

Decision on the Substantive Change Report by Accreditation Organisation of the Netherlands and Flanders (NVAO)

Register Committee

Ref. RC/C183

Ver. 1.0

Date 2026-09-28

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Decision of:	2026-09-29
Result:	Take note
Report received on:	2026-08-26
Agency registered since:	2008-03-04
Last external review report:	09/2022
Registration until:	2027-09-30
Absented themselves from decision-making:	Eltjo Bazen
Attachments:	1. Substantive Change Report, 2026-08-26

1. The Register Committee considered the Substantive Change Report of 2026-08-26.
2. The Register Committee took note of the following changes:

Start of new external quality assurance activity: *Programme accreditation 'Brevet de Technicien Supérieur' (Luxembourg)*

3. The Register Committee learned from the Substantive Change Report about the new activity which introduces NVAO-led external assessments of Luxembourg's EQF level 5 BTS programmes, covering both initial accreditation and re-accreditation, with NVAO providing recommendations and the Minister taking the final accreditation decision.
4. The Register Committee noted that NVAO provided a mapping for the criteria included in the new activity's assessment framework and ESG Part 1 and considered that the practical implementation of ESG Part 1 remains to be verified in the next external review of NVAO.
5. The Register Committee further noted that while there are no prima facie reasons to question compliance with ESG 2.4, the Substantive Change Report does not explicitly state that students are involved in all review panels.
6. Overall, based on the detailed information provided in the Substantive Change Report, the Register Committee had no prima facie concerns that the ESG are complied with in the case of the new external quality assurance activity *Programme accreditation 'Brevet de Technicien*

Supérieur' (Luxembourg). The Committee expects that this activity will be analysed in full as part of NVAO's next renewal of registration, with specific focus on ESG 2.1 and ESG 2.4.

Register Committee

Change of existing external quality assurance activity: *Combined assessment at Specialised Higher Education Institutions (Luxembourg)*

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7. The Register Committee learned from the Substantive Change Report about changes to the existing combined institutional/programme assessments of SHEIs in Luxembourg by introducing a revised legal and methodological framework under the 2023 higher education law, while maintaining its combined assessment of both programme-level and institutional-level elements, and continuing to provide accreditation recommendations to the Minister.
8. The Register Committee noted that NVAO provided a mapping for the criteria included in the changed activity's assessment framework and ESG Part 1 and considered that the practical implementation of ESG Part 1 remains to be confirmed in the next external review of NVAO.
9. The Register Committee further noted that the Substantive Change Report does not explicitly state that students are involved in all review panels, but considering NVAO's statement that the activity has not changed in regard to ESG 2.4, there are no prima facie reasons to question compliance with the standard.
10. Based on the detailed information provided in the Substantive Change Report, the Register Committee had no prima facie concerns that the ESG are complied with in the case of the revised external quality assurance activity *Combined assessment at Specialised Higher Education Institutions (Luxembourg)*. The Committee expects that the relevant changes will be analysed as part of NVAO's next renewal of registration.

EQAR Substantive Change Report

Agency #1	Nederlands-Vlaamse Accreditatieorganisatie
Agency acronym	NVAO
Expiry date #1	30/09/2027
Contact #1	Mark Frederiks
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Other organisations?	No
A. Has the organisational identity of the registered agency changed?	No
B. Has the organisational structure changed?	No
C. Changes in EQA activities	• 1. One or several new external QA activities were introduced • 2. Substantive changes carried out to one or several existing external QA activities (e.g. changes to their methodology, criteria or procedures)
Description new/changed	The NVAO has been conducting assessments of specialised higher education institutions (SHEIs) in Luxembourg since 2016. The activities of the NVAO in Luxembourg have further increased since the establishment in 2022 of annual Conventions between the Ministry of Research and Higher Education (MESR), and the Luxembourg Law of 21 July 2023 on the Organisation of Higher Education. Next to the Netherlands and Flanders, the NVAO can now also be considered as the official quality assurance agency for Luxembourg. Following the implementation of the law, the NVAO has developed and approved two assessment

frameworks: one for the bachelor and master's programmes offered by SHEIs, and another for the Brevet de Technicien Supérieur programmes (BTS) offered by Lycées. The BTS are EQF level 5 programmes of 120 ECTS. For both SHEIs and BTS, the NVAO carries out the assessments which concludes with a formal advice to the Minister of Research and Higher Education. The Minister takes the formal accreditation decision. The SHEIs assessments are a continuation of the activity that is listed in DEQAR as "Combined institutional/programme assessments in Luxembourg". Hence, this is a substantial change to an existing external QA activity. The assessment criteria, which are included in the law, continue to pertain for one half entirely to the programme level and for the other half include the institutional level as well. The assessments of the BTS programmes, however, is a new activity. These programmes were not assessed by an EQAR-registered agency before but were accredited based on the advice of a ministerial committee. The NVAO now assesses both new BTS programmes for accreditation and existing BTS programmes for re-accreditation.

1. New EQA activity:

1	Programme accreditation 'Brevet de Technicien Supérieur' (Luxembourg)
Focus	study programmes or higher education institutions
ESG 2.1	Programme Accreditation for the Brevet de Technicien Supérieur in Luxembourg assesses two-years short-cycle programmes at EQF level 5. The BTS assessments address four assessment areas: Aims and objectives of the programme; Admission, evaluation, certification;

Implementation of the programme; Quality assurance measures. The assessment criteria are aligned with the legal requirements for BTS programmes and with ESG Part 1. The BTS assessment framework requires an ESG-compliant IQA system and regular internal evaluations. In each of our procedures, the assessment panel examines (the effectiveness of) the existing IQA processes, through resources such as the SER, annexed evidence, stakeholder participation, governance clarity, and demonstrable follow-up on prior recommendations. A mapping of the BTS assessment framework against the ESG Part 1 was carried out, see attachment.

ESG 2.2

The BTS assessment methodology defines the purpose, scope, documentation, assessment criteria, panel expertise, assessment process, reporting requirements and decision rules. The BTS methodology was developed in response to the Luxembourg Higher Education Act of 21 July 2023 and the specific characteristics of professionally oriented short-cycle education at Lycées. The NVAO developed the framework and did this in coordination with the Luxembourg Ministry of Research and Higher Education. Stakeholder involvement included structured consultation through the MESR–NVAO working group, stakeholder seminars and direct dialogue with Lycées through the annual SynCo meetings. The NVAO's overview reports with input from stakeholders also serve to reflect on the design of the assessment frameworks and its application.

ESG 2.3

ESG 2.3

The BTS assessment procedures always include a site visit with dialogues between the assessment panel and the BTS programme. The panel reviews the submitted documentation and validates the evidence through the structured dialogues. It may request clarification or additional evidence where the submitted information is incomplete or insufficiently substantiated. The NVAO coordinates the external assessment, appoints and supports the panel, finalises the assessment report for publication and submits its conclusion and the panel report to the Minister of Research and Higher Education. The formal accreditation decision is taken by the Minister. In practice the judgement of the panel and conclusion of the NVAO is always followed by the Minister. The NVAO and the Ministry coordinate the planning of procedures through established working arrangements, while the independence of the external assessment and the panel's judgement is preserved.

ESG 2.4

The BTS assessments are conducted by panels of independent external experts whose combined expertise is appropriate for the programme and provider. Panels include subject-specific and professional field expertise, educational and quality assurance expertise, international and student-related expertise, and knowledge of higher education in Luxembourg or the larger region. Panel members are selected and appointed by NVAO on the basis of their expertise, independence and absence of conflicts of interest. They are required to comply with NVAO's ethical and deontological

requirements. The management of the Lycée can raise substantiated objections to the composition of the panel if it believes that a panel member is deemed not independent. The NVAO investigates the matter and amends the composition of the panel if incompatibility is established. Before the assessment, panel members receive procedure-specific training and preparation addressing the assessment framework, the applicable criteria, the decision rules, and the national legal context. The panel is supported throughout the procedure by an NVAO process coordinator and an external secretary.

ESG 2.5

Consistency is ensured through published assessment frameworks, predefined assessment grounds, documentation requirements, assessment scales, decision rules and standard reporting requirements. Panels receive procedure-specific training and are supported by an NVAO process coordinator who monitors adherence to the assessment framework and methodology throughout the procedure. The panel discusses its findings and judgements collectively. The assessment report must demonstrate a clear relationship between the evidence examined, the panel's findings, its considerations and the final judgement. The programme or provider is given the opportunity to identify factual inaccuracies before the report is finalised. The Executive Board of the NVAO reviews the report for coherence, substantiation and consistent application of the framework. Internal coordination between process coordinators, evaluation of completed procedures and stakeholder feedback are used to identify interpretation issues and support continuous improvement. Regular meetings with the Ministry also supports consistent application

of the legal and procedural requirements.

ESG 2.6

1

<https://www.nvao.net/en/procedures/lux/publication-of-nvao-decisions-outside-the-database2>

2

To be published on DEQAR when the activity can be chosen. Now building new website and connecting our database to database of Ministry. New system expected to come online January 2027. This will integrate into a new search engine on the website.

ESG 2.7

Appeals against the formal accreditation decision by the Minister need to follow the applicable Luxembourg legislation. Disputes related to the assessment procedure and its outcomes are the responsibility of the NVAO. The assessment framework includes a dedicated dispute resolution clause: parties (institutions, panel members, coordinators/secretaries, staff, students) can report issues that may affect independence or inconsistent implementation and outcomes via NVAO's dispute resolution channel. Dispute resolution can cover all aspects of the procedure under the responsibility of the NVAO. A dedicated dispute resolution procedure is available for all parties involved and the general public: <https://www.nvao.net/en/procedures/lux/dispute-resolution>

ESG 3.4/ESG 3.6

The BTS assessments are embedded in NVAO's internal quality assurance system. After completed procedures, the NVAO collects and analyses feedback from programmes, panel members and process coordinators. Findings are used to improve procedural guidance, templates, panel preparation and working arrangements. NVAO's internal coordination and intervention

support the identification of recurring issues and the consistent implementation of the methodologies. In Luxembourg, the MESR–NVAO working group provides an additional mechanism for evaluating the functioning of the procedures and clarifying operational responsibilities. Once a sufficient body of assessment results is available, recurring findings from BTS programme assessments are included in thematic analyses such as overview reports. Such analyses may identify common strengths, risks and development needs and support mutual learning among providers and other stakeholders. The first BTS overview report was published in May 2026 and shared and discussed with stakeholders at a SynCo event. You can find more information here: <https://www.nvao.net/en/news/2026/5/ovr-lux-bts-en>.

2. Changed EQA activity

1	Current description: Combined institutional/ programme assessments in Luxembourg
2	Proposed description: Combined assessment at Specialised Higher Education Institutions (Luxembourg)
ESG 2.1	The combined assessments at Specialised Higher Education Institutions (SHEIs) in Luxembourg address six assessment areas (each area has underlying criteria): Organisation, strategy and sustainability of the SHEI; Aims and objectives of the programme; Admission, evaluation, certification; Implementation of the programme; Research; Quality assurance measures. The assessment criteria are aligned with the legal requirements for SHEI programmes and with ESG Part 1. The SHEI assessment framework requires an ESG-

compliant IQA system and regular internal evaluations. In each of our procedures, the panel examines (the effectiveness of) the existing IQA processes, through resources such as the SER, annexed evidence, stakeholder participation, governance clarity, and demonstrable follow-up on prior recommendations. A mapping of the SHEI assessment framework against the ESG Part 1 was carried out, see attachment.

ESG 2.2

The methodology of the assessment of the bachelor and master's programmes of SHEIs, as described in the assessment framework, defines the purpose, scope, documentation, assessment criteria, panel expertise, assessment process, reporting requirements and decision rules. The revised methodology was developed in response to the Luxembourg Higher Education Act of 21 July 2023 and the specific characteristics of SHEIs as private institutions in Luxembourg. The NVAO developed the framework in cooperation with the Luxembourg Ministry of Research and Higher Education (MESR). Stakeholder involvement included structured consultation through the MESR–NVAO working group, and gathering input from the two SHEIs in Luxembourg.

ESG 2.3

1

<https://www.nvao.net/en/procedures/lux/bachelor-s-and-master-s-programmes-at-the-specialised-higher-education-institutions-shei-initial-accreditation-advice-and-re>

ESG 2.4

There were no major changes. The principle is retained that assessments are conducted by panels of independent external experts whose collective expertise is appropriate to the institution and programme under review. Panels

include subject-specific and professional field expertise, educational and quality assurance expertise, international and student-related expertise, and knowledge of higher education in Luxembourg or the larger region. Panel members are selected and appointed by the NVAO on the basis of their expertise, independence and absence of conflicts of interest. They are required to comply with NVAO's ethical and deontological requirements. The management of the SHEIs can raise substantiated objections to the composition of the panel if it believes that a panel member is deemed not independent. The NVAO investigates the matter and amends the composition of the panel if incompatibility is established. Before the assessment, panel members receive procedure-specific training and preparation addressing the assessment framework, the applicable criteria, the decision rules, and the national legal context. The panel is supported throughout the procedure by an NVAO process coordinator and an external secretary.

ESG 2.5

Consistency is ensured through published assessment frameworks, predefined assessment grounds, documentation requirements, assessment scales, decision rules and standard reporting requirements. Panels receive procedure-specific training and are supported by an NVAO process coordinator who monitors adherence to the assessment framework and methodology throughout the procedure. The panel discusses its findings and judgements collectively. The assessment report must demonstrate a clear relationship between the evidence examined, the panel's findings, its considerations and the final judgement. The programme or provider is given the opportunity to identify factual inaccuracies before the report is

finalised. The Executive Board of the NVAO reviews the report for coherence, substantiation and consistent application of the framework. Internal coordination between process coordinators, evaluation of completed procedures and stakeholder feedback are used to identify interpretation issues and support continuous improvement. Regular meetings with the Ministry also supports consistent application of the legal and procedural requirements.

ESG 2.6

1	https://www.nvao.net/en/procedures/lux/publication-of-nvao-decisions-outside-the-database2
2	To be published on DEQAR when the activity can be chosen. Now building new website and connecting our database to database of Ministry. New system expected to come online January 2027. This will integrate into a new search engine on the website.
D. Activity outside the scope of the ESG	No
File #1	ESG_Compliance_Luxembourg-BTS-SHEIs_.pdf (672 KB)
Submit form?	I am ready to submit the change report form
