From NVAO-NL's point of view, the pilot is weakened by the non-participation of the research universities.

Another issue in this debate is the standpoint of assessment agencies, which are widely used by Dutch institutions to coordinate programme accreditations on their behalf, in line with the NVAO assessment frameworks. The assessment agencies are private companies providing a service. They are not considered as direct stakeholders of NVAO - indeed in NVAO-NL's own SWOT analysis they are listed under the ‘threat’ category, as they could be perceived to limit NVAO's control over the assessment procedures. The potential introduction of institutional accreditation in the Netherlands clearly could encroach on their business interests, creating a potential existential threat to their survival.

The panel did not have an opportunity to talk directly to representatives of Dutch employers, but it did check the opinion of representatives of the ministry as well as of students. The political representatives were not fully convinced yet of the merits of institutional accreditation - higher education reform was not a particularly hot topic during the recent election campaign. However, in general they had no principled objection to institutional accreditation. The student representatives that the panel met with were divided in their views. The student representatives from Flanders as well as some of the Dutch student representatives can see real progress since the introduction of institutional accreditations. The other representatives of Dutch students were concerned that future programme re-evaluations would not be done by external authorities. There seemed to be a lack of trust in the HE institutions to conduct their own evaluations of programme quality.

### **Analysis**

Based on the above evidence, the panel recognizes progress made in the two parts of NVAO. Since the last review, the Flemish side has gone from an institutional evaluation pilot to full implementation. The panel concludes that this trust-based system is successful and efficient for all stakeholders. The Dutch HE system, being larger, more complex and more heterogeneous is one step behind in this regard. However, it has made a first step by introducing a pilot project. Following this, the panel points out an example of the value of NVAO's binational character - NVAO-NL could, and should, be able to benefit from the good practice of its Flemish counterpart.

### **Panel suggestions for further improvement**

Learning from the success of both the operational rollout, system-wide analysis and successful communication of the institutional review process in Flanders, NVAO-NL is encouraged to proceed with the implementation of institutional accreditation.

NVAO is encouraged to strengthen the involvement of representatives from the labour market in external quality assurance processes - both in NVAO's own procedures and within the higher education institutions themselves.

### **Panel conclusion: compliant**

## **ESG 2.3 IMPLEMENTING PROCESSES**

Standard:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up

### **2017 review recommendation**

In 2017 the ENQA review concluded the agency to be “substantially compliant” on ESG 2.3 and the EQAR Register Committee judged it “compliant”. The ENQA report recommended the following:

- NVAO should remain sensitive regarding issues of implementation as experienced by stakeholders and adopt a clearer terminology to differentiate between substantially different approaches to follow up of decisions.



Also, several issues were brought to NVAO's attention and have been followed up in this review.

## Evidence

### The four stage process

The panel has verified through the site visit discussions with HE institutions that the basic four stage process for all procedures is correctly implemented on the Dutch as well as the Flemish side.

- All assessments for accreditations of programmes, institutional audits and reviews are based on a self-evaluation report, which is structured according to the ESG.
- The SAR is studied by an independent panel of experts and a site visit always takes place, even if lately this has been done in an online fashion due to the pandemic.
- All assessment procedures eventually lead to a standard report conforming to the ESG written by the appointed panel of experts. Based on this report NVAO makes a final decision according to the newly prescribed format (positive/conditionally positive/negative). The report is published regardless of its outcome.
- The report may include recommendations, suggestions or discussion points. For NVAO the follow up of recommendations and improvements is primarily the responsibility of the HE institution. In the case where the accreditation decision has been conditional, the HE institution must undergo a recovery period (usually two years). In these cases, the follow up is checked by NVAO when it is due. In all other cases the follow up is reviewed during the next application. The terminology differentiating the two follow up approaches seems to have been resolved since the last review.

In cases where the HE institution chooses to use the services of an external assessment agency; this agency may be involved in all four steps of this process. However, the assessment agencies have no legal responsibility towards NVAO and have no judgement or accreditation powers.

### Issues from the 2017 review

- **NVAO-NL review clustering.** In order to achieve a better comparison between different programmes, reviews were clustered for consistency purposes. The resulting large numbers of programmes reviewed by the same panel team were found to be cumbersome and work intensive. HE institutions as well as assessment agencies found themselves operating in unfavourable conditions because of overburdened panels and delayed reports. NVAO-NL has addressed these problems by introducing several subpanels for specific programmes but was thereby reducing the originally intended compactness of clusters. So, the issue still remained an ongoing topic during the panel's meetings with stakeholders.
- **NVAO-FL publication dates of the institutional review pilot.** For consistency reasons the reports of the institutional review pilot were published at the end of the pilot. This created a long delay for the HEs which were being evaluated right at the beginning of the pilot. This problem resolved itself when regular evaluations started.
- **The implementation of the previous grading system for NVAO-NL's programme accreditations** was found to be confusing and unclear, following the findings of the review in 2017. With the introduction of the new legal framework in the Netherlands, the differentiation between judgements in the accreditation of Dutch existing programmes (formerly from "unsatisfactory" to "excellent") was abolished. Assessment panels now score the assessment standards as "meets the standard," "partially meets the standard" or "does not meet the standard" and recommend a final conclusion: "positive," "conditionally positive" or "negative." The assessment frameworks now include clear rules as to when a panel may draw which conclusion. All interviewees regarded this issue as resolved.
- **Administrative QA burden of Dutch HE institutions.** The new legal framework (as well as NVAO-NL's instructions for HE institutions to prepare their SAR) aims to reduce paperwork for

internal as well as external quality assurance. During the site visit, the panel brought up this issue with NVAO-NL, assessment agencies and HE institutions. All interviewees have confirmed that they are well aware that “less is more” so their SARs should be “lean and mean.” However, it appears that HE institutions would rather be “safe than sorry” which imply a lower trust in NVAO-NL. Once again, the panel has detected that the Dutch higher education system is a more contested space and appears in general to be less trust-based than its counterpart in Flanders.

### **NVAO-NL Terms and Communication**

During the interviews with representatives of HE institutions the panel encountered some robust opinions with respect to keeping to terms and deadlines. In all four stages of a procedure, the external quality assurance processes should be reliable and pre-defined which implies that all stakeholders should adhere to deadlines as defined by the legal framework as well as NVAO-NL itself. As some deadlines are short and the pandemic has been causing bottlenecks it is understandable that deadlines are occasionally missed from both sides - NVAO-NL and the HE institutions. However, representatives from HE institutions maintain that NVAO-NL exceeds its deadlines very often. In these cases, the institutions feel that they are missing an appropriate proactive communication from NVAO-NL.

### **Analysis**

The panel learns and confirms that four programmatic evaluation processes are correctly implemented and executed. The issues highlighted in the 2017 review have been resolved. The complex cluster evaluations of programmes in the Netherlands are still an ongoing concern, but NVAO-NL is aware of these difficulties and is working on solutions. Also, the anticipated transition to institutional review should help in solving this problem, since programme reviews will become a part of internal quality assurance.

In many conversations with different stakeholders the panel has reached the conclusion that Dutch HE institutions are deferential to NVAO-NL. For an agency to command respect is not inherently problematic, however this may lead to unintended consequences, as it may put excess distance between the agency and its institutions.

### **Panel recommendations**

NVAO-NL should proactively communicate with HE institutions when agreed timelines are in danger of being exceeded.

### **Panel suggestions for further improvement**

NVAO-NL should encourage HE institutions to adopt a lean approach to the documentation they submit in their applications.

### **Panel conclusion: compliant**

## **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).

### **2017 review recommendation**

In 2017 the ENQA review concluded the agency to be “fully compliant” on ESG 2.4 and the EQAR Register Committee judged it “compliant”. The ENQA report had no recommendations or suggestions.

## **Evidence**

No issues had been raised in connection with expert panels in the previous review. This is also the case for the more recent institutional review process in FL, which followed on from the pilot evaluations encompassed by the previous review. While not appearing as a suggestion in the previous review, the 2017 panel did note that the experts could more frequently be drawn from a wider international field beyond the Netherlands and Flanders. In this review the panel members make the same observation, as reflected below. The panel composition and size actually remained the same as reported in 2017.

For initial programme accreditations and institutional audits NVAO uses its binational status to compose panels. Flemish experts are used in Dutch evaluation procedures and vice versa. The four steps of the implementing processes (ESG 2.3) are conducted in the Dutch language. Other international experts are used only in cases of institutions with a distinctive international character. The panel queried as to whether Dutch speakers working outside NL-FL were sourced by NVAO as potential panel members.

In cases where an accreditation decision has been conditional, thereby requiring the HE institution to go through a recovery period, the panel checking the follow up is composed of the same members. Sometimes the student member must be replaced having lost their student status (without being re-appointed) in the intervening period and not

For regular programme accreditations in the Netherlands the institution proposes the expert panel members for NVAO-NL to approve. On the Flemish side all panel members are selected and trained by NVAO-FL itself.

In the meeting with representatives from the reviewers’ pool, they commended the well-prepared and efficient training they were provided with by the agency. NVAO also provides yearly certification for secretaries to maintain the quality of the review reports including useful report templates. The peer review experts also characterised NVAO as occasionally being a bit bureaucratic and not lean in approach. However, they see things improving on this front recently, so the panel did not investigate any further.

## **Analysis**

Following the provided evidence, the panel evaluates the agency’s panel composition and deployment is fit for purpose. The expert pool used by NVAO is composed independently, trained and supported by NVAO process coordinators.

Organising all procedures in English has been a topic of discussion but since we do not want programmes and institutions to generate new documentation for our procedures that would necessitate a fully bilingual learning and teaching environment for programmes solely offered in Dutch and was therefore deemed an extraordinary administrative burden. So, the majority of evaluation procedures are conducted in Dutch, thus reducing the pool of international experts to Dutch speaking ones.

## **Panel suggestions for further improvement**

While understanding the desire and value to conduct evaluations using the Dutch language, the panel believes this has tended to restrict the international dimension to evaluations, particularly when a move to institutional review will reduce the number of evaluations.

## **Panel conclusion: compliant**

### **ESG 2.5 CRITERIA FOR OUTCOMES**

Standard:

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

### **2017 review recommendation**

The 2017 review concluded the agency to be “substantially compliant” on this standard. The ENQA panel recommended the following: “NVAO reflects on the grading system as presently applied and considers making it as straightforward as necessary for the purpose of yes / no / conditional accreditation.”

The EQAR Register Committee judged it “compliant” with the conclusion “that the flag was largely addressed by NVAO and concurred with the review panel’s conclusion of compliance with standard 2.5.”

### **Evidence**

#### **NVAO-NL**

In the Netherlands, the grading of accreditation outcomes was previously part of a legislative requirement for NVAO. Four grades were predefined by law: “unsatisfactory,” “satisfactory,” “good” and “excellent” with the intention to stimulate institutions to enhance the quality of their education. However, the Dutch grading scale was deemed counterproductive by the 2017 review. The Inspectorate of Education also emphasised this aspect in the evaluation of the Dutch QA system. The subsequent political debate led to the abolition of the four point grading system imposed by law. Assessment panels are now required to score the standards as “meets the standard,” “partially meets the standard” or “does not meet the standard” and recommend a final conclusion: “positive,” “conditionally positive” or “negative.” Additionally, the assessment frameworks now include clear rules as to when a panel may draw which conclusion. Following this, the panel believes that the 2017 recommendation regarding the grading has been addressed by the agency.

During the visit, the panel brought up the question of criteria for outcomes with representatives of Dutch HE institutions. A clear opinion was voiced at the meeting (and through a written annotation supplied by the representatives to the Panel during the meeting) that NVAO-NL sometimes modifies a panel’s recommendation for a positive outcome of a panel report, while it, according to the annotation supplied to the panel “has never, until this day, questioned a negative decision by a peer review panel”. It is clear that the final judgement lies with the agency rather than with the panel experts. On the other hand, NVAO-NL can base its decision only on the findings of the panel report. Certainly, deviations of the final outcomes from the panel reports are to be expected on an exceptional basis, but not necessarily always against the institution.

#### **NVAO-FL**

The Flemish side uses a three score grading scale “positive,” “positive with limited validity” and “negative.” The panel also found that NVAO-FL has put in place well prepared and specific instructions

for panels designed to ensure that the final reports from the newly introduced institutional evaluation procedures are as consistent as possible by following the three score grading scale.

### **Analysis**

NVAO-NL's internal criteria for outcomes could be perceived to be stricter than the underlying panel criteria. The aforementioned annotation stated that the panel members (in the case of initial assessments) "are carefully selected on account of their skills and/or expertise, are trained and their CVs are thoroughly reviewed by the NVAO," so this phenomenon could be interpreted as a lack of trust, which might be counterproductive. The panel recognises the challenge of NVAO having to balance consistency and fairness of outcomes without losing the inherent trust-based nature of reviews by trained peer experts.

### **Panel recommendations:**

NVAO-NL should endeavour to minimise any discrepancy between the final outcomes and the panel recommendations. It is important to balance consistency and fairness of outcomes without losing the inherent trust-based nature of reviews by trained peer experts.

### **Panel conclusion: compliant**

## **ESG 2.6 REPORTING**

Standard:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

### **2017 review recommendation**

The 2017 review concluded the agency to be "substantially compliant" with ESG 2.6, recommending the following: "NVAO analyses the actual and potential readership of its reports and their needs, and develops new means to reach a readership among students and employers".

The EQAR Register Committee found NVAO to be "partially compliant," stressing "the publication of reports and concluding that the flag was insufficiently addressed and therefore did not concur with the review panel's conclusion of compliance and concluded that NVAO complies only partially with ESG 2.6."

### **Evidence**

Since the EQAR Register Committee had questioned the conclusion of the 2017 ENQA panel on standard 2.6 the current panel has been very diligent in this matter. The panel identified two related issues:

- **Structure and preparation of reports.** In the past, both the Dutch and the Flemish side have been found to be inefficient in terms of closing the QA loop of reporting, especially with students and employers. The reports were found to be difficult to read by these two non-professional groups. The main reason being NVAO not having specific guidelines for organising the content of the report. The reports were considered to be heterogeneous in style and unclear to a general readership. Even if NVAO has been organising training sessions for panel secretaries the lack of a specific report format (template) has led to the situation where assessment agencies used their own report structures. After

much probing, the panel now found clear instructions and even templates for initial assessment reporting. The reports in the Netherlands as well as in Flanders now consist of two parts. A formal full report aimed at QA professionals and HE institutions and a concise (maximum of six pages) “user friendly” report for the general public. The readability of submitted initial assessments reports is checked by NVAO. Also, additional student friendly links to the published reports have been established. The panel has nevertheless learned that student representatives (let alone regular students) are still not familiar with NVAO reports. Agencies and expert panels must constantly challenge themselves to find ways to make the information contained within them digestible and relevant to the student body.

- **Publication of reports.** In some cases, the reports had been published only after significant delays for several reasons. At the time of the last review, NVAO-NL had been experiencing a temporary shortage in personnel and NVAO-FL had kept back the publication of institutional reports until the end of the pilot. In this respect NVAO has improved significantly since the last review. The issues with delayed finalisation and publication of reports have been resolved on both sides, following the findings of the panel during the site visit. The panel has found that now NVAO-FL is timely publishing all reports on their web pages. This includes institutional reviews as well as reviews with negative outcomes. Also, NVAO-FL automatically uploads all reports to the DEQAR database without any delays, which is much appreciated by the Ministry and the institutions. NVAO-NL has also improved the timely publication of its reports; however, it does not publish negative outcomes in the cases where HE institutions withdraw their application. Moreover NVAO-NL does not upload reports to the DEQAR platform, but the panel learned that NVAO-NL is committed to doing so as soon as some technical difficulties are resolved.

## Analysis

The panel finds that the issues regarding unclear and heterogenous reports as flagged by the 2017 ENQA review as well as the 2017 EQAR Renewal of Registration have been addressed by the agency. Also, interviewees have not detailed any more significant delays in the publication of the reports.

However, the panel has noticed that NVAO-FL automatically uploads all reports to the public database of EQAR while NVAO-NL does not currently do so. The panel heard that this is a technical issue but feels that it is still worthy of suggestion.

## Panel suggestions for further improvement

NVAO-NL could/is encouraged to establish an automatic procedure for uploading current and historic reports to EQAR’s public database (DEQAR).

## Panel conclusion: compliant

## 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.

## 2017 review recommendation

The 2017 review concluded the agency to be “partially compliant” on this standard recommending that “NVAO develops a complaint procedure and opens a section “Complaints and appeals” at its website with appropriate formats for complaints and appeals”.

The EQAR Register Committee found NVAO to be “compliant,” with the following comment: “The Register Committee noted that NVAO’s system of appeals is well developed and that the review panel was satisfied with NVAO’s processes for handling complaints. The Committee therefore was unable to concur with the review panel’s conclusion of partial compliance and therefore concluded that NVAO complies with standard 2.7.”

## **Evidence**

The panel has checked NVAO’s complaint and appeal procedures. Appeals are being dealt with by NVAO’s independent appeal committees. NVAO has separate appeal committees for Flanders and The Netherlands, with an overlap of one member. The Flemish committee deals with remarks, complaints and internal appeals, as outlined in the Regulations on Governance principles approved by the Flemish Parliament. Both Dutch and Flemish appeal committees are appointed by NVAO and consist of independent experts with legal and educational backgrounds. So far nothing has changed since the 2017 review.

However, prompted by the 2017 panel recommendation on ESG 2.7, NVAO has added a link to complaint procedures right on top of its home page. The procedures are slightly different for Flanders and the Netherlands due to different regulations but in both cases the panel found the above steps to be explained very clearly for all NVAO activities. The complainant is not anonymous, but his/her identity is kept confidential. A designated complaints officer of the agency oversees the procedure:

- On the Dutch side there is an External Complaint form with an electronic submission option. The form may also be submitted on paper. Moreover, a complaint may be forwarded orally or by telephone.
- Complaints regarding the Flemish side of NVAO must be submitted in writing to the contact address of the designated handler. There is no special form - however all necessary elements of a complaint are explained in detail.

The same general link also explains specific procedures for lodging appeals to NVAO-NL and NVAO-FL. During the site visit, the panel checked with stakeholders learning that the complaint procedures are clear to them.

## **Analysis**

In 2017, the outcome of the external review identified discordance between the ENQA panel and the EQAR Register Committee decisions regarding ESG 2.7. Even if EQAR found NVAO to be compliant on this standard, NVAO responded to the ENQA recommendation, adding a transparent and clearly defined internet option for filing complaints. The panel finds NVAO to be compliant with this standard.

**Panel conclusion: compliant**

# ENHANCEMENT AREAS

## ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Since the 2017 ENQA review, NVAO further developed their IQA policies as a follow-up on the ENQA review with new strategy and the formation of two departments for the Netherlands and Flanders. The new policy outlines the shared principles as well as the specific working methods in the two departments. The policy augments the lightweight and effective nature of the existing system and its cyclical approach (PDCA), which was found to need 'the closing of some loop-holes' by the previous ENQA review panel. This is the main reason for NVAO selecting ESG 3.6 as the enhancement area of this review.

Internal quality assurance is an important part of NVAO's everyday routine. The agency is sensitive to such issues and has well-developed procedures and culture in place. The panel evidenced this by examining the new policy document entitled Internal Quality Assurance System (Annex 7 of the SAR) and by devoting two sessions (3 and 4) of the site visit to this topic. The main findings are that in the Netherlands as well as in Flanders informal weekly meetings take place without minutes being taken. It is important to NVAO that the new policy be lean and mean rather than another bureaucratic monster. All interviewees confirmed that the new IQA policy is having a positive effect even without much written documents.

The panel did however detect some objective differences on this between the Dutch and Flemish side of the organisation. The Flemish part is much smaller, so communication is easier, less formal and more trust based. Also, NVAO's Flemish department does not have responsibilities on a national level as it is not the major agency in Belgium. These are legitimate reasons why the IQA policy is implemented separately for both sides. Nevertheless, the panel believes that the two departments could work more closely together to learn more from each other in the development of their respective systems. In the following sections the panel points out these areas for further development.

### THE NETHERLANDS

NVAO-NL understands that internal quality assurance is an ongoing process of organisational development and growth with a never-ending learning curve. In September 2019, a new IQA policy was introduced distinguishing between a strategic and operational level. The related document is attached to the 2022 SAR as Annex 7.

The strategic level of the document includes formal initiatives like consultations with associations of universities, student unions, the Ministry of Education, the Inspectorate of Education, and less formal ones such as meetings and seminars with administrators of HEIs, students etc. On the operational level, NVAO-NL is implementing a systematically organised weekly meeting series, involving all essential internal stakeholders. The basic modus operandi is a cyclic closed PDCA loop, which is appreciated by the NVAO staff, as evidenced during the site visit.

NVAO is well aware that all IQA procedures inevitably add workload to all stakeholders involved. Thus, the agency reports that there needs to be a carefully balanced cost benefit analysis to keep the operation lean and mean but effective at the same time. The panel learned that first experiences with the new IQA policy seem promising in this regard.

### FLANDERS

The panel learned that NVAO-FL in general leans more towards informal ways of working on internal quality assurance of the agency. The panel understood that this is due to several factors. The Flemish part of NVAO is much smaller and thus easier to manage the communication channels.



During the site visit the panel understood that the department's quality culture is not always tangible. Some of their approaches, such as feedback sessions after every external meeting, and cultural transmitters, such as their obligatory meeting notes, are not easily identifiable as formal parts of their quality culture.

## **CONCLUSION**

NVAO felt a need to improve on IQA, which has been recommended in the 2017 ENQA review as well. The result was the design of a new common IQA policy in 2019 as described in the respective document (Internal Quality Assurance System). The system runs in the form of two perpetual cyclic PDCA loops based on surveys and subsequent interventions, one for each department. The panel concluded that indeed two separate loops are required because of all the above mentioned differences.

However, the panel suggests that regular meetings be held between some members of the two loops, exchanging good practice, brainstorming ideas, comparing achievements, organising workshops, etc. This overarching communication should also be informal, not overburdening and yet fit for purpose.

## ADDITIONAL OBSERVATIONS

### BINATIONAL CHARACTER OF NVAO

The self-assessment report reflected on the existential question of the future of NVAO as a bi-national agency, considering the separation, since the last review, of the administrative structure into two separate Dutch and Flemish departments. This occurred largely because of the different trajectories of the quality assurance systems of higher education in the two higher education systems, the Dutch and the Flemish one.

From the aggregate of the panel's discussions with the Executive and General Boards, institutions and the ministerial representatives of both departments, the panel detected a strong support and desire to maintain the bi-national character of the agency. From the Flemish side, there is a feeling that due to the small size of Flanders, there is much to be gained from the conjunction with a larger entity that speaks the same language but is larger and different and brings that externality and other view to the evaluation process. From the Dutch side, there is a sense that there is much to be learned from a system that is more flexible and has moved more quickly towards devolving greater responsibility for quality and its assurance to the institutions delivering higher education.

Furthermore, following the discussions during the visit, the panel formed the view that the difference in the evaluation approaches in Flanders and the Netherlands simply reflect the different characteristics of higher education systems in the bi-national systems. The Flemish system is more highly trust-based whereas there is still some political contestation in relation to the quality of higher education in the Netherlands. This provokes an ongoing desire for continuing with some form of external programmatic evaluations process in the Netherlands.

Nevertheless, the panel formed the view of a greater desire from the agency and the higher education institutions in the Netherlands to move to a more institutional approach to quality assurance. During the site visit all stakeholders agreed on the idea that institutional review should be more efficient in the long run. This, the panel understood, would not be opposed by the Dutch Ministry of Education. Even the student body, which has still to be convinced of the benefits of institutional over programmatic evaluation, was open to the move, provided that the principles of transparency and comparability could be enshrined in the system. The panel thus calls for further, open discussion between the listed higher education stakeholders, especially on the implementation roadmap.

### ASSESSMENT AGENCIES

The 2022 SAR included a highly informative SWOT analysis on NVAO-NL. The panel would like to comment on the ambiguous role of assessment agencies in the Netherlands. These agencies are not considered to be statutory stakeholders of NVAO as they have no legal status in accreditation. Institutions under review are not obliged to use agencies, but a large number of applicants opt for their services. The panel believes there is an opportunity for a better dialogue between the assessment agencies that are contracted by the institutions to assist in their programme evaluations, and NVAO-NL. These organisations are required to operate within the NVAO evaluation framework and use experts approved by NVAO, as well as their reports are judged by NVAO. The Netherlands is at a crossroad, introducing institutional accreditation. The current uncertainty around this potential transition is making the work of agencies difficult. They are not sure how to support the HEI. The overall message is to reduce the volume of submission documents, but HEIs tend not to follow this advice.

The agencies regret that NVAO is communicating with them in an ex-post manner even though they are covering most of the programme evaluations and thus could play a valuable consultation role. Since agencies have no formal position in the system their views are not much listened to.

The panel believes that an improved communication between NVAO-NL and the agencies would improve the efficiency of the agencies as well as it would help NVAO-NL in the future decision making process.

The panel further notes that with the proposed shift to institutional reviews, the HE institutions in the Netherlands will take responsibility for programme evaluations and in this case the role of assessment agencies may be diminished.

# CONCLUSION

## SUMMARY OF COMMENDATIONS

### ESG 3.4 Thematic analysis

NVAO-FL has published an excellent first annual system wide analysis, commended by and commented on by many stakeholders.

## OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

Standard	Judgement	Recommendation
ESG 3.1 Activities, policy, and processes for quality assurance	compliant	
ESG 3.4 Thematic analysis	compliant	NVAO-NL should rethink their approach to thematic analysis and embrace the opportunity to actively contribute to educational policies in the Netherlands using their authority and knowledge.
ESG 2.1 Consideration of internal quality assurance	compliant	
ESG 2.2 Designing methodologies fit for purpose	compliant	
ESG 2.3 Implementing processes	compliant	NVAO-NL should proactively communicate with HE institutions when agreed timelines are in danger of being exceeded.
ESG 2.4 Peer-review experts	compliant	
ESG 2.5 Criteria for outcomes	compliant	NVAO-NL should endeavour to minimise any discrepancy between the final outcomes and the panel recommendations. It is important to balance consistency and fairness of outcomes without losing the inherent trust-based nature of reviews by trained peer experts.
ESG 2.6 Reporting	compliant	
ESG 2.7 Complaints and appeals	compliant	

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, NVAO complies with the ESG.

## **SUGGESTIONS FOR FURTHER IMPROVEMENT**

### **ESG 3.1 Activities, policy, and processes for quality assurance**

Following on from the successful implementation of the institutional review process in Flanders, the panel believes that there is an opportunity to further institutional autonomy in the Netherlands by developing an appropriate institutional review process for that jurisdiction also.

### **ESG 2.2 Designing methodologies fit for purpose**

Learning from the success of both the operational rollout, system-wide analysis and successful communication of the institutional review process in Flanders, NVAO-NL is encouraged to proceed with the implementation of institutional accreditation.

### **ESG 2.3 Implementing processes**

NVAO-NL should encourage HE institutions to adopt a lean approach to the documentation they submit in their applications.

### **ESG 2.4 Peer-review experts**

While understanding the desire and value to conduct evaluations using the Dutch language, the panel believes this has tended to restrict the international dimension to evaluations, particularly when a move to institutional review will reduce the number of evaluations.

### **ESG 2.6 Reporting**

NVAO-NL should establish an automatic procedure for uploading current and historic reports to EQAR's public database (DEQAR).

# ANNEXES

## ANNEX I: PROGRAMME OF THE SITE VISIT

#	TIMING	TOPIC	PERSONS FOR INTERVIEW
<b>Day 1, 28.03.2022, NVAO staff</b>			
	8:00-8:30 (30 min)	Briefing	
1	8:30-9:10 (5+35 min)	Meeting with General Managers and Executive Board	Chair NL, Vice-chair FL, Managing Director NL, Managing Director FL, Board member
	9:10-9:20 (10 min)	Break	
2	9:20-10:00 (5+35 min)	Meeting with General Board	Two Board members NL, two Board members FL, Student Board member
	10:00-10:10 (10 min)	Break	
3	10:10-11:00 (5+45 min)	Self-selected enhancement area ESG 3.6	Department of The Netherlands, staff involved in IQA. Two Information Managers, two Policy Advisors
	11:00-11:10 (10 min)	Break	
4	11:10-12:00 (5+45 min)	Self-selected enhancement area ESG 3.6	Department of Flanders, staff involved in IQA. Managing Director FL, Policy Advisor, Policy Support
	12:00-13:10 (70 min)	Lunch Break	
5	13:10-13:50 (5+35 min)	Staff in charge of external QA activities	NVAO-NL Staff members involved in external QA. Six Policy Advisors.
	13:50-14:00 (10 min)	Break	
6	14:00-14:40 (5+35 min)	Staff in charge of external QA activities	NVAO-FL Staff members involved in external QA. Four Policy Advisors.
	14:40-14:50 (10 min)	Break	
7	14:50-15:30 (5+35 min)	Meeting with department / key body NL	NVAO-NL staff members. Managing Director NL, Head of Department NL, Head of support department, Policy Advisor
	15:30-15:40 (10 min)	Break	
8	15:40-16:20 (5+35 min)	Meeting with department / key body FL	NVAO-FL staff members. Managing Director FL, two Policy Advisors, two Policy Support.
	16:20-16:30 (10 min)	Break	
	16:30-17:30 (60 min)	Wrap-up and preparations for Day 2	
<b>Day 2, 29.03.2022, External stakeholders</b>			
	8:00-8:30	Briefing	

#	TIMING	TOPIC	PERSONS FOR INTERVIEW
	(30 min)		
9	8:30-9:20 (5+45 min)	Meeting with Ministry representatives	Representatives of the Dutch Ministry of Education, Culture and Science and of the Inspectorate of Education. Interim director Higher Education & Student Grants, two Policy Advisors, Head Inspection Higher Education
	9:20-9:30 (10 min)	Break	
10	9:30-10:20 (5+45 min)	Meeting with Ministry representatives	Representatives of the Flemish Ministry of Education, Culture and Science. Two members of the Cabinet of the Minister, two members of the Department of Education and Training.
	10:20-10:30 (10 min)	Break	
11	10:30-11:10 (5+35 min)	Meeting with Dutch Universities of Applied Science (VHS) and Dutch Universities (VSNU)	Managing Director and Policy Advisor The Netherlands Association of Universities of Applied Sciences, Managing Director Universities of Netherlands, Quality Officer University of Amsterdam, Quality Officer The Royal Conservatoire
	11:10-11:20 (10 min)	Break	
12	11:20-11:50 (5+25 min)	Meeting with Dutch private institutions for higher education (NRTO)	Heads, QA officers and representatives of NTRO. Policy Advisor
	11:50-12:00 (10 min)	Break	
13	12:00-12:40 (5+35 min)	Meeting with Flemish professional education (VLIR) and Universities (VLHORA)	Representative of VLIR. Two representatives of VLHORA Representative of UGent Representative of Odisee
	12:40-13:50 (70 min)	Lunch Break	
14	13:50-14:40 (5+45 min)	Meeting with Dutch and Flemish assessment agencies	Representatives from Dutch and Flemish assessment agencies: Hobeon, Certiked, AeQui, QANU, NQA, VLUHR-KZ
	14:40-14:50 (10 min)	Break	
15	14:50-15:40 (5+45 min)	Meeting with representatives from the reviewers' pool	Members of the NL and FL side of the reviewers' pool including secretaries and international members: Two Chairs, three Secretaries, two student members, one International member.
	15:40-15:50 (10 min)	Break	
16	15:50-16:40 (5+45 min)	Meeting with other stakeholders	Other stakeholders: Representative Student Union LSVB, representative Student Union, ISO representative Flemish Union of Students, representative employers FL

#	TIMING	TOPIC	PERSONS FOR INTERVIEW
	16:40-16:50 (10 min)	Break	
	16:50-17:50 (60 min)	Wrap-up and preparations for Day 3	
<b>Day 3, 30.03.2022, Conclusions</b>			
	8:00-9:00 (60 min)	Meeting among panel members to agree on final issues to clarify	
17	9:00-10:00 (5+55 min)	Meeting with CEO to clarify any pending issues	Chair NL, Vicechair FL, Managing Director NL, Managing Director FL, Member
	10:00-10:10 (10 min)	Break	
	10:10-11:40 (90 min)	Private meeting between panel members to agree on the main findings	
18	11:40-12:20 (5+35 min)	Final de-briefing meeting with staff and Board members of the agency to inform about preliminary findings	NVAO staff members



## ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

# Targeted review of Accreditation Organisation of the Netherlands and Flanders (NVAO) against the ESG

## Annex I: TERMS OF REFERENCE

The present Terms of Reference were agreed between NVAO (applicant), The European Association for Quality Assurance in Higher Education (ENQA) (coordinator) and EQAR (the European Quality Assurance Register for Higher Education).

### 1. Background

Accreditation Organisation of the Netherlands and Flanders (NVAO) has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 4 March 2008 and is applying for renewal of EQAR registration based on a targeted external review against *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* coordinated by The European Association for Quality Assurance in Higher Education (ENQA).

Accreditation Organisation of the Netherlands and Flanders-NVAO has been a member of ENQA since 2003 and is applying for renewal of ENQA membership.

NVAO is carrying out the following activities within the scope of the ESG:

- *(Initial) Accreditation of joint programmes*
- *European Approach for QA of Joint Programmes*
- *Programme accreditation in Flanders for universities and universities of applied sciences and arts (statutory/registered)*
- *Initial programme accreditation in Flanders for universities and universities of applied sciences and arts (statutory/registered)*
- *Programme accreditation in Flanders for other-statutory registered higher education institution*
- *Initial programme accreditation in Flanders for other-statutory registered higher education institutions*
- *Institutional reviews in Flanders*
- *Assessments of special (quality) features for programmes and institutions in the Netherlands and Flanders*
- *Initial institutional accreditation in the Netherlands*
- *Institutional audits in the Netherlands*

- *Programme accreditation in the Netherlands, including the Caribbean islands Bonaire, St. Eustatius and Saba<sup>4</sup>*
- *Initial programme accreditation in the Netherlands, including the Caribbean islands Bonaire, St. Eustatius and Saba*
- *Institutional and programme assessments in the Caribbean islands of Curaçao, Aruba and St. Maarten (so-called Caribbean part of the Kingdom of the Netherlands)*
- *Combined institutional/programme assessments in Luxembourg*
- *Assessment of transnational education programmes.*

All these activities will be included on the agency's profile on the EQAR website and linked to DEQAR database. NB: The agency may not upload reports from other activities to DEQAR.

The following activities are not external QA activities in themselves but address aspects that are transversal to the agency's quality assurance activities and are therefore considered as part of the agency's application for renewal of registration (to the extent it is relevant for the targeted review, see points under 2.1 Focus Areas):

- *formally validating the domain/discipline specific learning outcomes for each qualification in Flemish higher education (ESG 2.1, ESG 2.5);*
- *approving of panels for programme assessments proposed by institutions in the Netherlands (ESG 2.4);*
- *deciding on formal requests from institutions in the Netherlands to change the names and degrees of programmes (ESG 2.3, ESG 2.5);*
- *advising the minister of education in the Netherlands on applications for the merger of existing programmes (ESG 2.3)*
- *drafting and maintaining frameworks for the assessment of programmes and institutions in higher education (ESG 2.2, ESG 3.3);*
- *system-wide analysis in Flanders (ESG 3.4).*

The following activities of the applicant are outside the scope of the ESG:

- Assessment of Quality Agreements in the Netherlands
- Assessment of the quality of 'Training Schools' (Aspirant-Opleidingscholen)
- Development and assessment of Training Schools ('Samen Opleiden en Professionaliseren - Kibrahacha') in Aruba, Bonaire and Curaçao

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<sup>4</sup> The Caribbean islands: Bonaire, St. Eustatius and Saba are statutory 'special municipalities' within the Kingdom of the Netherlands

- Developing a guide for the assessment of training on the job ('Werkplekleren')

## 2. Purpose and scope of the targeted review

This review will evaluate the extent to which NVAO continues to fulfil the requirements of the ESG. The targeted review aims to place more focus on those parts that require attention and provide sufficient information to support NVAO's application to EQAR.

The review will be further used as part of the agency's renewal of membership in ENQA.

### 2.1 Focus areas

- A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision:
  - ESG 2.6 Reporting.
- B) Standards 2.1 to 2.7 for the following activities:
  - Institutional reviews in Flanders.
  - Assessment of transnational education programmes (as applicable)
  - Assessment framework for the higher education accreditation system (as applicable)
- C) Standards affected by other types of substantive changes:
  - ESG 3.1: how the agency clearly separates between its activities that are within and outside the scope of the ESG, in particular considering the 'Assessment of Quality Agreements in the Netherlands' and the 'Assessment of the quality of 'Training Schools'.
- D) ESG 2.1 Consideration of internal quality assurance.
- E) Selected enhancement area: ESG 3.6 Internal quality assurance and professional conduct;
- F) Other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any).

These issues should be investigated by the review panel as far as possible, providing an analysis and conclusion on the ESG standard(s) concerned.

## 3. The review process

The review will be conducted in line with the requirements of *the EQAR Procedures for Applications* and *the Policy on Targeted Reviews*, and following the methodology described in the *Guidelines for ENQA Targeted Reviews*.

The evaluation procedure consists of the following steps:

- Agreement on the Terms of Reference between EQAR, NVAO and ENQA;
- Nomination and appointment of the review panel by ENQA;
- Self-assessment by NVAO including the preparation and publication of a self-assessment report;
- A site visit by the review panel to NVAO;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Analysis of the final review report and decision-making by the EQAR Register Committee;
- Decision on ENQA membership by the ENQA Board.

### **3.1 Independence of the review coordinator**

The European Association for Quality Assurance in Higher Education (ENQA) has not provided remunerated (e.g. consultancy) or unremunerated services to NVAO during the past 5 years, and conversely NVAO has not provided any remunerated or unremunerated services to ENQA.

### **3.2 Nomination and appointment of the review team members**

The review panel consists of at least 3 members including an academic employed by a higher education institution, a student member and one other expert. At least one of the three members is from another country.

The third panel member should be a quality assurance professional that is currently employed by a QA agency and has been engaged in quality assurance within the past five years. When requested by the agency under review or when considered particularly pertinent, a second quality assurance professional or other stakeholders (for example, a representative of the labour market) may be included in addition to the three panel members. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

One of the members serves as the chair of the review panel, and one as the review secretary. At least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. At least two panel members come from outside the national system of the agency under review (if relevant).

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The Review Coordinator will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

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

ENQA will provide the agency with the proposed panel composition and the curricula vitarum of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

Once appointed, ENQA will inform EQAR about the appointed panel members.

### **3.3 Self-assessment by NVAO, including the preparation of a self-assessment report**

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

- Self-assessment includes all relevant internal and external stakeholders;

The self-assessment report is expected to contain:

- a description of the self-assessment process and the production of the SAR;
- a description of changes occurred within the agency since the last full review, including any eventual changes in the higher education system and quality assurance system in which the agency predominantly operates, the agency's structure, funding, its list of external quality assurance activities within the scope of the ESG, as well as the changes in the agency's quality assurance activities abroad (where relevant);
- a section that addresses the focus areas of the review, including standards that were considered to be partially compliant with the ESG in the last full review as well as ESG 2.1 and one self-selected ESG standard for enhancement (see 2.1 Focus areas);
- a SWOT analysis of the agency as a whole;
- for each of the individual standards enlisted above (see section 2) a consideration of how the agency has addressed the recommendations as noted in the previous EQAR Register Committee decision of inclusion/renewal (if applicable).

The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which NVAO fulfils its tasks of external quality assurance and continues to meet the ESG and thus the requirements for EQAR registration.

The self-assessment report is submitted to the ENQA Secretariat, which has two weeks to carry out a screening. The purpose of a screening is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Targeted Reviews*, is present. If the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

### **3.4 A site visit by the review panel**

The review panel will draft a proposal of the site visit schedule considering the aspects included under the focus area (as defined under point 2.1 of the Terms of Reference).

The schedule will include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit. The approved schedule shall be given to NVAO at least one month before the site visit, in order to properly organise the requested interviews.

The site visit should enable the review panel to explore how the agency has addressed the standards where it has been found to be partially compliant (if the case), aspects of substantive change, consideration of internal quality assurance (ESG 2.1) and the self-selected ESG standard(s) for enhancement. The panel will include extra time during the site-visit to address any other arising issues (if the case) that might have an impact on the agency's compliance with the ESG.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency.

Prior to the physical site visit, the panel attends a joint briefing call between the panel, The European Association for Quality Assurance in Higher Education (ENQA) and EQAR to clarify the review expectations and address any possible arising matters.

In advance of the site visit (at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

### 3.5 Preparation and completion of the final review report

The review report will be drafted in consultation with all review panel members and correspond to the purpose and scope of the review as defined under articles 2 and 2.1. In particular, it will provide a clear rationale for its findings concerning each ESG. When preparing the report, the review panel should bear in mind the *EQAR Policy on the Use and Interpretation of the ESG* to ensure that the report will contain sufficient information for the Register Committee for application to EQAR<sup>5</sup>.

The external report will present the facts and analysis reflecting the reality at the time of review. This will form the main basis for the Register Committee's decision making.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language. After panel has considered coordinator's feedback, the report will go to the agency for comment on factual accuracy. If NVAO chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report.

Thereafter, the review panel will take into account the statement by NVAO and submit the document for scrutiny to ENQA's Agency Review Committee and then to EQAR along with the remaining application documents (self-evaluation report, Declaration of Honour, statement to review report-if applicable). The report is to be finalised normally within 2-4 months of the site visit and will normally not exceed 30 pages in length. All panel will sign off on the final version of the external review report. ENQA will provide to NVAO the [Declaration of Honour](#) together with the final report.

## 4. Publication and use of the report

NVAO will receive the expert panel's report and publish it on its website once the ENQA Agency Review Committee has validated the report. Prior to the final validation of the report, the ENQA Agency Review Committee may request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome. The report will also be published on the EQAR website together with the decision on registration, regardless of the outcome.

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA.

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<sup>5</sup> See here: <https://www.eqar.eu/assets/uploads/2018/04/UseAndInterpretationOfTheESGv2.0-2015.pdf>

## 5. Decision-making on EQAR registration and ENQA membership

The agency will submit the review report via email to EQAR before expiry of the agency's registration on EQAR. The agency will also include its self-assessment report (in a PDF format), the Declaration of Honour and any other relevant documents to the application to EQAR (i.e. annexes, statement to the review report).

EQAR is expected to consider the review report and the agency's application at its Register Committee meeting in autumn 2022. The Register Committee's final judgement on the agency's compliance with the ESG as a whole can either be substantially compliant (approval of the application) or not substantially compliant (rejection of the application). In case of a positive decision (substantially compliant with the ESG), the registration is renewed for a further five years (from the date of the review report).

The decision on ENQA membership by the ENQA Board will take place after EQAR Register Committee decision.

To apply for ENQA membership, the agency is requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

## 6. Indicative schedule of the review

Agreement on Terms of Reference	November 2021
Appointment of review panel members	November 2021
Self-assessment report (SAR) completed by NVAO	20 January 2022
Screening of SAR by ENQA Review Coordinator	January 2022
Preparation of site visit schedule and indicative timetable	February 2022
Briefing of review panel members	February 2022
Review panel site visit	End March/early April 2022
Submission of the draft review report to ENQA Review Coordinator	May 2022
Factual check of the review report by the NVAO	June 2022



Statement of NVAO to review panel (if applicable)	June 2022
Submission of review report to The European Association for Quality Assurance in Higher Education (ENQA)	July 2022
Validation of the review report by the Agency Review Committee	September 2022
EQAR Register Committee meeting and decision on the application by NVAO	Autumn 2022
Decision on ENQA membership by the ENQA Board	December 2022

### ANNEX 3: GLOSSARY

EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
DEQAR	Public database of the European Quality Assurance Register for Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	higher education
HEI	higher education institution
NVAO	Accreditation Organisation for the Netherlands and Flanders
NVAO-NL	Dutch part of NVAO
NVAO-FL	Flemish part of NVAO
QA	quality assurance
EQA	external quality assurance
IQA	internal quality assurance
SAR	self-assessment report

## ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

### DOCUMENTS PROVIDED BY NVAO

- NVAO Self-Assessment Report 2022 (including Annexes 1-13)
- NVAO web pages

### OTHER SOURCES USED BY THE REVIEW PANEL

- ENQA agency review report 2012
- ENQA agency review report 2017
- Assessment framework for the higher education accreditation system of the Netherlands 2018
- Minutes from the panel visit of NVAO
- EQAR Renewal of Registration 2017
- EQAR Substantive Change Report 2019
- EQAR Substantive Change Report 2021
- DEQAR database
- Annotation from the Universities of the Netherlands (UNL)

## ENQA TARGETED REVIEW 2022

THIS REPORT presents findings of the ENQA Targeted Review of the Accreditation Organisation for the Netherlands and Flanders (NVAO), undertaken in 2022.

**enqa.**

European Association for  
Quality Assurance in Higher Education