

**Rejection of the Application
by NQA - Netherlands Quality Agency (NQA)
for Inclusion on the Register**

Register Committee
18/19 June 2019

Ref. RC24/A53
Ver. 1.0
Date 26/06/2019
Page 1 / 8

Application of:	08/03/2017
External review report of:	21/06/2018
Review coordinated by:	ENQA - European Association for Quality Assurance of Higher Education
Review panel members:	Pedro Teixeira (chair), Rudy Derdelinckx (academic expert), Oana Onicas (student), Núria Comet Señal (secretary)
Decision of:	19/06/2019
Absented themselves from decision-making:	Ann Verreth
Attachments:	<ul style="list-style-type: none"> 1. Confirmation of eligibility, 26/05/2017 2. External Review Report, 21/06/2018 3. Request to the Review Panel, 26/10/2018 4. Clarification by the Review Panel, 6/11/2018 5. Additional representation NQA, 14/3/2019 6. Request for clarification to NQA, 06/5/2019 7. Clarification by NQA, 19/5/2019

1. The application of 08/03/2017 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 26/05/2017.
3. The Register Committee considered the external review report of 21/06/2018 on the compliance of NQA with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee sought and received clarification from the chair of the review panel (letter of 06/11/2018).
5. The Register Committee invited NQA to make additional representation on the grounds for possible rejection on 20/12/2018. The Register Committee considered NQA's additional representation of 14/03/2019.

6. The Register Committee further requested and received clarification from NQA on a number of matters (letter of 19/05/2019).

Analysis:

7. The Register Committee found that the report provided sufficient evidence and analysis on NQA's level of compliance with the ESG with regards to *Assessments of degree programmes* and *International degree programme assessments* (in Saint Martin and Curacao).

8. The activities *EVC-assessments*, *hallmark for study programmes* and *Certification internal audit processes* were not analysed as part of the external review of NQA, although they were confirmed to be activities within the scope of the ESG in the eligibility decision of the Register Committee and included in the Terms of Reference for the review. The Committee has therefore requested the panel further clarifications.

9. In its response, the panel explained that *EVC-assessments* are audits of providers that validate competences acquired through prior learning (EVC providers). The audits are carried out through a combination of desk-research and site-visits, using the EVC Quality Code 2.0 as a reference point. The panel noted that all audits carried out by NQA so far concerned providers validating competences at NQF levels 2, 3 or 4, thus not at higher education levels. While no provider validating at NQF level 5 or higher was audited so far, the EVC system (and NQA's audits) in principle also extends to these levels.

10. The Register Committee confirmed that audits of providers validating below NQF level 5 are outside the scope of the ESG.

11. The review panel considered that EVC providers were not substantially concerned with teaching and learning in higher education.

12. The ESG relate to "all higher education offered in the EHEA regardless of the mode of study or place of delivery" and apply to all forms and types of provision understood in its broadest sense (ESG, p. 6 - 9), whereas higher education providers frequently offer recognition of prior learning as part of their programmes.

13. The Register Committee thus considered that the validation of competences at higher education level, even if based entirely on the recognition of prior learning, might qualify as "higher education in its broadest sense". Consequently, audits of EVC providers validating at NQF level 5 or higher might thus be quality assurance activities within the scope of the ESG.

14. The Register Committee acknowledged that, while NQA had not carried out assessment of such providers, such an offer was nevertheless available.

15. In its additional representation NQA stated that it has decided to terminate its EVC assessments due to its high costs. The remaining EVC audits are to be concluded in the first half of 2019.

Register Committee

18/19 June 2019

Ref. RC24/A53
Ver. 1.0
Date 26/06/2019
Page 2 / 8

16. As EVC audits (at level 5 or higher) are no longer on offer, the Register Committee concluded that the activity has become irrelevant for NQA's registration.

17. With regards to the *hallmark for study programmes* and *certification internal audit processes* the panel had not considered these activities due to the absence of predefined processes and standards, referring to characteristic (a) mentioned in section 4 of the EQAR Policy on the Use and Interpretation of the ESG¹.

18. The Register Committee considered that these activities, according to NQA's website (as of 02 April 2019), led to a formal yes/no decision and, in case of a positive assessment, the award of a "certificate" or an "education quality hallmark", respectively. Regardless of the fact that they do not meet the characteristic (a) by the letter, this suggests that these activities are external quality assurance in nature. Moreover, they clearly met characteristics (b) – (d).

19. The Register Committee thus concluded that these activities were within the scope of the ESG. As such, they were expected to have predefined processes and criteria if they are publicly advertised; offering the *hallmark for study programmes* and the *certification internal audit processes* entirely "tailor-made" and without any previously defined framework, process or criteria did not bring any guarantee on their compliance with ESG Part 2.

20. In its additional representation NQA considered these products as project-based or consultancy activities since they were not meant to lead to a decision with a formal status in the Netherlands or the European Higher Education Area.

21. NQA stated that it would change the names for *hallmark for study programmes* and the *certification internal audit processes* if the activities were to be on offer again, but for the time being these activities are removed from its website.

22. After having sought further clarification the Register Committee confirmed that the activities no longer featured on the agency's website.

23. The Register Committee underlined that if NQA were to reintroduce the activities as projects or consultancy it would need to clarify its offering to that effect, in particular the activity must then not result in a certificate, hallmark or similar. The agency has the responsibility to ensure that the name and presentation of its activities do not cause ambiguity or possible confusion with external quality assurance activities.

24. With regard to the specific European Standards and Guidelines, the Register Committee considered the compliance level the following:

¹ See Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies (p. 4, 18-19)

https://www.eqar.eu/assets/uploads/2018/04/RC_12_1_UseAndInterpretationOfTheESG_v2_0.pdf

ESG 2.4 – Peer-review experts

25. The Register Committee noted that while panel members are briefed on the manual and the accreditation framework, training is only offered for new Chair panel members. The Register Committee underlined the panel's recommendation of strengthening the training of panel members.

ESG 2.5 – Criteria for outcomes

26. The Register Committee noted that the criteria for the assessment of degree programmes are only published on the NVAO website, but are not available on NQA's website.

27. In its additional representation NQA clarified that the guideline-documents meant for their "clients" and for their panel members are not publicly available on the website due to commercial reasons, but that the accreditation framework in which the criteria are laid down is publicly available through the links provided.

28. The Register Committee noted that the agency has indeed published the accreditation framework and therefore concurred with the panel's conclusion that NQA complies with standard 2.5.

ESG 2.6 Reporting

29. The Register Committee noted that the reports and the formal accreditation decisions based on the assessment of degree programmes are published only on the website of NVAO; NQA does not publish these reports but provides a list of reviewed institutions.

30. In its additional representation the agency stated that it has initiated a consultation with NVAO considering the possibility to create an online search-option linking NVAO's database of degree assessment programme reports and decisions to the website of NQA. The agency added that its international assessments are also published by NVAO and that a web-link has been already added in the NQA website to the NVAO database.

31. Concerning its publication policy, the agency reasserted that the owner of reports is the higher education institutions and it is up to the institution to use the assessment report for an accreditation by NVAO. If the institution decides to hold on to the report, no decision on accreditation is taken and therefore the report will not be published.

32. While the Register Committee welcomed NQA's intention to integrate a searchable database on its website, the Committee underlined that the agency itself bears the responsibility to follow the ESG and therefore needs to ensure (e.g. contractually) that it is in a position to publish all reports of its external quality assurance procedures.

33. The Committee was therefore unable to concur with the panel's conclusion of (substantial) compliance, but considered that NQA complies only partially with standard ESG 2.6.

Register Committee

18/19 June 2019

Ref. RC24/A53

Ver. 1.0

Date 26/06/2019

Page 4 / 8

ESG 2.7 – Complaints and appeals

34. The review panel explained that NQA has no formal role in the appeal procedure on assessment of degree programmes as this is handled according to the Dutch accreditation system by NVAO.

35. With regards to complaints, the panel noted that there is no formally defined procedure, rather, complaints are addressed by the agency in an informal way.

36. The Register Committee underlined the panel's recommendation of developing a complaints procedure that may handle any relevant issues in a formal manner.

37. The Committee further underlined that the agency is also expected to have an appeals procedure in place. While appeals are handled by NVAO in case of assessments of degree programmes, NQA bears the responsibility for the report and its conclusion; higher education institution should thus be allowed to appeal (where the case) such results.

38. The Register Committee therefore concurred with the panel's conclusion that NQA only partially complies with standard 2.7.

Register Committee

18/19 June 2019

Ref. RC24/A53

Ver. 1.0

Date 26/06/2019

Page 5 / 8

ESG 3.1 Activities, policy, and processes for quality assurance

39. The panel found that while NQA's mission is to contribute to the continuous improvement of the quality of education, the agency does not have a long-term strategic plan or a public mission statement.

40. In its additional representation the agency explained that it would be unwise from a commercial point of view, as a private organisation, to publish its strategic goals. The agency stated that it has chosen a more dynamic course, so that NQA is able to adopt swiftly if/when radical changes such as the introduction of institutional accreditations in the system occur. The agency added that its yearly management review includes strategies based on its mission statement and goals.

41. While the Register Committee understood that publishing explicit strategic goals might not be the most favourable option for NQA, that the agency could nevertheless publicly communicate (in broader terms) its mission statement along with its goals and objectives.

42. In its review report the panel stated that NQA does not have any internal committees or other bodies where various representatives of different stakeholders could participate in the governance of the agency. The Register Committee noted from the observations of the panel that the involvement of stakeholders in NQA's governance and work is limited and mainly focused on developing adequate assessment processes with each individual institution.

43. In its additional representation NQA stated that the agency meets with a diverse group of university employees (e.g. CEO's, quality assurance officers, management of degree programmes and teachers), the NVAO, the Inspectorate and other quality assurance agencies. NQA emphasised that

the results of such meetings are translated into the work of the agency, i.e. in its strategic goals, management and review processes.

44. The Register Committee welcomed such consultations, but underscored the ESG understanding of stakeholders, which cover all actors within an institution and therefore also students. The Committee thus underlined the panel's recommendation to ensure stakeholder involvement by establishing regular interactions with all relevant groups of interest.

45. Concerning the separation between NQA's external QA activities the panel reported that one of the measures adopted by NQA was to ensure that staff members involved in assessment activities do not provide consultancy to the same institution. In most of the examples provided to the panel, the consultancy projects were completed by the Director. This was regarded by the panel as a potential problem in ensuring a clear distinction between NQA's consultancy and external quality assurance activities.

46. In its additional representation the agency stated that its separation of its external QA activity from consultation was addressed under independency, and that the report gave no reason to support the statement of the Register Committee.

47. The Register Committee, in line with its Policy on the Use and Interpretation of the ESG, addressed the issue under ESG 3.1, where the Policy notes that reports should demonstrate "how the agency ensures a clear distinction between external quality assurance and its other fields of work".

48. From the review panel's analysis the Committee noted that "NQA attempts to separate as much as possible quality assurance activities from consultancy services" and that "throughout the interviews, there was no feeling of a lack of independence". The Committee further noted that while the panel concluded the agency is "substantially compliant" re. independence, the panel found it necessary to recommend the establishment of stricter internal procedures in order to further separate consulting and assessment activities. In particular, the panel suggested to avoid performing consultancy activities to institutions NQA reviews, at least during a certain time span. This would be in line with Annex 5 of the Use and Interpretation of the ESG.

49. Responding to the Register Committee inquiry on how the panel satisfied itself that NQA separates its external QA from consultancy services in a way that ensures clarity and prevents conflicts of interest (see letter of 6 November 2018) the review panel stated that "the separation between review and consultancy issues was a matter of concern" and that the panel has tried to express its insufficient satisfaction with the current situation, both in its analysis and recommendations.

50. The Register Committee therefore concurred with the panel's view that NQA complies only partially with ESG 3.1.

Register Committee

18/19 June 2019

Ref. RC24/A53
Ver. 1.0
Date 26/06/2019
Page 6 / 8

ESG 3.4. Thematic analysis

51. The Register Committee noted that thematic analysis is not a regular activity performed by NQA, and that only a limited number of thematic analyses have been carried out in the past following requests from higher education institutions.

52. The Register Committee underlined the recommendation of the panel to include thematic analysis as part of NQA's regular planned activities and to make use of the experience and knowledge of internal and external secretaries in order to conduct such analyses.

53. In its additional representation the agency stated that it concurs with the review panel's analysis and that the agency has put in place an improvement plan which it will realise in the following four years.

54. The Register Committee welcomed the steps taken by NQA but noted that presently the agency has not yet implemented its plans to carry out systematic analysis. The Committee therefore concurred with the panel that NQA is only partially compliant with standard 3.4.

55. For the remaining standards, the Register Committee was able to concur with the review panel's analysis and conclusion without further comments.

Conclusion:

56. Based on the external review report and the considerations above, the Register Committee concluded that NQA demonstrated compliance with the ESG (Parts 2 and 3) as follows:

Standard	Review panel conclusion	Register Committee conclusion
2.1	Substantial compliance	Compliance
2.2	Full compliance	Compliance
2.3	Full compliance	Compliance
2.4	Substantial compliance	Compliance
2.5	Substantial compliance	Compliance
2.6	Substantial compliance	Partial compliance
2.7	Partial compliance	Partial compliance
3.1	Partial compliance	Partial compliance
3.2	Full compliance	Compliance
3.3	Substantial compliance	Compliance
3.4	Partial compliance	Partial compliance
3.5	Substantial compliance	Compliance
3.6	Substantial compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

Register Committee

18/19 June 2019

Ref. RC24/A53

Ver. 1.0

Date 26/06/2019

Page 7 / 8

57. After duly considering NQA's additional representation, the Register Committee concluded that NQA only achieved partial compliance with a number of standards. The Register Committee underlined that to ensure compliance with the ESG, NQA has yet to publish (or provide a link) to the results of each of its reviews on its own platform (ESG 2.6) and it has yet to formally define its procedures for complaints and appeals (ESG 2.7). In terms of its organisational arrangements, the agency has not demonstrated that it ensures the systematic involvement of stakeholders in its governance and work and it lacks a clear distinction between its degree assessment procedures and its other fields of work.

58. Given that NQA fails to meet some key requirements of the ESG, in its holistic judgement, the Register Committee remained unable to conclude that NQA complies substantially with the ESG as a whole.

59. The Register Committee therefore rejected the application.

60. NQA has the right, according to §3.21 of the Procedures for Applications, to undergo a focused review addressing those issues that led to rejection, and to reapply within 18 months based on that focused review.

61. NQA has the right to appeal this decision of the Register Committee in accordance with the Appeals Procedure (available on the EQAR website at <http://www.eqar.eu/application.html>). Any appeal must reach EQAR within 90 days from receipt of this decision.

Register Committee

18/19 June 2019

Ref. RC24/A53

Ver. 1.0

Date 26/06/2019

Page 8 / 8

Netherlands Quality Agency (NQA)

Peter van Achteren

Catharijnesingel 56

3511 GE Utrecht

The Netherlands

Brussels, 26 May 2017

Confirmation of Eligibility: Application for Inclusion on the Register

Application no. A53 of 08/03/2017

Dear Peter,

We hereby confirm that the application by NQA for inclusion on the Register is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by NQA fulfils the requirements of the EQAR Procedures for Applications.

We thank you for your clarification of 20 April 2017. Please allow us to clarify two general issues:

1. The EQAR Policy on the Use and Interpretation of the ESG sets out clearly that the Register Committee considers activities within the scope of the ESG "irrespective of whether they fulfil a statutory mandate or are initiated by higher education institutions on a voluntary basis" (p. 2). Therefore, also activities that depend on the "free will" of institutions may be within the scope of the ESG.
2. In the application form, all activities have to be described, irrespective of how frequently they are carried out in practice and even if a certain activity is only an "offer" at the moment. All activities within the scope of the ESG have to be in compliance with the ESG. When activities have not been carried out in practice (due to lack of interest by institutions) this should be assessed by the review panel on the basis of the processes and documentation that would be used in case of a demand for it.

We confirm that *assessments of degree programmes, including cluster audit visits and meta analysis*, are within the scope of the ESG.

In the application form, NQA did not mention the following activities to be within the scope of the ESG. Based on the above and having considered your clarification, we came to the conclusion that these activities are

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within the scope of the ESG and should thus be analysed in the external review of NQA:

- *NQA hallmark for study programmes*
- *International assessments*
- *Certification internal audit processes*
- *EVC procedures*, as far as qualifications at the higher education levels of the national qualifications framework (NQF) are concerned

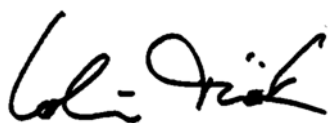
Please ensure that NQA's self-evaluation report covers all the aforementioned activities.

Please further ensure that NQA's self-evaluation report and the external review report address the way in which NQA separates between consultancy and quality assurance, in particular in relation to the activity *support in applying for accreditation*.

We will forward this letter to ENQA in its capacity of the coordinator of the external review. At the same time we underline that it is NQA's responsibility to ensure that the coordinator and review panel take account of the present confirmation, so as to ensure that all activities mentioned are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. NQA has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision.

Yours sincerely,



Colin Tück
(Director)

Cc: ENQA (review coordinator)

Brussels, 26 October 2018

**Application by NQA for inclusion/renewal of registration on EQAR –
Clarification Request**

Dear Mr Teixeira,

The Netherlands Quality Agency (NQA) has made an application for initial inclusion on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of 25/09/2018 on which NQA's application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members as necessary, some matters in order to contribute to the consideration of NQA's application:

1. In its confirmation of eligibility (letter of 26/05/2017), the Register Committee noted that *EVC procedures* are within the scope of the ESG as far as qualifications concern the higher education levels of the national qualifications framework (NQF). In the review report the panel also note that that certificates issued by EVC may be equivalent to higher education qualifications (pag. 14-15). While you noted that NQA so far only assessed EVC providers at NLQF/EQF levels 2-3-4, we understood that NQA would also make assessments of providers at EQF levels 5 – 8, if there were an application.

Please clarify whether the panel has considered the processes and documentation against the ESG that would be used in case of a demand for it, and if so please elaborate on their compliance with the ESG?

As clearly noted in our eligibility confirmation, in situations where activities have not been carried out in practice (due to lack of interest by institutions or for other reasons), but are "offered" by the agency to institutions, the activity should be assessed by the

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EQAR Founding Members:



review panel on the basis of the processes and documentation that would be used in case of a demand for it.

2. The panel took the view that the *certification of internal audit processes* and *NQA hallmark for study programmes* were outside the scope of the ESG, referring to the fact that NQA has not carried out such activities in the past five years.

We had pointed out in our confirmation of eligibility that these activities are “on offer” on the agency’s website and should therefore be reviewed by the panel, on the basis of the processes and documentation that would be used in case of a demand for it. NQA did not appeal the eligibility confirmation and, consequently, these activities were also mentioned in the terms of reference as within the scope of the review.

Could you please elaborate on the panel’s view on why these activities are not within the scope of the ESG? Please also note EQAR’s Use and Interpretation of the ESG considering the scope and applicability of the ESG (p. 3-4).

3. According to its website NQA also carried out international assessments/audits in Switzerland, Flanders and Vietnam.

Did the panel establish whether NQA offers assessments internationally outside the assessments of degree programmes carried out in Curaçao? If so, did the panel address whether these activities comply with the ESG?

4. In its eligibility confirmation (and as confirmed in its terms of reference), the Register Committee noted that the external review report should address the way in which NQA separates between consultancy and quality assurance, in particular in relation to its activities supporting the application for accreditation.

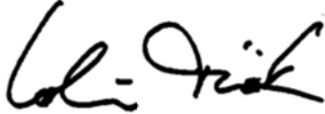
How did the review panel satisfy itself that NQA separates its external QA from consultancy services in a way that ensures clarity and prevents conflicts of interest? Please bear in mind the Guiding Principles for separation between agencies’ activities (Annex 5) contained in EQAR’s Policy on the Use and Interpretation of the ESG.

We be would grateful if it was possible for you to respond by 9 November 2018, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on NQA’s application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

We acknowledge that it might not be possible to clarify all of the above.
However, we appreciate your assistance and I shall be at your disposal if
you have any questions in relation to this request.

Kind regards,

A handwritten signature in black ink, appearing to read "Colin Tück".

Colin Tück
(Director)

Cc: Núria Comet Señal (Secretary)
ENQA (coordinator)
NQA

From: Pedro Teixeira pedrotx@fep.up.pt
Subject: RE: NQA - clarification re. the external review
Date: 6 November 2018 at 19:45
To: Melinda Szabo melinda.szabo@eqar.eu
Cc: ncomet@aqu.cat, Colin Tück colin.tueck@eqar.eu



Dear Melinda,

please find below our attempt to clarify the issues raised. Please let us know if that is sufficient.

Best,

Pedro

Application by NQA for inclusion/renewal of registration on EQAR – Clarification Request

1. In its confirmation of eligibility (letter of 26/05/2017), the Register Committee noted that EVC procedures are within the scope of the ESG as far as qualifications concern the higher education levels of the national qualifications framework (NQF). In the review report the panel also note that that certificates issued by EVC may be equivalent to higher education qualifications (pages 14-15). While you noted that NQA so far only assessed EVC providers at NLQF/EQF levels 2-3-4, we understood that NQA would also make assessments of providers at EQF levels 5 – 8, if there were an application. Please clarify whether the panel has considered the processes and documentation against the ESG that would be used in case of a demand for it, and if so please elaborate on their compliance with the ESG? As clearly noted in our eligibility confirmation, in situations where activities have not been carried out in practice (due to lack of interest by institutions or for other reasons), but are “offered” by the agency to institutions, the activity should be assessed by the review panel on the basis of the processes and documentation that would be used in case of a demand for it.

Reply – An EVC-procedure aims at demonstrating and validating earlier achieved competences of individuals, according to specific standards laid down in the EVC Quality Code 2.0 by the National Knowledge Centre EVC (NKC-EVC). The validation of these competences is carried out by so called EVC-providers, who grant EVC-certificates. EVC-providers have to be registered in a National Register after a positive assessment by one of three external quality agencies appointed by NKC-EVC. NQA is one of them.

Thus, NQA is not an EVC-provider, validating earlier achieved competences, but assesses the quality of an EVC-provider, its internal quality system and its procedures. Only when NQA has positively assessed an EVC-provider, this provider can be registered in the National Register. During an audit of an EVC-provider, NQA assesses whether the instruments of the EVC-provider meet the requirements of the EVC Quality Code 2.0. This code includes requirements regarding the instruments and procedures of the EVC-provider, the public information on these procedures, the quality of the individual assessors, the internal quality assurance system of the EVC-provider (PDCA).

The NQA audits of an EVC-provider include the following phases:

- Self-assessment report: the EVC-provider has to draw up a self-assessment report in which the compliance with the EVC Quality Code 2.0 is described.
- Site visit: During an EVC-audit, NQA assesses whether the assessment-instrument of the provider meets the requirements of the EVC Quality Code 2.0.
- Final report: The assessment results are presented in a report drawn up by the NQA project manager.
- Appeal procedure
- Follow-up

There are two types of assessments: one for initial applicants and one for re-assessments.

- The audit for initial applicants is focused on professionalism and integrity of the organization that wants to be recognized as an EVC-provider and on its work processes.
- The re-assessment has a broader focus including aspects as the functioning, guidance and assessment of assessors and the internal quality assurance. An important element in the re-assessment is the check on the awarded certificates.

In the period 2013-2017 NQA has carried out 23 assessments of EVC-providers. However, they all concerned providers at NQF levels 2-3-4. No EVC-providers that validate at NQF levels 5 or higher have been assessed by NQA.

According to the EQAR's Use and Interpretation of the ESG considering the scope and applicability of the ESG, activities that are within the scope of the ESG should be characterized, among other aspects, by its subject, i.e., being substantially concerned with teaching and learning in higher education. Thus, the Review Team considered that these activities of NQA did not fit into that scope.

Nevertheless, in the report that procedure is briefly presented.

According to the Agency, the scope of the EVC assessments is far more limited than that adopted when reviewing degree programs and the process combines desk-research with a site-visit. They also recognize that the compliance of the frameworks for the EVC audits with ESG part 1 is less strong, although they consider that most aspects are still covered by their procedures. Among the aspects that are less covered are those related to the programme and student-related standards of Part 1, though they emphasise that a strong emphasis on internal quality assurance of the EVC-provider is embedded.

Not all the ESG part1 standards are included in the assessments carried out by NQA, due to the nature of the EVC-procedures itself. An EVC-procedure is not related to educational programmes but to competences often achieved by an individual outside of an educational environment such as a professional practise.

The main aspects missing refer to the standards that have a relation with educational programmes and with the students, which are not included in the scope of an EVC-procedure. More precisely, the aspects not covered by reviews of EVC-providers are the

following: 1.2. Design and Approval of Programmes (although the competences achieved by individuals have to correspond to the Dutch national qualifications that are for higher education in line with the EQF); 1.3. Student-centred learning, teaching and assessment (except for the quality of assessors and assessments, which is part of the EVC Quality Code 2.0); 1.4. Student admission, progression, recognition and certification (except for recognition of earlier achieved competences and their certification); 1.5. Teaching Staff (there is no teaching involved), 1.6. Learning resources and student support; 1.7 Information management (regarding programmes and students' progression); 1.9 Ongoing monitoring and periodic reviews of programmes.

Part 2 of the ESG is covered in the assessments by NQA of EVC-providers. In more detail, ESG 2.1. Considerations of internal quality assurance - The EVC Quality Code 2.0. contains a standard regarding the internal quality assurance of an EVC-provider. (Standard 5 of EVC Quality Code). On ESG 2.2. Designing methodologies fit for purpose - NQA is certified by the National Knowledge Centre NKC-EVC to perform assessments of EVC providers according to the EVC Quality Code 2.0. It has to follow the procedures set up by NKC-EVC. On ESG 2.3. Implementing processes - The NQA-procedure contains the necessary steps of SAR, site visit, report, complain, follow up. On ESG 2.4. Peer review experts - The NQA-procedure is carried out by NQA assessors, that have been trained for the EVC-procedure. No students are involved. On ESG 2.5. Criteria for outcomes - The criteria for the assessment of EVC-providers are not publicly available, neither on the NVAO-website or the website of NKC-EVC. However, the procedure depends, among other issues, on the NQF-level and has to be in line with the EVC Quality Code 2.0, which is publicly available. The main task of NQA is to verify if the procedures of the EVC-provider comply with the EVC Quality Code 2.0. On the basis of CROHO- and CREBO -standards, NQA together with the EVC-provider, determines how to investigate the procedures of the EVC-provider, considering the EVC Quality Code 2.0. The investigation may be a desk audit, an assessment on location or a combination of the two. The NQA-procedure is tailor made, set up prior to the assessment and provided to the EVC-provider, that applies for registration in the National Register. On ESG 2.6. Reporting - NQA is not the owner of the reports, so NQA does not publish the reports. NKC-EVC has a website that contains all registered EVC-providers, but not the reports. Finally, on ESG 2.7. Complaints - There is a complaint procedure regarding the outcomes of the assessment in place.

As already mentioned previously, NQA has not yet assessed EVC-providers at levels 5 or higher.

2. The panel took the view that the certification of internal audit processes and NQA hallmark for study programmes were outside the scope of the ESG, referring to the fact that NQA has not carried out such activities in the past five years. We had pointed out in our confirmation of eligibility that these activities are "on offer" on the agency's website and should therefore be reviewed by the panel, on the basis of the processes and documentation that would be used in case of a demand for it. NQA did not appeal the eligibility confirmation and, consequently, these activities were also mentioned in the terms of reference as within the scope of the review. Could you please elaborate on the panel's view on why these activities are not within the scope of the ESG? Please also note EQAR's Use and Interpretation of the ESG considering the scope and applicability of the ESG (p. 3-4).

Reply – This matter was also discussed at length both in the interaction with the Agency and among the Review Team. As explained in the Review Report, until the site visit no applications for a NQA hallmark had been received by the Agency. Since these evaluations would be tailor made, there were no assessment criteria developed by NQA, nor procedures in place to be assessed. As explained by NQA, those processes would be tailor-made procedures in case a demand would occur.

The panel found this (potential) activity outside of scope of the ESG following EQAR's Use and Interpretation of the ESG where it is indicated that: "Activities within the scope of the ESG are characterized by the following: (a) Nature: the activity follows a predefined process, involves evaluating or assessing an entity against a set of predefined standards or another reference point set beforehand, with limited or no flexibility". In this case, we considered that it was outside the scope since the activity has not a predefined process and there were no specified standards against which it could be evaluated. Moreover, the Review Team would not have any evidence on which to base its judgement.

3. According to its website NQA also carried out international assessments/audits in Switzerland, Flanders and Vietnam. Did the panel establish whether NQA offers assessments internationally outside the assessments of degree programmes carried out in Curaçao? If so, did the panel address whether these activities comply with the ESG?

Reply - About the International assessments, the team was only aware, during the review, of those activities mentioned in the report, i.e., those that took place in Saint Martin and Curaçao (in 2017). Those activities have been considered during the review. The activities in Switzerland, Flanders and Vietnam were not mentioned in the SAR or during the review, nor were they included in the website at the time of the review.

The activities in Vietnam were part of a NUFFIC-project "Setting up and development of Quality Assurance Centres at five Universities and contribution to a system of quality assurance for higher education in Vietnam", that according to the information available on their website, was carried out in collaboration with the former HBO-Raad (umbrella organization of University Colleges in the Netherlands) in the period 2005-2008. The information available in the website regarding Vietnam indicates that is still under preparation. This information seems to be outdated (though this would have to be clarified by the Agency).

The information on Flemish programs indicates no assessment activities but primarily consultancy activities: supporting Flemish institutes to write self-evaluation reports, informing institutes about the accreditation frameworks.

Considering the activities in Switzerland, the NQA website mentions: NQA has investigated the quality of ZAK ("Zentrum für Agogik, Basel") study programmes in accordance with quality criteria endorsed by the Nederlands-Vlaamse Accreditatie Organisatie (NVAO) as recognition of scientific master study programs at Dutch institutes for higher education. The corresponding audit visits were carried out by panels with internationally selected members working on the basis of NVAO procedures and criteria for audit visits of institutes of higher education that apply in the Netherlands.

These details were not mentioned in the SAR, were not available on the website at the time of the assessment, and were not

mentioned during the site visit.

4. In its eligibility confirmation (and as confirmed in its terms of reference), the Register Committee noted that the external review report should address the way in which NQA separates between consultancy and quality assurance, in particular in relation to its activities supporting the application for accreditation. How did the review panel satisfy itself that NQA separates its external QA from consultancy services in a way that ensures clarity and prevents conflicts of interest? Please bear in mind the Guiding Principles for separation between agencies' activities (Annex 5) contained in EQAR's Policy on the Use and Interpretation of the ESG.

Reply – The separation between review and consultancy issues was a matter of concern for the Review Team, as expressed in the Report and we have tried to express our insufficient satisfaction with the current situation, both in the analysis and in the recommendations.

This was something that was raised in several instances of the site visit by the team (with the Director, the staff, and with external stakeholders such as the representatives of the institutions). During the site visit it was clear that NQA attempts to separate as much as possible quality assurance activities from consultancy services. One of the measures adopted to sustain this separation is that staff members involved in assessment activities do not provide consultancy to the same institution. In most of the examples provided to the panel, the consultancy projects were often completed by the Director. Moreover, in the interviews, there was no objective indications of a lack of independence. To some extent, that was credible, given the small volume of consultancy activities.

On the other hand, several of the interviewees (institutional representatives and the representative of the Inspectorate) agreed with the team that there was potentially a problem. Thus, the team felt the need to express its concern and to put it in the report. This was supported also by the size and the operations of the agency, who works in a very interactive atmosphere that makes that separation difficult.

Moreover, in the report we have expressed our concern that NQA should be very careful in selecting consultancy tasks. We have also recommended to the Agency the establishment of stricter internal procedures in order to further separate consulting and assessment activities and that NQA should avoid performing consultancy activities to institutions they review, at least during a certain time span, for example within the same review cycle, which is in accordance to the EQAR time span of six years mentioned in EQAR's Policy on the Use and Interpretation of the ESG .

Pedro Nuno Teixeira
Associate Professor - Faculty of Economics - U. Porto
Director - CIPES - Centre for Research in Higher Education Policies

De: Melinda Szabo [melinda.szabo@eqar.eu]
Enviado: sexta-feira, 26 de Outubro de 2018 15:52
Para: Pedro Teixeira
Cc: ncomet@aqu.cat; Colin Tück
Assunto: NQA - clarification re. the external review

Dear Mr Teixeira

We are contacting you in your capacity as chair of the panel that externally reviewed the Netherlands Quality Agency (NQA).

As you know, NQA applied for initial inclusion on EQAR and submitted the panel's review report in support of its application. The EQAR Register Committee's rapporteurs have been considering the application and the external review report and would like to seek further clarification on the panel's findings with regard to some aspects as detailed in the attached letter.

We be would grateful if it was possible for you to respond by 9 November 2018. Kindly get in touch with us should that date not be feasible.

Thank you in advance for your assistance with this matter.

Best regards,

Melinda

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Date
March 14, 2019
Subject
Additional representation
NQA application EQAR

Additional representation NQA application EQAR

Dear Register Committee,

EQAR's Register Committee made an analysis of the report produced by a ENQA Review Panel chaired by Pedro Teixeira, vice-rector for Academic Affairs at University of Porto and director of Centre for Research on Higher Education Policies (CIPES), nominee of the European University Association. The Review Panel concluded that, in light of the documentary and oral evidence considered, that in the performance of its functions, NQA is in compliance with ESG. The analysis by the Register Committee led to the request for additional representation as the committee was unable to concur with some conclusions of the ENQA Review panel. The Register Committee's considerations relate to specific activities mentioned on NQA's website: *Hallmark for study programmes* and *Certification internal audit processes*. Furthermore the Register Committee issues the *EVC audits* that NQA conducts and makes some remarks regarding specific standards. This document contains NQA's response to the analysis of the Register Committee starting with the remarks made regarding *EVC audits*, *Hallmark for study programmes* and *Certification internal audit processes*, followed by addressing the remarks on specific standards.

EVC:

In the letter of the Register Committee it addresses NQA's activity EVC-assessments (numbered 7 – 11). NQA decided by the end of 2018 to stop its EVC activities with respect to ongoing contracts. Now in March 2019, there are two more EVC assessments yet to be conducted. After those, the EVC assessments are no longer part of our product portfolio. The decision to shift aside this product is merely based on the fact that the workload and costs of keeping the product up-to-date outweighs the benefits of keeping it in portfolio with only 23 assessments performed in five years. Part of this workload stems from the need to be appointed by the NKC-EVC and the extensive deliberations needed with NKC-EVC and other government bodies to seek clarification about amongst other aspects the procedures within this external quality assurance system. After five years of investing in these contacts and contributing by performing a limited amount of assessments, it is now clear that the expected growth of the market of EVC-providers did not come through. NQA has now decided, despite its investments in the last years, to stop its EVC activities. As such, it feels it is not necessary to make a Substantive Change Report as suggested under 11 as it will not begin to offer EVC audits of providers validating at levels equivalent to higher education, i.e. NQF level 5 or above.

Certificates and Hallmarks by NQA

With regard to the *Hallmark for study programmes* and *Certification internal audit processes* NQA once more wants to emphasize that it never conducted either of these activities. Both activities are mentioned on our website as a demonstration of how NQA could expand its now narrow product portfolio with a nearly sole focus on the execution of assessments of degree programmes. This is also shown in the data in the external reviews report showing that in 2017 93,5 percent (assessments of degree programmes & follow-up assessments) of NQA's revenues depend on this activity. Another 2,21 percent stems from research evaluations, that have been considered outside the ESG scope. This shows the narrowness of the active portfolio and also the need for NQA as a private organisations - in terms of continuity - to offer a more diverse portfolio. Nevertheless, the situation up until this day hasn't changed: hallmark and certification activities haven't been conducted.

It is our strong believe that good quality assurance activities take into consideration the relevant frameworks but also the identity and scope of the organisations that are subject. This believe led to a working method for the two activities in which NQA builds – with the client involved – an audit framework that embeds the relevant national frameworks (for example accreditation framework) but also focus points the client wishes to address. In effect, both activities were never meant to lead to a decision with a formal status within the Dutch system of higher education or broader within the European Area of Higher Education. But it could, as stated now, lead to a certificate or hallmark by NQA as a private organisation, and in effect the value of these depend entirely on the reputation of our organisation. NQA considers these products as such project-based, consultancy activities. This has also been put forward in the process of developing the ToR for the external review.

As the Register Committee states (under 16) the name of the products and terms like 'audit', 'assessment' and granting certificates, hallmarks or other statements like these, could lead to ambiguity as these are usually associated with an external quality assurance activity. NQA took into considerations this point of view and will change these products names and procedures to make a clear distinction with its activities regarding external quality assurance within the Dutch system of higher education. For now, the products will be removed from our website. With these actions, NQA is convinced to meet the comments of the Register Committee.

ESG 2.1 - Consideration of internal quality assurance

ESG 2.2 - Designing methodologies fit for purpose

ESG 2.3 – Implementing processes

The Register Committee found NQA's activities compliant with ESG 2.1, 2.2 and 2.3, except for the *Hallmark for study programmes* and *Certification internal audit processes*. It concludes these are non-compliant with ESG 2.1, 2.2 and 2.3. As NQA excludes these activities from its portfolio, it is confident that the Register Committee will follow the review panel's conclusion of NQA's compliance.

ESG 2.4 – Peer-review experts

The Register Committee found the assessments of degree programmes by NQA complaint with ESG 2.4. As NQA excludes EVC assessments, *hallmark for study programmes* and *Certification internal audit processes* from its portfolio, it is confident the Register Committee will follow the review panel's conclusion of NQA's compliance.

Beside the exclusion of EVC, NQA would like to add that it realises that the lack of a student member is at odds with the European Standards and Guidelines. However, NQA would like to point out that it isn't consulted or has any formal position in drafting and establishing the legislation or frameworks by which EVC-assessments are conducted. NQA works within the legitimate procedures and requirements set out in the frameworks, installed by the relevant (governmental) bodies. In that sense, NQA is fully compliant within the Dutch situation.

ESG 2.5 – Criteria for outcomes

As NQA excludes *EVC assessments*, *Hallmark for study programmes* and *Certification internal audit processes* from its portfolio, it is confident that considerations concerning these activities no longer have an effect on the committee's judgement. Regarding the assessment of degree programmes the Register Committee focuses on the statement that our guideline-documents are not presented on our website and in effect that the criteria for outcomes are neither. It is correct that our guideline-documents meant for our clients and for our panel members are not publicly available on our website. This is due to commercial reasons, specifically bound to our own process-descriptions etc. as the framework is publicly available. It is incorrect to subsequently assume that our website doesn't contain the criteria for the assessments of degree programmes. These are available by providing links (in Dutch and English) to the accreditation framework in which the criteria are laid down. Based on this information NQA is confident the Register Committee will follow the review panel's conclusion.

ESG 2.6 – Reporting

As NQA excludes *EVC assessments*, *Hallmark for study programmes* and *Certification internal audit processes* from its portfolio, it is confident the Register Committee will follow the review panel's conclusion of NQA's compliance. It, furthermore, likes to point out that NQA is in consultation with the NVAO (as formal decision making body) to create a direct search-option on our website linked to the database of degree programme assessment reports and the decision by the NVAO.

ESG 2.7 – Complaints and appeals

As NQA excludes *EVC assessments*, *Hallmark for study programmes* and *Certification internal audit processes* from its portfolio, it is confident the Register Committee will follow the review panel's conclusion of NQA's compliance.

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

The Register Committee put forward a number of aspects regarding this standard that forms the basis for not being able to concur with the judgement of the Review panel of NQA being partially compliant with ESG 3.1. It surprises NQA that the profound assessment conducted by the Review panel and its well weighed conclusion is waved away by the Register Committee. Indeed, the considerations of the Review Panel show correctly that NQA does not have a website which contains our mission statement and all our strategic goals. The last would also be unwise from the commercial point of view NQA needs to apply as a private organisation. Nevertheless, it is incorrect to suggest that NQA does not have a long term ambition. But unlike the traditional way of presenting this ambition in a strategic plan, a company strategy or a business plan, NQA chose to adopt a more dynamic course. This is suited to its position within the Dutch system of higher education, whereas the development of the accreditation system is regulated by the Ministry, the NVAO and the Inspectorate. NQA needs to be able to adopt swiftly if/when radical changes to this system – such as the effect of implementing institutional accreditation described by the review panel - will occur. In effect NQA put in place a system with a yearly management review, which is also externally assessed in our yearly ISO-procedure. The yearly cycle of this management review might suggest that long-term goals are absent, but it assumption is untrue. It also includes strategic and tactical goals based on our (not published) comprehensive mission statement and generic goals. Next to the alignment of the management review with these strategic ambitions, these goals are also based on the outcomes of our consultations with the institutions for higher education. NQA meets with a diverse representation of employees of universities (for example: CEO's, quality assurance officers, management of degree programmes and teachers), the NVAO, the Inspectorate and other assessment agencies, and translates this knowledge to NQA's strategic ambition. The knowledge is brought together in our quality assurance system (for example each project is evaluated by our secretaries/project managers and the management of the degree programme assessed. These project evaluations are aggregated and discussed on the level of the project conducted, on the level of each institution of higher education and in respect of our overall performance, service level and developments in the needs of our stakeholders. The outcomes and developments are furthermore each month, if necessary addressed and discussed in our team meeting. This is yearly translated in our management review and processes. Our management review looks beyond yearly based performance and development. For example our decision to quit with the EVC assessments, is part of a decision based on our strategic goals and annual monitoring of the value of this product and is yearly monitored in our management review.

Another issue brought forward by the Register Committee is the independence. Regarding this issue NQA first of all likes to point out that the matter of independence is allocated in ESG 3.3. NQA trusts that the Register Committee will not include its remarks regarding the topic of independence to this standard.

That being said, NQA would like to point out that the review panel found NQA substantially complaint with this standard (3.3). The review panel reports that it “*found no evidence of violation*” of the independency. Furthermore the report states that “*...NQA is very proactive regarding independence. Their experience indicated that if NQA perceived any aspect that could compromise that independence, the agency would act promptly...*”. Regardless these and various other clear statements in the external review report in favour of our solid working methods and practice regarding independency, and on top of that the thorough research by the review panel of our projects, and of lists in which NQA monitors the deployment of its

employees, account managers and the director to ensure independency, it feels the remarks of the Register Committee can be considered suggestive and are therefore in our opinion not fair. In addition, the Register Committee states that *“In most of the examples provided to the panel, the consultancy projects were completed by the Director. This was regarded as a potential problem in ensuring a clear distinction between NQA’s consultancy and external quality assurance activities by those interviewed by the panel”*. NQA feels this statement is not based on the assessment of the ENQA review panel and incorrect. The Review Panel underlines, as we do ourselves, that ensuring the independence (considering the size of the organisation and the number of staff) requests carefulness. But the panel concludes with *“throughout the interviews, there was no feeling of a lack of independence”*. In effect, NQA states that the report gives no reason to support the statement of the Register Committee and specifically not as a problem brought forward by the interviewees concerning the role of the director.

Based on the above, NQA gives the Register Committee into consideration to review its analysis and judgement of non-compliant on this ESG.

ESG 3.4 – Thematic Analysis

NQA is satisfied to see that the Register Committee concurs with the review panel’s judgement on this ESG. NQA appreciates all recommendations made by the Review Panel and put in place an improvement plan which in this period of four years will be executed. The underlining by the Register Committee of the recommendation on ESG 3.4 motivates us even more.

Finally, we would like to thank the Register Committee for the opportunity to provide this additional representation and taking this into consideration. If you need any further information, or if you’d like us to send in the strategic ambition document as an appendix, please feel free to contact us. We are looking forward hearing from you.

Yours sincerely,

Paul Thijssen
Director NQA

Brussels, 6 May 2019

Application by NQA for inclusion of registration on EQAR

Dear Mr Mr Thijssen,

The EQAR Register Committee's rapporteurs have been considering the application for initial inclusion on EQAR by Netherlands Quality Agency (NQA). We would be obliged if you could clarify some matters in order to contribute to the consideration of NQA's additional representation.

1. According to NQA's statements in its additional representation *EVC audits, Hallmark for study programmes* and *Certification internal audit processes* have been excluded from the agency's portfolio. While we noted that the individual pages no longer exist we, however, noted that these activities feature on the homepage of your agency's website. Could you please clarify whether this is an oversight or if there is a specific reasoning for this?
2. According to the clarification response by the panel (see letter of 6/11/2018) the 'international assessments' provided by NQA for the Flemish higher education institutions are primarily consultancy activities and not assessments carried out within the scope of the ESG. As these services are presented on your website as part of the international assessments could you please clarify the nature of these activities?
3. We noted that the agency currently does not publish reports, but that is in consultation with NVAO to create a searchable options for the degree programme assessments prepared by NQA. Could you further clarify the publication practice re. audit visit reports and NQA's international activity reports? (ESG 2.6)?

We would be grateful if it was possible for you to respond by 20/05/2019, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on NQA's application. We, however, kindly

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ask you to keep information related to the application confidential until the final decision has been published.

We acknowledge that it might not be possible to clarify all of the above. However, we appreciate your assistance and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,

A handwritten signature in black ink, appearing to read "Colin Tück".

Colin Tück
(Director)



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Date
May 17, 2019
Subject
Additional representation
NQA application EQAR (2)

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Additional representation NQA application EQAR (2)

Dear Register Committee,

In the letter of May 6th 2019 EQAR requested clarification regarding three subjects to contribute to the consideration of the committee on NQA's application for EQAR registration. We would like to thank you once more for your thorough review of our application and the opportunity to clarify these matters. In this letter you'll find our additional information which hopefully completes the information file to enable the committee to come to a decision. The information below follows the structure of your letter.

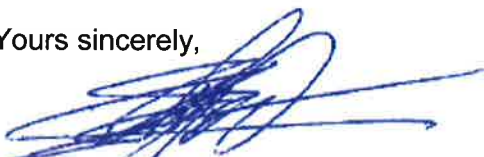
- 1) The withdrawal of the (inactive) products/services from our portfolio (*EVC audits*, *Hallmark for study programmes* and *Certification internal audit processes*) had to be reflected on our website. To do this we asked our website maintenance service to remove these pages. Your question shows us that a more thorough adjustment of our website should have been conducted. Unintentionally, the two homepages (Dutch & English) still mentioned these (inactive) products/services, although the linked webpages were deleted. We apologise for the lack of scrutiny in this process. As per the 20th of May a new update of our website is live, excluding any reference to the mentioned products/services.
- 2) Secondly, you refer to our website mentioning our Flemish activities under the label '*International assessments*'. The activities mentioned as part of our activities in Flanders are all consultancy services. In the past NQA decided to present all international related activities on one page. While the description on the page clearly shows our activities are consultancy related, the label suggests otherwise. As a temporarily update, we decided to relocate all information presented under '*International assessments*'. This information is now presented under '*Clients*' using the label '*International activities*' to make clear that the scope of our activities is wider.
This EQAR-application has shown us that the website should be more aligned with our day-to-day practice and should reflect our core-business properly. This will be taken into account in a broader evaluation of (the content of) our website later this year.
- 3) The final clarification request regards the publication of our audit visit reports and NQA's international activity reports. As shown in our SAR the ownership of reports lies with the educational institution. The institutions can send an NQA report to the Dutch Flemish Accreditation Organisation if they wish to extend their accreditation.

If the institution doesn't want to extend the accreditation of the degree programme, they can retain the assessment report. The report is a product we deliver to them and it's up to them to use the assessment report for an accreditation application. If they do, the decision of the NVAO based on our assessment report has a formal status and publication of the report is required. Up until this day the NVAO provides a database of all decisions made including the underlying assessment reports, including the ones NQA conducted. Based on the ESG we decided to investigate the possibilities to fully integrate the searchable database of the NVAO in our own website. This is still work in progress. In the meantime, we included a web-link on our website that leads interested website visitors directly to the database. This database also provides our international assessment reports conducted for the University of Curacao (UoC). A recent example (2017) can be found here: <https://search.nvao.net/search-detail/50939/-1#>

In addition, as mentioned under #2, we are planning to do a more thorough evaluation and update of our website. This is planned for coming fall/winter. Next to our goal to update the website and align it more with our core-business, we are also thinking about the opportunities to share more of our audit-experiences and knowledge gained from all the assessments conducted (see recommendation of the ENQA-panel on ESG 3.4). A recent article by amongst others NQA in the Dutch magazine Hoger Onderwijs Management (*Higher Education Management*) about enhancing the inclusion and participation of student members in assessment panels in co-operation with two student-unions, would be an example of an item on our updated website.

Finally, we would once more like to thank the Register Committee and rapporteurs for the opportunity to provide this additional representation and taking this into consideration. If you need any further information, please feel free to contact us. We are looking forward hearing your decision on our EQAR application.

Yours sincerely,



Paul Thijssen
Director NQA