



**Report of the committee for the
review of the Accreditation Organization
of The Netherlands and Flanders (NVAO)**

Self-evaluation Report 2007

Before you is the Report of the committee for the review of the Accreditation Organisation of the Netherlands and Flanders (NVAO) and the NVAO self-evaluation report.

NVAO was delighted with the observation of the committee that NVAO satisfies the European Standards and Guidelines and the Code of Good Practice of the European Consortium for Accreditation in Higher Education (ECA) on nearly all points. NVAO has therefore with confidence requested the continuation of its membership of the European Association for Quality Assurance in Higher Education (ENQA) and can continue playing a prominent role within the European Consortium of Accreditation Organisations, directed towards the mutual acknowledgement of accreditation decisions. The international legitimacy of NVAO – and by extension the Dutch-Flemish accreditation system – has thereby been assured. NVAO considers this a satisfactory situation.

The committee has made a number of recommendations for an improvement of the present accreditation system. The term of this system in the Netherlands is limited to up to and including 2009 and in Flanders up to and including 2012. In light of this, NVAO will discuss, in close consultation with the Dutch and Flemish stakeholders and authorities, which recommendations of the committee can be adopted in a meaningful manner. This involves making sure that the procedural timeframe for Dutch and Flemish applications is the same, monitoring the system-wide analysis of general issues and discipline-wide comparisons, formalising lines with the stakeholders; due to the physical distance between NVAO and the Flemish higher education establishments, also paying extra attention to contacts with Flemish stakeholders, intensifying contacts with the quality assessment agencies to remove as much “interference” as possible from the system; possibly including students in the Initial Accreditation panels, paying more attention to the training of panel members by NVAO, quality assessment agencies and evaluation organisations and bringing more focus to NVAO’s internal quality assurance policy.

The remaining recommendations in the report lie outside the purview of NVAO. NVAO has presented them to the Flemish and Dutch Ministers of Education.

On the basis of the results of the external review, on 20 December 2007, ENQA approved the full membership of NVAO. NVAO is also entitled to join the European Register of Quality Agencies to be set up on 4 March 2008.

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NVAO Self-evaluation Report 2007



Part 1

Report of the committee for the review of the Accreditation Organization of The Netherlands and Flanders (NVAO)

September 2007

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1. Executive summary

1.1 Introduction

NVAO (in Dutch: Nederlands-Vlaamse Accreditatie Organisatie) is the bi-national Accreditation Organization of The Netherlands and Flanders. It was established by international treaty and it ensures the quality of higher education in The Netherlands and Flanders by means of accrediting study programmes.

NVAO is a member of ENQA and ECA and their membership regulations stipulate a periodic review of the agency.

The Ministers of Higher Education of The Netherlands and the Flanders (Committee of Ministers) have agreed on an international peer review of NVAO during 2007, taking the European Standards and Guidelines (ESG) of ENQA and the Code of Good Practice of ECA as a framework for the evaluation.

The Committee of Ministers appointed hereafter a review committee consisting of international experts to review the performance of NVAO. The committee was also asked to evaluate NVAO with respect to the bi-national treaty between The Netherlands and Flanders and to present proposals to straighten the differences between the two accreditation systems and their implementation (transparency).

1.2 Review process

A preparatory visit to NVAO by the chairman and the secretary took place on April 23, 2007. Next, the committee, in close cooperation with NVAO drew up a programme of on-site meetings involving about 70 people including the chairman and members of the NVAO Board, the NVAO managing director and a number of staff members, representatives of umbrella organizations of higher education institutions, representatives of student organizations, representatives of quality assessment organizations, representatives of key stakeholders and representatives of the Committee of Ministers. All meetings were held in the NVAO offices in The Hague between June 5 and 9, 2007. The site visit also included a visit to the „Haagse hogeschool”.

The committee submitted a draft report for factual verification to the NVAO board on August 26, 2007. The final report was submitted to the Committee of Ministers on September 19, 2007.

1.3 Evidence

NVAO presented its Self Evaluation Report on May 11, 2007. This was considered by the committee, as well as various other documents that were available to the committee in advance of and during the site visit. The site visit provided further oral evidence.

NVAO Review Report

1.4 Conclusions

ENQA compliance

In the light of the documentary and oral evidence considered by it, the review committee is satisfied that, in the performance of its functions, NVAO is in compliance with the ENQA Membership Regulations and in substantial compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area. The Panel therefore recommends to the Board of ENQA that NVAO should have its Full Membership of ENQA confirmed for a further period of five years.

ECA compliance

In the light of the documentary and oral evidence considered by it, the Review Panel is satisfied that, in the performance of its functions, NVAO is in compliance with the ECA Code of Good Practice.

Bi-nationality

There are various legislative, political and cultural differences between the two countries. They add to the complexity but do not lead to serious problems in the functioning of the accreditation system. There is however reason to argue for more harmonization with respect to:

- Legal protection of titles that is absent in de Dutch situation.
- Sanctions in the case of a negative accreditation.
- The sequence of initial accreditation and macro-efficiency check.
- The length of the accreditation cycles (validity of accreditation).
- The use of clustered assessments on a bi-national scale.
- The different time limits for the processing of applications.

Transparency and public trust

The accreditation system certainly contributes to the goals of more transparency with regard to the quality of programmes and to an enhancement of public trust in higher education - but only to certain degree. The system can guarantee threshold quality but has only a limited function in quality enhancement above that level.

The output of the system is and can be trusted by students, employers and the general public, but the development of system itself - especially in the relationships between institutions, quality assessment agencies and NVAO - might be hindered by a „low trust“ characteristic, which is related to the positioning of the assessment agencies (the „free market“ system in The Netherlands is a case in point).

1.5

Recommendations

The committee formulates recommendations concerning:

- ESG 2.8; NVAO is advised to give more attention to the production of system-wide and comparative analyses - also with regard to the functioning of the accreditation procedures. More attention for these analyses will be beneficial for the „information function“ of accreditation, as expressed by umbrella organizations of institutes and by student organizations.
- ESG 3.8; NVAO is advised to strengthen its accountability procedures (regarding the relationship with and commitment of stakeholders) and to focus into their internal quality assurance system. NVAO will benefit more from a stronger and better positioned Advisory Council. More formal lines of communication with stakeholders are also in order. The review panel advises to include relevant stakeholders that are not yet represented, in the General Board, especially students. Further harmonization of regulations and procedures between the two countries with regard to:
 - Legal protection of titles. This is absent in de Dutch situation. The committee considers legal protection of titles a necessary prerequisite for an accreditation system, certainly given the presence of private institutions offering HE programmes.
 - Sanctions in the case of a negative accreditation. The Flemish system (of a statutory repair period) should also be implemented in the Dutch system.
 - The position of the macro-efficiency check. The Flemish procedure (where new programmes must first pass the macro-economic check before they can apply for initial accreditation) is preferable. The committee has learned that the position of the macro-efficiency check will be altered in The Netherlands, starting in July 2008.

- The length of the accreditation cycles. There appears to be no clear ground for the present differentiation. The Committee therefore suggests a harmonization between the two countries as far as the standard validity of a granted accreditation is concerned. But at the same time the Committee suggests to grant NVAO powers to vary the period of validity and thus the length of the accreditation cycle according to considerations of proven quality.
- The scale of assessments. Although NVAO is bi-national, the quality assessment agencies are in fact organized on a national scale. The outcome of the system would benefit if there were clustered assessments on a bi-national scale.
- Different time limits for the processing of applications and differing the sanctions (in case NVAO does not adhere to the time limit). A situation in which Flemish applications get precedence is to be avoided.
- The relationship between NVAO and the quality assessment agencies. The positioning of the quality assessment agencies is not sufficiently clear, a problem that is aggravated by the 'market' situation in The Netherlands. There is an issue of 'low trust' that needs to be adjusted.
- The further development of the system as the committee believes that the current system will show strongly diminishing results after the first cycle. A more or less legally demanding reform seems unavoidable. The committee suggest looking into the concept of self-accrediting institutions.

2. Introduction

2.1 Outline of the review process

2.1.1 NVAO

NVAO (in Dutch: Nederlands-Vlaamse Accreditatie Organisatie) is the bi-national Accreditation Organization of The Netherlands and Flanders. It was established by international treaty and it ensures the quality of higher education in The Netherlands and Flanders by means of accrediting study programmes.

NVAO is a member of ENQA and ECA and their membership regulations stipulate a periodic review of the agency.

2.1.2 Aims of the review and frame of reference

On 14 December 2006, the Ministers of Higher Education of The Netherlands and the Flanders (Committee of Ministers) agreed on the principle of an international peer review of NVAO during 2007. They took the European Standards and Guidelines (ESG) of ENQA and the Code of Good Practice of ECA as a framework for the evaluation. In addition, they decided that the review had to be the first evaluation of NVAO with respect to the international treaty between The Netherlands and Flanders and that the review could be used as an opportunity for presenting proposals to straighten the differences between the two accreditation systems and their implementation.

In the appointment letter of the members of the committee the following four purposes of the international peer review are summed up.

The international peer review should serve the following purposes.

NVAO is a member of the European Association for Quality Assurance in Higher Education (ENQA). The ENQA membership regulations require all member agencies to be subject of an external review at least once every five years. The review should establish that NVAO meets the criteria for full membership as laid down in Part 2 and 3 of the European Standards and Guidelines in Quality Assurance (ESG) in the European Higher Education Area, adopted by ministers in Bergen in 2005; part 1 being not applicable to NVAO.

Furthermore NVAO is member of European Consortium for Accreditation (ECA). The review should establish that NVAO meets the standards of the ECA Code of Good Practice.

NVAO is unique in being a bi-national accreditation organization. This implies that NVAO operates in two legislative contexts as a consequence of which various procedures and practices differ. We would welcome reflections of the review committee about the procedural and practical differences as well as any suggestions for further adjustments. Both in The Netherlands and in Flanders an evaluation of the functioning of the accreditation legislation is foreseen. The findings of the review committee will then also be taken into account. This does not imply, however, that the review committee should review accreditation on a system level. The review only bears on the functioning of NVAO within the system, but we would welcome if the committee could dwell upon what we consider the most important function of the accreditation legislation, namely the enhancement of transparency and of public trust (on a national and international scale) in our systems of higher education."

Therefore the review is more than only an assessment of NVAO compliance with ESG and ENQA membership criteria. This will be reflected in the outline of the report also.

The committee wishes to stress that a distinction must be made between findings, reflections, conclusions and recommendations with regard to the functioning of NVAO within the given system and with regard to (the functioning of) the system at large. For decisions about ENQA and/or ECA-membership only the former are relevant.

2.1.3 Committee and review method

The review committee members were selected and formally appointed by the Committee of Ministers. The committee consisted of seven members; a secretary (not being a member of the committee) was added to assist the committee and to write the report. The composition of the panel is recorded in annex 8.2.

The committee has studied the Self Evaluation Report and inspected various documents during the site visit. The schedule of the site visit is recorded in annex 8.3. In a tight and full schedule the committee has met and discussed with representatives of all relevant parties.

The committee has praise for the Self Evaluation Report, which is well written, contains relevant information and is notably straightforward in identifying strengths, weaknesses and points of attention, both on a system level and specifically with regard to the functioning of the organization itself. In an early phase of the writing process, some stakeholders were consulted by NVAO about a draft version. In the meetings most representatives stated that the Self Evaluation Report gives an adequate and comprehensive picture and identifies the central discussion points.

NVAO has in a very professional way organized the site visit and has assisted the committee in every way. The committee had access to all documents and people it wished to see. The atmosphere in the meetings with (executive) board members and staff members was very open and straightforward.

The committee wishes to compliment NVAO for the professional preparation of the review and the smooth organization during the visit.

2.2 Description of the agency: NVAO

NVAO is not a 'typical' accreditation organization. It is a bi-national organization (The Netherlands and Flanders) and the accreditation legislation refers to special arrangements as an „initial accreditation' and a 'macro-efficiency check'. This requires a somewhat lengthier explanation to facilitate a better understanding of the descriptions and analyses given by the committee in the report. This is done in a separate chapter (chapter 3).

2.3 Outline of the report

As just mentioned, the committee first presents a description of NVAO in chapter 3.

Subsequently the committee formulates its general observations and recommendations. The committee does this before presenting its findings per ENQA standard and ECA code because it is felt that a more comprehensive presentation can facilitate a better understanding of the various, sometimes more isolated analyses per standard/code.

The committee presents in chapter 5 the findings regarding NVAO's compliance with the European Standards and Guidelines and ENQA membership criteria.

In chapter 6 the committee presents the findings with regard to NVAO's compliance with the ECA Code of Good Practice.

The committee presents in chapter 4 some general observations and reflections. These are not always directly pertinent to the assessment of the ESG/ENQA criteria and ECA Code of Good Practice, but may be helpful to get a better understanding of the functioning of NVAO within the given system. Furthermore, these observations serve as background to the conclusions and recommendations regarding the third and fourth purpose of the review as differentiated in paragraph 2.1.2.

In chapter 7 the committee formulates conclusions and recommendations. In this chapter the committee also goes into the topics raised by the Committee of Ministers regarding the binational system.

A word on terminology: the Dutch Universities of Applied Science are alternatively called Universities of Professional Education, Polytechnics and Universities of Applied Science, whereas their Flemish counterparts are called University Colleges. In this report we use the terms Universities of Applied Science and University Colleges.

3. Description of NVAO and accreditation system¹

3.1 Formation of NVAO

In 2000, The Netherlands and Flanders expressed the intention to establish a joint accreditation organization. This organization would be charged with the accreditation of higher education programmes in both The Netherlands and Flanders. Accreditation would be the keystone of the already existing external review system. The Dutch government took the first step in establishing the NAO, The Netherlands Accreditation Organization, in June 2002, as a preliminary step to establishing the NVAO, the Accreditation Organization of The Netherlands and Flanders. This preliminary step was necessary for compliance with the Dutch law that ordered the implementation of both the bachelor-master system and the accreditation system and was enacted one year earlier than the Flemish Act.

In 2001, tentative talks took place between the Dutch and Flemish ministers about the establishment of an international accreditation organization. In December 2002, an observer from Flanders was attached to the Board of NAO. In April 2003, the then Dutch and Flemish Education ministers started their talks on the content of what was to become the Treaty by which NVAO would be established as a bi-national organization. On 3 September 2003, the Treaty for the establishment of a bi-national accreditation organization was signed by the competent ministers of The Netherlands and Flanders. Hence, the NVAO (in formation) was a fact. The Treaty assigns the tasks of NVAO, its form of administration and its supervision. On 1 February 2005, all legal formalities regarding the establishment of NVAO had been concluded and NVAO was formally established.

It should be pointed out that The Netherlands and Flanders already (before the introduction of the accreditation system) had a fully-functioning external review system that led to quality improvement in education. Characteristic of this system was the fact that the sector was evaluating itself, even if in The Netherlands there was independent oversight on an ex post basis from the Inspectorate of Education. With the introduction of the new system, efforts have been made to strengthen the former system of external review, to develop it and make it internationally more acceptable. This was achieved by making the system more independent and better aligned with external benchmarks and standards, by having the outcome result in explicit and clear judgements and by strengthening the power of possible sanctions. These developments resulted in the establishment of one accreditation organization for The Netherlands and Flanders.

It is important to note that, formally speaking, the only element that the Dutch and Flemish accreditation system really have in common is an accreditation agency in the form of NVAO as installed and organized by the 2003 treaty. Otherwise The Netherlands and Flanders each have their own accreditation system. Each defines by legislation and independently the position and role of accreditation in their HE systems, the accreditation procedures, the accreditation criteria, the consequences of accreditation and the system of legal review. In practice, because of informal consultation and reciprocal influence, many of these issues are addressed in quite similar ways in the two countries, although substantial differences exist and cause problems as the evaluation will show.

¹ This chapter is largely based on the NVAO Self Evaluation Report.

3.2 Status

In accordance with the Treaty, and in order to be able to operate independently, NVAO was granted the status of an autonomous administrative body with legal rights according to Dutch legislation. Consequently, NVAO does not report to a particular minister or the Committee of Ministers and is not subject to ministerial responsibility. The Committee of Ministers has no power over NVAO operations or decision-making. This implies that NVAO has full decision-making powers as regards applications for (initial) accreditation.

However, NVAO is accountable to the Committee of Ministers, which approves its budget, the annual report and the annual accounts. Five years following the enacting of the Treaty and subsequently every four years, the Committee of Ministers draws up a report on the operation and functioning of NVAO. In accordance with the Treaty, the Committee of Ministers can only intervene in case of serious neglect on the side of NVAO of its (initial) accreditation task, threatening the execution of that task. The Committee of Ministers can thus only intervene in the general functioning of NVAO, but not in NVAO's decision-making.

3.3 Mission

NVAO has defined its mission as follows:

"The Accreditation Organization of The Netherlands and Flanders (NVAO) independently ensures the quality of higher education in The Netherlands and Flanders by assessing and accrediting programmes, and contributes to furthering this quality. In addition, NVAO contributes to raising quality awareness within higher education and advancing the position of higher education in The Netherlands and Flanders in the national and international context."

3.4 Tasks

NVAO's major task is (initial) accreditation of higher education programmes both in The Netherlands and Flanders. The tasks of NVAO in The Netherlands were stipulated in the Dutch Act² and can be summarized as the (initial) accreditation of programmes of higher education and giving advice on the possible extension of academically oriented master's programmes including the research masters.

In Flanders, the Flemish Act of April 4, 2003³ forms the legal basis for (initial) accreditation in higher education and stipulates that the responsibility for (initial) accreditation of programmes lies with NVAO. In accordance with the Flemish Act and based on its stipulations, the Flemish Government has approved the frameworks for (initial) accreditation.⁴ In addition, the Flemish authorities have ratified several regulations concerning the implementation of the Flemish Act.⁵

Another important task for NVAO, stipulated by the Treaty, concerns the importance of the international perspective for the decisions and position of NVAO.

2 Act on Higher Education and Research (Wet hoger onderwijs en wetenschappelijk onderzoek).

3 Act of 4 April 2003 regarding the Higher Education Structure in Flanders (Decreet van 4 april 2003 betreffende de herstructureren van het hoger onderwijs in Vlaanderen).

4 There are various frameworks, one for accreditation and one for initial accreditation. The frameworks differ - as a result of differences in legislation - for Dutch and Flemish programmes, although the differences are minimized as far as possible. Besides NVAO has developed separate frameworks for initial Accreditation of Associate Degree programmes in The Netherlands and for Research Master programmes in The Netherlands.

5 The Netherlands and Flanders are each individually responsible for their own legislation on education and for their educational systems.

Apart from its primary responsibilities (i.e. (initial) accreditation), NVAO is charged with some additional tasks. These tasks have to be approved by the Committee of Ministers and should be compatible with NVAO's mission. For these tasks, extra budgetary provisions are made available. In the Strategic Policy Statement it was set down that if a new task is agreed upon, it should be in line with or provide an obvious connection with quality assessment of programmes.

The NVAO tasks that are not directly related to (initial) accreditation and/or quality assurance have not been considered in this review.

There is an important distinction to be made between 'accreditation' and „initial accreditation:’

- Accreditation refers to existing programmes on offer by institutions that have students enrolled.
- Initial accreditation refers to newly designed programmes that are not yet on offer. New programmes can receive public funding (in The Netherlands) and may grant legally recognised and protected (in Flanders) bachelor and master degrees only if initial accreditation has established that they conform to threshold quality standards. To actually receive public funding, there is also another condition: the macro-efficiency check. The execution of this check is not part of NVAO tasks; it will be discussed in paragraph 3.7.5.

3.5 Accreditation process

The accreditation process consists of three layered steps:

- *Self-evaluation report.*

The procedure starts with a self-evaluation report. This report is written by the institution and forms the basis for the external assessment. The self-evaluation report is not made public and is not included in the accreditation application that is filed with the NVAO, as the report should contain self-critical and reflective aspects on the basis of which a panel should be able to form balanced judgements.

In cases of initial accreditation, the institution produces a programme dossier.⁶ This dossier is submitted directly to NVAO where it is examined to determine whether it is complete and suitable for the initial accreditation procedure.

The NVAO (initial) accreditation frameworks stipulate the required content of these documents.

- *External assessment.*

The second step is an external assessment by a quality assessment agency (see paragraph 3.7.3). The assessment panel should be composed of experts who have subject-/discipline-specific knowledge and who have experience in the relevant professional practice. There should always be a student member on the panel. In addition, there should also be an expert with pedagogical/didactical experience and one with quality assessment and audit expertise.

⁶ The distinction will be evident; in the case of initial accreditation, there can be no self-evaluation as the programme is not yet on offer.

For initial accreditation, both in The Netherlands and Flanders, it is generally NVAO that selects the panel members. As with the external assessment by a quality assessment agency, these panel members should also have authority in their specific discipline, be independent and have expertise. There is no student member on the panel. In The Netherlands, a quality assessment agency can also be asked to carry out the initial accreditation procedure. In this case, the composition of the panel should be approved by NVAO prior to the assessment. It goes without saying that such a panel is subject to the same requirements as those selected by NVAO.

Prior to the assessment of the programme, the assessment panel should produce a subject-/discipline-specific frame of reference in which they specify what the learning outcomes of the programme should be to offer sufficient threshold quality.⁷ Then the site visit takes place during which the panel examines additional information, holds discussions with representatives of the programme (such as the programme management, the teaching staff, the professional practice and the students). Furthermore, the facilities are inspected (such as the library or laboratories). During the site visit, several aspects of the self-evaluation report or programme dossier are verified, supplemented or, if necessary, clarified. On the basis of the self-evaluation report or the programme dossier and the site visit, the panel reaches a judgement of the programme. This judgement is described in the assessment report. Before the assessment report is endorsed, it is first presented to the institution for factual verification. The institution then needs to submit the final version of the report together with the application for accreditation to NVAO. In the case of initial accreditation, the panel submits its report directly to NVAO.

- *Accreditation decision.*

On the basis of the panel report NVAO will formulate its „intended decision“. The institution can react to this intended decision before it is finalized by NVAO.

In the case of an initial accreditation procedure in Flanders, the considerations are formulated in an initial accreditation report. In the case of an accreditation procedure in Flanders, NVAO will formulate its considerations in an accreditation report that forms the basis of its accreditation decision.

At any moment during the course of an initial accreditation, the institution can decide to withdraw its application. Withdrawal usually occurs if a programme was negatively assessed by the assessment panel. Withdrawals of applications are not published. In this way, institutions do not lose public confidence unnecessarily.

If NVAO takes a negative accreditation decision, the institution will be granted an improvement period; see paragraph 3.74. In case new programmes want to receive public funding, the initial accreditation procedure will (in The Netherlands) have to be followed by a macro-efficiency check by the government. In Flanders the macro-efficiency check precedes the initial accreditation by NVAO. See paragraph 3.75.

⁷ NVAO uses the expression „generic quality“ to denote threshold quality. The committee prefers the later expression as it is more clear.

- *Appeal.*

Both in The Netherlands and in Flanders, institutions can lodge an appeal against (initial) accreditation decisions taken by NVAO. The appeal procedures are stipulated by law. There is the possibility of internal appeal (appeal at NVAO) and external appeal (appeal at court). Regulations and procedures differ between Flanders and The Netherlands. As yet there have been only a relatively small number of internal and external appeals.

3.6 Organization

3.6.1 Governing body

The NVAO governing body consists of an Executive Board and a (General) Board.

The Executive Board (four members) meets every week and is responsible for the day-to-day management of the organization for which it is accountable to the Board. The day-to-day management comprises: the administrative organization of NVAO; the decisionmaking process preceding the ratification of an (initial) accreditation decision; the employment, the salary and dismissal of personnel; the decision to seek advice on legal, financial or policy matters; and, finally, finance management and management of the moveable assets of NVAO.

The General Board (as yet twelve members, including the executive board members) ratifies decisions from the Executive Board and plays an explicit role in handling difficult cases concerning applications for (initial) accreditation. If necessary, the Executive Board can acquire a mandate, an authorization and/or full power to take decisions. The Board meets every month.

The Committee of Ministers appoints the members of the Board for a four-year term on the recommendation of the Dutch and Flemish Higher Education ministers. Members of the Board are eligible for reappointment for another term of four years and are recommended on the basis of their expertise in higher education, their professional practice related to higher education or their field of research or quality assurance. The Board constitutes a complete entity and as such takes decisions on applications concerning (initial) accreditation irrespective of whether these concern an application from The Netherlands or Flanders.

3.6.2 Advisory Council

The NVAO has an Advisory Council consisting of eleven members who represent NVAO's stakeholders.⁸ The Advisory Council's primary task is to provide advice - solicited or unsolicited - to NVAO on the general policy of NVAO. The Advisory Council meets twice a year on average. The Advisory Council does not discuss accreditation decisions.

3.6.3 Staff and management

The Director manages the NVAO staff, is responsible for the organization's day-to-day affairs and implements the strategic policy as set out by the Board. The Director sees to the correct implementation of decisions taken by the Board and is responsible for periodical reporting to the Board.

⁸ The Dutch members of the Advisory Council are appointed on the recommendation of the following organizations: The Netherlands Association of Universities of Applied Sciences (HBO-raad), the Dutch National Students Association (ISO), the National Union of Students (LSVb), the Platform of recognised private institutions (PAEPON) and the Association of Universities in The Netherlands (VSNU). The Flemish members of the Advisory Board are appointed on the recommendation of: the Flemish Interuniversity Council (VLIR), the Council of Flemish University Colleges (VLHORA), the National Union of Students in Flanders (VVS) and the Flemish Social and Economic Council (SERV).

The NVAO staff includes staff members (policy, legal and communication advisors) and support staff (secretariat, finances and human resources, records department and general services); about thirty FTE in total. The staff members are a mix of young and experienced people from The Netherlands and Flanders. The more experienced staff members are expected to possess wide-ranging knowledge of higher education and/or quality assurance, or a specific legal or communications background. Together they represent all major academic disciplines.

The policy advisors have their own secretariat that is responsible for the administrative processing of applications. The Records Department archives the digital and hard copy of incoming and outgoing mails and application dossiers. Support services are managed by the Controller.

3.6.4 Internal quality assurance

NVAO has developed a system for its internal quality assurance. Initially, this system had more a thematical approach than a structural one. As the organization gradually took on a more structured form, the system for internal quality became more structured as well (2006) and a more systematic approach for evaluation was developed (2007). This system, that is currently being implemented, is designed to:

- Allow an integrated approach of the organization and its working processes by applying the nine criteria of the EFQM-model.
- Allow frequent evaluation of the results and a structured plan for improvement (by following the Plan-Do-Check-Act cycle).
- Be transparent, simple and non-bureaucratic through the application of a limited number of instruments.
- Provide the basis for an external (international) evaluation by the adoption of international standards in the development of the internal quality assurance system.
- Stimulate involvement of all staff members, and in addition, guarantee involvement of all stakeholders by means of an open dialogue with these stakeholders.

NVAO distinguishes 13 quality areas within the internal quality assurance system („Strategy, Policy and Leadership”, ‘Accreditation’, „Initial Accreditation - including Research Master’s Programmes’, „International Affairs’, ‘Communication’, „Legal Affairs’, „Support Services’, „Additional Tasks’, „Quality Assurance’, „Human Resources’, „General Services’, „Finances and ICT’). For each quality area, a Quality Area Working Group has been formed consisting of NVAO staff members and a quality area coordinator. A member of the Executive Board is appointed as primarily responsible for each quality area. The „Working Group Quality Assurance” (the quality group pertaining to the quality area of quality assurance) coordinates all tasks regarding quality assurance.

3.6.5 Financial situation

NVAO is financed both by The Netherlands and Flanders (60% by The Netherlands and 40% by Flanders) and has an annual budget of approximately € 6 million.

External reviews of programmes (by quality assessment agencies) are financed by the institutions themselves. These costs are thus not accrued to NVAO. The costs incurred by NVAO for initial accreditation of programmes are partly charged through to the institutions. For The Netherlands, this amounts to a maximum of € 10.000,- and for Flanders to a maximum of € 5.000,-. The costs per accreditation amount to € 500,- financed by the institution. The income gained from (initial) accreditation procedures are deducted from the amount assigned to NVAO from government funding.

Staff members of NVAO are directly recruited or appointed by NVAO. NVAO bears all labour costs of its work force.

3.7 Specific characteristics of the system

3.7.1 NVAO decision making

On the basis of the information provided in the assessment reports, NVAO should be able to reach a well-evidenced decision. In the case of accreditation, NVAO assesses the quality of the assessment report and the working method of the quality assessment agency. Standard procedures and internal handbooks have been developed for that purpose. If NVAO cannot make an independent positive decision on the basis of the assessment report, this application is submitted to further scrutiny. Subsequently, there are still several ways for NVAO to reach a well-evidenced decision: NVAO can ask additional questions or claim additional information, organize hearings, reject the assessment report and appoint an NVAO verification commission. The procedure that applies is different in The Netherlands and Flanders due to the differences in legislation. In the Self Evaluation Report NVAO calls this a 'pro-active' attitude.

3.7.2 Three tiered system

A specific characteristic of the Dutch and Flemish accreditation system is that it is three tiered system (whereas generally a two tiered system is more common):

- Tier one is the institution: there lies the principal responsibility for quality assurance. In the process of (initial) accreditation the institution provides a Self Evaluation Report (or programme dossier).
- The second tier is the external quality assessment agency. Its task is to assess programmes using an independent panel, leading to a panel report. The agency is hired by the institution and reports to the institution. See also paragraph 3.7.3
- NVAO is the third tier. On the basis of the panel report, submitted by the institution, NVAO decides upon accreditation.

So as a rule NVAO does not execute the actual quality assessments; these are done by separate quality assessment agencies and their panels. These agencies have to adhere to the framework and NVAO checks this in the process of assessing the panel report.

In the case of initial accreditation however, the system is as a rule two tiered. The actual quality assessment is generally done by an NVAO panel. It is possible though (only in The Netherlands) that this is done by a panel from a quality assessment agency, in which case it is again a three tiered system.

3.7.3 Quality assessment agency

In The Netherlands, the legislative opted for an open system of quality assessment agencies (a free market). In Flanders, the umbrella organizations for university colleges and universities have been recognised as quality assessment agencies by law. In The Netherlands, given the open system, NVAO has been given the legal task to annually draw up a list of quality assessment agencies that are considered capable of producing assessment reports that meet NVAO requirements. To be eligible for inclusion on the list, quality assessment agencies annually submit a programme dossier to NVAO in which they point out how they meet the requirements of the 'Protocol for Quality Assessment Agencies'. Five quality assessment agencies in The Netherlands were included on the list for 2006 (Certiked, Hobéon, Netherlands Quality Agency (NQA), Quality Agency Netherlands Universities (QANU) and Det Norske Veritas (DNV)) and two German ones (Fachakkreditierungsagentur für Studiengänge der Ingenieurwissenschaften, der Informatik, der Naturwissenschaften und der Mathematik e.V. (ASIIN) and Foundation for International Business Administration Accreditation FIBAA). Each quality assessment agency has a different approach to quality assessment stemming from their origin.

The approach applied by NQA and QANU (which have their origin in the umbrella organizations of the universities of applied science and universities, respectively) has developed from a content-oriented ‘peer review’ system. The approach of Hobéon, Certikend and DNV (originally certification agencies and/or consultancy agencies) is more focussed on a process-based audit. QANU is oriented towards universities while the other quality assessment agencies primarily focus on universities of applied science. Institutions can choose the quality assessment agency that applies the working method that best accords with their vision for their programme. Whichever approach is used, NVAO ensures that sufficient attention is given to the content and the achieved learning outcomes of the programmes in its decision-making process.

3.74 Improvement period

In Flanders, institutions can submit an improvement plan for the programme with the Flemish Government in the case of a negative accreditation decision. This means that, during a maximum period of three years, the institution will be allowed to work on improving the quality of the programme; after this period a new application for accreditation can be submitted. This temporary recognition is not granted automatically, but on the basis of the quality of the programme and the feasibility of the improvement measures. As yet, there has been no application for temporary recognition with the Flemish Government.

In The Netherlands, there is also a possibility for an improvement period, but as long as a programme is not accredited, the institution cannot enrol new students in that specific programme. This has occurred in a number of programmes.

3.75 Macro-efficiency check

In Flanders, an institution submits an application for initial accreditation for each bachelor or master’s programme that does not yet appear on the Higher Education Register under the programmes offered by that institution. Before NVAO can begin the initial accreditation procedure, a statutory registered institution⁹ should submit an application with the Recognition Commission to carry out a macro-efficiency check of the new programme. New programmes offered by non-statutory registered institutions¹⁰ do not need to undergo a macro-efficiency check.

In The Netherlands, a macro-efficiency check takes place after the initial accreditation decision. A positive initial accreditation decision by NVAO entitles a publicly funded institution to apply for a macro-efficiency check with the Ministry of Education, Culture and Science. After having passed this macro-efficiency check, a programme can be included in the Central Register for Programmes in Higher Education (CROHO). After receiving a positive initial accreditation decision, a privately funded institution can have a new programme listed immediately on the CROHO register. In July 2008 also in The Netherlands the macro-efficiency check will be carried out before the initial accreditation takes place.

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- ⁹ Statutory registered institutions are the traditional higher education institutions, i.e. the universities, university colleges, institutions for post-graduate programmes and „other statutory registered institutions“. These institutions were already recognised by the Flemish or Belgian government before the introduction of the bachelor and master’s degree system in 2003. All these institutions receive public funding for their education and research.
- ¹⁰ (Non-statutory) Registered institutions: since 2004, some private institutions have successfully completed a procedure for registration and, consequently, obtained official registration by the Flemish government. They are called (non-statutory) registered institutions. The registration procedure consists of providing proof of financial solvency and the entering into partnership agreements with statutory registered institutions or recognised higher education institutions abroad.

4. General observations and recommendations

In this chapter the committee presents some general observations and reflections. These are not always directly pertinent to the assessment of the ESG/ENQA criteria and ECA Code of Good Practice,¹¹ but may be helpful to get a better understanding of the functioning of NVAO within the given system. Furthermore, these observations serve as background to the descriptions and analyses with regard to the ENQA/ECA standards/codes in the subsequent chapters.

4.1 Accountability function versus quality improvement

NVAO is central to the accountability function in the Higher Education systems within the two countries, Flanders and The Netherlands. The accreditation system serves to guarantee (to all parties concerned) that all programmes on offer reach threshold quality. The committee sees a clear relation to public funding. The government simply wants accreditation to be able to guarantee the quality of publicly funded higher education to the tax payer and the student. In other words, threshold quality plays a dominant role in the system: the system is designed to assure that tax payers' money is spent adequately and that consumers are adequately protected.

In the few years of its existence the system has been generating at least the following three benefits:

- The implementation and development of internal quality assurance systems within institutions has made substantial progress. Of course this does not imply that there was no internal quality assurance before. In the last 15 to 20 years a large amount of work has been performed in the field of evaluation. Nevertheless, since the start of the new system improvements may still be perceived.
- Without exception, peer reviews at programme level are appreciated and do contribute to reflection upon and improvement of programmes - generally at a level above threshold quality. Of course there are various comments and criticisms to be heard (which the committee discusses in chapter 5 and 6), but basically the instrument of peer review is seriously appreciated.

It is also firmly established that a substantial number of programmes has already been withdrawn from offer as institutions judged that these programmes would not pass the criterion of threshold quality and thus would not be accredited. Unfortunately this is not directly visible because (almost) all programmes that are assessed pass the accreditation. This can lead to the false impression that the system has no added value. There is added value, but that materializes before the actual accreditation process and not as a visible result of negative decisions.

- The system of initial accreditation does definitively serve to improve the quality of new programmes and will probably shorten the development cycle in which a new programme gets consolidated. The major criticism has to do with the fact that in The Netherlands the 'macro-efficiency check' that all new programmes have to undergo for public funding is inefficiently placed after the initial accreditation (instead of before as in Flanders).

¹¹ If they are they are touched upon in the paragraph(s) in chapter 5 and 6.

- The accreditation system has a very large impact on the private sector in The Netherlands (in Flanders there is no private sector offering bachelor and master programmes). NVAO estimates that of the 3.000 higher education programmes registered in the private sector before the start of the accreditation system, considerably less will remain at the end of the accreditation cycle.¹²

All this should certainly not be underestimated. The committee signals how-ever a downside that should be addressed with respect to the system in the phase after the first full cycle.

There is a very strong orientation on processes and procedures (which are rather formalistic and legalistic) and there is too little attention paid to content and to quality improvement above the threshold level. The orientation on process, procedures and an 'appeal-proof' legal phrasing of decision documents - and less upon content - seems to be related to the fact the accreditation system consists of threshold accreditation as a condi-tion for funding (especially in the Dutch public sector) and recognition (in the private sector).¹³ As one committee member put it during an internal discussion: "NVAO is not about quality, it is about accountability and funding."

Threshold quality has to a certain degree to do with formal aspects, like the presence of an adequate system for internal quality assurance. The fact that funding of an accredited programme (offered by a public institution) is conditional on accreditation implies a somewhat legalistic approach; the stakes are high and institutes can appeal at court. This quite naturally forces NVAO into more formal and procedural processes. Every decision is carefully scrutinized by one of NVAO's lawyers. A consequence of this is that the documents containing the accreditation decisions are no easy reading - at least not for the general public. The situation differs between The Netherlands and Flanders.

- In Flanders the decision documents have to comply with many regulations, making them very elaborate (thirty to forty pages); decisions pertaining to Dutch programmes are considerably shorter: about ten pages.
- In The Netherlands the consequences of a negative accreditation are harsher than in Flanders. The institute is granted an improvement period during which funding stops and no first-year students may be enrolled.

In Flanders, a negatively accredited programme can improve for a certain period during which funding continues and new students may still be enrolled after a positive decision by the government.

While institutions do recognize the importance of threshold accreditation for the system as a whole, the general feeling (as emphasised in the meeting with the umbrella organizations of institutions) is that the system does not provide an effective drive for real quality improvement of individual programmes. There is not much interest in the conclusion that all programmes are equal in the sense that they all pass the threshold level. The fact that it results in a certain 'clean up' is a valuable, but probable only one-time benefit.

¹² Strictly speaking, there were 3.000 licences; not all of the 3.000 programmes were actually offered.

¹³ The latter primarily in The Netherlands as there is hardly any private sector in the Flemish higher education system.

A more comparative system that differentiates in terms of quality and that would enable institutions to be benchmarked with reference to a certain ‘league’ is considered much more preferable by the umbrella organizations. The Dutch student organizations support this view. The Flemish national union of students support a more comparative system that differentiates in terms of quality, but are not supportive of a benchmark approach. They oppose any evolution in the direction of (international) ranking.

The committee agrees that the clustered programme accreditations as done in Flanders and in the Dutch University sector can provide more useful information to the institutions on quality improvement at the programme level. However the committee doubts that some type of ranking or benchmarking against other institutions will improve the quality of student learning in the system. If the ranking/benchmarking is based upon subjective assessments of programme content, staff quality, resources, or other traditional input measures, which is almost always the case, then such benchmarking is apt to drive up the costs of higher education without providing educational value-added to students. The real challenge is to provide incentives and encouragement for programmes and institutions to systemically assess student learning and to use such empirical evidence to guide their efforts to improve academic quality. Without this type of concrete evidence at the institutional level alternative efforts to improve academic quality are likely to be wasteful and ineffective.

Although institutions state that they are not very interested in a system of threshold quality, they are apprehensive about the risk of not being accredited. In The Netherlands especially, the consequences of a negative accreditation are very harsh: such programmes cannot enrol firstyear students or receive public funding during the improvement period. This leads to some risk reducing behaviour. This tendency is intensified by the fact that NVAO was (and partly still is said to be) inclined to view recommendations of panels as criticism and as a negative assessment of parts of the programme. This has led to reluctance within panels to formulate criticism and recommendations above threshold level. Perhaps sometimes even below that level if it is supposed that it might lead to an unsubstantiated negative accreditation decision by NVAO.

There were rumours in some meetings that recommendations were all kept out of the reports and only stated in side letters to the institutions, but this was not confirmed by the quality assessment agencies.¹⁴

NVAO confirms in the Self Evaluation Report (and in meetings with the committee) the erosion of the improvement function and seeks actively (in communication with the quality assessment agencies to) to turn the tide.

A possible suggestion would be that NVAO agrees to a guideline that all evidence for accreditation decisions by accreditation agencies would be presented in one section of the report and that a special section (i.e. ‘below the line’) would be reserved for recommendations to the institutions on means of strengthening the programme. NVAO would agree not to consider information from this latter section in its decisions.¹⁵

¹⁴ Only one of the agencies present told that in very few cases (10 out of 300 panel reports) side letters were written.

¹⁵ The committee has understood that this is in the process of being implemented.

The committee once more points to benefits of the current system but doubts whether these can be prolonged after the first cycle. Unchanged, a next cycle would still fulfil an accountability function, but an accountability function without a strong quality improvement function might have too little added value to both institutions and the general public - also in the light of the costs and administrative burden.

4.2 Market situation in The Netherlands

In The Netherlands, the government has chosen to let the institutions free choice as to the quality assessment agency: a market system. Institutions can hire an agency of their choice to execute the programme review. NVAO has drawn up a list of 'Vecognized' quality assessment agencies, but institutions are not obliged to choose from that list.¹⁶

The committee closely looked at the market, but the closer one looks, the less market one sees. In fact, the initial expectations for an efficient market in this field appear naïve:

- The market is too small to be attractive for new market entrants.
- The threshold to enter the market is too high, given the very specific knowledge of the field that is required.
- Furthermore the required accreditation framework does not encourage existing international creditors to enter the market as they would have to change/compromise their well-established processes.¹⁷
- The return on investment (the profit margin) in this field is far too low to encourage many new entrants.
- There is much „differentiation by client (type)”, leading to close client - agency relationships where the division between assessment and consultancy may not always be strictly kept.
- The combination of a small market and differentiation by client could possibly create a dependency of agencies upon institutions (while the original expectation of policy makers was probably that a free market would lead to independency). There are, however, no indications that the independence of panel assessments is in any way jeopardised. In the ‘monopoly’ situation (Flanders and Dutch Universities) the dependency risk is at any rate much smaller.
- As a result of the frameworks and the strict guidelines for recognition of agencies there is actually little bandwidth for differentiation between agencies in working methods. There is differentiation between a more content oriented peer review method and a more process oriented audit method, but there is a certain convergence. There is also differentiation on clustering, with some agencies using this method and others not.
- It should be emphasized that in actual fact only for the Dutch publicly funded Universities of applied science (hogescholen) to some extent, and for the Dutch commercial private Universities of applied science (hogescholen) there is a free market in operation.

¹⁶ The term 'Vecognition' does not imply a recognition to the effect that NVAO accepts the conclusions of the panel reports.

¹⁷ The occasional presence of FIBAA on the Dutch market does not contradict this.

Most importantly, if NVAO is to make valid assessments of programme quality, it is illogical for them to try to base their decisions on independent accrediting agencies using different accrediting methods. There is no accepted academic discipline of accreditation with clear professional standards to assure the objective performance of independent agencies. An unregulated market for accrediting agencies will compromise the validity and reliability of the regulatory process. It is in the public interest for all the accrediting agencies to be using assessment processes of similar demonstrated validity and reliability. For this to occur, either NVAO needs a formal contractual relationship with each agency to assure that its accrediting processes are effective and/or it needs some means for assuring the validity and reliability of each agency's processes (e.g. auditing/supervising their activities). In either case, this will require an ongoing relationship between the accrediting agencies and the NVAO.

4.3 Complications of the three tiered system

NVAO works in a three tiered system as described in paragraph 3.7.2: institution, quality assessment agency and NVAO. In the Self Evaluation Report NVAO states that this tiered system "self-evidently leads to considerable 'tensions' between the quality assessment agencies and NVAO" (SER, 51).

An important factor is that NVAO adopts what is called a pro-active attitude; NVAO desires to be able to formulate an independent assessment. Therefore it happens (very) regularly that NVAO poses additional questions and even organizes formal hearings (in Flanders) or sends in a verification panel (in The Netherlands). This met with a lot of criticism in the meetings with umbrella organizations of institutions and quality assessment agencies. They experience criticism, remarks, additional questions and the rejection of assessment reports by NVAO as excessive 'independent' behaviour on the part of NVAO. In fact, their impression is that NVAO is Vedoing' the work of the panel.

NVAO, on the other hand, claims that its only aim is to ensure reports are unambiguous and well-founded, so that it can make substantiated decisions.

In fact, none of the parties the committee spoke, contests the right of NVAO to formulate an independent assessment. They do, however, consider the amount of interference sometimes as excessive and inefficient and complain that it is unpredictable in which case NVAO will ask which question to which party. Agencies say they are not able to detect any pattern therein.

This issue relates to 'consistency' not of decisions but of process and procedure by NVAO. This might be related to the fact that NVAO does not produce and publish systematic analyses of their accrediting decisions and does not effectively guide the performance of the quality assessment agencies by issuing formal, public guidelines, policy updates, etc. designed to assist the assessment agencies and the institution in their quality assessment and accrediting related activities.

An extra complication is that said 'interference' often leads to additional questions by NVAO to agencies or to institutions. In the Dutch-Flemish system the institution is the owner of (and is responsible for) the panel report. This can lead to tensions between agencies and their clients, the institutions

- especially in the free market part (Dutch universities of applied science).

A regrettable consequence of this is that panels or agencies tend to be reluctant to state criticisms or to formulate recommendations in the reports because they fear that NVAO might see this as a substantial weakness, leading to questions, rejection of reports or even a negative accreditation decision. This has led to a certain erosion of the improvement function of the system; see also paragraph 5.6.2.

It may be that part of this has to do with a natural learning cycle in any starting system with different layers - although the learning cycle might then be considered a bit long (at least in the Dutch situation).

The committee feels that the problem has to do with an unclear positioning of the quality assessment agencies, a problem that is aggravated by the market situation, described in paragraph 4.2. Looking at it as an accrediting system, the quality assessment agencies ought to be the „data collectors“ for NVAO. Through the instruments of the frameworks and the procedure for recognition of agencies NVAO should in fact develop ‘trust’ in the (panel reports from) the agencies. The behaviour by NVAO suggests that this trust is absent and that agencies are perhaps not viewed as parts of the NVAO’s accreditation system, but somewhat as an extension part of the institution (and therefore to be assessed together with the programme). Given the way the market situation was introduced in The Netherlands this is an understandable reflex (see also paragraph 4.2).

In fact there are two basic solutions to this problem:

- One solution (proposed by the two Dutch national unions of students) would be to remove the second tier. In a two tier system programmes would be obliged to hand in (just as is the case now) an external peer review report and NVAO would formulate an accreditation decision on the basis of an assessment of the report. Institutions would of course be free to hire external agencies to do the peer review but these agencies would not be a part of the system.

One could argue that this is, formally speaking, the present situation. Given the more or less substantial amount of ‘Vedoing’ by NVAO, one could argue to skip the second tier. This would however not ensure that the quality assessment agencies are valid and reliable „data collectors“ for NVAO. Perhaps a more relevant alternative would be to turn the NVAO into an accrediting agency, similar to those in the US, which guides the institutions on the development of the self study, arranges the external peer assessment, and also makes the final accrediting decision.

- The other solution would be to position the agencies clearly as part of the accreditation system. This could for instance be done by extending the recognition into a formal certification. Via this certification NVAO could more strongly than is now the case (where agencies are free to choose their own model and working methods) ensure that its „data collectors“ are doing the required job properly. This could mean that during the period that an agency is certified, NVAO only marginally assesses the panel reports of that agency. This formally would still keep intact the right of NVAO to form independent decisions.

In any case, this approach would necessitate some type of ongoing, formal relationship between NVAO and the accrediting agencies and would require that NVAO view the assessment activities of the accrediting agencies as one of NVAO’s core processes. Note that there are a number of possible forms for such a relationship, including a contractual arrangement, licensing of agencies, etcetera.

To an extent, both solutions would tackle the criticism that accreditation causes an excessive administrative burden. Both solutions would also require more or less extensive legal reform in both The Netherlands as Flanders. A more minimal reform programme could also be considered and could include:

- A clear and formal policy on behalf of NVAO stating its relationship with the assessment agencies, developed in cooperation with these agencies.
- Clear and up to date formal communication.
- Guidance by NVAO to the agencies on how to perform their role via newsletters, policy briefs and system wide analysis of NVAO decisionmaking.
- A light system of review of the working of the assessment agencies by NVAO from a consultant's perspective.

4.4 Harmonizing in the bi-national context

The Netherlands and Flanders share a bi-national accreditation system. Due to political and legislative differences between the countries, some differentiation in the system is inevitable. The committee feels that in some respects greater harmonization would be preferable.

4.4.1 Protection of titles

The bachelor and master titles are protected by law in Flanders and dependent upon accreditation, while this is not the case in The Netherlands. This leaves the possibility open for the private sector to offer non-accredited bachelor or master programmes. Of course students and employers can check easily whether any programme is NVAO-accredited (which they generally don't do), but the committee feels that a legal protection of titles is desirable.

To secure and strengthen the 'sanitizing' effects of the accreditation system on the courses of commercial private providers, the Dutch government should now follow its Flemish counterpart and protect the bachelor and master degree titles. This should mean that bachelor and master degrees may only be granted when a student has completed an NVAO-accredited programme: so the degree awarding power is (at least partly: as far as the programme and the student is concerned) to become part of the positive accreditation decision. This should make it impossible to offer degree programs which are not accredited, which is desirable if only for the transparency of the higher education market from the consumer's point of view.

4.4.2 Improvement period with the right of enrolment

The committee supports the principle of unconditional accreditation. In the Dutch situation however the sanction in the case of a negative accreditation is too harsh. The programme loses the funding and may no longer enrol first-year students. This leads to various forms of risk-avoidance; it also puts pressure on the panels that may become reluctant to be completely frank out of fear for the consequences for the programme. The Flemish situation is evidently better. The committee recommends also for The Netherlands an improvement period including the right of enrolment in cases of negative accreditation.

4.4.3 Macro-efficiency check before the initial accreditation

In The Netherlands new programmes that apply for public funding have to be (initially) accredited before there is the so called macro-efficiency check that decides about funding. As only few programmes pass the macro-efficiency check, a lot of time, money and energy are in fact wasted in the process of initial accreditation. All parties the committee spoke to agree that the Flemish procedure (where new programmes must first pass the macro-efficiency check before they can apply for initial accreditation) is preferable. The committee has learned that the position of the macro-efficiency check will be altered in The Netherlands, starting in July 2008.

4.4.4 *Harmonization of cycles*

The committee feels that in a bi-national system a harmonization of cycle durations would be preferable. The committee feels that the cycles should not be too short. Given short cycles, the incremental benefits of the system will rapidly decrease, the peer review system will suffer from burn out, and the bureaucratic overhead costs will continue to rise. This will especially be the case in a system of threshold accreditation as most programmes will be able to keep up to that standard. In fact, the committee thinks that it is highly unlikely that the given system could be continued unchanged after the first full cycle.

Initial accreditation on the basis of threshold quality will always be needed. The validity of an initial accreditation would need to have the duration of one full programme cycle, preferably with an extra year so as to be able to take the experience of the first alumni into account.

The committee suggests considering a variable period of validity of accreditation. For a particular programme NVAO could found its decision as to the validity of the given accreditation on such considerations as the track record of the programme, the degree of change in content and didactics of the programme and the proven rigour of the institution's internal quality assurance system. A cycle of up to ten years (as is common in the United States for both institutional and programme accreditations) could well be feasible. It would also be conceivable that given such a longer period of validity of the accreditation, NVAO would demand a midterm review on the basis of outcomes of the internal quality assurance of the institution.

5. Findings ENQA/ESG compliance

In this chapter the committee presents the major findings according to the following format:
 Description of the information gathered - making reference to meetings or documentation explored.

- Analysis of that information in reference to the respective standard.
- Conclusion as to how compliant NVAO is with the standard.

5.1 ESG 2.1 Use of internal quality assurance procedures

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

5.1.1 Description

The internal quality assurance system is incorporated as a separate theme (theme 5) in the (initial) accreditation frameworks (both the Dutch and the Flemish versions). This theme contains three separate standards:

- Periodical evaluations;
- Measures for improvement;
- Involvement of staff, students, alumni and the professional field.

NVAO as a rule does not execute the actual quality assessments as there is a three tier accreditation system (see paragraph 3.7.2). The actual quality assessments are done by separate quality assessment agencies and their panels. These agencies have to adhere to the framework and NVAO checks this in the process of assessing the panel report (see paragraph 3.7.3). In the case of initial accreditation, the actual quality assessment is as a rule done by a NVAO panel (but in The Netherlands it is also possible that it is done by a panel from a quality assessment agency).

In the meetings the committee learned that the umbrella organizations of the higher education institutes and the quality assessment agencies have perceived a positive impact upon the implementation and/or development of internal quality assurance systems and procedures within the institutes. Student representatives agreed with this observation, but remarked that they still perceive shortcomings in internal quality assessment systems within the institutions.

5.1.2 Analysis

Both the documentary and orally presented evidence is convincing. The committee has understood that the inclusion of theme 5 in the frameworks especially (but by no means exclusively) has had a positive influence upon the private institutions offering programmes that formerly (in the period before the accreditation legislation) were not - as the public funded institutions - subject to any form of formal programme assessment.

The committee considers the increased attention for internal quality assurance within the institutes as a positive outcome of the accreditation system executed by NVAO in The Netherlands and Flanders. The remarks of students, that they still perceive shortcomings, underline the importance of this aspect.

The extent to which the accrediting processes assess the effectiveness of the internal quality assurance systems with regard to actual learning outcomes, is however unclear. NVAO states the following: "The differences between the concepts 'competences', 'learning outcomes', and subject 'contents' are not always clearly understood in daily practice. In addition, some consider the frameworks to be too focussed on the processes of the programme and not enough on its content. Another criticism refers to the attention given to learning assessment. This only receives comparatively marginal attention, instead of a standard; some claim this should be a theme." (SER, p. 38) The experience in other countries suggests that the effective assessment of student learning outcomes is a critical weakness and challenge for all systems of internal quality assurance in higher education. The means by which programmes assess student learning outcomes may need to be further clarified/emphasized in the NVAO frameworks if the accrediting process is to validly evaluate the effectiveness of the internal quality assurance systems. It was not possible for the committee to ascertain the extent to which the current accreditation process addresses and/or improves the overall institutional internal quality assurance system rather than the programme level systems.

In all meetings (including meetings with NVAO board) it has been brought to the committee's attention that certain aspects of the accreditation system might hinder a full development of the quality improvement function of the accreditations system. While this does not regard ESG 2.1 (as ESG 2.1 states that the effectiveness should be taken into account, but does not stipulate a measure of effectiveness), it does merit discussion by the committee; see paragraph 4.1.

5.1.3 Conclusion

NVAO fully complies with ESG 2.1.

5.2 ESG 2.2 Development of external quality assurance processes:

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

5.2.1 Description

The aims and objectives of the external quality assurance processes under the responsibility of NVAO have been determined in a legislative process (separately in The Netherlands and in Flanders), in the course of which there has been input from and/or consultation of various parties. Subsequently the Dutch and Flemish (initial) accreditation frameworks have been developed after extensive consultation with representatives of institutions and other stakeholders. Experts involved in assessment procedures were also consulted.

There is documentary evidence of this involvement; moreover the relevant parties have confirmed this in their meetings with the committee.

The aims and objectives of the quality assurance processes and the frameworks containing the standards have been published and are easily available for the parties involved and the general public (available online on NVAO's website or as hard copy upon request).

5.2.2 Analysis

In the evaluation of this standard, the fact that accreditation in Flanders and The Netherlands is regulated by law, has to be taken into account. The relevant stakeholders have been consulted, but the aims and objectives have been determined in a democratic process by legislation and the frameworks have been determined by the respective ministers. In this process the frameworks that were developed by NVAO have been accepted unchanged.

The fact that all parties concerned have played a role in the process of developing the aims and objectives of quality assurance processes does of course not rule out that they voice now (as happened in the meetings), after a few years of experience, various comments and criticisms. These will be discussed by the committee in the context of the relevant ENQA/ECA standards/codes.

5.2.3 Conclusion

NVAO fully complies with ESG 2.2.

5.3 ESG 2.3 Criteria for decisions

Any formal decisions made as a result of an external quality assurance activity should be based on explicit, published criteria that are applied consistently.

5.3.1 Description

NVAO's formal decisions are based on explicit and published criteria. These are contained in the various frameworks and are easily available for the parties involved (institutes and quality assessment agencies) as well as the general public. The decisions themselves (as well as the underlying panel reports) are also published and are available online on NVAO's website. In these decisions NVAO explicitly refers to standards in the relevant framework. This is conducive to consistency.

The process of decision making within NVAO is steered by handbooks, templates and a software programme specifically designed to process the many accreditation applications in a systematic way. Each application is handled from entry by a combination of a staff and an executive board member. In many cases three or four people are involved in a single application. Every draft decision is carefully scrutinized by a lawyer and all executive board members dispose of the relevant documents in the meeting where the decision is taken. All these measures promote consistency in the decision making process.

In various meetings the topic of inconsistency was raised. Both umbrella organizations of institutes and quality assessment agencies have complained about a certain lack of consistency in the procedure of evaluating the panel reports by NVAO, but it has not been reported that this has led to inconsistencies in the ultimate decision making.

This topic has been amply discussed by the committee with the NVAO executive board. NVAO has explicitly adopted a 'pro-active attitude' as stated in the Self Evaluation Report. NVAO does not just 'rubber stamp' the conclusions of the panel reports, but forms its own conclusions on the basis of that report. If NVAO has any doubt about the motivation of the assessment of a certain standard or perceives inconsistencies in the report, NVAO will ask for more information or for an elaboration of the motivation. Ultimately NVAO can - in a Flemish case - organize a formal 'hearing' or can even - in a Dutch case - send its own verification panel for a new site visit. In the Self Evaluation Report all these actions are labelled as 'interference'.

None of the parties contests the right of NVAO to make autonomous decision. What they do criticize is the amount of interference and - as it was several times called - the unpredictability as to when (in which cases, given which shortcomings) and how (telephone, email, letter, meeting, hearing, verification) NVAO will 'interfere' in the direction of which party (panel, agency, institution).

NVAO explained that they ‘read between the lines’; look for inconsistencies in reports and also take into account the track record of institution and quality assessment agency. Programmes from private institutions can be certain of extra scrutiny, as perceived by their umbrella organization.

In the Self Evaluation Report NVAO identifies in chapters 10 two points of attention of the accreditation system with regard to standard 2.3:

- ‘Interference’ resulting from the layering of the assessment system (SER, par. 9.4.2). Absence of clustered assessments of programmes at universities of applied science, only in The Netherlands (SER, par. 9.4.3).

The Self Evaluation Report also identifies in chapter 10 two weaknesses of NVAO:

- Realising consistency in decisionmaking (SER, par. 9.6.1).
- ‘Interference’ as a result of NVAO’s pro-active attitude (SER, par. 9.5.1).

5.3.2 Analysis

It is clear that there is interference due to the layering of the assessment system (three tier system). The Self Evaluation Report in par. 9.4.2 relates this interference especially to the free market situation in The Netherlands. Although there is logic in this, the committee notices that there are complaints about interference also in the Flemish situation where there is no free market. The issue of ‘interference’ warrants discussion, but not with regard to standard 2.3, because while there are inconsistencies in the process of gathering additional information by NVAO while evaluating panel reports (the above mentioned ‘unpredictability’), there are no indications that this interference has led to inconsistency in the final accreditation decisions. Given the fact that NVAO accredits on the basis of ‘threshold quality’¹⁸ inconsistent decisions are anyhow less likely. Also the description of the process and the number of people involved (see paragraph (5.3.1)) seems geared to promoting consistency.

The committee concludes that the issue of interference and ‘unpredictability’ of NVAO refers only to the process of NVAO investigating the work of the agencies and does not refer to inconsistency in the decision making (even though NVAO relates the issue of interference to standard 2.3) and so does not refer to standard 2.3. The committee discusses this matter in paragraph 4.3.

There is indeed absence of clustered assessments of programmes at universities of applied science in The Netherlands. While the committee agrees with NVAO in considering this a weakness, there is no indication that absence of clustered assessments leads to inconsistency in the accreditation decisions. Given the fact that NVAO accredits on the basis of ‘threshold quality’ inconsistent decisions are anyhow less likely. The committee concludes that the absence of clustered assessments does not imply non-compliance with standard 2.3.

The Self Evaluation Report states in chapter 10 that ‘Realising consistency in decision-making’ is a weakness, referring to paragraph 9.6.1. That paragraph identifies consistency in decision making however as a ‘point of attention’ given the very large number of programmes that have yet to be accredited, and not as a weakness. The committee agrees that consistency should be a point of attention, but this fact does not imply non-compliance with standard 2.3. Furthermore, NVAO has taken various measures to enhance and secure consistency in decision making, internally¹⁹ and externally.²⁰

¹⁸ The SER uses the term ‘generic quality’ which in the opinion of the committee is not an adequate translation of the Dutch term ‘basiskwaliteit’; the committee therefore uses the term threshold quality.

¹⁹ E.g. the use of handbooks and the four eyes principle.

²⁰ E.g. the Protocol for Quality Assessment Agencies.

There is evidence of interference due to NVAO's 'pro-active' attitude, although in the view of the committee and in the experience of the institutes and quality assessment agencies the difference with interference due to the 'layering' of the system is not great. As said before, the parties involved do not contest NVAO's validation role during decision making; they wish more predictability in the process and that more would be done to bring in an element of 'trust' in the process. The committee dwells further upon this in paragraph 4.3, and concludes here that there is no indication that said pro-active attitude in fact leads to inconsistency in the accreditation decisions.²¹

5.3.3 Conclusion

NVAO fully complies with ESG 2.3.

5.4 ESG 2.4 Processes fit for purpose

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

5.4.1 Description

The Self Evaluation Report describes in great detail the processes. It is a system consisting of three layered steps. First, the institution writes and a self-evaluation report (in the case of accreditation) or a programme dossier (in the case of initial accreditation). Then there is the actual site visit and the assessment of the programme by an independent panel, composed by the quality assessment agency (not being the NVAO²²). The third step is the decision-making by NVAO on the basis of the panel report submitted to them by the institute. At any moment during the course of this process, the institution can decide to withdraw its application.

If NVAO takes a negative accreditation decision, the institution will be granted an improvement period. In case new programmes want to receive public funding, the initial accreditation procedure will (in The Netherlands) be followed by a macro-efficiency check by the government. In Flanders this check precedes the initial accreditation.

Various internal instruments and procedures have been developed to handle the great amount of accreditation applications in a consistent way and as efficiently as possible. These were demonstrated to the committee.

In all the meetings parties told the committee that they are of the opinion that the NVAO does a good job within the given system. At the system level however they perceived some elements that make the system less fit for purpose. Two problems were identified:

²¹ It could be argued that in the case of initial accreditation (where there are far more negative decisions) the risk of inconsistency might be greater. On the basis of the meetings the panel concludes that 'interference' and 'pro-activity' are even

²² Only in most cases of initial accreditation the site visit and programme assessment is done by a panel from NVAO; in all other cases this is done by panel from separate agencies.

- The consequences of a negative decision for programmes in The Netherlands are very harsh: the programme is not definitively terminated (as the institution is granted a two year improvement period) but the programme is no longer funded and can no longer enrol first-year students. In Flanders, a negatively accredited programme can be granted (by the Flemish government) a statutory repair period during which funding is continued and students may still be enrolled. In various meetings parties pointed out that the Dutch system leads to high insecurity and to various strategies of risk reduction, not only by the institutions but also by the assessment panels who may be reluctant to stress negative points or to formulate recommendations for fear that these might be viewed by NVAO as grounds for extra validation or verification or even lead to a negative decision. In fact, the NVAO executive board admits (in the Self more common in cases of initial accreditation but there is no evidence of inconsistency in the decision making).

Evaluation Report confirmed this in discussion to the committee) that they indeed had this perception in the first period.
- In The Netherlands new programmes that apply for public funding have to be initially accredited before the so called macro efficiency check to decide about the funding. As only a small proportion of programmes pass the macro efficiency check, and many of the proposed programmes cannot be offered without public funding, this procedure obviously leads to a substantial waste of time, energy and money in the preliminary process of initial accreditation. All parties the committee spoke to agree that the Flemish procedure (where new programmes must first pass the macro-efficiency check before they can apply for initial accreditation) is preferable. The committee has learned that the position of the macro-efficiency check will be altered in The Netherlands, starting in July 2008.

5.4.2 Analysis

From the discussions in the meetings it is evident that the lack of a repair period (without the loss of funding and the right to enrol students) is indeed not fit for purpose. These consequences are too harsh and do indeed - as is confirmed by umbrella organizations of institutions and by quality assessment agencies - lead to risk avoiding behaviour and at least to some extent to mitigation of criticism and recommendations in the panel report. There is however no indication that this reluctance to formulate recommendations in the report could lead to false positives in the accreditation decisions.

All concerned parties (NVAO executive board included) definitely have the impression that the lack of a repair period weakens the improvement function. NVAO has discussed this with agencies and umbrella organizations and would like to see more attention paid to recommendations in the panels' reports, but the committee perceived that there is still hesitation to take this step. The committee considers possible underlying mechanisms in paragraph 4.1 and 4.3.

As the accreditation system in The Netherlands and Flanders is basically an accreditation system with threshold quality as central criterion, this shortcoming is formally speaking acceptable. Furthermore the shortcoming is not to the effect that there is no or hardly any improvement period. Therefore this issue does not imply non-compliance with standard 2.4.

It is fairly evident to the committee that the position of the macro-efficiency check in the whole process is not optimal. It leads to a waste of time, energy and money. However, as the position of the macro-efficiency check in the HE system in The Netherlands is regulated by law and NVAO has no role in this check, this cannot weigh negatively upon the assessment of standard 2.4.

5.4.3 Conclusion

NVAO fully complies with standard 2.4

5.5 ESG 2.5 Reporting

Reports should be published and should be written in a style that is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

5.5.1 Description

Both the (initial) accreditation reports and the underlying panel reports are all published and available for the general public on the NVAO website. Publication occurs only when the decision is finalized. Institutions can appeal (internally and externally) and during this period neither the intended decision nor the underlying panel report is published. Students have re-marked in the meeting with the committee that they would like to see this information published as it could be valuable information in the process of deciding which programme to follow.

Representatives of both students and umbrella organizations of institutions have the very strong impression that the decisions and panel reports are not widely read outside the circle of managers within the institutions. In their view this follows from the fact that all funded programmes available for study must be accredited by law and, therefore, students could come across a non-accredited programme in the private sector only. It was mentioned that students very rarely check the accreditation status of a programme before they register.

The system relies furthermore on threshold accreditation, so there is relatively little (or even no) comparative information available in the published documents with regard to differentiation in quality. The committee has heard no complains about style and accessibility of panel reports and accreditation decisions.

The accreditation decisions have legal consequences and can be contested in court. All draft decisions are carefully scrutinized by a lawyer before they are finalized. Therefore the decisions are characterized by a rather formal style. Because of legal requirements, decisions regarding Flemish programmes are relatively more elaborate and legalistic.

5.5.2 Analysis

All reports and decisions are easily available to the general public. The students wish to have information about intended, negative decisions. The committee understands that this is formally impossible and not feasible given the negative consequences that publication of such a decision may have in case an appeal procedure is lodged and leads to overturning the initial accreditation decision.

The formal and even somewhat legalistic nature of the accreditation decisions is not conducive to NVAO's public information function, but the committee understands that there is hardly any possibility to change that.

5.5.3 Conclusion

NVAO fully complies with standard 2.5.

5.6 ESG 2.6 Follow-up procedures

Quality assurance processes which contain recommendations for action or which require a subsequent action plan should have a predetermined follow-up procedure that is implemented consistently.

5.6.1 Description

The accreditation system in Flanders and The Netherlands consists of threshold accreditation. This implies unconditional and dichotomous (positive - negative) decisions. Therefore, the decisions contain no recommendations for action and require no action plan that has to be executed as a condition for a subsequent positive accreditation. There is just a negative accreditation decision and the institution can be entitled to an improvement period during which the institution can improve the programme.²³ An institute can of course benefit from the panel's motivations (and sometimes recommendations) concerning the standards that are negatively assessed.

An element in the accreditation procedure is that in the self evaluation report the institution accounts for what has been done regarding shortcomings and recommendations recorded in the panel report of the last visitation/accreditation.

There have been however remarks (by umbrella organizations of institutions and by the quality assessment agencies) that there is - especially in the Dutch situation, due the harsh sanctions in case of a negative accreditation

- some hesitation to formulate non-essential criticism and recommendations given NVAO's 'interference' and 'pro-activeness'.

5.6.2 Analysis

Given the principle of threshold accreditation there is logic in unconditional and dichotomous accreditation decisions. This does certainly not have to exclude the possibility of repair during an improvement period, but in the given system NVAO is not responsible for making recommendations or for developing, authorizing or implementing action plans. The responsibility for improvement lies solely with the institution; after the improvement period a new site visit will be held, leading to a new decision.

Strictly speaking there are no quality assurance processes in terms of standard 2.6 under responsibility of NVAO. Therefore NVAO cannot act in contradiction to this standard and so must be considered compliant.

The committee treats the element of 'interference' and 'pro-activeness' also in paragraphs 4.3 and 5.3. Suffice it to state here that there is indeed (as was also confirmed by NVAO) some erosion of the improvement function, but not to the point where it would be obsolete; furthermore, the standard does not refer directly to this matter.

There is however the matter of recommendations in the panel reports. One of the problems frequently mentioned to the committee is the negative incentives in the current NVAO system for accrediting agencies to provide

recommendations for improving/strengthening programmes to the institutions. The committee refers to reports of NVAO interpreting improvement recommendations as weaknesses, to the use of side letters to avoid arousing the suspicion of the NVAO, and to the overly legalistic format of the reports that reportedly discourage peers from offering suggestions for improvement.

²³ As said earlier the regulations differ between Flanders and The Netherlands.

This is relevant with regard to this standard, because if such recommendations appeared in the published accreditation reports they would permit future panels accrediting the same programme to follow up on the extent to which these recommendations were implemented and thereby help the overall accreditation process to better meet this standard. It should be noted though, that the panel recommendations in no case have a conditional character as accreditation must always - in the Dutch and Flemish system - be unconditional. Therefore, the matter of the recommendations does not imply a less than full compliance to standard 2.6.

See also the discussion and recommendation of the committee in paragraph 4.1.

5.6.3 Conclusion

NVAO fully complies with ESG 2.6.

5.7 ESG 2.7 Periodic reviews

External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

5.7.1 Description

(Initial) accreditation within The Netherlands and Flanders is undertaken on a cyclical basis. The length of the various cycles differs. Accreditation takes place once every six years in The Netherlands and once every eight years in Flanders. In the case of new programmes, the accreditation is valid for six years (The Netherlands) and four years (Flanders) after the beginning of the programme. These cycles are clearly stipulated in Dutch and Flemish legislation and were published in advance

In the Self Evaluation Report NVAO advocates a harmonization of the cycles as follows: four year duration for an initial accreditation and six year cycle for accreditation.

The topic of harmonizing the cycles was discussed in various meetings. Umbrella organizations of institutions are generally in favour of longer cycles in order to reduce costs and administrative burden.²⁴

5.7.2 Analysis

Compliance is evident.

The committee feels that in a bi-national system a harmonization of cycles terms would be preferable. The committee elaborates on this matter in paragraph 4.4.4.

5.7.3 Conclusion

NVAO fully complies with ESG 2.7.

5.8 ESG 2.8 System-wide analyses

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

²⁴ In fact the committee understood that this was the reason in Flanders not to adopt the Dutch six year cycle for accreditation.

5.8.1 Description

The Self Evaluation Report lists a number of activities of the NVAO with regard to this standard: visits to institutions, participation at conferences and workshops, publication of newsletters. Also is mentioned that there are many clustered assessments leading to comparative description and analysis (by the panels that execute the assessment - not directly by NVAO). In the week of the site visit NVAO presented the findings of a Research master review that investigated the significance of research master programmes for the universities in The Netherlands. A similar conference on the development of professional master courses in The Netherlands was scheduled shortly after the Committee's site visit.

In the meetings standard 2.8 has not explicitly been discussed, but the parties expressed their opinions about the outcome in terms of added information about programmes individually and in comparative respect. The umbrella organizations of institutions and the student representatives mentioned that this outcome is somewhat meagre. Representatives of institutions argued that threshold accreditation has little extra information value as the overwhelming majority of the (publicly funded) programmes are above threshold level. They would prefer a system leading to more transparency about quality levels or characteristics above threshold level and about differentiation between programmes - though they oppose an evolution in the direction of (international) ranking. Students also stated that they wanted more differentiating information.

Another topic raised in the meetings with umbrella organizations of institutions and with the quality assessment agencies, was that NVAO does not (publicly) reflect upon the experience of the 1.350 accreditations that have been conducted to date. There appears to be no regular, formal publications of updates, guidelines, or recommendations with regard to the interpretation and operational aspects of the NVAO processes and procedures to help guide the actions of the accrediting agencies. Instead there were reports of many individual and uncoordinated contacts between the NVAO staff and the accrediting agencies as a means of conveying procedural information. While one might expect transparency and consolidation to increase over time, there appeared to be no perceivable improvement with regard to the amount and type of 'interference' and 'pro-activity' (see paragraph 5.3).

5.8.2 Analysis

As the description shows, NVAO contributes to the goals underlying standard 2.8. The substantial contribution however seems to stem from the comparative descriptions and analyses in reports from clustered assessments. Clustered assessment is the rule for all programmes in Flanders and for the university programmes in The Netherlands. Of course there is no need for NVAO to duplicate activities, but NVAO could fill the lacuna with regard to the programmes of the Dutch universities of applied sciences (where no comparative clustered assessments are done) and could draw up meta-analyses on the basis of clustered assessments.

The committee feels that NVAO could (and should) do more with regard to this standard. The extensive NVAO report on the Research Masters does provide evidence of a relevant capacity for systemwide analysis within the NVAO, but also raises the question of strategic priorities - why is so much time and effort being spent on this supplementary, less immediate issue, when so little effort appears to have been given to date on learning from and providing information to the agencies and institutions on means of improving the core processes of accreditation?

In discussion with the committee the NVAO executive board stated that NVAO would gladly produce system-wide analyses if asked to do so by the government. The reluctance to produce system-wide analyses was related to a hesitation to participate in the public debate given NVAO's role as a public decision maker. This fits in with NVAO perceiving itself primarily as an executive body, working upon instruction of the government. However, the standard requires agencies to produce system-wide analyses irrespective of a government instruction to do so. NVAO's attitude in this regards surprises the committee somewhat given their pro-active orientation in other respects. In the Self Evaluation Report NVAO does (rightly so, according to the committee) state that it's 'informative role in respect of students, the labour market and society' is a point of attention. The committee is convinced that more attention for system-wide and comparative analyses would be beneficial for this information function, especially since umbrella organizations of institutes and of students have made remarks in that direction.

The committee considers here also the various complaints heard about NVAO's 'interference' (see also paragraph 5.3) and the fact that the relationship between NVAO and quality assessment agencies is characterized by certain tensions (see also paragraph 4.3). This also would warrant a system-wide analysis - as NVAO in fact touches upon in the Self Evaluation Report. The committee however takes into account that NVAO is a relatively young agency, that the system is only a few years in operation and therefore has not produced much evidence for general analysis, that NVAO has a stated intention to embark on this kind of analysis in the years to come and that NVAO takes steps (e.g. the Research master project) to comply more to this standard.

5.8.3 Conclusion

NVAO partially complies with ESG 2.8.

5.9 ESG 3.1 (and section 2)/ENQA criterion 1: Use of external QA procedures

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

5.9.1 Description

There are - except in most cases of initial accreditation²⁵ - always two layers of external quality assurance:

- The external review of the programme by a panel from one of the quality assessment agencies.
- The external validation of the panel report by NVAO.

By means of the various accreditation frameworks and the Guidelines for recognition of Quality Assessment Agencies, and given its own validatory role in the process, NVAO warrants that effective external quality assurance processes are present.

In none of the meetings the committee has heard any remarks to doubt the full compliance with this standard.

5.9.2 Analysis

See the analyses on the standards of Part 2 of the European Standards and Guidelines in paragraphs 5.1 up to and including 5.8. Although the committee has made critical remarks with regard to standard 2.8, this is no reason to withhold the judgement of full compliance.

²⁵ As a rule the assessment is done by a NVAO panel; in The Netherlands it is however possible that an institution contracts one of the quality assessment agencies to assess the new programme.

5.9.3 Conclusion

NVAO fully complies with ESG 3.1.

5.10 ESG 3.2/ENQA criterion 2: Official status

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

5.10.1 Description

The position of NVAO is explicitly and formally regulated in the legislation of both countries.²⁶

From the meeting with representatives from the Committee of Ministers, and also from all the other meetings, it is evident that NVAO is regarded by all parties as a competent public authority.

The Self Evaluation Report makes it clear that NVAO strives to comply as fully as possible with the various legal requirements that may apply. In meetings with the executive board and NVAO staff, it became evident that lawyers play a significant role in this process. In the Self Evaluation Report NVAO describes its involvement and contributions within the European Higher Education Area.

5.10.2 Analysis

That NVAO operates on a clear legal basis can easily be established. The committee has not consulted other public authorities in the European Higher Education Area but it is evident from the description in the Self Evaluation Report (and individual members of the committee can attest to that) that NVAO is internationally regarded as an agency with responsibilities for external quality assurance.

There have been remarks (in meetings with the executive board and the umbrella organizations of institutions) that legal requirements (especially because institutions can appeal in court) tend to somewhat dominate, leading to more formalistic and legalistic decision documents and perhaps also distracting from a more content- and improvement-oriented approach. Although this issue is not pertinent to the evaluation of standard 3.2, it merits further discussion by the committee; see paragraph 4.1.

5.10.3 Conclusion

NVAO fully complies with ESG 3.2.

5.11 ESG 3.3/ENQA criterion 1: Activities

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

²⁶ In The Netherlands, the tasks of NVAO are based on the Law regarding Higher Education and Research which, in short, comes down to: the accreditation of higher education programmes that are already offered in The Netherlands, initial accreditation of new programmes and giving advice on other matters concerning higher education policies.

5.11.1 Description

It is evident that NVAO undertakes external quality assurance activities on a regular basis and that is its core business, as evidenced by the 1.350 programmes that have been accredited so far. Within the current system, these are focused on the programme rather than the institutional level although it follows from the various accreditation frameworks that aspects of institutional quality are considered in programme assessments.

5.11.2 Analysis

In a vast majority of cases the actual programme assessment is not directly being executed by NVAO but by panels from independent quality assess-

In Flanders, the operation of NVAO is established by the Law regarding the Higher Education Structure. This provides the legal basis for an international treaty that appoints the body that grants accreditations and carries out initial accreditation procedures. It stipulates that bachelor and master's programmes can only be offered by recognised institutions and if they have been (initially) accredited.

ment agencies. NVAO validates these assessments, not just in a formal and marginal way, but on the basis of an independent judgment. In parallel, there are a number of assessments that are done by NVAO panels. This concerns a substantial number of initial accreditations. Recently NVAO has executed the assessment and accreditation of associate degree programmes, which may be offered by Universities for applied science/University Colleges in The Netherlands during an experimental period. Because of the specific, layered system in The Netherlands and Flanders, NVAO is perhaps not a typical external quality assurance agency, which will be reflected in the range and division of assessment and accreditation activities, but its core business definitely consists of external quality assurance activities.

5.11.3 Conclusion

NVAO fully complies with ESG 3.3

5.12 ESG 3.4/ENQA criterion 3: Resources

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

5.12.1 Description

NVAO is financed both by The Netherlands and Flanders (60% by The Netherlands and 40% by Flanders) and has an annual budget of approximately € 6 million. The total work force is about 35 fte. NVAO has four full time members of the executive board. The office is located in The Hague.

The committee was favourably impressed by the NVAO office and the facilities. The quality of the Self Evaluation report, the perfect organization of the site visit and the support given to the committee all attest to quality of the staff. The committee also saw a demonstration of the tailor made software application NVAO uses (together with several procedural handbooks) for controlled processing of all accreditation applications.

In all meetings the discussion partners of the committee have stated that the quality of the staff is good to excellent and that the NVAO generally does quite a good job in handling the applications. Of course there is criticism at the system but this needs not be taken into account with regard to present standard.

One relevant criticism that has been made by umbrella organizations of institutions but also by NVAO in the Self Evaluation Report is that timeframes are regularly exceeded. In annex 3 of The Self Evaluation Report NVAO provides an analysis of the exceeding of time limits.

Finally many remarks have been made about the total costs of the system. This pertains not directly to this standard, but it is relevant to weigh the NVAO resources against the contribution by quality agencies and the institutions.

5.12.2 Analysis

The fact that time limits are transgressed is not due to shortage of resources; in periods of peak loads NVAO hires additional staff.²⁷ The reason is that the processing takes time, especially if additional information is needed. There is a relationship here with the issue of „interference“ and ‘pro-activity’ by NVAO as is shown in the analysis in the Self Evaluation Report.²⁸ The committee discusses that elsewhere (see paragraph 4.1 and 4.3). The analysis provided in the Self Evaluation Report shows that there are also other reasons (lying outside of NVAO).²⁹ Another reason for exceeding time limits lies in the fact that the Dutch applications (so far the overwhelming majority of cases) are not spread evenly over the year; most of these are handed in the month December, leading to a substantial peak burden.

This criticism about the time limits and its analysis in the SER are based on the Dutch experience since at the time of drafting the SER only less than 40 accreditations had been performed in Flanders. There is however a double discrepancy between the Dutch and Flemish legislation when it comes to time limits. Firstly, art. 5a.9, 4 of the Dutch Law on HE and scientific research imposes a time limit of 3 months, while art. 60, §1 of the Flemish decree concerning the restructuring of HE imposes a time limit of 4 months. Secondly, the time limits in the Dutch law are of what is called an orderly nature (“ordettermijnen”). This means that they only give an indication about the time frame within which a decision has to be reached by NVAO. If NVAO exceeds the time limit there are no sanctions. In the corresponding article in the Flemish decree the time limits are of what is called a decay nature (“vervaltermijnen”). If the NVAO exceeds the time limit, there is a sanction and this sanction is the automatic extension of the earlier accreditation decision for a certain period. It is clear that this makes for a bigger stimulus for the NVAO to respect the time limits in Flanders.

²⁷ Applications for accreditation are not evenly spread over the year; about 60 percent of the Dutch applications are handed in in the month December.

²⁸ The following reasons for exceeding the time limit can be related to the issue of ‘interference’ and ‘pro-activity’:

- additional questions after the content analysis.
- additional assessments were requested.
- reports were rejected and the applications had to be resubmitted later with a new quality assessment agency report; the committee remarks that this of course can also be caused by inherent weaknesses in the quality of the report
- hearings.
- verification committees.

²⁹ This regards the following reasons for exceeding the time limit:

- file was not complete, additional information requested.
- substantive comments from the institution about the intended decision
- clustered processing of applications.
- reports were rejected and the applications had to be resubmitted later with a new quality assessment agency report.
- quality assessment agency reports submitted later than the application.

The committee feels that a harmonization of (the character of) the time limits is advisable, in order to avoid that Flemish applications are structurally processed more quickly than Dutch applications.

Not directly related to this standard, but relevant to mention is that the umbrella organizations of the institutions complained extensively about the total costs. They refer to the costs of the quality assessment agencies and their panels and to the internal costs (implementing quality assurance systems, drawing up of self evaluation reports, organising panel visits).

The committee could not get a reliable picture of the total costs, but institutions mentioned an amount of € 50.000 per programme (costs of agency and internal costs). This must be related to the validity (6 year in The Netherlands and 8 years in Flanders) and of course also to the number of students in the programme. It follows that in particular for small (master) programmes accreditation can be relatively expensive).

The debate of the (division of the) costs could be related to the layering of the system; see also paragraph 4.3. For the present standard this is without consequences.

5.12.3 Conclusion

NVAO fully complies with ESG 3.4.

5.13 ESG 3.5/ENQA Criterion 4: Mission statement

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

5.13.1 Description

The complete text of the NVAO mission statement is as follows: "The Accreditation Organization of The Netherlands and Flanders (NVAO) independently ensures the quality of higher education in The Netherlands and Flanders by assessing and accrediting programmes and contributes to furthering this quality. In addition, NVAO contributes to raising quality awareness within higher education and advancing the position of higher education in The Netherlands and Flanders in the national and international context."

The mission statement is not explicitly discussed in the meetings; however in none of the meetings (including the discussion with the representatives from the Committee of Ministers) remarks have been made that would suggest criticism of the mission statement or a transgression of the mission statement by the actual activities of NVAO.

5.13.2 Analysis

The mission statement is publicly available and is consistent with the goals and objectives set for the NVAO in the accreditation legislation of both countries.

5.13.3 Conclusion

NVAO fully complies with ESG 3.5.

5.14 ESG 3.6/ENQA Criterion 5: Independence

Agencies should be independent to the extent that they have both autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

5.14.1 Description

Legislation grants NVAO an independent and autonomous position. Of course NVAO has to operate within the system as it is given in the legislation. The Committee of Ministers supervises the functioning of NVAO, but has no power over NVAO operations or decisionmaking. In Flanders the Minister has the authority to overrule a NVAO decision, but this does not affect the decision itself; it is an act after NVAO had made its decision.

Representatives of the Committee of Ministers have confirmed to the committee that NVAO is an independent executive body and not a government body subject to direct political influence on decision making in individual cases.

NVAO employs rules that board and staff members will not be involved in the processing or decision making of applications from institutions that they have been associated with in any form over a certain period.

In none of the meetings was hinted at a possible lack of independence or at any indication of third party influence upon NVAO decision making.

5.14.2 Analysis

The committee is convinced that autonomy and independence are adequately guaranteed. Given the procedures the possibility of third part influence can effectively be ruled out:

- The processing of the applications is for instance highly formalized; all steps are controlled and archived by the software application NVAO uses.
- Every application is handled from the start by a team of a policy advisor and an executive board member, who both should have had no association with the applying institution for a number of years. Often one or two others persons are involved in the period before the application is scheduled for discussion in the executive board.
- At least at one point in the process there is a careful check by a lawyer.
- Every decision is discussed at least once in the executive board (four members, disposing of all relevant documentation) and every decision is validated by the general board.

Even if there were at any stage a certain amount of influence, it is highly improbable that it effectively could lead to a false positive.

5.14.3 Conclusion

NVAO fully complies with ESG 3.6.

5.15 ESG 3.7/ENQA Criterion 6 & 8: External quality assurance criteria and processes

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:

- A self-assessment or equivalent procedure by the subject of the quality assurance process.
- An external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
- The publication of a report, including any decisions, recommendations or other formal outcomes.

- A follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

5.15.1 Description

Processes, criteria and procedures used by NVAO are predefined and publicly available; this has already been established in 5.2 and 5.3.

In the (initial) accreditation procedure the first three steps mentioned in the standard can clearly be distinguished:

- The first step is the writing and submission of the self-evaluation report (in the case of accreditation) or the programme dossier (in the case of initial accreditation) by the institution.
- The second step is the actual site visit and the assessment by an external panel of a quality assessment agency.
- The third step is the decision-making by NVAO on the basis of the panel report. Report and decision are made public.

The fourth step (follow-up procedure) is not present as conditional accreditations are not possible within the Dutch and Flemish system. The committee has already discussed this in paragraph 5.6.

Student representatives have remarked that they would like to see a student member in panels for initial accreditation, which is now not the case. In cases of regular accreditations there is always a student member in the panel. NVAO executive board has explained that there is no student in initial accreditation panels as there is not yet a running programme with students enrolled.

5.15.2 Analysis

The committee refers to paragraph 5.2, 5.3 and 5.6.

The committee has no strong feelings about the student position in initial accreditation panels (in the sense that it might be considered a weakness), but points to the fact that the function of initial accreditation is to lead to a programme that will have students and that students could very well comment sensibly on various standards of the framework in a panel for initial accreditation. In this regard, the committee refers to the situation in Flanders where there is a student member in the Recognition Commission which performs the macro-efficiency check on behalf of the Flemish government. The macro-efficiency check in Flanders is the first step in the procedure by which a HEI can be granted the right to organize a new programme leading to a legally recognised bachelor or master degree. Initial accreditation is the second step. If students are included in the first step, why then not include students in the following concrete assessment of the potential quality of the proposed new programme?

5.15.3 Conclusion

NVAO fully complies with ESG 3.7.

5.16 ESG 3.8/ENQA Criterion 7: Accountability procedures

Agencies should have procedures in place for their own accountability.

5.16.1 Description

Both in The Netherlands and Flanders, institutions can lodge an appeal against (initial) accreditation decisions taken by NVAO. The appeal procedures are stipulated by law. There is the possibility of internal appeal (appeal at NVAO) and external appeal (appeal at court). Regulations and procedures differ between Flanders and The Netherlands. There have been a relatively small number of internal and external appeals.

From the outset, NVAO has developed a system for its internal quality assurance. Only recently this has taken on a more structured and cyclical character as one might expect for this type of agency. In fact this system only became operational in 2007 and must still prove itself.

Accountability is also determined by the way in which the various stake-holders are involved. In the structure of the NVAO the Advisory Council is of importance. This council consists of eleven members who represent NVAO's stakeholders. The Advisory Council's primary task is to provide advice - solicited or unsolicited - to NVAO on the general policy of NVAO. The Advisory Council meets twice a year on average. The Dutch members of the Advisory Council are appointed on the recommendation of the following organizations: The Netherlands Association of Universities of Applied Sciences (HBO-raad), the Dutch National Students Association (ISO), the National Union of Students (LSVb), the Platform of recognised private institutions (PAEPON) and the Association of Universities in The Netherlands (VSNU). The Flemish members of the Advisory Board are appointed on the recommendation of: the Flemish Interuniversity Council (VLIR), the Council of Flemish University Colleges (VLHORA), the National Union of Students in Flanders (VVS) and the Flemish Social and Economic Council (SERV). The committee has had a meeting with this council. Several statements made in other meetings (especially with the umbrella organizations of institutions) point to the fact that - although both board and staff members are open and accessible - NVAO seems somewhat 'insulated' when it comes to more formal communication about various aspects of the processes and operations.

The committee has for instance already mentioned the fact that 'great vagueness and uncertainty' were reported by some of the smaller agencies about the when, why and how of 'interference' (see paragraph 5.3).

5.16.2 Analysis

The committee considers the appeal procedures in balance with the interests that are at stake for the institutions. The committee has received no indication of any flaw in the appeal system. In the meeting with student organizations the criticism was mentioned that information about intended negative accreditation decisions ought to be public. In the present situation only final decisions are made public. The committee has touched upon this issue already in paragraph 5.5.

Experience with the internal quality assurance and evaluation system is understandably scarce, given the fact that it became operational in 2007. Nevertheless, there is a structured and differentiated system. From the presentation the committee received during the visit, the impression is that it is a rather 'heavy' and all-embracing system. The system should be granted the time to prove itself, but in the process a strategic priority on the core processes might be sensible.

The NVAO Quality Assurance Protocols show that NVAO is developing an approach to internal quality assurance that could help address some of the reported weaknesses, particularly with regard to the improvement of relationships with the accrediting agencies. The committee notes the following stated objectives in the Protocol with regard to quality assurance in accreditation:

6. In 2006, the „reduction of the accreditation burden” will take shape. Measures will be developed to make the interaction between the various internal and external actors involved more efficient, more reliable and more transparent.
7. In 2006 and 2007, the procedures and actions will be examined internally to improve consistency, communication and the burden of tasks.”

That said the committee still has some remarks to make. The documents suggest internal Quality Assurance activities were underway during 2006, but the committee heard little evidence of this. Furthermore the Quality Assurance Protocols all appear to have been recently approved (April 2007), although the referenced dates may represent recent actions taken on policy documents adopted at an earlier time.

Furthermore, the listed performance indicators for Accreditation emphasize ‘satisfaction’ with the process by the various parties. The public interest in accreditation (as well as the stated mission of NVAO), is not that relevant parties are satisfied, but that the process actually helps assure and improve academic quality. The test to NVAO of identifying performance indicators to measure such improvement is challenging, but no more challenging than what NVAO is asking of the institutions.

Finally, these Protocols, similar to the related internal Quality Assurance discussion in the SER, appear to give equal weight or importance to all internal Quality Assurance processes: initial accreditation, accreditation, international activities, management processes, etc. It should be obvious that internal QA on the accreditation processes is the highest and most immediate priority. Logically, strategic priorities should be established in implementing these internal QA processes, with the less important processes being phased in at a later point in time. The committee saw little evidence of this type of strategic priority setting during the visit and in the materials presented.

The committee has discussed the position of the Advisory Council to some length. Strictly speaking the discussion reflects more than just the topic of accountability and touches also upon the topic of governance. Given an executive board of four full time members meeting weekly and a general board of twelve members (including the executive board members) meeting once a month, the stakeholders in the Advisory Council (consisting of nine members and meeting two to three times a year) are in a rather weak and detached position and - such was the committee’s impression - is primarily reacting to an agenda set by the executive board.

The Advisory Council members have no clear relationship with the respective stakeholders’ parties and do not effectively function as a communications channel in that direction.

The committee strongly feels that NVAO might benefit more from a stronger and better positioned Advisory Council. More formal lines of communication with stakeholders are in order.

In this respect the question was raised whether it might not be helpful to have stakeholder members on the General Board. Especially student representatives made a point of this in the meeting with the committee. In discussion with the committee the executive board strongly opposed this suggestion upon the grounds that it would affect the independency of the board and might lead to undesirable forms of influencing in specific cases. The arguments put forward by the executive board do not convince the committee as there are well known procedures to safeguard influencing (procedures NVAO in fact practices already in cases that might involve a conflict of interest given former positions of board and staff members).

Furthermore, the committee feels that board positions for stakeholder parties might very well contribute to a greater support and to a more active participation in the development of the system which may be a serious issue given the risk of substantially decreasing benefits in a heavy system of programme accreditation based on threshold quality. (This risk is mentioned by the committee in paragraph 6.16.2). The committee deems this a potential weakness, and therefore cannot conclude that NVAO complies fully with this standard.

The review panel advises the ministers and the NVAO to include relevant stakeholders that are not yet represented, in the General Board, especially students. The inclusion of students in the board is an international good practice to which moreover the ministers responsible for higher education adhered to in their 2003 Berlin Communiqué.

Finally, the committee comments upon the quality of the panel members as deployed by the quality assessment agencies). The committee learned that there is not much serious peer training by the agencies. Generally there is not much more than an orientation or a short training of chairs. This requires attention from NVAO.

5.16.3 Conclusion

NVAO substantially complies with ESG 3.8.

5.17 Active contribution to ENQA aims

12. The agency is willing to contribute actively to the aims of ENQA (ENQA membership criterion).

5.17.1 Description

See also paragraph 6.11.

NVAO is an active member of various international networks in accreditation and quality assurance. NVAO participates in the annual General Assembly and as a rule is present at ENQA Workshops. In the last few years NVAO has participated in the Transnational European Evaluation Project II (TEEP II) and organized the meeting of the General Assembly of 2006 in Brussels. One of NVAO's Executive Board members is also an ENQA board member.

5.17.2 Analysis

As stated in paragraph 6.11 it can be firmly established that NVAO plays an active role on an international scale. Committee members, active within ENQA, confirm the active contribution of NVAO with regard to the ENQA aims.

5.17.3 Conclusion

NVAO fully complies with this ENQA membership criterion.

6. Findings ECA Code of Good Practice Compliance

In evaluating NVAO compliance with the ECA code of good practice, the committee will - to avoid redundancy and repetition often refer to related ENQA standards.

- 6.1 *The accreditation organization has an explicit mission statement*
See paragraph 5.13.
Conclusion: NVAO fully complies with ECA code of good practice 1.
- 6.2 *The accreditation organization is recognised as a national accreditation body by the competent public authorities*
See paragraph 5.10.
Conclusion: NVAO fully complies with ECA code of good practice 2.
- 6.3 *The accreditation organization must be sufficiently independent from government, from higher education institutions as well as from business, industry and professional associations*
See paragraph 5.14.
Conclusion: NVAO fully complies with ECA code of good practice 3.
- 6.4 *The accreditation organization must be rigorous, fair and consistent in decision-making*
See paragraph 5.3 and 5.4.
Conclusion: NVAO fully complies with ECA code of good practice 4.
- 6.5 *The accreditation organization has adequate and credible resources, both human and financial*
See paragraph 5.12.
Conclusion: NVAO fully complies with ECA code of good practice 5.
- 6.6 *The accreditation organization has its own internal quality assurance system that emphasises its quality improvement*
See paragraph 5.16.
Conclusion: NVAO fully complies with ECA code of good practice 6.
- 6.7 *The accreditation organization has to be evaluated externally on a cyclical basis*
NVAO is cyclically being evaluated by an external review committee to comply with ENQA and ECA membership regulations. This report is the first external evaluation of NVAO since it was established. It is expected that NVAO will undergo cyclical evaluations as required. Conclusion: NVAO fully complies with ECA code of good practice 7.
- 6.8 *The accreditation organization can demonstrate public accountability, has public and officially available policies, procedures, guidelines and criteria*
See paragraph 5.1, 5.2 and 5.3.
Conclusion: NVAO fully complies with ECA code of good practice 8.
- 6.9 *The accreditation organization informs the public in an appropriate way about accreditation decisions*
See paragraph 5.5.
Conclusion: NVAO fully complies with ECA code of good practice 9.

6.10 A method for appeal against its decisions is provided

See paragraph 5.16.

Conclusion: NVAO fully complies with ECA code of good practice 10.

6.11 The accreditation organization collaborates with other national, international and/or professional accreditation organizations

6.11.1 Description

It will not come as a surprise that a bi-national agency as NVAO will have an explicit international dimension. The Treaty signed by the Dutch and Flemish governments by which NVAO was set up explicitly refers to the international dimension. An explanatory note underlines the importance of international transparency and independent quality assurance by stating that "a well functioning and internationally recognised accreditation system is a prerequisite to advance international comparability in higher education". The importance of the international dimension of NVAO has been stressed by the representatives of the Committee of Ministers in their meeting with the committee. The choice for co-operation between The Netherlands and Flanders fits with this international perspective. The Self Evaluation Report sums up the five major objectives NVAO has formulated as its international policy and describes the various activities undertaken by NVAO.

In all meetings parties stressed (to a greater or lesser extent) the importance of NVAO as a bi-national organization (as a first - albeit small - concretisation of the concept of a common higher education area). Sometimes it was expressed that an expansion with one or even more countries would be welcomed (although at the same time it was understood that the level of complexity would rise). The general feeling however in the meetings (those with NVAO board and staff excluded) was that the actual added value for institutes, student and labour markets is still relatively small.

6.11.2 Analysis

It goes unchallenged that NVAO is (fairly if not very) active in the international field. Committee members can attest to that on the basis of their own personal experience in the international field.

The committee is strongly of the opinion that it is valuable to have an effectively working bi-national agency. Despite certain shortcomings and even if the treaty would not be expanded or if the model would not be followed elsewhere, valuable lessons are to be learned from this Dutch-Flemish initiative.

It is easy to understand why the added value seems rather small to many of the discussion partners. Traditionally there has always been a relatively great cooperation between higher education institutions in The Netherlands and Flanders and there is already some mobility of students (though mostly one-way from The Netherlands to Flanders).

Another factor seems to be the fact that the system is based upon threshold accreditation. Most programmes meet these criteria and as only accredited programmes are on (publicly funded) offer there is as yet a limited impact for the general public and the labour market. The fact that there is a definite impact upon new programmes (via initial accreditation) is not readily obvious to the general public as this has no perceivable effect (because non-accredited programmes simply will not be started).

There is one area where the accreditation has a great impact and that is the private sector in The Netherlands. There is however no (substantial) private sector in Flanders offering bachelor and master programmes so this evident benefit of the system has no real bi-national relevance.³⁰ Of course these reflections do not detract from the ambition and contribution of NVAO in the international domain as are central in this element of the ECA code.

6.11.3 Conclusion

NVAO fully complies with ECA code of good practice 11.

6.12 Accreditation procedures and methods must be defined by the accreditation organization itself

6.12.1 Description

See paragraph 5.14.

6.12.2 Analysis

The aims and goals of the accreditation system are established by law. The formal establishment of the frameworks was done by the Dutch and Flemish ministers separately. The actual accreditation frameworks, procedures and methods have been developed by NVAO, within the boundaries of the two legislations. There has been no external political intervention in this process.

The committee feels that the way accreditation procedures and methods were defined is not in contradiction with the intention behind this element of Code of Good Practice.

6.12.3 Conclusion

NVAO fully complies with ECA code of good practice 12.

6.13 Accreditation procedures must be undertaken at institutional and/or programme level on a regular basis

See paragraph 5.7.

Conclusion: NVAO fully complies with ECA code of good practice 13.

6.14 Accreditation procedures and methods must include self-documentation/-evaluation by the higher education institution and external review (as a rule on site)

See paragraph 5.15.

Conclusion: NVAO fully complies with ECA code of good practice 14.

6.15 Accreditation procedures and methods must guarantee the independence and competence of the external panels or teams

See paragraph 5.14.

Conclusion: NVAO fully complies with ECA code of good practice 15.

³⁰ The extent of the private sector in Flanders is unknown, since until the decree of 2003 there was no registration procedure or tracking device. Since 2003 the degree titles of bachelor and master are legally protected and private HEI's wishing to grant them, have to be registered via a legal procedure and their programmes have to be accredited. At this moment there are only four registered HEI's.

6.16 Accreditation procedures and methods must be geared at enhancement of quality

6.16.1 Description

The committee refers to paragraph 5.1 and 5.4. There the committee concluded that procedures and methods are geared to the enhancement of quality. In the meetings with umbrella organizations of institutions and with quality assessment agencies it was confirmed that there is a positive influence upon the development of systematic internal quality assurance within the institutions. Furthermore there is agreement about the effect upon the quality of new programmes that institutions consider to offer. Despite remarks about 'interference' and 'pro-activeness' none of the parties present was of the opinion that NVAO is unduly harsh in the assessment of new programmes. Thirdly there is significant impact of the accreditation system upon the private sector.³¹ The quality enhancement function of the accreditation system is clearly visible in what is no less than a cleanup of a great many substandard programmes (many of which are withdrawn without even applying for accreditation) and in the enhancement of quality of the programmes on offer. There is ample evidence - as stated by the umbrella organization of the private sector and quality assessment agencies - of repair activities before and during the accreditation process.

Many parties (NVAO executive board included) however state that the improvement function for the majority of accredited programmes in publicly funded institutions is rather limited - which in the meetings was mostly blamed on the fact that the system is one of threshold accreditation. The committee doubts whether the quality improvement effects of the system will outlive the first round if this remains unchanged.

6.16.2 Analysis

There is evidently a positive effect of the accreditation system upon the (improvement of the) quality of the higher education programmes. Unfortunately the added value is not very visible, because it appears in a 'negative' way: new programmes that are not started, private programmes that are withdrawn, the implementation and development of internal quality assurance systems in the background.

There is definitively some impact on the quality of existing programmes, but that impact is limited due to the threshold character of the accreditation. Pruning 'bad' programmes is fine, but what is done to improve the quality of all the other programmes? For many institutions the ambitions rank higher than merely offering programmes just above threshold quality. And in the same vein students (and labour market parties) would prefer more comparative positioning of programmes vis-à-vis one another on different scales of quality although the representatives of the Flemish national union of students clearly stated that this should not lead to any sort of ranking. These ambitions are to be praised and deserve support, but the committee feels that is somewhat unfair to dismiss the initial impact on programme quality too quickly as only marginal.

³¹ This applies mostly to The Netherlands as in Flanders the private sector offering bachelor and master programmes is only marginal.

This being said, the committee also has the strong feeling that the system as it has been set up will show strongly diminishing results after the first cycle. In the mid-long term, a system based on threshold-based (relatively short) cyclical programme accreditation is bound to yield decreasing benefits relative to the high costs over time (see also paragraph 5.16.2). As already stated, this does not mean that it is a ‘wrong’ system. More probable, this is a quite logical first phase in a developing process. It encourages institutions to establish sophisticated internal quality assurance systems; it clearly defines the threshold level and it effectively and quickly ‘eliminates’ sub-threshold programmes. These are certainly no insignificant benefits, but they are not sufficient in the long run. After the first accreditation cycle, all programmes will be up to standard and from then on the evolution of the programmes is no longer served by a ‘negative’ system (discouraging the offering of sub-threshold programmes) but will probably need a positive approach (promoting the continuous improvement of programmes). This requires attention to institution-wide quality assurance (which the current programme-oriented accreditations do not emphasize). It also requires that NVAO analyses the initial accreditations as well as the programme accreditations it has thus far completed and publishes information on lessons learned including identifying good and bad practices. Such information would serve the public and should be shared by NVAO. These types of structured enhancement activities would help benefit and improve the entire higher education system, public and private. The committee saw relatively little evidence of structured enhancement activities by NVAO and this was reflected in the lack of systematic analysis of the accreditation processes that might be used to inform and improve the activities of institutions and quality agencies.

With regard to the element of the code under discussion, the committee evaluates NVAO on the basis of the stage the development of quality assurance in the two countries is in.

The committee has a few times pointed out that the principle of ‘threshold accreditation’ is in some respects not very conducive to the improvement function. This does not mean, however, that the procedure is merely formal and not at all content-oriented. In this respect the committee points for instance to the fact that in all cases (except of course initial accreditation), as was understood from the quality assessment agencies, panel members read and assess a number of student theses which is of course a strong content oriented assessment activity.

6.16.3 Conclusion

NVAO fully complies with ECA code of good practice 16.

7. Conclusions

In the letter of appointment to the members of the committee a fourfold assignment was given:

- "The review should establish that NVAO meets the criteria for full membership as laid down in Part 2 and 3 of the European Standards and Guidelines in Quality Assurance (ESG) in the European Higher Education Area, adopted by ministers in Bergen in 2005; part 1 being not applicable to NVAO."
- "The review should establish that NVAO meets the standards of the ECA Code of Good Practice."
- "NVAO is unique in being a bi-national accreditation organization. This implies that NVAO operates in two legislative contexts as a consequence of which various procedures and practices differ. We would welcome reflections of the review committee about the procedural and practical differences as well as any suggestions for further adjustments."
- "Both in The Netherlands and in Flanders an evaluation of the functioning of the accreditation legislation is foreseen. The findings of the review committee will then also be taken into account. This does not imply, however, that the review committee should review accreditation on a system level. The review only bears on the functioning of NVAO within the system, but we would welcome if the committee could dwell upon what we consider the most important function of the accreditation legislation, namely the enhancement of transparency and of public trust (on a national and international scale) in our systems of higher education."

In this final chapter the committee formulates the conclusions and recommendations for each of the four assignments.

7.1 NVAO compliance with ENQA/ESG

In the light of the documentary and oral evidence considered by it, the review committee is satisfied that, in the performance of its functions, NVAO is in compliance with the ENQA Membership Regulations and in substantial compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area. The Panel therefore recommends to the Board of ENQA that NVAO should have its Full Membership of ENQA confirmed for a further period of five years.

7.2 NVAO compliance with ECA Code of Good Practice

In the light of the documentary and oral evidence considered by it, the Review Panel is satisfied that, in the performance of its functions, NVAO is in compliance with the ECA Code of Good Practice.

7.3 Bi-nationality

NVAO is indeed a unique bi-national organization. The committee views the Treaty and the NVAO accreditation as a first example of a supranational higher education area. Of course it is not yet the envisaged European higher education area, but it is a step towards it and a step from which all European countries may learn.

The major lesson learned is that, notwithstanding all the legislative, political and cultural differences between two countries, it is possible to develop a common accreditation system that is working quite efficiently in actual fact, thereby enabling, in principle, effective mutual recognition of programmes and diplomas.³²

³² The Netherlands and Flanders have not yet made full use of the potential the joint accreditation system has. Neither in The Netherlands nor Flanders the degrees of the other country are automatically recognised. Graduates still have to file a re-quest with the relevant authorities and have to go through a recognition procedure. It is for the moment unclear whether the status of accredited programme will make recognition easier and smoother.

It may be true that impact and effects are for the time being greater on each national scale. These impacts are substantial:

- Further implementation and development of adequate internal quality assurance systems within institutions
- Rigorous application of the criterion of threshold quality, leading to a 'weeding out' of sub-threshold programmes - with notable effects upon the programmes offered by private institutions.
- The benefits programmes receive from cyclical peer review that go beyond the level of mere threshold quality.
- The significantly raised quality of proposals for new programmes.

It may be also true that impact and effects are for the time being less impressive on the bi-national scale. There was already much cooperation between Dutch and Flemish institutions and the common accreditation system does not add very much to that. There was also already some student mobility between both countries and there is no visible effect that this is being increased by the common accreditation system.

This however is not surprising as we are talking about a system based on threshold quality and given the fact that the overwhelming majority of (publicly funded) programmes are (well) up to that standard.

The committee feels that the added value of a common system might be increased if it were more geared towards a more clustered approach and towards quality enhancement above threshold level. While in the present system all programmes are in a certain sense made equal (i.e. of threshold quality) this would allow for more differentiation within the accreditation process. Also there is a need for analyses that would identify common issues and challenges. In the meetings umbrella organizations of institutions and student representatives were largely in favour of such a development. The committee has already stated that it is not very likely that the current system can be effectively continued as is after a first full cycle (see para-graph 5.16). In this respect it is somewhat unfortunate that the first cycle will end earlier in The Netherlands than in Flanders.

The committee has understood that there are various legislative, political and cultural differences between the two countries that should be taken into account. There seems, however, to be some room for more harmonization:

- In Flanders there is a legal protection of titles that is absent in the Dutch situation. The committee considers protection of titles a necessary pre-requisite for an accreditation system, certainly given the presence of private institutions offering HE programmes. See also paragraph 4.4.1.
- Sanctions in the case of a negative accreditation differ between the two countries. There is unanimous agreement among all parties consulted that the Flemish system (of a statutory repair period) should also be implemented in the Dutch system. See also paragraph 4.4.2.
- In The Netherlands new programmes that apply for public funding have to be (initially) accredited before there is the so called macro-efficiency check. As only few programmes pass the macro-efficiency check, a lot of time, money and energy are in fact wasted in the process of initial accreditation. All parties the committee spoke to agree that the Flemish procedure (where new programmes must first pass the macro-economic check before they can apply for initial accreditation) is preferable.

The committee has learned that the position of the macro-efficiency check will be altered in The Netherlands, starting in July 2008.

- The length of the accreditation cycles (validity of accreditation) differs between Flanders and The Netherlands. There appears to be no clear ground for this differentiation. The Committee therefore suggests a harmonization between the two countries as far as the standard validity of a granted accreditation is concerned. But at the same time the Committee suggests to grant NVAO powers to vary the period of validity and thus the length of the accreditation cycle according to considerations of proven quality. For a more elaborate treatment of these suggestions see chapters 4.4.4 and 7.5.
- Except for the sector of the Universities of applied science in The Netherlands, accreditation is based on clustered assessment. The committee is generally in favour of clustered assessment, because it adds valuable comparative information to the system of threshold accreditation. This however is not possible given the market situation in The Netherlands. Effective clustered assessment presupposes a monopoly situation as exists in Flanders and in The Netherlands for the universities. See also the reflection of the committee in paragraph 4.2. Although NVAO is bi-national, the quality assessment agencies are in fact organized on a national scale. The committee feels that the outcome of the system would benefit if there were clustered assessments on a bi-national scale.
- Different time limits apply for the Flemish and Dutch applications; also the sanctions (in case NVAO does not adhere to the time limit) vary. This could lead to a situation in which NVAO pays more attention to Flemish applications. A harmonization could prevent this. See also paragraph 5.12.2.
- External appeal differs between the two countries. If the Dutch and Belgian highest administrative courts were to take different positions regarding appeals, this could pose operational problems for the functioning of the accreditation system in practice and could enlarge rather than bridge the differences between the regulatory systems in both countries. A „joint venture“ could prevent this.

There is some disparity between the two countries. The Dutch HE system is substantially larger; the system was implemented at an earlier stage in The Netherlands and the NVAO office is located in The Hague. The committee feels that it is important to pay attention to such - politically sensitive - differences. It would be important for NVAO to pay special attention to the Flemish stakeholders who need to feel as much part of the organization as their Dutch counterparts.

7.4 Enhancement of transparency and public trust

The accreditation system should lead to more transparency with regard to the quality of programmes and to an enhancement of public trust in higher education. The system certainly contributes to these goals, but only to a limited degree:

- Institutions see by and large not much of added value in a system of threshold quality. They would prefer a system that can differentiate in quality above that level.
- Owing to the system all programmes that are offered are of threshold quality. There is therefore not really a need for students to consult reports and decisions as there is little differentiating information. Student representatives told that they have the impression that students hardly ever consult the NVAO register of accreditation programmes. They stated that the system would improve if more comparative and differentiating information were available. Dutch student representatives would welcome rankings; the Flemish student representatives oppose this.
- The committee had the impression that the system is welcomed by employers (organizations), though not many representatives were present in the meetings. Threshold quality is certainly important for them.
- In The Netherlands there is an extra benefit that the system extends to the private sector. This is important both for students and employers.

The committee however was surprised to learn that the bachelor and master titles are not protected by law in The Netherlands. Therefore the private sector can still offer non-accredited bachelor or master programmes. Of course students and employers can check whether any programme is NVAO-accredited, but the committee feels that a legal protection of titles is in order.

With regard to ‘trust’ the committee wants to address not only public trust in the system, but also the use of the element ‘trust’ within the system. There has been much discussion in the meetings about ‘interference’ and ‘pro-activity’. Nobody challenges the position of NVAO to do more than just rubber stamping the panel reports. The impression however is one of rather low trust between NVAO, quality assessment agencies and institutions. This is not confined to the domain of the „free market” (where it would perhaps be more understandable).

Agencies are - or at least should be - an element of the accreditation system: it is their task to produce independent panel reports. Given their independence they cannot and should not be viewed as part of the institution. The agencies are the „data collectors” for the NVAO and not a public relations instrument of the institutions. To the extent that this is indeed the case (and it is the task of NVAO to make sure it is and to make the agencies collect the data NVAO needs), there should be trust in the working of the system. Of course not an unconditional trust but this trust should not as a rule be established in each case.

This could amongst other things imply that agencies should in no way help or consult institutes (to avoid that agencies later have to assess the quality of their own consultancy). The committee did not delve deep into this matter, but the impression is that it is a thin line that is sometimes over-stepped.

Paradoxically, as explained in paragraph 4.2, the Dutch market system seems more Vulnerable’.

7.5 Further development of the system

The Committee has stressed the positive impact of the accreditation system in its first cycle: stimulating the awareness of the need for systematic quality control, inducing institutions to install systems of internal quality control, defining criteria for basic (threshold) quality which are internationally validated, getting rid of a large number of non-existent or sub standard programmes from commercial private institutions etc.

To secure this positive impact the governments should move to further develop the system in the following way.

Institutions that prove to have installed solid internal quality assurance systems (which should, in order to be solid, include some sort of independent peer review at programme level) could at the discretion of NVAO be given a longer duration of the validity of their accreditation at threshold level. In this respect an institution will then for some of its programmes for some longer period of time be ‘self-accrediting’.

As far as threshold quality is concerned, NVAO should have the power to grant certain institutions for certain clusters of programmes, on the basis of strict criteria (e.g. the quality of internal quality assurance) and after a solid positive accreditation, a period of up to ten years of validity of the accreditation. It could also be decided that during these up to ten years the institution is for the programmes mentioned ‘self-accrediting’ and should give proof of this.

For instance the institution could be obliged to present to NVAO after six years a „mid-term review”, organized by itself but including a peer review by an independent panel, or NVAO could do a mid- term review itself focussing on the state of the internal quality assurance system. The introduction of a well defined status of „self-accrediting institution” may have very positive effects on the administrative burden and the inefficiency of the threshold quality system.

It would furthermore add to the flexibility institutions of higher education need if they are to more effectively serve society and the economy. They require the flexibility to respond to social demands by creating new programmes more quickly and efficiently than is now possible under the current accreditation regime. Many of the most distinguished universities in the world are self-accrediting institutions, including private and some public universities in the US as well as the universities in the Westminster countries (Australia, Canada, UK, etc.). These institutions thereby possess a competitive advantage over EU universities in their ability to develop innovative academic programmes. The EU Rectors increasingly recognize this disadvantage and are seeking comparable authority and flexibility in academic programme development. As EU national governments seek greater international visibility for their institutions of higher education, this problem will become more obvious, and is clearly related to the design of the accreditation system.

For this reason, the committee suggests that NVAO initiates a project to attempt to define the framework conditions (i.e. internal institutional accrediting/quality assurance system) that would be necessary for an institution of higher education to achieve self-accrediting status as well as the type of external assessment that would be necessary to award and assure such a status over time. While the creation of such an institutional status would be a political decision, by investigating the feasibility of formally defining such a classification as well as designing a process to assure appropriate public accountability for such a status, NVAO could make an invaluable contribution to likely future public policy debates. Establishing such an institutional status would obviously not preclude as now the state from requiring accreditation or special approvals for academic programmes in fields critical to the public interest such as medicine, veterinary medicine, teacher education, etc.

Creating such an institutional status and awarding it selectively following a suitably rigorous assessment, would create a powerful incentive for all institutions of higher education to develop effective internal quality assurance systems that would encourage the continuous improvement of academic programmes. Over time, such a classification could also help reduce the need for external accreditation of academic programmes.

The foregoing proposal of the committee does not imply abolishing the current subject-oriented accreditation system using peers. That characteristic of the current system is a vital one. Nor is the committee of the opinion that there are no other ways to improve the current system. Paragraph 4.3 has sketched a reform programme that would legally be less demanding. It would be however a missed opportunity if the concept of self accreditation would not be the subject of a feasibility study by NVAO.

8. Annexes

8.1 Glossary of acronyms

ECA	European Consortium for Accreditation in higher education
ENQA	European Association for Quality Assurance in Higher Education
ESG	European Standards and Guidelines
ISO	Dutch National Students Association
LSVb	National Union of Students (Netherlands)
NQA	Netherlands Quality Agency
NVAO	Accreditation Organization of The Netherlands and Flanders
QANU	Quality Agency Netherlands Universities
VHLORA	Council of Flemish University Colleges
VLIR	Flemish Interuniversity Council (Flanders)
VVS	National Union of Students (Flanders)

8.2 Members of the review committee

Helmut Konrad, Chairman

Former chairman of the Austrian Accreditation Council, former Board member ENQA, professor University of Graz.

Frans Leynse, committee member

Former chairman of the 'HBO-raad' (the Association of Universities of Applied science), member of the House of Lords of The Netherlands, Professor at the Open University in The Netherlands, Lector at the „Hogeschool van Utrecht“ (a University of Professional Education).

Marcel Crochet, committee member

Former rector of the University of Louvain-la-Neuve, advisor of the Minister of Higher Education of the French Community of Belgium.

Andrée Sursock, committee member

Deputy Secretary General in charge with quality assurance of European University Association (EUA).

Caroline Campbell, committee member

Director at the Quality Assurance Agency in higher education (QAA).

David Dill, committee member

Professor of Public Policy, University of North Carolina at Chapel Hill; Director of the Research Programme on Public Policy for Academic Quality.

Stephan Neetens, committee member

Student appointed by the Dutch and Flemish Student Unions.

Carlo Hover, committee secretary

Independent expert in quality assurance in higher education, The Netherlands.

8.3 Schedule of the site visit

Date	Time	Subject	Group	Participants
June 5	15.00 -18.30	Preparatory meeting at NVAO	Review committee only	-
	19.00 -21.00	Diner meeting	Review committee only	-
June 6	9.00 -10.30	Committee interview	Executive Board NVAO	Mr. Karl Dittrich (NL: chairman NVAO) Mr. Marc Luwel (FL: vice-chairman NVAO) Mr. Guy Aelterman (FL: board member NVAO) Mr. Leendert Klaassen (NL: board member NVAO) Mr. Rudy Derdelinckx (FL: managing director NVAO)
	10.45 -12.15	Committee interview	Staff NVAO	Mr. Henri Ponds (NL: policy advisor) Mrs. Michèle Wera (FL: policy advisor) Mr. Wim de Boer (NL: policy advisor) Mrs. Nancy Van San (FL: policy advisor) Mrs. Mirjam Woutersen (NL: policy advisor) Mr. Mark Frederiks (NL: international policy advisor)
	12.30 -13.00	Committee interview	General Board NVAO	Prof. drs. J. Weitenberg (NL: board member NVAO) Mr. E. Derycke (FL: board member NVAO)
	13.00 -14.00	Informal lunch at NVAO	General and Executive Board NVAO	Mr. Karl Dittrich (NL: chair-man NVAO) Mr. Marc Luwel (FL: vice-chairman NVAO) Mr. Guy Aelterman (FL: board member NVAO) Mr. Leendert Klaassen (NL: board member NVAO) Mr. Rudy Derdelinckx (FL: managing director NVAO) Prof. drs. J. Weitenberg (NL: board member NVAO) Mr. E. Derycke (FL: board member NVAO)
	14.00 -14.30	Demonstration of NVAO handbooks and Xelion	Staff member NVAO	Mr. Rudy Derdelinckx (FL: managing director NVAO)
	14.30 -15.30	Committee interview	VLIR VLHORA and (umbrella organizations Flanders)	Prof. dr. Joke Denekens (deputy vice-chancellor University of Antwerp, member VLIR)

Date	Time	Subject	Group	Participants
				Prof. dr. Ludo Melis (coordinator of educational policy Catholic University of Leuven, member VLIR) Mrs. A.-M. De Jonghe (managing director VLIR) Mr. Luc Van de Velde (secretary-general VLHORA) Mr. Frank Baert (managing director Catholic University College Sint-Lieven, board member VLHORA) Mrs. Flora Carrijn (managing director Lessius hogeschool, member general assembly VLHORA)
	15.45 -16.45	Committee interview	VSNU (umbrella organization Netherlands)	Mr. Sybolt Noorda (chairman VSNU) Mr. Roelof de Wijker-slooth (vice-chairman VSNU)
	17.00 -18.00	Committee interview	Paepon (umbrella organization Netherlands)	Drs. J.M. Winkelmann (board member PAEPON) Drs. A.J.M. Bakker (managing director PAEPON)
	18.00 -19.00	Committee interview	HBO-raad (umbrella organization Netherlands)	Mrs. Joke Snippe (board member INHOLLAND) Mr. Erwin van Braam (head general policy affairs HBO-raad)
June 7	9.00 -10.30	Committee interview	NQA, Hobéon, Certiked and QANU (quality assessment agencies Netherlands)	Mr. Eus Schalkwijk (managing director NQA) Mrs. Nel Göbel (panel secretary NQA) Mr. Luuk van de Veen (panel secretary NQA) Mr Rob Stapert (panel secretary Hobéon) Mr. Jan Veldhuis (chairman QANU) Mr. Chris Peels (managing director QANU) Mr. Frank Wamelink (education coordinator QANU and panel secretary QANU)
	10.45 -12.15	Committee interview	VLIR and VLHORA (quality assessment agencies Flanders)	Dr. Steven Van Luchene (staff member quality assessment department VLIR) Mrs. Magalie Van Lishout (staff member quality assessment department VLIR) Mr. Pieter-Jan Van de Velde (staff member quality assessment department VLIR) Mrs. Veerle Hulpiau (staff member quality assessment department VLIR)

Date	Time	Subject	Group	Participants
				Christiane Vanvinckenroye (coordinator Quality Assurance VLHORA) Floris Lam mens (staff member Quality Assurance VLHORA) Paul Garré (managing director Education and Quality Assurance European University College Brussels (EHSAL), member steering committee Quality Assurance VLHORA)
	12.30 -14.00	Lunch A meeting at NVAO	Advisory council NVAO	Mr. P. Verboven (FL: VOKA-Chambers of Commerce and Industry) Prof dr. P. Geerlings (FL: VUB - Vrije Universiteit Brussel) Mr. T. Martens (FL: Leuven University College) Mr. J. Mijs (NL: LSVB - National Union of Students in The Netherlands)
	14.15 -15.30	Committee interview	Dutch and Flemish student organizations	Mr. Sebastiaan den Bak (NL: chairman ISO) Mr. Bart Buijs (NL: board member ISO: Mrs. Fabienne Hendriks educational quality) (NL: newly appointed board member ISO: educational quality) Mrs. Inger de Bruin (NL: board member LSVB) Mrs. Lisa Westerveld (NL: newly appointed board member LSVB) Mrs. Joanneke Krämer (NL: newly appointed vice-chairman LSVB) Mr. Jan Fabry (VL: Member VVS) Mr. Geert Noppe (VL: Member VVS)
	17.00 -18.00	External visit	Haagse Hogeschool	Mrs. E. Verhoef (executive board member Haagse Hogeschool) Mrs. M. v.d. Werke (director Academy of Health) Mr. G. de Ruiter (director Academy of ICT & Business Information Technology) Mr. M. Wiersma (director Academy of Masters) Mrs. F. Brouwer (staff member)

Date	Time	Subject	Group	Participants
	18.00 -19:00	External visit	Haagse Hogeschool	Mr. S. van Leeuwen (student) Mrs. M. de Keijzer (student) Mr. M. Gravesteijn (student) Mr. G. Nijhuis (teacher) Mr. R. v.d. Lans (teacher)
	19.00 -20.00	Defining final clarification issues	Review committee	
	20.30 -22.00	Diner meeting	Ministry of Flanders and The Netherlands	Mr. Dirk Van Damme (FL: Director of Cabinet of the Flemish Minister of Work, Education and Training) Mr. Noël Vercruyse (FL: Senior Policy Advisor Flemish Ministry of Work, Education and Training) Mr. Frans de Zwaan (NL: Senior Policy Advisor Department Governance)
June 8	9.00 -13.00	Formulating report and preliminary findings	Review committee only	
	13.00 -14.00	Lunch and final clarification issues	Executive board NVAO	Mr. Karl Dittrich (NL: chairman NVAO) Mr. Marc Luwel (FL: vice-chairman NVAO) Mr. Guy Aelterman (FL: board member NVAO) Mr. Leendert Klaassen (NL: board member NVAO) Mr. Rudy Derdelinckx (FL: managing director NVAO)
	14.00 -15.00	Presenting preliminary findings	Executive board and staff NVAO Ministry of Flanders and The Netherlands	Executive board and staff NVAO Mr. Noël Vercruyse (FL: Senior Policy Advisor Flemish Ministry of Work, Education and Training) Mr. Frans de Advisor Department Governance)



Part 2

NVAO Self-evaluation Report

16 April 2007

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1 Preface

NVAO, the Accreditation Organisation for the Netherlands and Flanders [*Nederlands-Vlaamse Accreditatieorganisatie*] was formally established just over two years ago. This does not imply that external quality assurance in higher education in the Netherlands and Flanders has only recently been given attention. Many higher education institutions in the Netherlands and Flanders have experienced external reviews before. Hence, quality assurance in the Netherlands and Flanders is a known and familiar concept.

However, the introduction of the bachelor-master's degree system and the aim of European countries to achieve a European Higher Education Area, have given external quality assurance an extra dimension. The Bologna Declaration and its ensuing activities were significant in that they gave external quality assurance an important role in ensuring and assessing quality. All Bologna signatories (45 at the time of writing) assigned themselves the task of co-operation in a system that delineates and strictly observes the level of bachelor and master's programmes. There are several ways to implement this system. The Netherlands and Flanders have chosen an accreditation system in which NVAO independently and formally ensures quality by assessing and accrediting programmes.

Another result of the Bologna Declaration was the establishment of the European Association for Quality Assurance in Higher Education (ENQA). ENQA not only occupies a formal position regarding the implementation of external quality assurance for agencies, but as an 'association' also feels very strongly about agencies' internal quality assurance. For this reason, organisations that apply for membership of ENQA or that want to renew their membership should meet the Standards and Guidelines that were set down in 2005 at the third Ministerial Bologna follow-up meeting in Bergen by the higher education ministers. Whether an organisation meets the Standards and Guidelines has to be judged by a panel of independent experts through an external review. These experts should base their judgment on a written report drawn up by the organisation under review in combination with discussions with the said organisation and with its stakeholders. The present report has as its primary function to enable the external review committee to form a judgement on whether NVAO meets the Standards and Guidelines. Additionally, the report serves three other functions. It should enable the committee to determine whether NVAO meets the criteria of the Code of Good Practice of the European Consortium for Accreditation in higher education (ECA), of which NVAO is one of the founding members. Secondly, it should enable the committee to formulate proposals in order to minimise the differences between the Dutch and Flemish regulations on accreditation and their implementation. NVAO was assigned this task by the Dutch-Flemish Committee of Ministers, which supervises the functioning of NVAO.

Finally, but not least, the report should be an instrument for the critical examination of the accreditation system and at the functioning of NVAO. We hope that the descriptions, observations and opinions included in this report will lead to considerations on how to improve the accreditation system and the functioning of NVAO.

2 Approach to the external review

The preparation of the external review consisted of three parts. First of all, the Committee of Ministers¹ and NVAO agreed upon the method of preparation of the external review. Secondly, the self-evaluation report was written. And finally, an internal preparatory meeting was organised.

2.1 Agreement with the Committee of Ministers

The point of departure was that NVAO would undergo several external reviews:

- an external review in order to remain a full member of ENQA. Before 2009, an assessment should take place on whether NVAO meets the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG);
- an external review in order to remain a member of ECA. According to mutual agreement, all ECA members should have implemented the Code of Good Practice before the end of 2007;
- a review of NVAO as agreed upon in the Treaty between the Netherlands and Flanders. This assessment should take place before the end of 2009.²

In the interest of efficiency and equally to diminish the bureaucracy involved in preparing and implementing these reviews, the Committee of Ministers decided on 23 April 2006 that there would be one internationally oriented external review taking place in 2007. This review should take into account the different requirements and provisions set down by each of the assessing organisations or the relevant authorities. The external review will be carried out under the authority and responsibility of the Committee of Ministers. As an additional assignment, the Committee of Ministers ordered that the external review should generate a series of proposals to minimise the differences between the Dutch and Flemish regulations on accreditation and their implementation. This report comprises the programme dossier for the external review.

2.2 The writing process of the self-evaluation report

For the writing process of the self-evaluation report some points of departure were defined first. Most importantly, the report should have the support of NVAO's stakeholders. In order to make sure this was the case, the draft of the self-evaluation report was presented to several stakeholders: the NVAO Board, the NVAO staff members, the Advisory Council as representatives of the stakeholders in society and the Dutch and Flemish quality assessment agencies. There have been several rounds of discussion concerning the draft versions of the self-evaluation report with these stakeholders. On the basis of the feedback of these groups of stakeholders the concept version has been revised several times.

¹ The responsible Ministers of Education in the Netherlands and Flanders, respectively, together form the Committee of Ministers.

² The Inspectorate of Education in the Netherlands [Inspectie van het Onderwijs] will carry out a mid-term review concerning the state of affairs of accreditation in higher education in the Netherlands. In w, the Netherlands Court of Audit [Nederlandse Rekenkamer] and the Court of Audit of Belgium [Rekenhof] will carry out a joint assessment on some aspects of the accreditation systems and the operating procedures of NVAO. All these evaluations will be incorporated in the total evaluation of NVAO.

NVAO is a bi-national entity. The differences between the Dutch and Flemish systems in higher education and external quality assurance are minimal in most cases, but considerable in a few. The self-evaluation report has been written taking into account the similarities between the higher education and accreditation systems. Where necessary, the report refers to differences between the Netherlands and Flanders.

The original version of the self-evaluation report and the annexes were in Dutch. The translation was completed on 10 May 2007.

2.3 Preparation of the external review

The preparation for the external review consisted of discussions on the concept version of the self-evaluation report with the NVAO staff members. Additionally, an internal preparatory meeting was organised to consider NVAO's strengths and weaknesses and areas to which NVAO should give special attention.

3 Higher Education in the Netherlands and Flanders

The structure of Higher Education in the Netherlands is enacted and laid down by the Act on Higher Education and Scientific Research [*Wet op het hoger onderwijs en wetenschappelijk onderzoek*] (Dutch Act)³. This Act, which was adopted in 1992, has been subject to several revisions and additions over the years, primarily as a result of the Bologna Declaration and the introduction of the accreditation system. A new Act on higher education has been submitted but has not yet been passed. In Flanders it is the Act of 4 April 2003 regarding the Higher Education Structure in Flanders [*Decreet betreffende de herstructuring van het hoger onderwijs in Vlaanderen*] (Flemish Act)⁴. The Flemish Act also incorporates the principles of the Bologna Declaration and lays down their application. The Flemish Act further lays down the implementation of the (initial) accreditation system.

This chapter gives an outline of the higher education systems in the Netherlands and Flanders. First a description will be given on the types of institutions and programmes, and, secondly, some key figures on higher education will be quoted.

3.1 Higher education in the Netherlands

The system of higher education in the Netherlands is built upon two pillars: professional higher education [*hoger beroepsonderwijs*] (hbo) and academic higher education [*wetenschappelijk onderwijs*] (wo). There are two types of institutions that offer higher education programmes: universities of professional education [*hogescholen*] and universities. Most universities of professional education and universities receive public funding. In the Netherlands, both universities and universities of professional education can offer programmes with an academic as well as a professional orientation.

Apart from the regular institutions, there are two other types of higher education institutions in the Netherlands: recognised private institutions [*aangewezen instelling*] and privately funded institutions that are not recognised [*niet-bekostigde en niet-aangewezen instellingen*].

Recognised private institutions

Recognised private institutions do not receive public funding. However, after having completed a special procedure, these institutions are allowed to offer bachelor and master's programmes.

Privately funded institutions that are not recognised

Privately funded institutions that are not recognised are only allowed to offer postgraduate programmes.

In the Netherlands, there are in general two ways of access into higher education, i.e. the HAVO (higher general secondary education - pre-higher professional education) and VWO (pre-academic education) level of secondary education and the MBO-4 level of middle professional education. However, enrolment in higher education largely consists of secondary school leavers (HAVO and VWO).

³ This Act will be further referred to in this document as the Dutch Act.

⁴ This Act will be further referred to in this document as the Flemish Act.

In the Netherlands, higher education consists of three cycles: bachelor, master and PhD's degrees. Within the bachelor and master's degrees, the following types can be distinguished:**I**

I Bachelor's degree:

- Bachelor's programme with professional orientation (hbo-bachelor)
- Bachelor's programme with academic orientation (wo-bachelor)

II Master's degree:

- Master's programme with professional orientation (hbo-master)
- Master's programme with academic orientation (wo-master)
- Research master's programme

III PhD:

Only universities have the 'ius promovendi'.

The contents and workload of the different qualifications can be described as follows:

3.1.1 Bachelor's programmes with professional orientation or hbo-bachelor)

These programmes are specifically aimed at a career in the professional practice. Students should obtain a level of general and specific knowledge and the supplementary competences needed for independent professional practice. Therefore, the curriculum has a practical orientation and includes several periods of work placements. These programmes require 240 ECTS⁵ and are generally completed within four academic years.

3.1.2 Bachelor's programmes with academic orientation or wo-bachelor)

These programmes are aimed at obtaining academic subject-/discipline-specific knowledge and preparing students for continuation of their studies at master's level. This type of bachelor's programme has only recently been considered a final qualification as well. These programmes require a minimum of 180 ECTS and generally can be completed within three academic years.

3.1.3 Master's programmes with professional orientation or hbo-master)

Master's programmes with professional orientation consist of at least 60 ECTS and are aimed at more complex situations of the professional practice. Generally, these programmes do not receive public funding, unless they have successfully filed a request for it. These exceptions usually relate to programmes that prepare students for professions with considerable social significance, for example in education or health and welfare.

3.1.4 Master's programme with academic orientation or wo-master)

These master's programmes always have an academic orientation, but can have a supplementary professional orientation. These programmes are aimed at preparing students for an advanced level of subject-/discipline-specific knowledge and competences.

These programmes consist of at least 60 ECTS, although, in the Netherlands, all the programmes offered in the academic discipline of the (Applied) Sciences consist of 120 ECTS. In the Netherlands, it is possible within certain disciplines to offer specific master's programmes of 120 or 180 ECTS. These programmes are considered initial master's programmes and they receive public funding.

⁵ ECTS stands for European Credit Transfer System. In the Netherlands, one credit point stands for 28 hours of workload and is calculated following the European Credit Transfer System.

3.1.5 *Research master's programme*

In academic higher education in the Netherlands, a relatively new type of master's programme is offered, i.e. the research master's programme, aimed at preparing students for entrance into a PhD programme or for a career in research. These master's programmes require 120 ECTS.

3.1.6 *PhD's*

The qualification of 'doctor' is granted by a panel of researchers after a public presentation of the doctor's thesis in which the writer/researcher/student has demonstrated the ability to extend the frontier of scientific knowledge based on independent research. On average, a PhD-student spends four years of research in preparation of the doctor's thesis to obtain the title of doctor.

3.2 **Higher education in Flanders**

In Flanders, higher education is offered by university colleges [*hogescholen*] and universities. Universities offer programmes with academic orientation. University colleges offer programmes with professional orientation. However, they can also offer programmes with academic orientation if they do so in an 'Association' with a university.

Such an association is an official body in which the co-operation between a university and one or more university colleges is officially established. Associations have several competences, but do not award degrees. Degrees are awarded by the universities and university colleges themselves.

Only registered institutions of higher education can offer bachelor and master's programmes. There are two types of institutions: statutory registered institutions and non-statutory registered institutions.

Statutory registered institutions

These institutions are the traditional higher education institutions, i.e. the universities, university colleges, institutions for postgraduate programmes and 'other statutory registered institutions'⁶. These institutions were already recognised by the Flemish or Belgian government before the introduction of the bachelor and master's degree system in 2003. All these institutions receive public funding for their education and research.

(Non-statutory) Registered institutions

Since 2004, some private institutions have successfully completed a procedure for registration and, consequently, obtained official registration by the Flemish government. They are called (non-statutory) registered institutions. The registration procedure consists of providing proof of financial solvency and the entering into partnership agreements with statutory registered institutions or recognised higher education institutions abroad. This guarantees that students can finish their studies at one of the statutory registered institutions in case the (non-statutory) registered institution has to terminate its activities (e.g. after bankruptcy)⁷.

⁶ The other statutory registered institutions are: The Vlerick Leuven Gent Management School, the Institute for Tropical Medicine, the Faculty for Protestant Theology and the Evangelical Theological Faculty.

⁷ Only after an institution has been registered, it can apply for initial accreditation of its programmes with NVAO.

In Flanders, any secondary school diploma from whichever school, type of education or discipline, gives unlimited access to higher education. Only the programmes in medicine and dentistry, and some particular programmes in the arts have specific entry requirements.

As in the Netherlands, higher education in Flanders consists of three cycles: bachelor, master and PhD's degrees. The following types can be distinguished:

I Bachelor's degrees:

- *Bachelor's programme with professional orientation*
- *Bachelor's programme with academic orientation*
- *Advanced bachelor's programme (professional orientation)*

II Master's degrees⁸:

- *Master's programme*
- *Advanced master's programme*

III PhD

Only universities have the '*ius promovendi*'.

The contents and workload of the different qualifications can be described as follows:

3.2.1 Bachelor's programme with professional orientation

These programmes are specifically aimed at the professional practice. Students should obtain a level of general and specific knowledge and supplementary competences needed for independent professional practice. Therefore, the curriculum has a professional orientation and comprises several periods of work placements.

The Flemish bachelor's programmes with professional orientation consist of a minimum of 180 ECTS and are generally completed within three academic years. In contrast, the Dutch bachelor's programmes with professional orientation, or hbo-bachelors, as mentioned above, consist of 240 ECTS and are generally completed within four academic years. The difference in ECTS and length of studies between the Netherlands and Flanders regarding the bachelor's programmes with professional orientation can be explained by the student's level of education at the point of enrolment. In the Netherlands, a HAVO diploma is required to enrol for a bachelor's programme with professional orientation and the average age of a student with a HAVO diploma at the time of enrolment is 17 years. A Dutch bachelor's programme professional orientation is generally completed within four academic years, including what is called in the Netherlands the 'propedeuse' (the first year of the programme). In Flanders, the normal age of a student receiving a secondary school certificate is 18 years and a bachelor's programme with professional orientation is generally completed within three academic years and does not include a 'propedeuse'.

3.2.2 Bachelor's programme with academic orientation

These programmes are aimed at obtaining academic subject-/discipline-specific knowledge and preparing students for continuation of their studies at the master's level. These programmes consist of a minimum of 180 ECTS and are generally completed within three academic years.

⁸ In Flanders, all master's programmes have academic orientation.

3.2.3 Advanced bachelor's programme (professional orientation)

An advanced bachelor's programme is aimed at more in-depth knowledge and/or competences already acquired in the previous bachelor's programme with professional orientation. A student should already have a bachelor's degree to be able to enrol. These programmes consist of at least 60 ECTS and are generally completed within one academic year.

3.2.4 Master's programme

Master's programmes always focus on the academic orientation, but can have a supplementary professional orientation. These programmes are aimed at preparing students for an advanced level of subject-/discipline-specific knowledge and competences.

In Flanders, master's programmes should be concluded with a master's thesis, which consists of a minimum of 15 ECTS and a maximum of 30 ECTS.

Master's programmes consist of a least 60 ECTS. The number of ECTS is higher depending on the discipline.

3.2.5 Advanced master's programme

An advanced master's programme is aimed at in-depth knowledge and/or competences within a specific discipline. A student should already have a master's degree to qualify for enrolment. The programme consists of a minimum of 60 ECTS and is generally completed within one academic year.

3.2.6 PhD's

The qualification of 'doctor' is granted by a panel of researchers after a public presentation of the doctor's thesis in which the writer/researcher/student has demonstrated to be able to conceive new scientific knowledge based on independent research. On average, a PhD-student spends four years of research in preparation of the doctor's thesis to obtain the title of doctor.

3.2.7 Embedding programmes in research

University colleges that, in an association with a university, offer programmes with academic orientation are currently undergoing a process aimed at strengthening the link to research, i.e. embedding programmes in research. At the end of the academic year 2012-2013 the academic qualifications of these programmes should match those of programmes offered solely at universities. Programmes with academic orientation in the arts receive special attention in this process.

3.3 Overview of the Dutch and Flemish degree programmes

The Dutch and Flemish types of programmes described in the preceding paragraphs can be found in the following matrix of higher education in the Netherlands and Flanders.

Matrix of the degree programmes in higher education of the Netherlands and Flanders

Level Orientation	Bachelor	Master
Academic orientation (the Netherlands and Flanders)	180 ECTS	≥ 60 ECTS
Professional orientation (the Netherlands)	240 ECTS	≥ 60 ECTS
Professional orientation (Flanders)	180 ECTS	

3.4 Key figures in higher education

Table 1 shows that there are approximately 160 higher education institutions in the Netherlands and Flanders, which account for more than 4.400 programmes offered.

Table 1: Overview of key figures of higher education in the Netherlands and Flanders

	the Netherlands	Flanders	Total
Inhabitants	16 million	6 million	22 million
Universities	14*	7	21
Universities of professional education (NL) and University colleges (FL)	44**	22	66
Recognised private institutions (NL) and Registered institutions (FL)	68***	3	71
Other statutory registered institutions (FL)		4	4
Programmes	> 3000	> 1600	> 4600
Fulltime students	± 560.000	± 161.500	± 721.500

January 2007: * <http://www.vsnu.nl>;

** <http://www.hbo-raad.nl>;

*** <http://www.minocw.nl> (60 universities of professional education and 8 universities);

**** <http://www.highereducation.be>.

In the next two subparagraphs a number of key figures for the Netherlands and Flanders are quoted.

3.4.1 Key figures the Netherlands

Source: Year Book education in figures 2006, Central Bureau for Statistics [Jaarboek onderwijs in cijfers 2006, Centraal Bureau voor de Statistiek], www.cbs.nl.

Table 2: Total enrolment higher education in the Netherlands 2005-2006

Enrolment 2005-2006 (x 1000)	M	F	Total
Professional education	170,7	185,9	356,6
Academic education	102,7	102,4	205,2
Total	273,4	288,3	561,8

In the academic year 2005-2006 higher professional education accounted for 63% of total enrolment in higher education in the Netherlands. Academic education accounted for 37% of total enrolment. In higher professional education female enrolment is slightly higher. In academic education, male and female enrolment is almost equal.

Table 3: Subdivision according to field of study in higher professional education

	Number of enrolled students (x1.000)	Percentage
Educational and Teaching Sciences	78,0	21,9%
Linguistics and Culture, History and Arts	20,3	5,7%
Social Sciences, Applied Economic Sciences and Law	115,2	32,3%
Physical Sciences, Mathematics and Applied Information Sciences	23,8	6,7%
Technical Sciences, Industrial and Engineering Sciences	26,0	7,3%
Biotechnical Sciences and Veterinary Sciences	6,5	1,8%
Healthcare, Social Work and Welfare Studies	69,1	19,4%
Customer service, Transport, Environment and Safety	17,7	5,0%
Total	356,6	

In higher professional education the highest percentage of students can be found within the disciplines of Social Sciences, Applied Economic Sciences and Law; followed by Educational and Teaching Sciences; and then Healthcare, Social Work and Welfare Studies.

Table 4: Evolution of enrolment in higher professional education

Evolution of enrolment (x 1.000)	M	F	Total
2000-2001	149,8	162,9	312,7
2002-2003	154,4	168,5	323,0
2003-2004	161,0	174,8	335,7
2004-2005	166,3	180,4	346,8
2005-2006	170,7	185,9	356,6

Enrolment in higher professional education has slowly risen over the last six years. Since the 2000-2001 academic year, there is a slight majority of female students (52% female enrolment versus 48 % male enrolment).

Table 5: Subdivision according to field of study in academic education

	Enrolment (x 1.000)	Percentage
Educational and Teaching Sciences	8,1	3,9%
Linguistics and Culture, History and Arts	26,8	13,1%
Social Sciences, Applied Economic Sciences and Law	104,5	50,9%
Physical Sciences, Mathematics and Applied Information Sciences	20,1	9,8%
Technical Sciences, Industrial and Engineering Sciences	17,9	8,7%
Biotechnical Sciences and Veterinary Medicine	2,2	1,1%
Healthcare, Social Work and Welfare Studies	24,7	12,0%
Customer service, Transport, Environment and Safety	0,9	0,4%
Total	205,2	

In academic education the highest percentage of students can be found within the disciplines of Social Sciences, Applied Economic Sciences and Law; followed by Linguistics and Culture, History and Arts; and then Healthcare, Social Work and Welfare Studies.

Table 6: Evolution of enrolment in academic education

Evolution enrolment (x 1.000)	M	F	Total
2000-2001	86,4	80,3	166,7
2002-2003	91,4	89,0	180,4
2003-2004	96,1	93,7	189,8
2004-2005	100,5	99,4	199,9
2005-2006	102,7	102,4	205,2

Enrolment in academic education has equally risen over the last six years. In the 2000-2001 academic year, there was still a significantly higher number of male students, but since the 2004-2005 academic year, male and female enrolment have almost equalised.

3.4.2 Key figures Flanders

*Source: Flemish education in figures 2005-2006,
<http://www.ond.vlaanderen.be/onderwijsstatistieken/publicaties-eng.htm>.*

Table 7: Total enrolment higher education in Flanders

Enrolment 2005-2006 (x 1.000)	M	F	Total
University colleges (professional orientation)	32,3	45,4	77,7
Total professional orientation	32,3	45,4	77,7
University colleges (academic education)	14,6	10,0	24,6
Universities (academic orientation)	26,5	32,7	59,2
Total academic orientation	41,1	42,7	83,8
Total	73,4	88,1	161,5

In the academic year 2005-2006, 52% of Flemish students were enrolled in academic education. The majority (71%) are studying at a university. 48% of the students are enrolled in programmes with professional orientation. In this group, female students form the majority. The number of male students almost equals that of female students in programmes with academic orientation.

Table 8: Subdivision according to field of study: bachelor's programmes with professional orientation

Bachelor's programmes (professional orientation)	Total enrolment (x 1.000)	Percentage
Architecture	1,9	2,5%
Audiovisual and Visual Arts	0,2	0,2%
Biotechnology	1,7	2,2%
Healthcare	10,5	31,3%
Commercial Sciences and Business Studies	24,3	12,3%
Industrial Sciences and Technology	9,5	0,0%
Music and Dramatic Arts	0,0	0,0%
Nautical Sciences	0,1	0,1%
Education	18,9	24,4%
Social and Community Work	10,5	13,5%
Total	77,7	

In higher professional education at university colleges the highest percentage of students can be found within Healthcare, followed by Education.

Table 9: Subdivision according to field of study at university colleges: programmes with academic orientation (bachelor and master's degrees).

Programmes with academic orientation	Total enrolment (x 1.000)	Percentage
Architecture	2,3	9,2%
Audiovisual and Visual Arts	3,7	15,0%
Biotechnology	0,3	1,4%
Combined fields of study: Architecture and/or Industrial Sciences and Technology	0,2	0,7%
Healthcare Healthcare	0,8	3,2%
Commercial Sciences and Business Studies	4,7	19,0%
Industrial Sciences and Technology	7,3	29,6%
Music and Dramatic Arts	1,7	7,0%
Nautical Sciences	0,4	1,5%
Product Development	0,4	1,4%
Applied Linguistics	3,0	12,0%
Total	24,7	

In academic education at university colleges the highest percentage of students are in Industrial Sciences and Technology, followed by Commercial Sciences and Business Studies and Audiovisual and Visual Arts.

Table 10 Evolution in enrolment in higher education at university colleges

Evolution enrolment (x 1.000)	M	F	Total
2000-2001	45,7	53,5	99,2
2001-2002	45,7	53,6	99,3
2002-2003	46,1	53,5	99,7
2003-2004	46,0	54,1	100,2
2004-2005	46,2	55,0	101,2
2005-2006	46,9	55,5	102,4

Enrolment at university colleges has slightly risen over the last six years. Since the 2000-2001 academic year, there has been a slight majority of female students. In the 2005-2006 academic year, enrolment of female students is at 54% versus 46% of male students.

Table 11: Subdivision according to field of study in higher education at universities

Programmes with academic orientation Education at universities	Total enrolment Total enrolment	Percentage (x 1.000)
Percentage		
Philosophy and moral sciences	1,0	1,7%
Theology, theological sciences and canon law	0,3	0,6%
Language and literature	3,4	5,8%
History	2,3	3,9%
Archaeology and history of art	1,2	2,1%
Law, notary sciences and criminology	8,5	14,3%
Psychology and educational sciences	6,7	11,4%
Economic and applied economic sciences	6,7	11,4%
Political and social sciences	5,0	8,4%
Social health sciences	0,7	1,2%
Kinesiology and rehabilitation sciences	2,3	3,9%
Sciences	4,1	7,0%
Applied sciences	4,3	7,2%
Applied Biological Sciences	1,9	3,1%
Medicine	4,3	7,3%

Dentistry	0,4	0,7%
Veterinary Sciences	1,6	
2,6%		
Pharmaceutical Sciences	1,5	2,5%
Biomedical Sciences	1,5	2,6%
Traffic Safety Sciences	0,1	0,1%
Combined fields of study	1,3	2,1%
Total	59,2	

In higher education at universities the highest percentage of enrolment is in Law, Notary Sciences and Criminology, followed by Psychology and Educational Sciences and Economic and Applied Economic Sciences.

Table 12: Evolution of enrolment in higher education at universities

Evolution enrolment (x 1.000)	M	F	Total
2000-2001	25,7	30,5	56,1
2001-2002	25,6	31,0	56,7
2002-2003	25,4	31,5	56,8
2003-2004	25,4	31,5	56,8
2004-2005	25,4	31,6	57,0
2005-2006	26,5	32,7	59,2

Enrolment in higher education at universities has also risen over the last six years. Since the academic year 2000-2001, there has been majority of female enrolment over male enrolment. In the academic year 2005-2006, the percentage of female enrolment is at 57% versus 43% that of male enrolment.

4 A short history of external quality assurance in higher education in the Netherlands and Flanders

Chapter 4 gives a short description of the former system of external quality assurance of higher education in the Netherlands and Flanders and of the most important changes following the implementation of the accreditation system. This background information is relevant to understand the current accreditation system and the position and tasks of NVAO.

4.1 The former system of external quality assurance in the Netherlands

The external system of quality assurance was developed in the second half of the 1980s by representative associations of universities and universities of professional education. The Association of Universities in the Netherlands [*Vereniging van Samenwerkende Nederlandse Universiteiten*] (VSNU) developed a system for external quality assurance for universities, whereas the Netherlands Association of Universities of Applied Sciences [*de vereniging van hogescholen*] (HBO-raad) did the same for the universities of professional education. Both systems of external quality assurance were created with the same intention and served two central purposes:

- accountability:
by means of public reports it was made transparent to what extent institutions, and especially programmes, met generic quality standards;
- quality improvement:
the assessment reports not only described the level of quality, but also included recommendations for quality improvement. In addition, during site visits assessment panels examined how far recommendations from earlier assessments had led to quality improvement when programmes were assessed for a second or even third time.

In academic and professional higher education, assessment procedures were carried out by a panel of experts who were appointed by the umbrella organisations. These assessment panels were supported by the umbrella organisations of universities and universities of professional education, respectively, and reported to the boards of these umbrella organisations.

The assessment panels appointed by VSNU consisted mainly of peers: university professors with a considerable record within the relevant discipline. The assessment panels contained varying degrees of international representation. Several of the assessment procedures within academic higher education were carried out in cooperation with Flemish universities. The first external assessment in 1991 that served as a pilot was also a cooperation between the Netherlands and Flanders. The assessment panels selected by the HBO-raad often consisted of peers with university backgrounds and representatives of the professional practice. Both types of assessment panel always included one or more students and at least one expert with pedagogical/didactical expertise.

Assessments took place per discipline: an assessment panel was convened for the programmes in the same subject, or in some cases, per set of related subjects belonging to the same discipline. The assessment panel undertook a site visit to the institution and wrote the assessment report. Apart from the quality assessment of each separate programme, the assessment report also gave a comparative overview of the quality level of programmes belonging to the same

discipline at national level. The assessment panel also formulated conclusions at the national level and often made recommendations for quality improvement and further development of the discipline throughout the sector. Although assessment reports often included an overview of results of similar programmes offered at different institutions, they never included an explicit quality ranking among programmes offered at different institutions.

Both universities and universities of professional education followed a similar procedure to assess programmes. The first phase in the assessment procedure was the self-evaluation; institutions themselves wrote a self-evaluation report in which the programme concerned was described and assessed based on a set assessment framework. At the same time, the umbrella organisation selected the panel members that would form the assessment panel and prepared them for the assessment procedure. The second phase consisted of the actual site visit by the assessment panel at the programmes concerned. The assessment panel studied the self-evaluation report of each programme, the additional information supplied during the site visit and discussions were held with all stakeholders (management, teaching staff, students, alumni, representatives of the professional field). The third phase consisted of the writing of the assessment reports: first the reports for each individual programme, then the general report. Each programme was given the opportunity to comment on the draft version of the programme-specific assessment report before the final version of the assessment report was published.

This model became known as ‘The Dutch Model’. It served as a role model for the development of external quality assurance systems in Flanders, Denmark, Portugal, Slovenia, the Czech Republic and Hungary. The essence of this model was that the institution already had a system for internal quality assurance in place, that a nationwide assessment was carried out on a regular basis for each set of programmes by an assessment panel of broad composition and that the functioning of the whole external quality assurance system, as far as the Netherlands were concerned, fell under the authority of the Inspectorate of Education in the Netherlands [*Inspectie van Onderwijs*].

4.2 The former system of external quality assurance in Flanders

In Flanders, a system of external quality assurance was created at the beginning of the 1990s, at first only for universities. The legislation of 12 June 1991 identified the tasks and responsibilities for quality assurance and quality control for universities. In accordance with this legislation, the universities themselves were made responsible for internal and external quality assurance. It was further stipulated that universities had to subject their programmes to regular external assessments and act upon the outcome of the external assessment. Before this legislation took effect, the Flemish Interuniversity Council (VLIR) [*de Vlaamse Interuniversitaire Raad*] had already discussed how this system of quality assurance could be implemented. Discussions were held with VSNU about possible collaboration and a pilot was organised for a joint assessment procedure. This pilot took place in 1991 and concerned Earth Sciences. As a result of this first assessment procedure, more joint assessment procedures were carried out in collaboration with VSNU, either in the form of a completely joint procedure, or through the participation of one or more institutions in the procedure of the other country. In the first round of external reviews, 43 assessment procedures took place, of which 12 were carried out through collaboration between institutions in the Netherlands and Flanders.

The system for quality assurance at university colleges was set up at a later stage. Legislation in 1994 for university colleges provided for a merger process to enlarge and university colleges and to contribute to their professional competencies. It also provided for the set-up of an internal and external quality assurance system. At the beginning of the new millennium, the system of external quality assurance at university colleges was laid down by law. As with the universities, this system also provided for external assessments and closely followed the system that had already been implemented for universities. The Council of Flemish University Colleges [*de Vlaamse Raad van Hogescholen*] (VLHORA) drew up guidelines for external quality assessment in 2001. The first external quality assessment procedures were carried out in 2003 and the first assessment reports were published in 2004. As far as the university colleges are concerned, the introduction of the accreditation system ran almost in parallel with the introduction of the external quality assessment system.

The systems of external quality assurance for both universities and university colleges consisted of three phases. The first phase consisted of the institutions writing the self-evaluation report. At the same time, VLIR or VLHORA selected the assessment panel. The panel consisted of independent, often international, external peers. The second phase consisted of the site visit by the assessment panel of all the institutions that offered the programmes under review. The third phase consisted of the writing of the assessment reports in which the assessment panel assessed the quality of the programmes and formulated recommendations for improvement. This report was published and made available on the websites of both VLIR and VLHORA. Before reports were published, each programme was given the opportunity to comment on the draft version of the report. The assessment procedures followed a predetermined protocol and were closely focussed on the weak and strong elements of a programme, and thus on the purpose of quality improvement. The external quality assurance systems involved the participation of many stakeholders: students, staff and representatives of the professional practice actively participated in internal quality assurance and were also involved in the drafting of the self-evaluation reports and during the external assessment procedure.

In 2003, the first round of assessment procedures was completed and a second round is currently taking place. This second round is operating within the framework of the accreditation system. Only a limited number of programmes offered at university colleges were assessed during the period 2003-2004. Most programmes are now assessed for the purpose of accreditation and following the assessment protocol that was adopted in February 2005.

4.3 Accreditation of master's programmes with professional orientation in the Netherlands

In the Netherlands, since the 1990s, an increasing number of universities of professional education started offering postgraduate master's programmes with professional orientation. This was often done by means of a 'U-turn construction', i.e. the programme was officially offered by an international (mostly British) university that also awarded the degrees. Universities of professional education felt the need to award master's degrees by their own authority, but at the same time, they needed to have these master's programmes independently assessed on both their quality and level. The Dutch Validation Council (DVC) was established in the second half of the 1990s to further this aim. The DVC board and the council responsible for the decision-making on programme accreditation included representatives from (associations of) universities of professional education, employers' organisations and Nuffic (Netherlands organization for international cooperation in higher education).

Within DVC, a specific assessment framework was created and an assessment procedure was laid out for the assessment of master's programmes. For this assessment procedure, DVC distinguished between an 'ex ante' assessment on the basis of the dossier submitted by the programme/institution that led to eligibility for registration and the actual assessment of a programme that was already offered and that had produced graduates; the latter assessment leading to accreditation.

The assessment were organised per programme. The application from a programme/institution had to be accompanied by a self-evaluation report. An ex ante assessment was carried out by two experts in the subject/discipline of the programme concerned. They reported their findings to the council. An assessment was then carried out by a panel of experts, consisting of at least one member with subject-/discipline-specific knowledge (from a university background), a professional member with a specialisation in the subject or discipline and one member with pedagogical/didactical experience. The assessment followed the same procedure as those of VSNU and HBO-raad. During the site visit, the panel used the self-evaluation report as a basis for discussions with the different stakeholders. Subsequently, the assessment report was presented to the council and the panel chair gave a verbal account of the procedure. A positive decision led to accreditation with a validity of four years.

4.4

The assessment procedure of recognised private institutions in the Netherlands

At the end of the 1990s, the platform of recognised private institutions in the Netherlands [*Platform van Aangewezen-Erkende Particuliere Onderwijsinstellingen in Nederland*] (PAEPON) developed an assessment system for recognised private universities of professional education. This initiative resulted from the regulation under Dutch law that institutions should be subject to a regular external assessment by independent experts. In collaboration with the Inspectorate of Education in the Netherlands and the Ministry of Education, Culture and Science (OCW), a framework was set up for external assessment that was based upon the framework used by the Inspectorate for the assessment of (publicly funded) programmes in higher education.

The assessment procedure was piloted by an agency for certification called Certikid [*Certificatie Kennisintensieve Dienstverlening*]. A total of twenty programmes have voluntarily participated in this pilot. Assessments took place in 2001 and 2002, and these resulted in reports for each of the participating programmes. The assessment was usually carried out by a panel of two people including a subject-/discipline-specific expert and an audit expert.

At first, these reports were assessed by the Inspectorate. Later on, this became a task for NVAO. The Inspectorate made a critical assessment of the composition of the panel and of the report. NVAO took a further step in offering institutions the possibility to demonstrate by means of a supplementary assessment on the quality of the programme that had previously been assessed as 'satisfactory', that the same level was still attained and that the institution had adequately put into practice the recommendations made in the assessment report. During 2005, NVAO assessed eight reports, including the supplementary assessment. For the other programmes included in the pilot and for all other programmes and institutions that were not involved in the pilot, the transitional arrangements that were laid down by legislation applied (see next paragraph).

4.5 The transitional arrangement for programmes offered at universities and universities of professional education in the Netherlands

NVAO agreed on a transitional arrangement with HBO-raad⁹ and VSNU¹⁰. This arrangement was enacted at the same time as the implementation of the accreditation system. It concerned programmes for which the assessment procedure according to the 'old' procedure had not been completed. These programmes are subject to the regulations of the transitional arrangement in order to be eligible for 'accreditation by virtue of law'. They need at least (a supplement to) an assessment report from a quality assessment agency in the Netherlands or an agency that used to be a recognised agency under the old procedure.

⁹ Transitional arrangement for publicly funded professional higher education, October 2006 – [Overgangsregeling bekostigd hoger beroepsonderwijs, oktober 2006] <no translation available>.

¹⁰ Transitional arrangement for academic higher education, 2003 – [Overgangsregeling bekostigd wo, 2003] <no translation available>.

5 The functioning of NVAO

Before the introduction of the accreditation system, the Netherlands and Flanders already had a fully-functioning external review system that led to quality improvements in education (see previous chapter). The disadvantage of this system resided in the fact that the sector was evaluating itself, even if in the Netherlands there was independent oversight from the Inspectorate of Education. With the introduction of the new system, efforts have been made to strengthen the former system of external review, to develop it and make it internationally acceptable. This was achieved by making the system more independent and better aligned with external benchmarks and standards, by having the outcome result in explicit and clear judgements and by strengthening the power of possible sanctions. These developments resulted in the establishment of one accreditation organisation for the Netherlands and Flanders.

5.1 Treaty between the Netherlands and Flanders

In 2000, the Netherlands and Flanders expressed the intention to establish a joint accreditation organisation. This organisation would be charged with the accreditation of higher education programmes in both the Netherlands and Flanders. Both parties were endeavouring to implement the Bologna Declaration and deemed a well-functioning and internationally acceptable accreditation system a precondition for furthering international comparability of higher education programmes. Accreditation would be the keystone of the already existing external review system. The Dutch government took the first step in establishing the NAO, the Netherlands Accreditation Organisation, in June 2002, as a preliminary step to establishing the NVAO, the Accreditation Organisation of the Netherlands and Flanders. This preliminary step was necessary for compliance with the Dutch law that ordered the implementation of both the bachelor-master system and the accreditation system and was enacted one year earlier than the Flemish Act.

In 2001, tentative talks took place between the competent Dutch and Flemish ministers about the establishment of an international accreditation organisation.¹¹ In December 2002, an observer from Flanders was attached to the Board of NAO. In April 2003, the then Dutch and Flemish Education ministers started their talks on the content of what was to become the Treaty by which NVAO would be established as a bi-national organisation. On the request of the Flemish minister, preparations were made for the introduction of the accreditation system for higher education in Flanders. For that purpose, a NAO-project group was set up including both Dutch and Flemish experts. On 3 September 2003, the Treaty¹² for the establishment of a bi-national accreditation organisation was signed by the competent ministers of the Netherlands and Flanders. Hence, the NVAO (in formation) was a fact. The Treaty assigns the tasks of NVAO, its form of administration and its supervision. On 1 February 2005, all legal formalities regarding the establishment of NVAO had been concluded and NVAO was formally established.

¹¹ From the outset, NVAO has been set up as a bi-national organisation that could eventually include other international partners.

¹² Treaty between the Kingdom of the Netherlands and the Flemish Community of Belgium regarding the accreditation of programmes within Dutch and Flemish higher education, The Hague, 3 September 2003 [Verdrag tussen het Koninkrijk der Nederlanden en de Vlaamse Gemeenschap van België inzake de accreditatie van opleidingen binnen het Nederlandse en Vlaamse hoger onderwijs, 3 september 2003]. Referred to in this document as the Treaty.

5.2 Tasks and official status

NVAO's major task is (initial) accreditation of higher education programmes both in the Netherlands and Flanders. NVAO makes independent judgements and takes autonomous decisions.

The Committee of Ministers supervises the functioning of NVAO, but has no power over NVAO operations or decision-making.

5.2.1 Tasks of NVAO

The tasks of NVAO in the Netherlands were stipulated in the Dutch Act¹³ and can be summarized as the (initial) accreditation of programmes of higher education and giving advice on the possible extension of academically oriented master's programmes.

In Flanders, the Flemish Act of 4 April 2003¹⁴ forms the legal basis for (initial) accreditation in higher education and stipulates that the responsibility for (initial) accreditation of programmes lies with NVAO. In accordance with the Flemish Act and based on its stipulations, the Flemish Government has approved the frameworks for (initial) accreditation. In addition, the Flemish authorities have ratified several regulations concerning the implementation of the Flemish Act.¹⁵

Another important task for NVAO stipulated by the Treaty concerns the importance of the international perspective for the decisions and position of NVAO (see Chapter 7 'The international policy of NVAO').

5.2.2 Official status

In accordance with the Treaty, and in order to be able to operate independently, NVAO was granted the status of an autonomous administrative body with legal rights according to Dutch legislation.¹⁶ Consequently, NVAO does not resort under a particular minister or the Committee of Ministers and is not subject to ministerial responsibility. This implies that NVAO has full decision-making powers as regards applications for (initial) accreditation.

However, NVAO is accountable to the Committee of Ministers, which approves its budget, the annual report and the annual accounts. Five years following the enacting of the Treaty has taken effect and subsequently every four years, the Committee of Ministers draws up a report on the operation and functioning of NVAO. In accordance with the Treaty, the Committee of Ministers can only intervene in case of serious neglect on the side of NVAO of its (initial) accreditation task, threatening the execution of that task.

The Committee of Ministers can thus only intervene in the functioning of NVAO, but not in NVAO's decision-making.

¹³ Act on Higher Education and Research [Wet hoger onderwijs en wetenschappelijk onderzoek]

¹⁴ Act of 4 April 2003 regarding the Higher Education Structure in Flanders [Decreet van 4 april 2003 betreffende de herstructurering van het hoger onderwijs in Vlaanderen].

¹⁵ The Netherlands and Flanders are each individually responsible for their own legislation on education and for their educational systems.

¹⁶ Clause 2, sections 1 and 2 of the Treaty state the following:

1. The accreditation organisation is a legal body according to Dutch law.
2. The accreditation organisation can take decisions according to Dutch law and can execute administrative legal acts according to Belgian law.

5.3 Mission and strategic policy

NVAO's mission is clearly dependent on legislation. This mission has been incorporated in the NVAO Quality Statement¹⁷, which was approved by the board on 10 April 2006. During the spring of 2007, NVAO also drew up a Strategic Policy Statement¹⁸.

5.3.1 Mission

NVAO has defined its mission as follows:

The Accreditation Organisation of the Netherlands and Flanders (NVAO) independently ensures the quality of higher education in the Netherlands and Flanders by assessing and accrediting programmes, and contributes to furthering this quality. In addition, NVAO contributes to raising quality awareness within higher education and advancing the position of higher education in the Netherlands and Flanders in the national and international context.

NVAO's mission refers to two elements from the Treaty: '(initial) accreditation of higher education programmes in the Netherlands and Flanders' and 'advancing the position of higher education in the Netherlands and Flanders in the national and international context'.

The organisation of NVAO's systems of (initial) accreditation is further described in Chapter 6 'The accreditation systems of the Netherlands and Flanders'.

In its Quality Statement, NVAO states that it considers institutions primarily responsible for quality improvement. NVAO sees its role as stimulating the quality debate, giving account of its procedures, disseminating 'good practices' and visiting the institutions and programmes. NVAO respects the autonomy of institutions, which are themselves responsible for their internal quality assurance and for taking measures for quality improvement.

In practice, NVAO's role in stimulating debate is illustrated by its ten or more visits a year to institutions in the Netherlands and Flanders. During these visits, discussions are held with the management of the institution on, among other things, their experiences with the accreditation system and the analysis of a series of accreditation decisions for a number of their programmes. The initiative for these visits comes from NVAO.

In addition, members of the NVAO Executive Board often give presentations at conferences. NVAO organises a conference itself every two years either in the Netherlands or in Flanders. Apart from these conferences, several smaller workshops are organised relating to specific themes. During conferences and workshops NVAO holds discussions, gives presentations on its procedures and disseminates 'good practices'. The goal of these activities is quality improvement in higher education. Furthermore, the NVAO newsletters issued every two months give more information on several issues regarding (initial) accreditation. These activities are further described in the Communication Strategy 2006-2007¹⁹.

How NVAO is advancing the position of higher education in the Netherlands and Flanders in the national and international context is further described in Chapter 7 'The international policy of NVAO'.

¹⁷ NVAO Quality Statement (adopted by the NVAO Board on 10 April 2007) <English version available>.

¹⁸ NVAO Strategic Policy Statement (adopted by the NVAO Board in March 2007) <English version available>.

¹⁹ Communication Strategy 2006 – 2007 <English version available>.

5.3.2 Strategic policy statement

During the spring of 2007, NVAO drew up a Strategic Policy Statement. The primary points of departure in this statement are: the implementation of tasks laid down by law, the advancement of quality and quality awareness, engagement with the international developments and the international position regarding quality assurance and, finally, the realisation of specific tasks related to quality as commissioned by the responsible ministers. NVAO does not actively seek to extend its tasks and duties.

5.4 Staff Management of NVAO

NVAO has a (General) Board of which the chair and three other board members separately comprise the Executive Board. NVAO also has an Advisory Council.²⁰ The preparation of policy decisions is done by the staff. This includes staff members (policy, legal and communication advisors) and support staff (policy secretariat, finances and personnel, records department and general services). The staff are managed by the director. See the organisational chart on the next page.

5.4.1 Board, director and advisory council

The NVAO governing body consists of an Executive Board and a (General) Board. The Executive Board meets every week and is responsible for the day-to-day management of the organisation for which it is accountable to the Board. The day-to-day management comprises: the administrative organisation of NVAO; the decision-making process preceding the ratification of an (initial) accreditation decision; the employment, the salary and dismissal of personnel; the decision to seek advice on legal, financial or policy matters; and, finally, finance management and management of the moveable assets of NVAO.²¹

The Board ratifies decisions from the Executive Board and plays an explicit role in handling difficult cases concerning applications for (initial) accreditation. If necessary, the Board can acquire a mandate, an authorization and/or full power to take decisions. The Board meets every month.

The Committee of Ministers appoints the members of the Board for a four-year term on the recommendation of the Dutch and Flemish Higher Education ministers. Members of the Board are eligible for reappointment for another term of four years and are recommended on the basis of their expertise in higher education, their professional practice related to higher education or their field of research or quality assurance. The Board constitutes a complete entity and as such takes decisions on applications concerning (initial) accreditation irrespective of whether they concern an application from the Netherlands or Flanders.

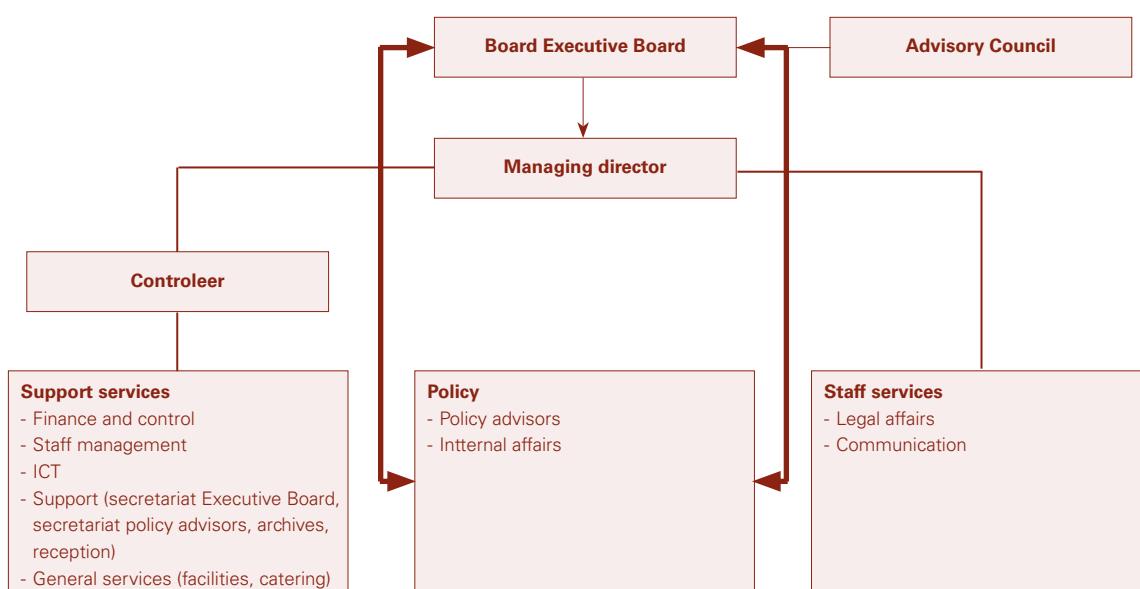
The Director manages the NVAO staff, is responsible for the organisation's day-to-day affairs and implements the strategic policy as set out by the Board. The Director sees to the correct implementation of decisions taken by the Board and is responsible for periodical reporting to the Board.

²⁰ Administrative Regulation of NVAO – ('Bestuursreglement NVAO', Nederlands-Vlaamse Accreditatieorganisatie). This Regulation is mentioned in Clause 7, section 3 of the Treaty.

²¹ A full description is incorporated in the Regulation concerning the description of some aspects of the working procedures of the Accreditation Organisation of the Netherlands and Flanders - [Regeling betreffende de omschrijving van sommige werkingsaspecten van de Nederlands-Vlaamse accreditatieorganisatie] <no translation available>.

The Board is assisted in its task by the Advisory Council consisting of eleven members who represent NVAO's stakeholders. The Advisory Council's primary task is to provide advice – solicited or unsolicited - to NVAO on the general policy of NVAO. The Advisory Council meets twice a year on average. The Dutch members of the Advisory Council are appointed on the recommendation of the following organisations: the Netherlands Association of Universities of Applied Sciences (HBO-raad), the Dutch National Students Association (ISO), the National Union of Students (LSVb), the Platform of recognised private institutions (PAEPON) and the Association of Universities in the Netherlands (VSNU). The Flemish members of the Advisory Board are appointed on the recommendation of: the Flemish Interuniversity Council (VLIR), the Council of Flemish University Colleges (VLHORA), the National Union of Students in Flanders (VVS) and the Flemish Social and Economic Council (SERV).

Organisational chart of NVAO



Legend:

- Formal hierarchical line
- Advice line
- Internal consultation line

5.4.2 NVAO staff

The NVAO staff include staff members (policy, legal and communication advisors) and support staff who provide support services (secretariat, finances and human resources, records department and general services).

The staff members are a mix of young and experienced people from the Netherlands and Flanders. The more experienced staff members are expected to possess wide-ranging knowledge of higher education and/or quality assurance, or a specific legal or communications background. In actual figures, NVAO has currently employed 3,0 fulltime equivalents (fte) staff members with bachelor's degrees, 17,6 fte with master's degrees and 4,0 fte with a PhD level.²² Together they represent all major academic disciplines.

²² As at 8 March 2007.

The policy advisors have their own secretariat that is responsible for the administrative processing of applications. The Records Department put the digital and hard copy of incoming and outgoing mail and application dossiers into the archives. Support services are managed by the Controller.

For reasons of efficiency, ICT is outsourced. There is 1,0 fte permanently posted with NVAO to guarantee continuous support.

To employ new personnel, vacancies are widely published in Dutch and Flemish media. NVAO gives a high priority to the continuous training of its staff. For this purpose, a specific part of the annual budget is dedicated to training expenses. Staff are invited to attend conferences, seminars, presentations and lectures. A number of staff members have obtained a time credit in order to follow specific training or to prepare their PhD dissertation.

5.4.3 *Independence of the Board and of the policy advisors*

In order for members of the Board and policy advisors to be considered independent, NVAO has ruled that they cannot participate in applications from institutions that they have been associated with in any form over the last two years. For programmes a period of five years is applicable.

Members of the Board are completely independent in taking decisions. If there is a specific application where this cannot be guaranteed, the member of the Board will withdraw from the decision-making process for the programme concerned.

5.5 *Financing, work force and location of NVAO*

NVAO is financed both by the Netherlands and Flanders (60% by the Netherlands and 40% by Flanders) and has an annual budget of approximately € 6 million. The work force is limited (about 35 fte). NVAO is located in The Hague.

5.5.1 *Financial situation*

The Treaty stipulates that 60% of NVAO's finances come from the Netherlands and 40% from Flanders. Overall, NVAO has an annual budget of approximately € 6 million. This amount was set on the basis of studies by the 'Commission Fransen' in the preparation of the accreditation system. It has subsequently been extrapolated to the Flemish situation.

External reviews of programmes (by quality assessment agencies) are financed by the institutions themselves. These costs are thus not accrued to NVAO.

The costs incurred by NVAO for initial accreditation of programmes are partly charged through to the institutions. For the Netherlands, this amounts to a maximum of € 10.000,- and for Flanders to a maximum of € 5.000,-. The costs per accreditation amount to € 500,- financed by the institution. The income gained from (initial) accreditation procedures are deducted from the amount assigned to NVAO from government funding.

Staff members of NVAO are directly recruited or appointed by NVAO. NVAO bears all labour costs of its work force.

5.5.2 Work force²³

NVAO has 34,3 fte personnel. The NVAO Board consists of a maximum of fifteen members (60% by the recommendation of the competent Dutch minister and 40% by the recommendation of the competent Flemish minister), the Executive Board consists of a maximum of five members (a maximum of three Dutch members and a maximum of two Flemish members). At present, the Executive Board consists of four fulltime members, two Flemish and two Dutch members, of whom one is the chair. The Board consists of six Dutch and six Flemish members. The NVAO consist of 22,5 fte staff members (policy, legal and communication advisors) and 10,8 fte support staff. About 3 fte of staff members are available for international projects. The staff are managed by a director.

The total workforce of NVAO was assigned in 2004 on the basis of the estimated workload for applications: three working days for an accreditation application and from eight to eleven working days for an application for initial accreditation. This resulted in a budget based on an estimated yearly average of 430 applications for the Netherlands and 250 applications for Flanders. The actual number of people employed is still based on these figures on which the budget was based.

However, the amount of applications received is variable. Especially for the Netherlands, 2006 and 2007 are peak years for applications. NVAO has taken some measures to reduce this burden as much as possible, such as appointing external secretaries for initial accreditation procedures and employing policy advisors or other personnel on a temporary basis.

5.5.3 Location and work space

NVAO is established at one location: a spacious office building centrally located in The Hague. NVAO has modern information and communication tools at its disposal.

5.6 NVAO's stakeholders

NVAO considers the participation of both its staff and the external stakeholders of the utmost importance. In the complex field of higher education, the Netherlands and Flanders are confronted with many different stakeholders. These stakeholders can be subdivided into four groups: three different layers of external stakeholders that are concentrically situated around the working of NVAO, and one group of internal stakeholders at the NVAO level:

First layer

- the higher education institutions in the Netherlands and Flanders
- the umbrella organisations for higher education in the Netherlands (VSNU, HBO-raad and PAEPON) and Flanders (VLIR and VLHORA)
- the quality assessment agencies of the Netherlands and Flanders (VLIR and VLHORA) and the international panels of experts working for NVAO
- students' associations in the Netherlands (LSVb and ISO) and Flanders (VVS)
- Ministers responsible for Higher Education of the Netherlands and Flanders and both governments

²³ As at 8 March 2007.

Second layer

- employers' organisations and trade unions in the Netherlands represented in the educational committees of the Social and Economic Council of the Netherlands (SER) and in Flanders represented in the Flemish Social and Economic Council (SERV)
- Education Councils in the Netherlands and in Flanders
- international accreditation organisations and their associations

Third layer

- society at large, consisting of Dutch and Flemish civil society (including, amongst others, the media)

Internal

- the NVAO staff
- the NVAO Board
- the NVAO Advisory Board

The first, second and third layer of stakeholders are, to a greater or lesser extent, involved in the functioning of NVAO. The involvement of the internal level is at the same level as that of the first layer. This has been further elaborated in the evaluations for the internal quality assurance system (see next paragraph).

5.7 System of internal quality assurance

From the outset, NVAO has developed a system for its internal quality assurance. Initially, this system had a more thematical approach than a structural one. As the organisation gradually took on a more structured form, the system for internal quality became more structured as well (2006) and a more systematic approach for evaluation was developed (2007).

5.7.1 Starting points

NVAO has developed a system for quality assurance that:

- allows an integrated approach of the organisation and its working processes by applying the nine criteria of the EFQM-model²⁴,
- allows frequent evaluation of the results and a structured plan for improvement (by following the Plan-Do-Check-Act cycle),
- is transparent, simple and non-bureaucratic through the application of a limited number of instruments),
- provides the basis for an external (international) evaluation by the adoption of international standards in the development of the internal quality assurance system,
- stimulates involvement of all staff members, and in addition,
- guarantees involvement of all stakeholders by means of an open dialogue with these stakeholders.

NVAO independently determines its priorities and pace within the framework of international agreements on quality assurance.²⁵

²⁴ European Framework of Quality Management

²⁵ NVAO Quality Statement, 10 April 2006.

5.7.2 Elaboration

NVAO distinguishes 13 quality areas within the internal quality assurance system ('Strategy, Policy and Leadership', 'Accreditation', 'Initial Accreditation - including Research Master's Programmes', 'International Affairs', 'Communication', 'Legal Affairs', 'Support Services', 'Additional Tasks', 'Quality Assurance', 'Human Resources', 'General Services', 'Finances and ICT'). For each quality area, a Quality Area Working Group has been formed consisting of NVAO staff members and a quality area coordinator. A member of the Executive Board is appointed as primarily responsible for each quality area. The 'Working Group Quality Assurance' (the quality group pertaining to the quality area of Quality Assurance) coordinates all tasks regarding quality assurance.

Blueprint of the outline of quality areas²⁶

Quality area	A*	B**	R***
1. Strategy, Policy and Leadership			
Operational Management	2. Accreditation		
	3. Initial Accreditation (incl. research master's progr.)		
	4. International Affairs		
	5. Communication		
	6. Legal Affairs		
	7. Support Services		
	8. Additional Tasks		
	9. Internal Quality Assurance		
Staff Management	10. Human Resources		
Resource Management	11. General Services		
	12. Finance and Control		
	13. ICT		

* A: Coordinator quality assurance (staff member directly responsible for the quality assurance cycle in the quality area concerned);

** B: Staff members involved, who together with A and R make up the quality group within that quality area.

*** R: Board member with primary responsibility for the results.

For each quality area, strategic objectives and target figures are set on an annual basis. In addition, evaluation data is gathered by each Quality Area Working Group on a systematic basis and at least once a year. The character and the level of completeness of evaluations are prepared by the quality coordinator of that specific quality area.

²⁶ Quality Areas of NVAO's Internal Quality Assurance System <English version available>.

The starting point is that primary processes (Accreditation, Initial Accreditation and International Affairs) are subject to a more thorough evaluation in comparison with other processes. The Working Group Quality Assurance facilitates the process and steers the evaluations for the whole organisation.

As of 2007, each Quality Area Working Group will draw up an annual quality report concerning its own quality area. The separate quality reports will be integrated into the annual quality report of NVAO. The Working Group Quality Assurance will draw preliminary conclusions and will formulate possible measures for improvement. Subsequently, the Executive Board and the director will discuss the quality report. They will develop it into an annual management strategy that refers back to the different quality areas. The strategic targets per quality area are the steering factors in this process.

5.7.3 *Implementation*

Since the beginning of 2006, a structured system of internal quality assurance was developed and implemented: the quality assurance model (based on EFQM) was developed, quality areas were defined, quality coordinators were appointed and a budget was drawn up.

By the end of 2006, a protocol had been drawn up for each quality area that included the strategic objectives and target figures for 2006 and 2007. For the primary processes the objectives and target figures were also linked to set periods of evaluation.²⁷

As of spring 2007, the protocols have actually taken effect and the process of systematic evaluation has been put into operation.

Prior to the implementation of the quality protocols, NVAO organised a large number of quality assurance activities that had a more thematical and incidental character. Examples of external activities were the evaluation among panel members of the initial accreditation procedure and the subsequent 'round table conference' with panel chairs and the evaluation among quality assessment agencies in the Netherlands on the occasion of their annual listing. Internally, an inventory of weak points was drawn up among NVAO staff concerning NVAO's functioning regarding (initial) accreditation and a evaluation was made regarding the assessment of 'Associate degrees'.

5.8 **Additional tasks**

Apart from its primary responsibilities (i.e. (initial) accreditation), NVAO is charged with some additional tasks. These tasks have to be approved by the Committee of Ministers and should be compatible with NVAO's mission. For these tasks, extra budgetary provisions are made available. In the Strategic Policy Statement it was set down that if a new task is agreed upon, it should be in line with or provide an obvious connection with quality assessment of programmes. NVAO's most important additional tasks are the following.

5.8.1 *Administrative management evaluation*

From the Inspectorate of Education in the Netherlands, NVAO has taken over the administrative management evaluation that was a part of the assessment procedure in the previous external assessment system. This task will be completed by mid-2007. The administrative management evaluation refers, on the one hand, to assessing the quality of the organisation and the realisation of activities of the external assessment panels that were operational before 2004, and, on the other hand, to assessing the extent to which institutions have taken action on improving weaknesses pointed out by the external assessment panel during an earlier assessment procedure.

²⁷ NVAO Quality Assurance Protocols 2006 <English version available>.

5.8.2 Associate degrees

A second additional task concerns the assessment of Dutch applications for Associate degree programmes. These 'pilot' programmes were assessed by NVAO in the 2005-2006 period at the request of the State Secretary of Education in the Netherlands. These programmes can be provided by universities of professional education which offer accredited bachelor's programmes in the same field of study. Associate degree programmes are short first cycle programmes with a professional orientation that are usually completed within two years. After completion of these programmes graduates can enter the labour market or continue their studies at the bachelor's programme of the university of professional education.

5.8.3 'Open system'

A third extra task concerns the initial accreditation of programmes within the Dutch experiment 'Open System' [Open Bestel]. These programmes are offered at either a recognised private university of professional education or a private institution for higher education, which under the terms of this experiment can receive public funding.

5.8.4 'Room for Talent'

Another additional task is the assessment of the Dutch experiment 'Room for Talent' [Ruim baan voor talent]. Under the terms of this experiment, programmes are allowed to raise tuition fees and enrol students on the basis of selection if programmes offer 'recognised and evident added value'. Another part of this experiment is that it aims to enhance the development of honours' programmes. To assess 'evident added value' in programmes with a selection of students and higher tuition fees and for the assessment of honours' programmes, NVAO has developed assessment frameworks and has set up an evaluation committee.

5.8.5 Recognition of private higher education institutions

The Dutch State Secretary of Education, Culture and Science has stipulated the policy regulation concerning recognition of private higher education institutions and has requested NVAO to play a role in the recognition procedure.²⁸ For this purpose, NVAO has developed the 'Protocol Recognition Procedure'²⁹ including the criteria that programmes have to meet to be eligible for recognition.

5.8.6 Protocol broadened programmes

The Dutch minister for Education, Culture and Science determines whether an institution's intention to combine two or more programmes already incorporated in the Central Register for Programmes in Higher Education (CROHO) leads to a broadened new programme. In this regard, NVAO carries out a marginal assessment and provides advice to the minister. For this purpose, the 'Protocol Broadened Programmes'³⁰ has been developed.

²⁸ Recognition means that, in the Netherlands a higher education institution – with the exception of the right to public funding – enjoys the same rights as a publicly funded institution. It concerns either legal bodies that offer accredited advanced master's programmes or recognised private institutions (recognised as such by the government). If an institution is neither publicly funded, nor recognised and applies for accreditation of its programmes with NVAO, the institution will first have to apply for recognition.

²⁹ Protocol Recognition Procedure, explanatory note on the NVAO procedure, 13 September 2004 – [Protocol aanwijzingsprocedure, toelichting op de werkwijze van de NVAO, 13 september 2004] <no translation available>.

³⁰ Protocol for the implementation of art. 5.1 and 5.2. of the Policy Rule Effective Higher Education (Stcrt 2006, 131) - [Protocol ter uitvoering van de artikelen 5.1 en 5.2 van de Beleidsregel doelmatigheid hoger onderwijs (Stcrt 2006, 131), inhoudende de uitgangspunten van de NVAO met betrekking tot de samenvoeging] <no translation available>.

5.8.7 *Integrated supervision of higher education*

The objective of the project ‘Integrated Supervision Higher Education’ [Geïntegreerd Toezicht HO] is to establish an integrated chain of supervision in higher education in the Netherlands. This form of supervision should be all-encompassing and supply supervisory information on the quality in higher education. Risks and problems should be identified as soon as possible and should be made visible. This should not place a burden on institutions, but requires close cooperation between the parties active in the field of supervision in higher education. NVAO, the audit service of the Ministry of Education, Culture and Science, the Inspectorate of Education in the Netherlands and the Central Funding of Institutions Agency [Centrale Financiën Instellingen] (CFI), the latter supplying the information to the other partners, are charged with integrated supervision. In addition, the IB-group [IB-groep] occupies an important position regarding the registration of student and programme data.

5.8.8 *Higher Education Register*

A last extra task concerns the online development and database administration of the Higher Education Register in Flanders (HOR, <http://www.highereducation.be>). This website lists all the recognised bachelor and master’s programmes in Flanders.

6 The accreditation systems of the Netherlands and Flanders

The accreditation procedures of the Netherlands and Flanders relate to both accreditation and initial accreditation.

The accreditation procedure laid down in Dutch and Flemish legislation stress the importance of the role of both the Dutch and Flemish quality assessment agencies³¹. In the accreditation procedure, the panels assessing a programme operate under the supervision of these quality assessment agencies. Based on the assessment report³², NVAO takes an independent decision on whether the programme offers sufficient generic quality. In the case of initial accreditation, the assessment is delegated to an assessment panel selected by NVAO. In the Netherlands, an initial accreditation procedure may also be carried out by an assessment agency.

The Dutch and Flemish (initial) accreditation systems contain the following elements:

- Assessment frameworks for (initial) accreditation consisting of themes, standards and criteria linked with assessment rules;
- A description of equivalence in the case of an international accreditation (only applies for Flanders)
- Protocols for research master and extended master's programmes (only applies for the Netherlands).

The subsequent themes described in this chapter are: the frameworks for (initial) accreditation, the quality assessment agencies in the Netherlands and Flanders, the different steps of the (initial) accreditation process, the NVAO decision-making process, consistency in decision-making, procedures for appeal, the publication and readability of assessment reports and (initial) accreditation decisions and quality improvement of programmes.

Each paragraph begins with a summary. The different elements of the summary are elaborated in subparagraphs. Each paragraph ends with a subparagraph in which NVAO expresses its understanding of the described activities.

The chapter ends with a summarizing overview of the (initial) accreditation procedures in the Netherlands and Flanders.

6.1 Frameworks for (initial) accreditation

When drawing up the frameworks, NVAO had to take into account the assessment criteria previously stipulated in Dutch and Flemish legislation. Based on these, a number of themes with underlying standards and criteria were formulated.

NVAO applies different frameworks for the Netherlands and Flanders both for accreditation and initial accreditation. However, these frameworks have been made as similar as possible. Differences mainly stem from differences in the higher education systems of the Netherlands and Flanders rather than differences in quality standards. The quality standards and the assessment rules are almost identical in both frameworks. To accommodate to the diversity of programmes offered both in the Netherlands and Flanders and the autonomy of institutions, NVAO refrained from drawing up detailed and normative/prescriptive frameworks. On the contrary, these frameworks have been conceived to be all-purpose and accessible.

³¹ Quality assessment agencies in the Netherlands are referred to in Dutch as 'VBI's' [Visiterende en beoordelende instanties], which are the quality assessment agencies that appear on the list that is drawn up annually; in Flanders, they are called the 'Evaluatieorganen'.

³² In this report, the term 'assessment report' is used both for the reports that are drawn up by quality assessment agencies and for the reports drawn up by NVAO panels in the initial accreditation procedure.

The Dutch and Flemish (initial) accreditation frameworks were designed after consultation with representatives of institutions and programmes and experts involved in assessment procedures. A specific section of the Flemish accreditation framework relates to the possibility of recognising the equivalence of an accreditation decision by an international organisation. For the Netherlands, there are supplementary protocols for research master's programmes and for extended master's programmes.

All frameworks are available online on NVAO's website (<http://www.nvao.net>).

6.1.1 *The structure of the accreditation frameworks*

The accreditation framework for the Netherlands (14 February 2003) and the accreditation framework for Flanders (14 February 2005)³³ are the frameworks that are used to assess programmes that are already offered and registered. The accreditation framework for the Netherlands consists of 6 themes and 21 standards and is applicable to the four types of bachelor and master's programmes offered in the Netherlands. The framework for Flanders consists of 6 themes and 23 standards and is applicable to the three types of programmes offered in Flanders.³⁴

The assessment panel assesses all standards on a four-points scale: unsatisfactory, satisfactory, good and excellent. Standards that are assessed 'unsatisfactory' can – if substantiated – be compensated within one theme. However, each theme as a whole has to be rated 'satisfactory'.

6.1.2 *Initial accreditation frameworks*

The initial accreditation framework for the Netherlands (14 February 2003) and the initial accreditation framework for Flanders (14 February 2005)³⁵ are the frameworks that are used to assess programme proposals or programmes that are not officially registered. The initial accreditation framework for the Netherlands consists of 6 themes subdivided into 19 standards. It is applicable to the four types of programmes offered in the Netherlands. The initial accreditation framework for Flanders consists of the same 6 themes and 21 standards and is applicable to the three types of programmes offered in Flanders. The standards need to be assessed by the panel on a two-points scale: 'satisfactory' or 'unsatisfactory'. This is normally a more limited 'ex ante' assessment, as a more extensive assessment of the learning outcomes cannot yet be undertaken.

6.1.3 *Differences between accreditation and initial accreditation frameworks*

The main difference between the accreditation and the initial accreditation frameworks concerns the final theme. In the accreditation frameworks the last theme is 'Results' and in the initial accreditation framework it is 'Conditions for continuity'. In the case of a programme that is already offered, it is important to assess whether it achieves its previously set aims and objectives, i.e. its intended learning outcomes. In the case of a new programme, it is important to assess whether an institution is sufficiently solvent and whether sufficient financial resources are invested in the programme. In addition, the new programme is also assessed on the basis of the guarantee offered to students that they will be able to complete the programme.

³³ <English versions available>

³⁴ See Chapter 3 'Higher education in the Netherlands and Flanders' for an overview of the types of programmes offered.

³⁵ <English versions available>

6.1.4 Drawing up the frameworks

Between October 2002 and January 2003, NVAO held numerous of consultative meetings in the Netherlands. Thanks to the substantial contribution of an external consulting firm (Andersson Elffers Felix; AEF), the concept frameworks were published in December 2002. In January 2003, five regional meetings were organised with all publicly funded institutions and most recognised private institutions. At the end of January 2003, a formal meeting was held with the umbrella organisations (VSNU, HBO-raad, PAEPON), students' organisations (ISO and LSVb) and the trade unions from the educational sector. In the second week of February 2003, the frameworks were submitted for approval to the then State Secretary, who gave her official approval on 22 May 2003. The Dutch frameworks were published in the official bulletin, the Staatscourant (2003, 120).

In Flanders, the frameworks were implemented later on, but the same approach was applied. Together with – among others - higher education experts, a project group was established that helped shape the frameworks by holding several consultative meetings with all stakeholders in higher education in Flanders (the government, umbrella organisations, social and economic partners, the Flemish Education Council. As a result of these consultative meetings, the frameworks were broadly accepted in Flemish higher education sector. During the course of 2004, the final versions of the frameworks were drafted. They were formally adopted by NVAO in February 2005 and ratified by the Flemish Government on 16 September 2005. They were published in the official bulletin, the Belgisch Staatsblad, on 22 November 2005.

To secure broad-based support for the frameworks and to increase public awareness of its contents, a number of meetings were organised for each Association in the period 2003-2004. At the request of some higher education institutions, several informative meetings were held and on 9 March 2005, a conference was organised in Antwerp for which the frameworks were one of the main topics.

6.1.5 Characteristics of the frameworks

The NVAO frameworks can be characterised as universal and accessible. The standards and criteria were formulated to be highly abstract rather than rigid and constraining. This was a conscious choice that was based on the feedback from the consultative meetings with the institutions during the initial phase of NVAO. In leaving the frameworks open for interpretation, NVAO desired to accommodate the autonomy of institutions and programmes. In this way, institutions are able to elaborate their educational concept themselves and can position themselves more effectively within the higher education sector. At the same time, quality assessment agencies are given the liberty to make professional assessments.

There have been some critical observations from quality assessment agencies and institutions regarding some aspects of the frameworks. First, there is criticism on the (alleged) overlap between certain standards, more precisely within the theme 'Aims and objectives' and between the themes 'Aims and objectives' and 'Curriculum'. Another critical observation refers to the frameworks being 'fragmentary'. This means that the subdivision between the themes 'Aims and objectives' and 'Curriculum' is considered artificial and too theoretical. The differences between the concepts 'competences', 'learning outcomes', and subject 'contents' are not always clearly understood in daily practice. In addition, some consider the frameworks to be too focussed on the processes of the programme and not enough on its content. Another criticism refers to the attention given to learning assessment. This only receives comparatively marginal attention, instead of a standard, some claim this should be a theme. Finally, there was also criticism on the fact that internationalisation only received marginal attention in the frameworks. Only in the theme 'Aims and objectives' is there explicit attention given to embedding programmes in the international context.

6.1.6 *Equivalence of international accreditation decisions*

In Flanders, institutions may have been granted a positive accreditation decision for a programme by an agency located outside Flanders. This accreditation decision can be used to submit an application for accreditation directly to NVAO. NVAO can recognise this positive accreditation decision as equivalent and thus grant accreditation. Conditions for equivalence of international accreditation decisions are included in the Accreditation Framework for Flanders.

In the Netherlands such an equivalence decision is not possible. To have their programme accredited, institutions can submit a report from an international accreditation organisation as if it were a report from a quality assessment agency that does not appear on the list (for more information on the list of quality assessment agencies in the Netherlands, see paragraph 6.2.1 'Quality assessment agencies in the Netherlands').

6.1.7 *Protocols for research master's programmes and extended master's programmes in the Netherlands*

At the request of the State Secretary for Education in the Netherlands, a separate protocol was developed for providing advice on research master's programmes.³⁶ This protocol describes how the initial accreditation framework should be implemented when assessing a research master's programme. NVAO wrote this protocol in close cooperation with the Royal Netherlands Academy of Arts and Sciences (KNAW) [Koninklijke Akademie van Wetenschappen]. An additional requirement is that the research master's programme should be specifically aimed at exceptional students. Another requirement is that the curriculum should be taught and composed by prominent researchers with a proven record in the field of research and with a well-functioning research environment at their disposal.

To assess these programmes on quality, NVAO draws on the expertise of KNAW. For that purpose, KNAW has set up several committees that advise on programmes within a specific discipline of the sciences.

Research master's programmes always take two academic years to be completed. The same applies for some other master's programmes as well, where one academic year is insufficient to complete the programme. For these programmes, NVAO has developed two separate assessment protocols³⁷. The first protocol concerns programmes in the field of comparative international law and programmes in the field of linguistics and culture where an extended study is needed for language acquisition. The second protocol concerns master's programmes that need two academic years to attain the desired learning outcomes that are internationally acceptable or that are necessary to meet the requirements of the professional practice.

³⁶ Initial accreditation framework: Subject/discipline-specific elaboration for research master's programmes [*Toetsingskader Nieuwe Opleidingen: Domeinspecifieke uitwerking voor Onderzoeksmasters, 1 september 2004*] <no translation available>.

³⁷ Protocol extended master's programmes, Assessment on the extension of programme length of some specific master's programmes with academic orientation, 23 April 2003; Protocol programme length master's programmes, 8 October 2003 [*Protocol verlengde masters, Beoordeling van de verlenging van de cursusduur van enkele specifieke masteropleidingen in het WO, 23 april 2003; Protocol cursusduur masters, 8 oktober 2003*] <no translation available>.

6.1.8 Availability of the frameworks

All (initial) accreditation frameworks are available online on the NVAO website (<http://www.nvao.net>). In addition, the regulations (for Flanders) and the guidelines for application from the Netherlands and from Flanders can also be downloaded. These guidelines refer to the requirements for submitting an application for (initial) accreditation^{38 39} that need to be met in order to be taken into consideration (NL) or declared admissible (FL) by NVAO. They also indicate the process of NVAO decision-making.

6.1.9 Appreciation

NVAO positively appreciates the open character of the frameworks. In drawing up the frameworks, maximum liberty was taken in the way that assessment criteria stipulated in Dutch and Flemish legislation were implemented. The frameworks are the result of close cooperation with the higher education sector and are fully supported by the Ministers responsible for Higher Education in the Netherlands and Flanders.

The themes incorporated in the frameworks broadly correspond with the themes that are internationally applied in the accreditation of programmes. The criticism from stakeholders that internationalisation and learning assessment are not given enough attention is understandable. In other international accreditation frameworks, learning assessment is often incorporated as a theme. The position learning assessment occupies in the framework is an issue that should be addressed when new (initial) accreditation frameworks are drawn up. The same applies for internationalisation.

According to NVAO, the alleged overlap within the frameworks, as indicated frequently by stakeholders, refers only to the Dutch frameworks, and more specifically, to the difference between the standards 'level' and 'orientation'. In NVAO's view, this overlap has been removed in the more recent Flemish frameworks.

The criteria stipulated in Dutch and Flemish legislation focus primarily on processes. NVAO does not agree with the criticism that this process-based approach undermines the importance given to content and the achieved learning outcomes. NVAO is of the opinion that sufficient attention is given in the frameworks to the content of a programme, especially under the themes 'Aims and objectives', 'Curriculum' and the important standard 'Achieved learning outcomes'.

6.2 Quality assessment agencies in the Netherlands and Flanders

In the Netherlands, the legislative opted for an open system of quality assessment agencies. In Flanders, the umbrella organisations for university colleges and universities have been recognised as quality assessment agencies by law. They are, respectively, the Council of Flemish university colleges (VLHORA) [Vlaamse Hogescholenraad] and the Flemish Interuniversity Council (VLIR) [de Vlaamse Interuniversitaire Raad]. The underlying basis of this decision was that this allowed university colleges and universities in Flanders to retain their ownership of the quality assurance system.

³⁸ The Netherlands: Guidelines Accreditation the Netherlands, 8 November 2005; Flanders: Guidelines Accreditation Flemish Community, 22 February 2005 - [Nederland: Handreiking Accreditatie Nederland, 8 november 2005; Vlaanderen: Handleiding accreditatie Vlaamse Gemeenschap, 22 februari 2005] <no translation available>.

³⁹ The Netherlands: Guidelines Initial Accreditation the Netherlands, 15 June 2005; Flanders: Guidelines Initial Accreditation Flemish Community, 5 December 2006 - [Nederland: Handreiking aanvraag Toets Nieuwe Opleiding Nederland, laatste versie: 15 juni 2005; Vlaanderen: Handleiding toets nieuwe opleiding Vlaamse Gemeenschap, 5 december 2006] <no translation available>.

The assessment of programmes is carried out by assessment panels. Both in the Netherlands and Flanders, in the accreditation procedure, these panels are selected by the quality assessment agency. Panel members should be independent. In the Netherlands, their independence is monitored by the quality assessment agency prior to the assessment procedure, whereas in Flanders, it has to be examined previously by a separate Recognition Commission [*Erkenningscommissie*]. NVAO also monitors the independence of panel members while judging the assessment report. (See paragraph 6.3.2. ‘The external assessment by the quality assessment agency’ for the assurance of independence in the initial accreditation procedure) NVAO has developed several protocols by which quality assessment agencies have to abide. NVAO also takes great care to assure the quality of the judgements.

6.2.1 Quality assessment agencies in the Netherlands

In the Netherlands, the legislative opted for a free market of quality assessment agencies. NVAO has been given the legal task to annually draw up a list of quality assessment agencies that are considered capable of producing assessment reports that meet NVAO requirements. To be eligible for inclusion on the list, quality assessment agencies annually submit a programme dossier to NVAO in which they point out how they meet the requirements of the ‘Protocol for Quality Assessment Agencies’⁴⁰ in order to be inserted on the list. Departure points are: the quality assessment agency should be an independent organisation, its assessment panels should be of good quality and its assessment reports should enable NVAO to make independent judgements whether an assessed programmes offer sufficient generic quality.

In addition, in accordance with the system implemented by NVAO, quality assessment agencies should undergo an audit every two years. The audits select and examine applications on a random basis and they examine the organisational aspects of the quality assessment agencies. Five quality assessment agencies in the Netherlands were included on the list for 2006 (Certiked, Hobéon, Netherlands Quality Agency (NQA), Quality Agency Netherlands Universities (QANU) and Det Norske Veritas (DNV)) and two German ones (Fachakkreditierungsagentur für Studiengänge der Ingenieurwissenschaften, der Informatik, der Naturwissenschaften und der Mathematik e.V. (ASIIN) and Foundation for International Business Administration Accreditation FIBAA)).

Each quality assessment agency has a different approach to quality assessment stemming from their origin. The approach applied by NQA en QANU (which have their origin in the umbrella organisations of the universities of professional education and universities, respectively) has developed from a content-oriented ‘peer review’ system. The approach of Hobéon, Certiked and DNV (originally certification agencies and/or consultancy agencies) is more focussed on a process-based audit. QANU is oriented towards universities while the other quality assessment agencies primarily focus on universities of professional education. Institutions can choose the quality assessment agency that applies the working method that best accords with their vision for their programme. Whichever approach is used, NVAO ensures that sufficient attention is given to the content and the achieved learning outcomes of the programmes in its decision-making process.

⁴⁰ Protocol for Quality Assessment Agencies, 22 August 2005 (last updated version) [Protocol VBI's Nederland, 22 augustus 2005] <English version available>

6.2.2 Quality assessment agencies in Flanders

Under the Flemish Act, the coordination of external assessments of programmes of statutory registered institutions has been delegated to VLIR and VLHORA. These two agencies have developed a joint protocol⁴¹ that was given an authoritative recommendation by NVAO on 14 February 2005. NVAO was also involved in the preparation of a protocol for embedding programmes in research.

Programmes offered at (privately funded) registered institutions are assessed by agencies that are recognised by NVAO. VLIR and VLHORA can also have themselves recognised for this kind of assessments. For this type of recognition, NVAO has drawn up regulations⁴² and guidelines⁴³.

6.2.3 Independence of panel members

In the protocol for the quality assessment agencies of the Netherlands, a requirement for inclusion on the list is that panel members should not only have authority and expertise, but should also be independent. When selecting panel members, quality assessment agencies explicitly take great care in selecting independent panel members.

Especially in Flanders, considering the position of the umbrella organisations, independence is a major issue. Procedures concerning independence have been developed thoroughly and independence of the decision-making process is made transparent and has been ratified by law. For this reason, VLIR and VLHORA are responsible for the selection of panel members, but it is the task of the Recognition Commission, prior to an assessment procedure, to verify whether panel members are independent of the institution or programme under review. The Recognition Commission is an independent body appointed by the Flemish Government that ratifies the independence of panel members in accordance with the stipulations of the Flemish Act. In the decision-making process, NVAO again explicitly verifies the independence of all panel members.

6.2.4 Quality assurance by quality assessment agencies both in the Netherlands and Flanders

If unclear issues are recurring in the assessment reports, NVAO looks into the problem with the quality assessment agencies. This takes place both in bilateral discussions between the quality assessment agency and NVAO (and in the Netherlands via the audits of quality assessment agencies) and during plenary meetings in which all quality assessment agencies are represented. These plenary sessions concentrate usually upon a central theme, e.g. the reduction of the accreditation burden in the Netherlands or procedures concerning prior learning (2006).

6.2.5 Appreciation

Although there are always some differences in quality between quality assessment agencies, NVAO is generally positive about the cooperation with quality assessment agencies and what can be achieved together: the independence of panel members is assured, the diversity in approach of the quality assessment agencies in the Netherlands runs parallel with the diversity in programmes and there is a regular exchange in which working methods are further developed.

⁴¹ Guidelines for assessment procedures in higher education, VLIR/VLHORA, February 2005 – [Handleiding Onderwijsvisitudes, VLIR-VLHORA, februari 2005] <no translation available>.

⁴² Regulation concerning the recognition of quality assessment agencies in Flanders that have a coordinating task regarding external assessment of programmes in higher education for non-statutory registered institutions in the Flemish Community, 19 February 2005 – [Reglement betreffende de erkenning van de evaluatieorganen die een coördinerende taak hebben ten aanzien van de externe beoordeling van hogeronderwijsopleidingen van niet-ambtshalve geregistreerde instellingen in de Vlaamse gemeenschap, 19 februari 2005] <no translation available>.

⁴³ Guidelines for recognition of quality assessment agencies in Flanders, 22 February 2005 – [Handleiding erkenning evaluatieorganen, 22 februari 2005] <English version available>.

6.3 Steps in the (initial) accreditation procedure

In the (initial) accreditation procedure there are roughly three steps that can be distinguished. First, the writing and submission of the self-evaluation report (in the case of accreditation) or the programme dossier (in the case of initial accreditation) by the institution. The second step is the actual site visit and the assessment by the quality assessment agency. The third step is the decision-making by NVAO. At any moment during the course of this process, the institution can decide to withdraw its application. If NVAO takes a negative accreditation decision, the institution will be granted an improvement period. In case new programmes want to receive public funding, the initial accreditation procedure will be combined with a macro-efficiency check.

6.3.1 *The writing and submitting of the self-evaluation report or the programme dossier*

The accreditation procedure starts with a self-evaluation report. This report is written by the institution and forms the basis for the external assessment. The self-evaluation report is not made public, as the report should contain self-critical and reflective aspects on the basis of which a panel should be able to form balanced judgements.

In cases of initial accreditation, the institution produces a programme dossier. This dossier is submitted directly to NVAO where it is examined to determine whether it is complete and suitable for the initial accreditation procedure.

6.3.2 *The external assessment by the quality assessment agency*

The panel should be composed of experts who have subject-/discipline-specific knowledge and who have experience in the relevant professional practice. There should always be a student member on the panel. In addition, there should also be an expert with pedagogical/didactical experience and one with quality assessment and audit expertise. An amendment in the requirements that was added in 2005 for quality assessment agencies in the Netherlands concerns the age and qualification requirements for the student member of the panel.

For initial accreditation, both in the Netherlands and Flanders, it is NVAO that selects the panel members. As with the external assessment by a quality assessment agency, these panel members should also have authority in their specific discipline, be independent and have expertise. There is no student member on the panel. In the Netherlands, a quality assessment agency can also be asked to carry out the initial accreditation procedure. In this case, the composition of the panel should be approved by NVAO prior to the assessment. It goes without saying that such a panel is subject to the same requirements as those selected by NVAO.

Prior to the assessment of the programme, the assessment panel should produce a subject-/discipline-specific frame of reference in which they specify what the learning outcomes of the programme should be to offer sufficient generic quality. Then the site visit takes place during which the panel examines additional information, holds discussions with representatives of the programme (such as the programme management, the teaching staff, the professional practice and the students). Furthermore, the facilities are inspected (such as the library or laboratories). During the site visit, several aspects of the self-evaluation report or programme dossier are verified, supplemented or, if necessary, clarified. On the basis of the self-evaluation report or the programme dossier and the site visit, the panel reaches a judgement of the programme. This judgement is described in the assessment report. Before the assessment report is endorsed, it is first presented to the institution for factual verification. The institution then needs to submit the final version of the report together with the application for accreditation to NVAO. In the case of initial accreditation, the panel submits its report directly to NVAO.

It was agreed with the quality assessment agencies that their assessment report should give a complete picture of the programme. Institutions themselves should mention their weak and strong points in their self-evaluation report and offer measures for improvement of the weak points. During the site visit, the panel assesses the institution's implementation of the measures for improvement and verifies whether the programme offers sufficient generic quality.

6.3.3 *The NVAO decision*

On the basis of the assessment report drawn up by the quality assessment agency (accreditation procedure) or by the panel (initial accreditation procedure), NVAO will formulate its 'intended decision'.

In the case of an accreditation procedure in Flanders, NVAO will formulate its considerations in an accreditation report that forms the basis of its accreditation decision. In the case of an initial accreditation procedure in Flanders, the considerations are formulated in an initial accreditation report (see paragraph 6.4. 'NVAO decision-making' for a more extensive description).

6.3.4 *Macro-efficiency check*

In Flanders, an institution submits an application for initial accreditation for each bachelor or master's programme that does not yet appear on the Higher Education Register under the programmes offered by that institution. Before NVAO can begin the initial accreditation procedure, a statutory registered institution should submit an application with the Recognition Commission to carry out a macro-efficiency check of the new programme. New programmes offered by non-statutory registered institutions do not need to undergo a macro-efficiency check.

In the Netherlands, a macro-efficiency check takes place after the initial accreditation decision. A positive accreditation decision by NVAO entitles a publicly funded institution to apply for a macro-efficiency check with the Ministry of Education, Culture and Science. After having passed this macro-efficiency check, a programme can be included in the Central Register for Programmes in Higher Education (CROHO)⁴⁴. After receiving a positive initial accreditation decision, a privately funded institution can have a new programme listed immediately on the CROHO register. A privately funded institution that is not recognised can only offer advanced master's programmes for registration in the CROHO register.

6.3.5 *Withdrawal of an application*

Both in the Netherlands and Flanders, an institution can withdraw its application at any moment in the course of the accreditation procedure before the final decision has been taken. In the Netherlands, this has happened 26 times since the accreditation system was set up. (This amounts to 3,2% of total applications in the Netherlands). The same applies for initial accreditation. An application can be (temporarily) withdrawn at any moment in the course of the initial accreditation procedure, before the final decision⁴⁵ is taken. In the Netherlands, this has happened 86 times with regular initial accreditation procedures and 36 times with research master's programmes. (This amounts to 32,7% and 24,2%, respectively, of total applications in the Netherlands for initial accreditation and research master's programmes). At the time of writing, there were 7 (temporary) withdrawals concerning applications for initial accreditation in Flanders. (This comes down to 50% of total applications for initial accreditation in Flanders). Withdrawal usually occurs if a programme was negatively assessed by the assessment panel. Withdrawals of applications are not published. In this way, institutions do not lose public confidence unnecessarily.

⁴⁴ The Information Management Group [*Informatie Beheer Groep*] is responsible for the administration of the CROHO register.

⁴⁵ This does only apply to initial accreditation in Flanders.

6.3.6 *Improvement period for programmes*

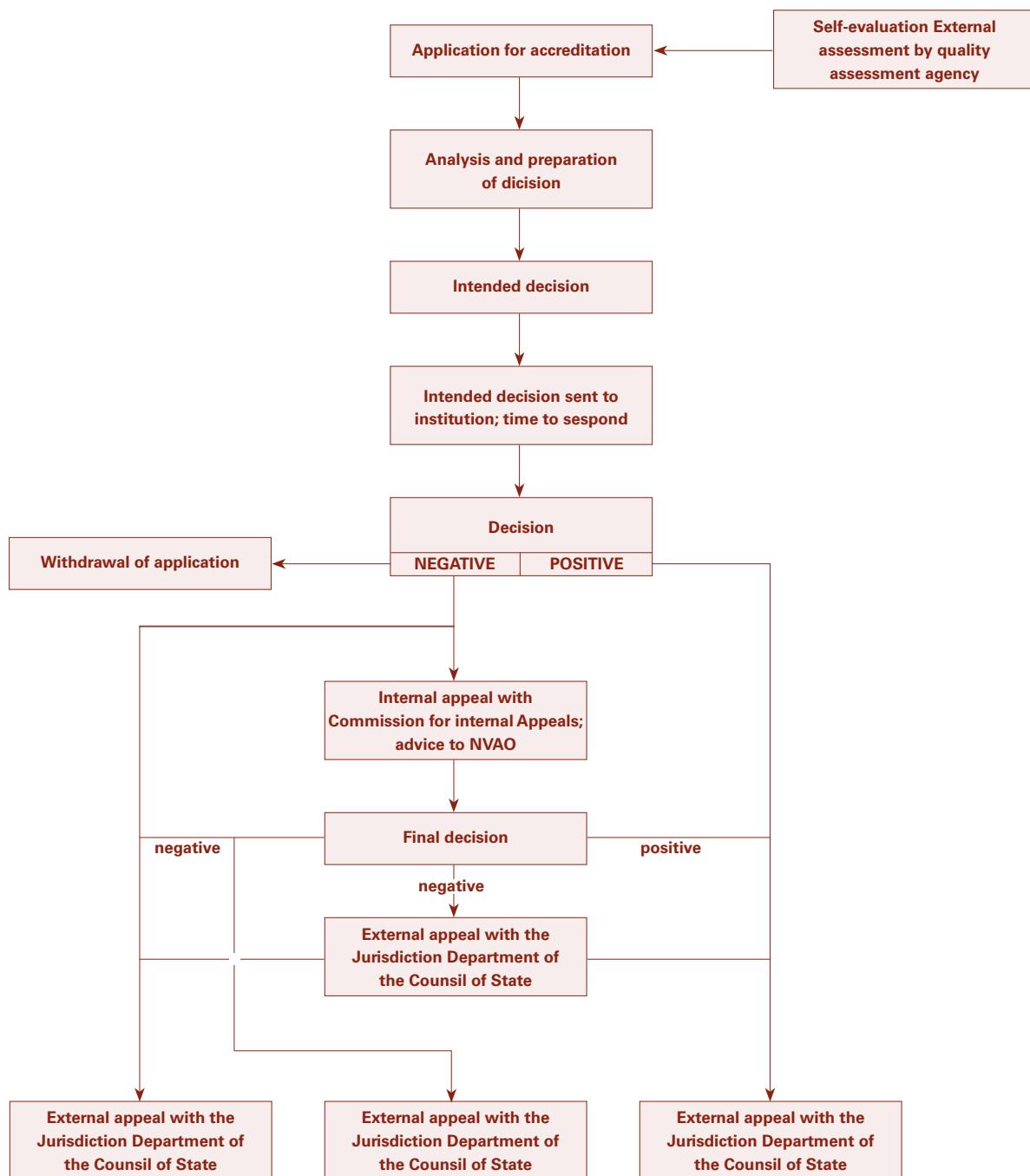
In Flanders, institutions can submit an improvement plan for the programme with the Flemish Government in the case of a negative accreditation decision. This means that, during a maximum period of three years, the institution will be allowed to work on improving the quality of the programme, after this period a new application for accreditation can be submitted. This temporary recognition is not granted automatically, but on the basis of the quality of the programme and the feasibility of the improvement measures. At the time of writing, no negative accreditation decisions have been taken – NVAO has taken a positive accreditation decision in all 42 cases – and, thus, as yet, there has been no application for temporary recognition with the Flemish Government.

In the Netherlands, there is also a possibility for an improvement period, but as long as a programme is not accredited, the institution cannot enrol new students in that specific programme. By the time of writing, this had occurred in the cases of two programmes.

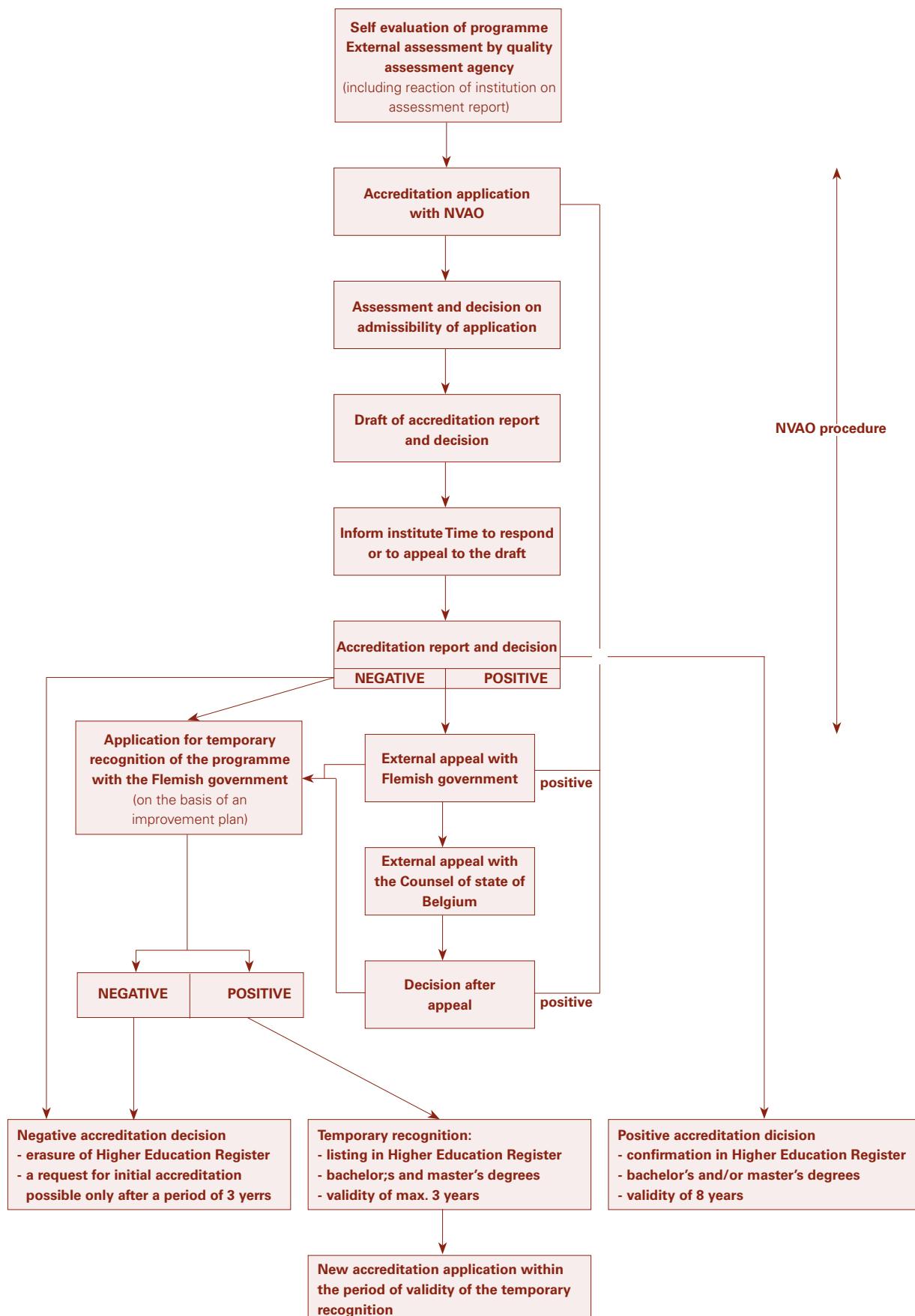
6.3.7 *Flow charts*

In flow charts, the working processes of (initial) accreditation for the Netherlands and Flanders can be represented as follows:

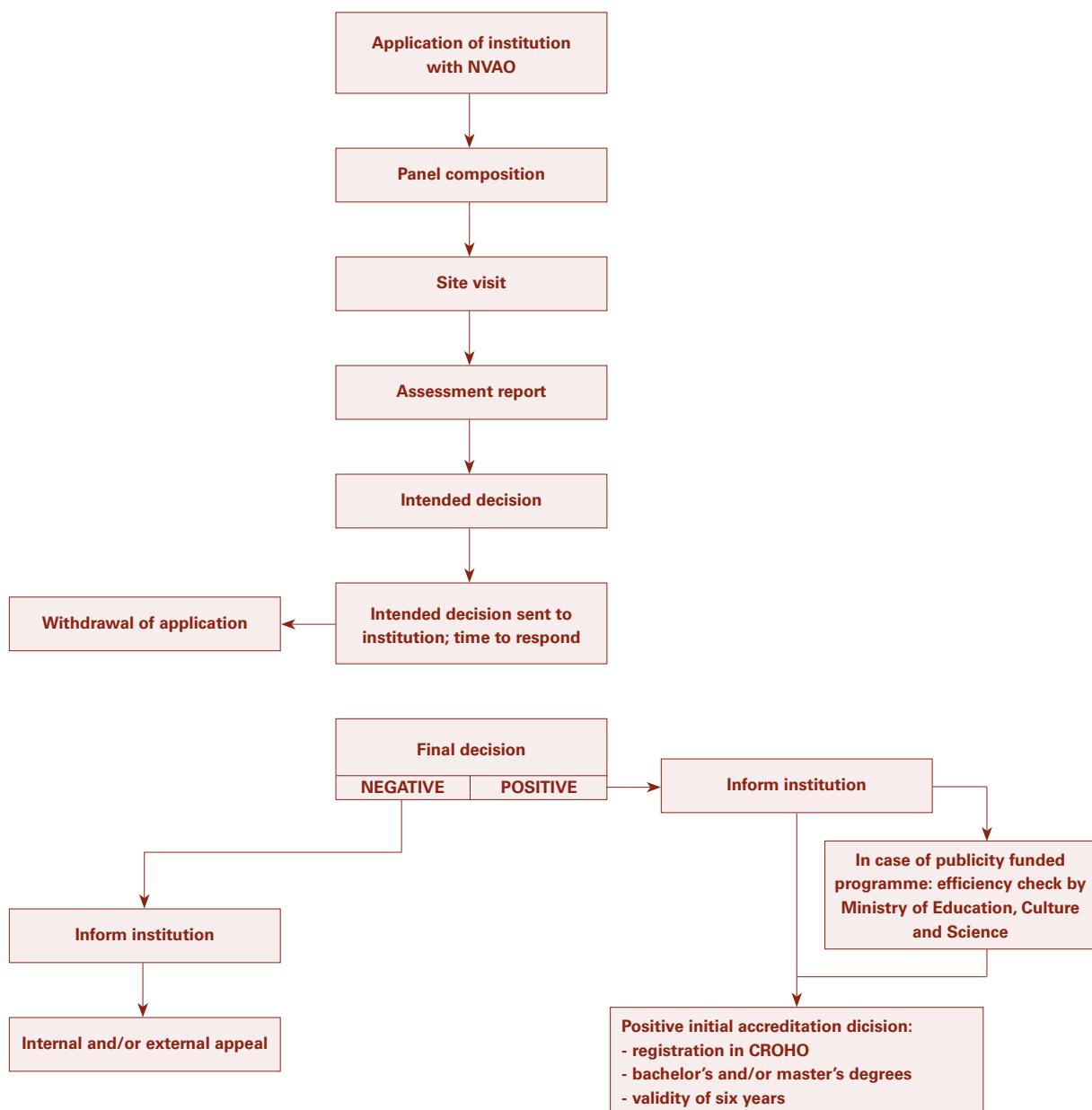
Flow chart 1: Accreditation in the Netherlands



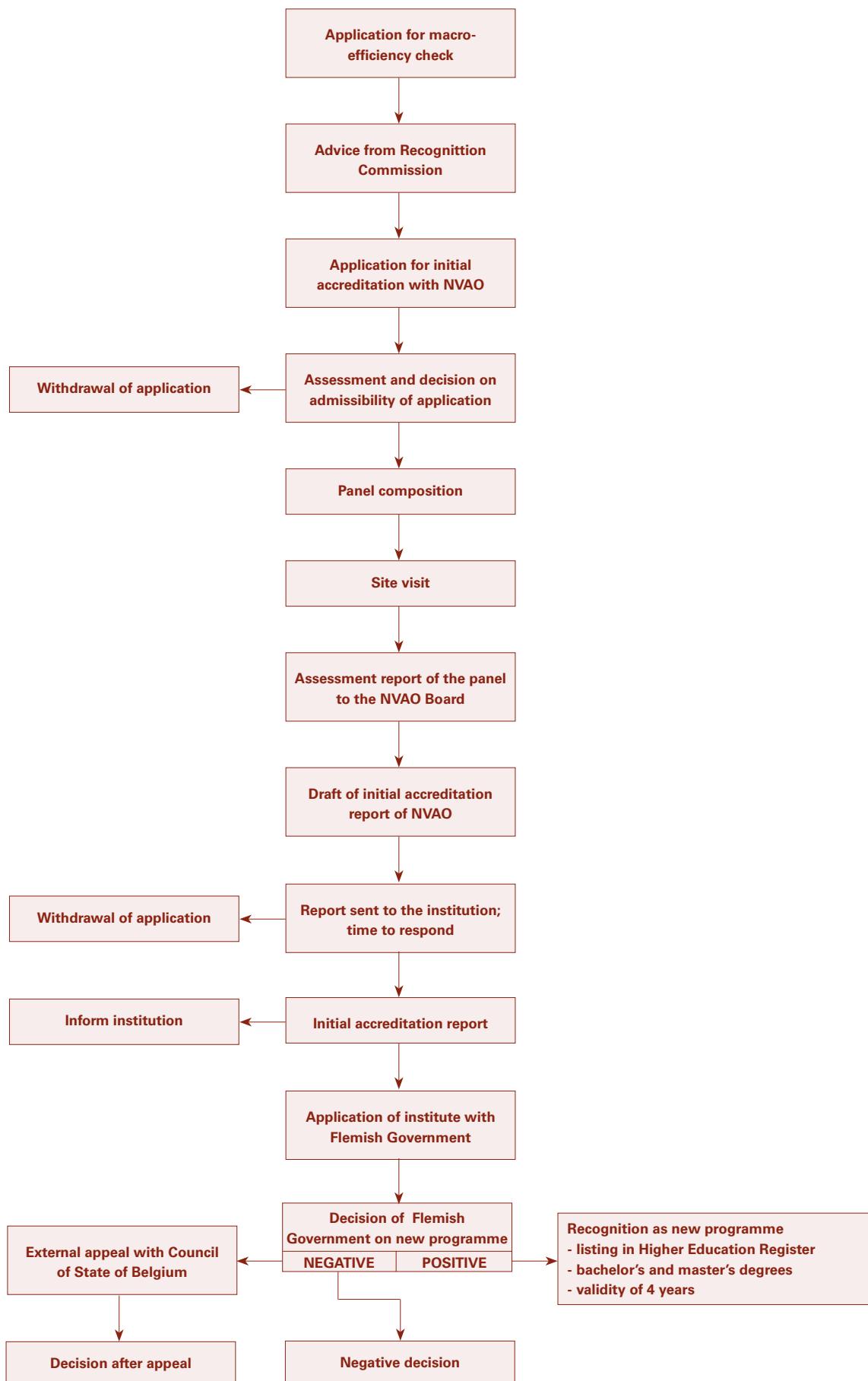
w chart 2: Accreditation in Flanders



Flow chart 3: Initial accreditation in the Netherlands



Flow chart 4: Initial accreditation in Flanders



6.3.8 *Appreciation*

The lack of a possibility for ‘an improvement period including the right to enrolment’ in the Netherlands, has led to insecurity and risk-avoiding behaviour in institutions. Quality assessment agencies indicate that this explains why self-evaluation reports sometimes lack depth. At the same time, the assessment procedure has become a formalised procedure. This explains why the report no longer includes recommendations for improvement of the panel, but focuses on giving evidence of the correct functioning of programmes. In addition, in the Netherlands, the fact that the quality assessment of a programme takes place before the macro-efficiency check is considered an impediment.

As a result of the limited number of applications in Flanders, it is difficult to make an appreciation of the (initial) accreditation procedure in Flanders.

6.4 **NVAO decision-making**

On the basis of the information provided in the assessment reports, NVAO should be able to reach a well-evidenced decision. In the case of accreditation, NVAO assesses the quality of the assessment report and the working method of the quality assessment agency. Standard procedures have been established for that purpose. If NVAO cannot make an independent positive decision on the basis of the assessment report, this application is submitted to further scrutiny. Subsequently, there are still several ways for NVAO to reach a well-evidenced decision: NVAO can ask additional questions or claim additional information, organise hearings or even reject the assessment report. The procedure that applies is different in the Netherlands and Flanders due to the differences in legislation.

Both in the Netherlands and Flanders, the (initial) accreditation procedure is subject to fixed time limits concerning assessment and decision-making. In some cases and for various reasons the deadlines for these terms are not met either by the institutions, the quality assessment agencies, or NVAO itself. Possible actions or sanctions for exceeding these deadlines also differ in the Netherlands and Flanders.

6.4.1 *Decision-making for standard applications*

In each assessment procedure, NVAO has to verify whether the quality assessment agency applied the protocol for quality assessment agencies (e.g. as to the question whether panel members meet the requirements) and whether the assessment report contains sufficient information and well-evidenced judgements for NVAO to be able to make an independent decision (amongst others, the name of the programme should be in accordance with the content of the programme). For this purpose, NVAO has drawn up internal handbooks and procedures.⁴⁶ They describe how NVAO decisions are prepared by policy advisors in cooperation with an Executive Board member. During the procedure, they apply standard templates for the documents used. The final decision is taken by the Executive Board and ratified by the Board. (See paragraphs 6.5.1. ‘NVAO internal handbooks’ and 6.5.2. ‘Procedures to obtain consistency in decision-making’).

⁴⁶ There are four internal handbooks: Accreditation the Netherlands, Accreditation Flanders, Initial Accreditation the Netherlands and Initial Accreditation Flanders <no translation available>.

Flow charts of these internal handbooks are available in English.

An additional procedure applies for the Netherlands in cases where the information provided in the assessment report is sufficient, but where NVAO desires greater clarity on the judgement of a specific standard or theme. If this case arises, NVAO will send a letter to the institution in which it will request the institution to contact the quality assessment agency, so that the assessment panel can draw up an additional motivation of its judgement concerning the theme or standard in question. Only if an assessment report is not completely clear on minor issues, the policy advisor will contact the external secretary (by phone) to have these minor issues clarified.

For initial accreditation procedures, for which NVAO selects the panel members, a policy advisor of NVAO will always be involved in the decision-making process. The policy advisor will give guidance to the panel following the procedure in the internal handbook. In principle, this policy advisor will also be the external secretary who writes the panel report. However, it is more often the case that a secretary from outside NVAO is appointed to write the panel report. In this case, the policy advisor will act as process coordinator and ensure that the assessment report meets the procedural requirements and is well-founded and transparent.

6.4.2 *Decision-making in cases requiring further scrutiny*

As regards applications in the Netherlands, the procedure applies that an assessment report is rejected if the presence of generic quality is insufficiently demonstrated for the different modes of study and the different locations or if a substantial part of the information is missing.⁴⁷ Since accreditation was introduced, 9 reports have been rejected. If an assessment report provides sufficient insight, but NVAO has reasonable doubt about the judgements of the panel and is considering rejecting the overall positive judgement of the panel, NVAO will hear the panel. If afterwards, NVAO still doubts the panel's judgements, NVAO will appoint a verification commission. This commission will organise a site visit to the institution and will write an assessment report on the standards and themes that caused doubts with NVAO. In the period 2003-2006, NVAO appointed a verification commission seven times. In these cases, NVAO will make a decision on the basis of the original assessment report by the quality assessment agency and the assessment report by the verification commission. This has led to a negative decision on five occasions, one positive decision and one rejection of the assessment report by the quality assessment agency. In addition, NVAO also applies specific procedures, depending on the content and gravity of its criticism concerning the assessment report and the extent of doubt about the generic quality of the programme. In its decision, NVAO will point out which specific procedure was followed.⁴⁸

These procedures also apply in cases of initial accreditation where the assessment report was written by a quality assessment agency.

Examples of cases of special scrutiny were programmes in the Netherlands that applied for a 'distinctive quality feature'⁴⁹. As it happened, the procedure to apply for a distinctive quality feature as described in the accreditation framework for the Netherlands, was unmanageable. After taking this matter under review with the quality assessment agencies and the institutions, an addendum was added to the accreditation framework in which 'distinctive quality' and a 'distinctive feature' can be assessed independently from one another.

⁴⁷ Memo on procedure in case the assessment report is rejected – accreditation procedure the Netherlands, 11 June 2005 [Memo: Werkwijze wanneer VBI rapport niet voldoet – accreditatie Nederland, 11 juni 2005] <no translation available>.

⁴⁸ As at 8 March 2007.

⁴⁹ Addendum distinctive quality features, 12 July 2006 [Addendum bijzondere kwaliteitskenmerken, 12 juli 2006] <no translation available>.

As regards applications in Flanders, NVAO will first verify whether all the necessary documents have been submitted, if the assessment procedure took place in accordance with the regulations (protocol) and whether the report gives judgement on each of the standards for each mode of study, location and specialisation. NVAO will then decide whether the application is admissible. If not, the institution will be offered the chance to supplement the application dossier. If, however, NVAO deems an assessment report to be insufficiently transparent in its formulation in order to be able to take an independent decision, an official hearing will be organised, a record of which will be kept. On the basis of the original report and on the basis of the record of the hearing, NVAO will decide whether the programme offers sufficient generic quality, or whether there is need for a supplementary or new external assessment. The record of the hearing is included in full in the final accreditation report (the NVAO decision).

A number of oral and written hearings have taken place. These hearings provided greater insight into the generic quality and the assessment of the programmes in question, which resulted in NVAO being able to make a substantiated decision.

For regular initial accreditation procedures, where the assessment panel does not convincingly offer a positive judgement, NVAO can still consider several possibilities which could lead to a positive judgement. NVAO can request the institution and/or the panel (chair) to provide additional information, can request the panel to reformulate the panel report or can request additional information from an external expert. If these supplementary procedures do not result in the desired level of information in order to judge whether a programme offers sufficient generic quality, the institution will be requested to (temporarily) withdraw its application, or NVAO will formulate a negative decision.

6.4.3 Consequences of rejecting the assessment report

If, in the Netherlands, an assessment report is rejected, the institution will be offered the opportunity to resubmit the application within one year. If, in Flanders, NVAO is unable to take an independent decision on the basis of an assessment report, a hearing will be organised. If this hearing does not result in a substantiated decision, the institution will be informed of the deficiencies in the assessment report and the term within which a new or supplementary assessment needs to take place.

6.4.4 Time limits regarding assessments

The assessment of programmes by NVAO takes place once every six years in the Netherlands and once every eight years in Flanders. In the case of new programmes, the assessment takes place within six years (the Netherlands) and within four years (Flanders) after the beginning of the programme. These cycles are stipulated in Dutch and Flemish legislation. Within a set period before the accreditation term has expired, the institution should submit an assessment report together with its application for accreditation to NVAO. The timeframe between the time of publication of the accreditation decision and the time of application is stipulated (by law). In addition, in Flanders, there is also a timeframe within which the whole assessment procedure has to be completed.⁵⁰

In the Netherlands, quality assessment agencies regularly exceed the time limit for submitting their assessment reports to NVAO. This was the case in 2004 with a number of programmes with professional orientation offered at universities of professional education, and in 2006-2007 this was the case with a number of programmes with academic orientation. In both cases this

⁵⁰ These timeframes are specified in the (initial) accreditation frameworks.

was due to a sudden increase of assessment procedures for which an assessment report had to be submitted before the end of the calendar year. The production of these reports, which has to be done separately for each programme, creates considerable time pressure. In cases of programmes with academic orientation, it is often a cluster of programmes that is assessed by the same assessment panel including a site visit to each institution. As a rule, in the case of a cluster of programmes, NVAO adopts a compliant attitude towards requests from institutions in the Netherlands to postpone the deadline for submitting their assessment reports. However, the application for accreditation to NVAO needs to be submitted in time.

In Flanders, extending the deadline to submit an assessment report and completing the NVAO (initial) accreditation procedure is more difficult, since these terms are stipulated by law. The Flemish Act allows VLIR and VLHORA to submit a request to the Flemish Government to deviate from the legal provisions in cases with a clustered assessment of programmes. In that case, the Flemish Government will decide whether to extend the period of accreditation and the period within which the assessment report should be submitted.

6.4.5 *Exceeding the procedural timeframes by NVAO⁵¹*

The time limits for completing the (initial) accreditation procedure by NVAO are stipulated in Dutch and Flemish legislation (i.e. three months for an accreditation procedure in the Netherlands; four months for an (initial) accreditation procedure in Flanders). In the Netherlands the term for an initial accreditation procedure is six months. The decision-making process is often delayed for applications in the Netherlands. In Annex an analysis of the (actual) time invested in the procedures is presented. Here you find that one third of the accreditation procedures are completed within three months in the Netherlands and almost two thirds within a period of four months. For initial accreditation, almost half of the procedures are completed within six months. For research master's, 80% is completed within eight months. For the smaller flow of applications from Flanders, the procedure is almost always completed within the set timeframe, because of the threat of a sanction for exceeding the deadlines stipulated by law. (If NVAO does exceed the deadline, the validity of the current accreditation of the programme is automatically prolonged by a year) This implies that for the applications in Flanders, a strict procedural timeframe is set.

Reasons for exceeding deadlines can be diverse (see annex 3), and at the moment, only a broad analysis can be made of this matter. NVAO intends to complete a statistical analysis of the reasons for exceeding the procedural timeframes. The objective of this analysis will serve two purposes: internally, it will improve working procedures, and, externally, it will make suggestions for possible changes in legislation.

6.4.6 *Appreciation*

Within NVAO, the period within which accreditations in Flanders need to be reassessed (8 years) is considered too long. The 6-year re-assessment timeframe for accreditations in the Netherlands is considered adequate. However, the 6-year re-assessment timeframe for initial accreditations in the Netherlands, is considered too long. Here the 4-year timeframe for initial accreditations in Flanders is considered adequate. Although in principle standard procedures are applied for decision-making, NVAO sometimes follows specific procedures as a consequence of assessment reports drawn up by a quality assessment agency and in case of doubt concerning the generic quality of a programme.

51 As at 8 March 2007.

These procedures often give rise to questions from the quality assessment agencies and institutions or even give rise to their criticism on the critical and activist approach of NVAO. On more than one occasion, both quality assessment agencies and institutions criticised the value and necessity of, for example, additional questions, requests for explanation and verification by NVAO. When such cases arise, NVAO is considered to be the major cause of ‘interference’ in the system.

NVAO is of the opinion that the three tiered external quality system (institution, quality assessment agency and NVAO) as it is applied now, self-evidently leads to considerable ‘tensions’ between the quality assessment agencies and NVAO. Other aspects that lead to tensions are the fact that self-evaluation reports are not available to NVAO and that programmes in the Netherlands are not entitled to an ‘improvement period including the right to enrolment’. All these aspects together lead to ‘interference’ in the system. Quality assessment agencies experience criticism, remarks, additional questions and the rejection of assessment reports as excessive ‘independent’ behaviour on the part of NVAO. NVAO, on the other hand, claims that its only aim is to ensure reports are unambiguous and well-founded, so that NVAO can make substantiated decisions. In NVAO’s view, the need for a tailor-made approach is dependent on the extent of criticism of the generic quality of a programme.

Another point of criticism is that NVAO hardly succeeds in processing applications for accreditation of programmes in the Netherlands within the three months’ timeframe. This often leads to discontent in the higher education sector, the more so if the delay is partly due to additional questions being raised.

In the initial accreditation procedure, which is carried out by NVAO itself, NVAO is able to follow the assessment process more closely thanks to the continuous presence of the process coordinator. This explains why there is less ‘interference’ and less need to raise additional questions.

6.5 Consistency in decision-making

NVAO enhances consistency in decision-making by following the procedures in the internal handbooks and by organising internal meetings. The clustered assessment of programmes by the same quality assessment agency further contributes to consistency.

6.5.1 Internal handbooks of NVAO

The internal procedures applied by NVAO are detailed in the internal handbooks for (initial) accreditation that are used for processing applications: the internal handbook for accreditation in the Netherlands and in Flanders and the internal handbooks for initial accreditation in the Netherlands and in Flanders, and, finally, the internal handbook for research master’s programmes. These handbooks are for internal use only and are not published on the NVAO website. They have no legal status and should be considered internal working instruments. They are completely compatible with the (initial) accreditation frameworks and the regulations set down by NVAO. The internal handbooks describe the internal procedures and contain the documents and formats that are used when processing an application. The internal handbooks are regularly updated, so that the most recent version is available at all times.

To monitor the workflow of the application procedure, an information system was developed (Xelion) that allows for a constant and continuous monitoring of the (initial) accreditation procedures. Delays and omissions in the information system as to the indication of the status of the application often lead to problems with monitoring applications. On a monthly basis, management information is produced on the progress and decision-making regarding applications. The system is also used as an electronic archive for applications.

6.5.2 Procedures for consistency in decision-making

NVAO ensures consistency in decision-making by guaranteeing that in the application process a decision is never taken by one single person. Together with a member of the Executive Board, a policy advisor will prepare the intended decision. In this process, great care is taken as to the consistency of the assessment and the ensuing decision: does the content of the assessment report and the decision contain elements that contradict each other? In difficult cases, a second policy advisor and a second Executive Board member are involved in the preparation. In these cases, significant attention is given to consistency between the assessments and decisions: are there precedents of similar cases? Especially in the case of a clustered application, a team is appointed that prepares the decision-making together through mutual consultations. In these consultations the team addresses the issue of consistency between the assessments of the separate programmes, the cluster of programmes and the ensuing decisions. Finally, all intended decisions are checked by a legal advisor.

The results of this preparation are discussed in the meeting of the Executive Board which will take a decision. In some cases, one Executive Board meeting will suffice to take a decision, in other cases, the decision will be spread over several Executive Board meetings. In difficult cases, the Board will also be involved in the decision-making. Members of the Board will have all the necessary documents at their disposal.

6.5.3 Stimulating consistency in decision-making

Quality assessment agencies both in the Netherlands and Flanders often raise questions concerning consistency in decision-making by NVAO. In order to accommodate the quality assessment agencies as much as possible, NVAO has organised a number of meetings for quality assessment agencies and their (external) secretaries in which policy advisors gave a presentation on the internal process of decision-making. In these meetings several aspects of the analysis were addressed that can lead to additional questions to institutions and quality assessment agencies. In order to stimulate consistency in decision-making, meetings were organised in 2006-2007 between members of the Board, policy advisors and legal advisors. In these meetings the aspects of the analyses were addressed that could lead to additional questions to institutions and to quality assessment agencies. In order to maintain and improve consistency in decision-making, the internal quality system of NVAO concerning (initial) accreditation procedures provides for annual meetings between policy advisors and the Executive Board on the one hand, and policy advisors and external secretaries of quality assessment agencies on the other. In these meetings the parties involved coordinate the assessment procedure, the requirements for content and transparency of assessment reports and decisions. In the discussion between the Executive Board and the quality assessment agencies, consistency of judgements concerning generic quality is a recurrent issue. Finally, by analysing a random sample of assessment reports, additional questions raised and final decisions taken, an effort is made to provide insight concerning the consistency of decision-making.

As regards initial accreditation procedures, a written survey among panel members has been undertaken and a 'roundtable conference' with panel members is organised every two years during which the consistency of decision-making is one of the main topics.

6.5.4 Clustered assessments

In cases of clustered assessments of similar programmes in Flanders, VLIR and VLHORA have assigned themselves the task to also make an analysis of the cluster of these programmes, beside the individual assessment for each programme. In the Netherlands, QANU is the only quality assessment agency that applies this working method as well. This clustered assessment contributes to the national comparability of results between programmes and thus stimulates consistency. A disadvantage of this clustered assessment is that the period between the drawing up of the self-evaluation reports and the accreditation decision can amount to more than two years, and in the case of programmes offered at university colleges in Flanders, even up to three years.

Within NVAO, clustered applications are dealt with as much as possible by the same limited number of policy advisors and Executive Board members. There are regular meetings among policy advisors involved with clustered applications.

6.5.5 Appreciation

NVAO enhances consistency of decision-making by means of set procedures and organising meetings. In this way, NVAO tries to avoid erroneous (initial) accreditation decisions being taken.

The clustered assessment of programmes has positive and negative aspects. The positive aspect is the comparability and consistency of the decisions concerning programmes that are assessed as a cluster. (This does not apply for programmes offered at universities of professional education, because there are several quality assessment agencies involved in the assessment of these programmes.) The negative aspect is that the procedure of a cluster of programmes takes much longer.

The three tiered system creates ‘tensions’ regarding consistency: programmes and institutions differ as to their organisational structure and their educational development, several quality assessment agencies are involved in the accreditation procedure often with different panels and NVAO sometimes gains a better perspective on the basis of former applications.

6.6 Appeal procedures

Both in the Netherlands and Flanders, institutions can lodge an appeal against (initial) accreditation decisions taken by NVAO.

6.6.1 Appeal procedure in the Netherlands

Prior to taking a final decision concerning an application for (initial) accreditation, NVAO will inform the institution of its ‘intended decision’. The institution then has two weeks’ time to react. Subsequently, NVAO will take its final decision.

As a consequence of the General Administrative Act [*Algemene wet bestuursrecht*] (Awb), an institution can lodge an internal appeal against a NVAO decision. To lodge an internal appeal, the party concerned submits an appeal to NVAO. Apart from this Act, the ‘Procedure on Internal Appeal Awb NVAO’ [Regeling bezwaarschriftenprocedure Awb NVAO] is also applicable.

To handle internal appeals, NVAO has set up an external advisory commission as laid down in art. 7:13 of the Awb. This ‘Commission for internal appeal’ provides advice to NVAO on which decision to take concerning the internal appeal upon which NVAO will take its decision. If the subsequent decision is negative, the institution can take this further by lodging an external appeal against this decision with the Administrative Jurisdiction Department of the Council of State [*Raad van State*].

Since the start of the accreditation system, there have been eight cases of internal appeal. One appeal was granted in accordance with advice provided by the advisory commission; three appeals were dismissed and one appeal was declared inadmissible. Two procedures for internal appeal are still pending at the time of writing. There has been one external appeal lodged against a NVAO decision with the Administrative Jurisdiction Department (in another case the term for lodging an external appeal has not yet expired).

These internal appeals concerned six bachelor's programmes with professional orientation, one master's programme with professional orientation and one advanced master's programme with academic orientation. In three cases, they concerned an initial accreditation decision while in five cases they concerned an accreditation decision.⁵²

6.6.2 Appeal procedure in Flanders

Before the four months' term for NVAO to take a final decision expires, NVAO will send a draft (initial) accreditation report to the institution concerned. For applications for accreditation, the institution has a term of fifteen calendar days during which it can decide to lodge an internal appeal against the draft report. In the case of initial accreditation, the institution has ten calendar days to lodge an internal appeal against the draft report. However, remarks of a technical nature can be submitted to NVAO at all times.

'The Procedure Regulation concerning Internal Appeal against Intended Decisions and Draft Reports of the Accreditation Organisation of the Netherlands and Flanders' [*'Procedureregeling inzake bezwaren ten aanzien van ontwerpbesluiten en ontwerprapporten van de Nederlands-Vlaamse Accreditatieorganisatie'*] lays down the procedure for lodging an internal appeal.

An internal appeal needs to be forwarded to NVAO in the form of a 'response notification'. The institution can enclose other relevant documents with the response notification. All these documents are submitted together and entered in an inventory.

To handle an objection, NVAO appoints an advisory commission of members independent of NVAO consisting of a chair who is a legal advisor and two educational experts. After the response notification is declared admissible, a hearing is organised with the Executive Board of the institution and NVAO. Based on its conclusions, the commission provides advice to NVAO within a term of fourteen calendar days, taking effect the day after the hearing. NVAO will take its decision based on the commission's advice.

The four months' term within which NVAO has to take its final decision will be extended to six months if the internal appeal was declared admissible and presented to the advisory commission.

In Flanders, institutions can also lodge an external appeal against a decision taken by NVAO with the Council of State of Belgium [*Raad van State*]. However, before lodging an external appeal with the Council of State, an institution can also lodge an external appeal with the Flemish Government. Although the Flemish Government cannot take NVAO's place in taking an independent decision concerning accreditation, it can annul a decision taken by NVAO. Up to the time of writing, no appeal has been lodged against NVAO in Flanders⁵³.

6.6.3 Appreciation

The internal appeal procedures are set up satisfactorily. In the Netherlands, they have been proven to function effectively when put into practice. In Flanders there have been no internal appeal cases, therefore the functioning in practice of the procedure cannot yet be evaluated.

6.7 Publication and readability of reports and decisions

NVAO decisions and the assessment reports are made public. It is NVAO's aim that relevant information in the assessment reports and decisions should be easily accessible for the general

⁵² As at 8 March 2007.

⁵³ As at 8 March 2007.

public. For this reason, assessment reports and decisions have a fixed format. For initial accreditations carried out by NVAO, the process coordinator sees to it that the format is adhered to. The style used in assessment reports can vary, because the responsibility for drawing up these reports lies with different quality assessment agencies in both the Netherlands and Flanders and with the assessment panels that vary in their composition.

6.7.1 Publication of the decisions

Both in the Netherlands and Flanders, it is stipulated in legislation that assessment reports and decisions should be made public. For this reason, NVAO publishes on its website all (initial) accreditation decisions together with the accompanying documents (e.g. the assessment report). Any member of the public can look up a programme, institution, field of study, location, country, level and status (positive (initial) accreditation decision, negative accreditation decision, report rejected).

As far as Flanders is concerned, extracts from the (initial) accreditation decisions are also published in the official bulletin, the 'Belgisch Staatsblad', and are incorporated in the Higher Education Register. The quality assessment agencies in Flanders, VLIR and VLHORA, also publish their assessment reports. Their reports can be downloaded from their websites even before an application is submitted to NVAO. In the Netherlands, some quality assessment agencies do this as well, but not all.

In order to enhance their international reputations, institutions can have NVAO decisions translated by a certified translator. If requested, the English version of the decision is then also published on the English version of the NVAO website.

6.7.2 Format of the assessment report

The assessment reports have a fixed format. First of all, they should describe the working method applied in the assessment procedure and, secondly, they should detail the expertise and independence of the panel members. When assessing the programme, the panel members should follow the (initial) accreditation frameworks and the panel should make a judgement concerning each separate standard. Both at the level of the standard and the theme, the panel should formulate a substantiated judgement and motivation of its decision. This method of decision-making is applied both in the Netherlands and in Flanders and it is the condition for the legal validity of decisions. Each assessment report should also contain a table listing each judgement arranged by standard and by theme for each mode of study (fulltime, part-time or work-based).

Every two years, NVAO organises a meeting with the chairs of panels that were selected by NVAO for initial accreditation procedures. In these meetings, the assessment procedure and the requirements as to content and transparency of assessment reports (the panel reports) are the major topics for discussion.

6.7.3 Format of NVAO decisions

NVAO decisions also incorporate the themes of the (initial) accreditation frameworks. In the Netherlands, a decision includes first of all a summary of the most important elements that led to the judgement of the panel; secondly, a description of the applied procedure that led to the final decision (this can be the request of additional information or appointment of a verification commission); and thirdly, it can be supplemented with additional information. In Flanders, the procedure that was followed and the most important elements that led to the judgement of the panel are also the major parts of the accreditation report. They are preceded by a short summary of the decision, and, if a hearing was part of the procedure, than a complete record of its content will also be included in the accreditation report.

6.74 *Appreciation*

NVAO appreciates the legal obligation to publish all its decisions and does so on the NVAO website. Although this is less fortunate for institutions whose programmes were negatively assessed, this form of information provision on accreditation decisions and underlying assessment reports serves the purpose of accountability and transparency of the accreditation system very well. What still needs to be fully ascertained, is whether the information provided answers the needs of the different stakeholders (students, labour market, higher education institutions and civil society).

6.8 **Quality improvement of programmes**

In order to enhance the quality of programmes, the internal quality assurance system (and the corresponding focus on measures for improvement) was incorporated as a theme in the (initial) accreditation frameworks. When assessing this theme, the assessment panel will take into account the recommendations for improvement from earlier assessment procedures. In addition, in its decision NVAO will draw the institution's attention to necessary improvement measures and, in side letters, to possible future problems.

In the Netherlands, the assessment procedure for research programmes had a positive side effect on the relation between education and research.

6.8.1 *Internal quality assurance system in the accreditation frameworks*

The internal quality assurance system of programmes is the fifth theme of the accreditation framework. This theme addresses both the objectives and targets set by the institution for its programme, the evaluations and the corresponding evaluation results, and the actual improvement measures that the institution has implemented on the basis of these evaluation results. In other words, this theme assesses whether the quality cycle is closed.⁵⁴ In addition to the above, the focus will also be on the participation of the different stakeholders (members of staff, students, alumni and the professional practice) in the internal quality system. When assessing this theme, the assessment panel will also assess to what extent improvement measures from a previous assessment procedure were effectively put into practice.

6.8.2 *Internal quality assurance in the initial accreditation frameworks*

The internal quality assurance system has also been incorporated as a theme in the initial accreditation frameworks. In this framework it includes two standards and, besides the involvement of stakeholders, it underlines the importance of a systematic approach. The institution should demonstrate that, regarding new programmes, it intends to aim from the outset for an acceptable level of generic quality.

Subsequently, the quality should be constantly monitored and be subject to improvement measures. In the explanatory chapter of the initial accreditation framework, NVAO points out that it considers these intended improvement measures to be more plausible if an institution has implemented an overarching effective system of internal quality assurance for all its programmes.

6.8.3 *Focus on improvement measures in the decisions and in side letters*

In its decision, NVAO will clearly indicate the most prominent needs for quality improvement. In addition, NVAO uses side letters as a confidential means of informing the institution about possible future bottlenecks concerning the programme.

⁵⁴ The quality cycle is also indicated as the Plan-Do-Check-Act cycle (PDCA-cycle).

6.8.4 Relation between education and assessment procedures in research in the Netherlands

In the Netherlands, there is a system of assessment procedures for research in universities. Every six years, an assessment procedure takes place for research in which the work of researchers is assessed. NVAO is not only confronted with this when assessing applications for research master's programmes, but also when assessing applications for (initial) accreditation of other programmes, where, during the procedure, results from assessment procedures in research are also frequently referred to. This strengthens the relation between education and research. In Flanders, there is no such system for assessing research.

6.8.5 Transparency of the purpose of quality improvement

Both in the Netherlands as in Flanders, institutions feel that, since the introduction of the accreditation system, the purpose of quality improvement as applied in the former external assessment system has disappeared. This refers to measures for improvement of separate programmes. However, NVAO is of the opinion that these actions are still present in the current system of external assessment, but that they are less prominently reflected in reports and decisions. The working method of quality assessment agencies (by applying 'quick scans') makes it possible for measures for improvement to be implemented much sooner in the course of the assessment procedure, so that institutions can already take measures before their programmes are actually assessed by an external assessment panel. Institutions often invite a quality assessment agency for a site visit long before the expiration of the accreditation term. In this way, if the assessment report turns out to be negative, they can take pre-emptive improvement measures. After they have implemented improvement measures, institutions can request a second site visit and begin the assessment procedure, this time with the purpose of being able to submit a positive assessment report to NVAO. The improvement measures taken after the first site visit are usually not recorded in the final assessment report or badly reported upon and therefore not easy to trace in the report.

For initial accreditation, institutions will (temporarily) withdraw their applications if it is clear that their programmes do not potentially provide sufficient generic quality. Usually the quality of these new programmes will be further improved before institutions submit an adapted application, resulting this time in a positive initial accreditation decision.

Another observation made by NVAO is that recommendations are no longer included in the assessment reports. A programme that was positively assessed in the assessment report, but for which the quality assessment agency made several recommendations, will raise questions or doubts with NVAO. This explains why quality assessment agencies feel inclined to leave out their recommendations in the assessment report, but put them down in a separate side letter to the institution. NVAO often experiences that quality assessment agencies do not clearly indicate their critical remarks in the assessment report, or that they try to balance them out against other positive remarks and so do not give them enough prominence. NVAO admits that, especially at the beginning, it considered these recommendations as negative remarks on the quality of the programme. Therefore, quality assessment agencies gradually started to leave out these kinds of remarks in their assessment reports. NVAO presently makes an effort to be more reserved when judging the assessment reports and to put these recommendations in the right perspective. NVAO has explicitly encouraged quality assessment agencies to once again incorporate these recommendations in their assessment reports.

6.8.6 Appreciation

NVAO is of the opinion that the improvement of quality can be seen as a clear consequence of initial accreditation. This can be explained by the fact that if a programme receives a negative initial accreditation decision, a substantial effort can be seen to improve the quality of the programme in consequence. NVAO regrets that the purpose of quality improvement has

become less visible in the accreditation system and that it seems to have moved into the background when compared to the ‘old’ system of external assessments. This is partly due to the major focus on accountability in the new accreditation system. Nevertheless, NVAO is convinced that the purpose of quality improvement occupies an important position in the assessment procedure and is effectively present in it. However, the improvement function should be mentioned more explicitly in the assessment reports. In agreement with the quality assessment agencies and the institutions’ umbrella organisations, an effort is being made to incorporate the explicit purpose of quality improvement as an essential part of the accreditation procedure.

6.9 Summarising overview of (initial) accreditation in the Netherlands and Flanders

	The Netherlands	Flanders
Object	programme	Programme
Character	obligatory	Obligatory
Level	bachelor and master’s level	bachelor and master’s level
Orientation	professional orientation (bachelor and master’s degrees) and academic orientation (bachelor and master’s degrees)	professional orientation (bachelor’s degrees) and academic orientation (bachelor and master’s degrees)
Quality assessment agencies	free market with a list drawn up by NVAO	VLIR and VLHORA for statutory recognised institutions; recognised agencies for other institutions
Decision	yes or no (with an improvement period for offered programmes which includes an enrolment stop)	yes or no (with an improvement period for offered programmes)
Frameworks	approved by a minister/state secretary (after proposal in parliament)	ratified by the Flemish parliament
Term	6 years for (initial) accreditation	8 years for accreditation and 4 years for initial accreditation
Effect	publicly funded, recognised degree, study finance	publicly funded, recognised degree, study finance
Implementation	mid-2003	spring 2005
(Macro-)efficiency check for initial accreditation	afterwards, by the Ministry of Education, Culture and Science	beforehand by the Recognition Commission
Panels in case of initial accreditation	NVAO and quality assessment agencies	NVAO

7 The international policy of NVAO

The Treaty signed by the Dutch and Flemish governments by which NVAO was set up explicitly refers to the international dimension of NVAO's activities. In the explanatory note the importance is underlined of international transparency and independent quality assurance. The ministers therefore stated that "a well functioning and internationally recognised accreditation system is a prerequisite to advance international comparability in higher education".

The choice for co-operation between the Netherlands and Flanders fits in with this international perspective.

7.1 Objectives of NVAO's international policy

Hence, from the outset, NVAO was assigned the task to play an important role in internationalisation. In order to adequately fulfil this international role, NVAO formulated five objectives that outline its international policy. These objectives are:

- a. Playing an active membership role in international networks of accreditation and quality assurance organisations (INQAAHE, ENQA, ECA);
- b. Occupying an international leading position in promoting the Dutch and Flemish accreditation and higher education systems so as to strengthen the international position of the Dutch and Flemish higher education institutions;
- c. Cooperating with other accreditation organisations in order to achieve mutual recognition of accreditation decisions;
- d. Contributing to the creation of a European Qualifications Area where the competent authorities automatically recognise degrees from accredited programmes and institutions;
- e. Pro-actively following up on international developments in quality assurance and higher education.

7.2 Objectives in practice

The five objectives have been put into practice as follows:

7.2.1 Active membership of international networks in accreditation and quality assurance

NVAO is an active member of three international networks of accreditation and quality assurance organisations:

- International Network for Quality Assurance Agencies in Higher Education (INQAAHE)
- European Association for Quality Assurance in Higher Education (ENQA)
- European Consortium for Accreditation in higher education (ECA).

International Network for Quality Assurance Agencies in Higher Education (INQAAHE)

INQAAHE is a worldwide organisation for quality assurance agencies (<http://www.inquaah.org>).

NVAO participates in the two-yearly INQAAHE conference and NVAO organised the two-yearly INQAAHE workshop in The Hague in 2006. Almost 100 participants from more than 40 countries were present at this three days' workshop.

European Association for Quality Assurance in higher education (ENQA)

Members of ENQA are quality assurance agencies from countries party to the Bologna process (<http://www.enqa.net>). NVAO participates in the annual General Assembly and as a rule is always present at ENQA Workshops. In the last few years NVAO has participated in the Transnational European Evaluation Project II (TEEP II) and organised the meeting of the General Assembly of 2006 in Brussels. One of NVAO's Executive Board members is also an ENQA board member.

European Consortium for Accreditation in higher education (ECA)

The ECA network consists of fifteen accreditation organisations from ten European countries and regions (<http://www.ecaconsortium.net>).

NVAO participates in every plenary ECA Workshop (twice a year) and plays an active role in the four working groups of ECA, chairing two of them. Additionally, NVAO coordinates the ECA secretariat and organised the bi-annual Workshop in the spring of 2006 in Bruges. One of NVAO's Executive Board members is also member of ECA's Management Group.

In 2006, the TEAM project was started as a separate project under the wings of ECA. TEAM stands for Transparent European Accreditation decisions and Mutual Recognition Agreements. The project is financed by the European Commission, but is coordinated by NVAO. In addition to four publications on mutual recognition of accreditation decisions, an ECA conference is planned to convince European stakeholders of the importance of mutual recognition. The most important objective of the TEAM project is the development of an online European information tool for students, recognition bodies, higher education institutions and employers in which they can look up which institutions and programmes have been accredited within Europe. Additionally, analogous to the diploma supplement, the TEAM project will provide for an English accreditation supplement that can be downloaded from this website.

7.2.2 Internationally promote the accreditation and higher education systems

The international promotion of the Dutch-Flemish accreditation system and the Dutch and Flemish higher education systems should contribute to international recognition of Dutch and Flemish programmes, degrees and qualifications.

NVAO representatives therefore take part in numerous international conferences and workshops in which they make active contributions. The Dutch-Flemish accreditation system and the bi-national cooperation clearly set an example for other countries, considering the growing number of international delegations visiting NVAO on a yearly basis. In 2006, NVAO welcomed delegations from Norway, Denmark, Sweden, Germany, United Kingdom, Vietnam, Tanzania, Ghana, Ethiopia, Zambia, Montenegro, Indonesia, Russia, Kazakhstan, Japan and China. This international exchange can sometimes influence the development of a foreign accreditation system. In this light the example of Denmark can be quoted, where the implementation of the accreditation system was influenced by building on Dutch and Flemish experiences.

Providing specific information to international quality assessment agencies, international accreditation organisations and other international stakeholders equally fits in with this objective.

The English version of the website, the international publications and the translation of the Higher Education Register (<http://www.highereducation.be>) into English are the tools by which NVAO contributes in providing online information on assessed programmes and the position these programmes occupy in the higher education system.

7.2.3 Mutual recognition of accreditation decisions

Mutual recognition of accreditation decisions is one of NVAO's main objectives. If accreditation decisions taken by NVAO would be automatically recognised by international accreditation organisations and recognition bodies, it would increase mobility of Flemish and Dutch students and alumni. In reverse, it would also make it easier for foreign students and alumni to continue their studies or find a job in the Netherlands and Flanders. At present, institutions that offer international programmes are confronted with different accreditation procedures and regulations in the countries involved. These institutions would equally benefit from mutual recognition of accreditation decisions. As mutual recognition of accreditation decisions is one of the major objectives of ECA's member organisations,

NVAO invests a lot of its resources in the membership of ECA. Thanks to the joint effort of ECA members and the Dutch and Flemish governments, the Bologna ministers decided to incorporate an encouragement for mutual recognition of accreditation decisions in the Bergen Communiqué. This was followed by a similar act of support in the Recommendation for Quality Assurance in Higher Education issued by the European Council and the European Parliament. Several bilateral and multilateral cooperation projects have been set up which, in accordance with the road map established by ECA, should lead to mutual recognition of accreditation decisions. NVAO welcomed observers from other accreditation organisations who participated in NVAO's (initial) accreditation procedures and, on their turn, NVAO sent out staff members to act as observers with other organisations. NVAO staff members have written observation reports on: 'Organ für Akkreditierung und Qualitätssicherung der Schweizerischen Hochschulen' (OAQ; Switzerland), Foundation for International Business Administration Accreditation (FIBAA; Germany), 'Österreichischer Fachhochschulrat' (FHR; Austria), 'Österreichischer Akkreditierungsrat' (ÖAR; Austria), 'Commission des Titres d'Ingénieur de France' (CTI; France), 'Agencia Nacional de Evaluación de la Calidad y Acreditación' (ANECA; Spain) and 'National Qualifications Authority of Ireland' (NQAI); Ireland). Comparative analyses were made with the accreditation systems of France (CTI), Switzerland (OAQ), Norway (Nasjonalt organ for kvalitet i utdanningen; NOKUT), Germany (Akkreditierungsrat), Spain (ANECA) and Poland (Pa stwowa Komisja Akredytacyjna; PKA). In addition, joint accreditation procedures were undertaken by the German organisations 'Akkreditierungs-, Certifizierungs- und Qualitätssicherungs-Instituts' (ACQUIN), FIBAA, Zentrale Evaluations- und Akkreditierungsagentur Hannover (ZEvA) en ASIIN. And finally, NVAO has contributed to the 'Reakkreditierung' of FIBAA by the German Akkreditierungsrat.

7.2.4 Automatic recognition of qualifications

In the period 2005-2006, organisations responsible for recognition of foreign qualifications and the accreditation organisations from the Netherlands and Flanders, Norway, Austria, Poland and Switzerland signed the *Joint Declaration concerning the automatic recognition of qualifications*. More countries are expected to sign this declaration in the near future. The declaration is based on mutual recognition of accreditation decisions and on the implementation of compatible national qualification frameworks in order to come to automatic recognition of qualifications. This Joint Declaration was a major advance towards NVAO's eventual aim, i.e. the realisation of a European Qualifications Area where qualifications from accredited programmes and institutions are automatically recognised. The preparatory activities NVAO, NARIC-Vlaanderen (the National Academic Recognition Information Centre), Nuffic and the IB-Groep are undertaking to realise a Dutch-Flemish recognition area to a great extent paved the way for the signing of the Joint Declaration.

7.2.5 Pro-actively following up on international developments in quality assurance and higher education.

NVAO's fifth objective concerning its international activities is to pro-actively monitor, influence and implement international developments in quality assurance and higher education. In the past, NVAO participated in the following international activities: the United Nations Educational, Scientific and Cultural Organization (UNESCO) / Organisation for Economic Co-operation and Development (OECD) *Guidelines for Quality Provision in Cross-border Higher Education*, the *European Standards and Guidelines for Quality Assurance in Higher Education* and the *European Qualification Framework* proposed by the European Commission.

NVAO maintains excellent contacts with the appropriate government officials in the Dutch and Flemish ministries and with the appropriate members of the international network organisations. The current key areas of awareness are the progress of the Bologna process and the development of the Dutch and Flemish national qualification frameworks. NVAO played a major role in the introduction of the Erasmus Mundus programme by facilitating the assessment of these joint master's programmes and by providing information to the institutions involved in these programmes.

Other international activities that the Dutch government assigned to NVAO were the assessment of short programmes, the so-called non-degrees, aimed at foreign students and the assessment of programmes offered in the Netherlands Antilles and Aruba. Furthermore, the Dutch National Commission on the Code of Conduct concerning Education of Foreign Students [*Nederlandse landelijke gedragscodecommissie inzake onderwijs aan internationale studenten*] assigned to NVAO the task of advising on the equivalence between NVAO and other accreditation organisations. NVAO also participates in international projects in order to follow up on international developments in specific fields. For example, NVAO participates in a research project concerning the attribution of a European label to programmes in engineering (EUR-ACE), in the introduction of an accreditation system in Tunisia (EvaFor) and in European research on the application of subject-/discipline-specific descriptors for accreditation (Tuning).

7.3 Future perspectives

NVAO's international activities should be compatible with the international activities undertaken by institutions. For this reason, NVAO undertook an open dialogue with the institutions and organised several workshops over the last few years during the Flemish and Dutch conferences on accreditation. Together with the institutions' staff involved in international affairs, NVAO formulated 'good practices' concerning international activities and accreditation.

NVAO is planning a series of seminars specifically aimed at the institutions' staff who are involved in international affairs to continue and deepen the dialogue and thus learn from each others' experiences in international activities.

8 Added value of NVAO as a bi-national organisation

As a result of the Bologna Declaration of 1999, the then ministers of the Netherlands and Flanders agreed to harmonise the Dutch and Flemish accreditation systems with one another and to set up a joint organisation for making accreditation decisions. Both ministers expected this cooperation to have a positive impact, at least at the international level.

8.1 Objectives

The objectives implicitly formulated by the ministers comprised national and international components.

These objectives can be more explicitly formulated as follows.

Internationally

By working in cooperation, the Netherlands and Flanders can add more weight to the balance of European developments in the field of external quality assurance. Given the Dutch and Flemish tradition in quality assurance, particularly in the development of a sound assessment system, both traditions should be able to play an active role in international developments.

Nationally

The establishment of a bi-national organisation emphasises the independence and objectivity of the accreditation body. Moreover, in terms of economy of scale the effect on the composition of the panels would be positive (bi-national and with a greater pool of potential experts). In addition, the learning effect is increased for panel members, quality assessment agencies as well as institutions in the Netherlands and Flanders.

8.2 Objectives in practice

In practice, a number of effects of the cooperation can be seen at the international level.

- NVAO plays a leading role in the development of external quality assurance in Europe. This is illustrated in paragraphs 7.2.1 '*Active membership of international networks in accreditation and quality assurance*' and 7.2.2 '*Internationally promote the accreditation and higher education systems*'
- Several foreign delegations have visited NVAO in recent years to study the Dutch-Flemish model.
- Board members and staff members are regularly invited as speakers, panel members or to chair working groups at important international symposia, conferences and workshops.

The positive effects of the cooperation are visible at the national level too.

- The quality assessment agencies' assessment panels are largely composed of a combination of Dutch and Flemish experts. The panels composed by NVAO itself (the initial accreditation panels in particular, but also the verification committees) are always made up of Flemish and Dutch experts. Moreover, a NVAO survey has shown that the panel members greatly appreciate this mix of expertise. Their comments are positive regarding the learning experiences during visits to institutions and the discussions within the panels themselves. Particularly the 'confrontation' between various educational concepts was experienced as constructive and providing clarity.
- The Dutch and Flemish quality assessment agencies frequently consult one another and cooperate together. In addition, expertise and experience is shared.

- An unexpected, but nonetheless desirable, result of the Flemish-Dutch cooperation in NVAO is that new joint ventures between university colleges in Flanders and universities of professional education in the Netherlands have been effected or are being effected. The Hague University of Professional Education [*Haagse Hogeschool*], for example, has established new contacts with university colleges in Flanders: the Erasmus University College [*Erasmushogeschool*], the eXpertise Centre for Industry, Training and Social Sciences, a.k.a XIOS University College Limburg [*eXpertisecentrum voor Industrie, Onderwijs en Samenleving van de Hogeschool Limburg*] (XIOS), the European University College in Brussels [*EHSAL - Europese Hogeschool Brussel*] (EHSAL) and the Catholic University College Kempen [*Katholieke Hogeschool Kempen*] (KHK). Windesheim University of Professional Education (NL) and Artevelde University College (FL), for example, are cooperating in the field of revising teacher training programmes. Cross-border traffic between Flemish university colleges and Dutch universities of professional education has intensified in recent years. The parties involved are enthusiastic about these new relations.
- Cooperation runs smoothly within NVAO. The policy advisors encounter no or few problems in assessing applications pertaining to Flemish or Dutch programmes. In practice, the differences between the frameworks do not seem to give rise to any significant problems although, naturally, there should be an awareness of the legal and procedural differences between the procedures of the two regions. Board and staff members have a positive image of the consistency between the decisions in Flanders and the Netherlands which in itself entails that there is no difference in quality level.
- A clear picture of the strengths and weaknesses of both higher education systems has been established within NVAO that facilitates the sharing of experiences regarding Dutch and Flemish applications in order to exchange good practices across the border.
- The Education Commissions of both the Dutch and Flemish parliaments have entered into mutual consultation with NVAO.

Needless to say, differences do exist: the Flemish and Dutch administrative cultures are different and require constant attention. The role NVAO can and should play in public debate is different and requires explanation. The legal requirements regarding justification and argumentation weigh more heavily in Flanders than in the Netherlands and therefore require additional attention. The discussions concerning the next phase of the accreditation system are not running parallel in time which could lead to complications. The differences can, however, be discussed and, seen as a whole, are not insurmountable.

8.3 Appreciation

NVAO itself considers the impact of the cooperation within a single bi-national organisation to be positive. In general, cooperation between Dutch and Flemish staff within NVAO is running smoothly while the attitude abroad is one of respect and interest in this experiment and appreciation of the role NVAO plays in it.

9 Analysis of NVAO

In this chapter of the report, NVAO itself weighs the strengths and weaknesses of the system and the performance of NVAO. In this respect it also identifies a number of points for attention. A number of notes accompany this analysis.

9.1 Notes on the analysis

In the first place, it should be made clear that the Dutch-Flemish accreditation system is still in its infancy and that the analysis in this chapter was made based on four years' experience in the Netherlands and two years' in Flanders. A degree of caution is therefore advisable. Second, it should be pointed out that the accreditation system was thought up and elaborated on the drawing board and that NVAO began working with these 'blueprints': there was no time for pilots and NVAO was therefore – necessarily, but with full conviction – presented as a learning organisation. Refinements, changes of policy and further elaborations have been made along the way, for example, in the relationship with the quality assessment agencies. The accreditation and initial accreditation frameworks, however, have not been changed.

The third note is that from its inception NVAO chose to be active: when it might have been possible for NVAO to limit itself to adopting the assessments of panels convened by quality assessment agencies, NVAO expressly chose, within its statutory authority, to develop its own assessment procedure regarding the quality of programmes. In this way, NVAO has developed into an independent assessment authority.

Finally, readers of the analysis should be aware that it incorporates far more experiences from the Netherlands than Flanders, and is therefore biased: clearer insights into accreditation practice in Flanders will only be possible in a few years' time.

9.2 Strengths of the accreditation system

NVAO believes the accreditation system has two main strengths.

9.2.1 *Improving the quality of programmes*

NVAO is convinced that the accreditation system improves quality, both incidentally and structurally. Incidental quality improvement can be observed in all assessments, but, according to NVAO, is most visible in initial accreditation procedures. Almost all parties involved (programmes, institutions and panel members) agree on the initial accreditation procedure being an extremely valuable contribution to quality improvement, as a result of which a second request is often considerably better than the original. The objectives of the programme are then clearly formulated and their consequences better thought out. Moreover, the quality assessment agencies have reported this same quality impetus in their assessment reports.

The quality improvement effect is particularly visible in the private education sector because this sector had only been assessed in an extremely limited way against international quality standards. Learning by doing was and is a difficult process but the effects are quickly visible.

The structural quality improvement effect can be observed in the development of internal quality assurance systems. NVAO and the quality assessment agencies are thus working jointly towards improving the quality of education in Flanders and the Netherlands.

9.2.2 *Swift international recognition of the position of the Dutch-Flemish accreditation system through the establishment of a bi-national accreditation organisation*

In a short space of time, the accreditation system of the Netherlands and Flanders has acquired a recognised position in the international sphere of quality organisations. This is influenced by the fact that NVAO is a bi-national organisation that operates in two regions: Flanders and the Netherlands. One can say that this created a preliminary European higher education area, small though it may be. Many consider it a valuable experiment and an example for similar, future European forms of cooperation.

9.3 **NVAO's strengths**

NVAO distinguishes four main strengths in its performance.

9.3.1 *Swift acquisition of the position of supervisory body*

Much has been done and achieved in recent years and through its work NVAO has quickly acquired an authoritative position. The result is not only to be seen in quantitative terms but also in terms of quality: programmes that are not up to standard have been identified and received negative accreditation decisions. The careful and meticulous decision-making by NVAO makes that NVAO's decisions are not really disputed by the outside world. Consequently, NVAO decisions are not the subject of political debate and this has confirmed the authority of NVAO as a supervisory body.

Due to the swift acquisition of its authoritative position, NVAO is asked to do more than (initial) accreditation. For example, NVAO has an assessment role regarding a new type of academic master's programmes in the Netherlands (known as research master's programmes) and new short programmes within the professionally-oriented bachelor's programmes in the Netherlands (known as Associate Degrees).

NVAO is also active (or has been active) in other projects set up by the Dutch government. This applies to the Room for Talent project [*Ruim baan voor talent*] in which NVAO monitors the quality of the programmes. The same also applies to the Integrated Supervision of Higher Education project [*Geïntegreerd Toezicht HO*] in which the Inspectorate, the Audit Department of the Ministry of Education, Culture and Science (OCW), the Central Funding of Institutions Agency (CFI) of OCW, the Information Management Group (IB-groep) and NVAO work together to allow the various supervisory bodies to operate collectively where possible and by so doing reduce the 'burden' on programmes and institutions.

9.3.2 *Transparency of the accreditation and initial accreditation frameworks*

In accordance with legislation, NVAO implemented the accreditation and initial accreditation frameworks. NVAO considers the transparency of these frameworks to be a strength. NVAO expressly refrained from drawing up detailed and normative/prescriptive frameworks. On the contrary, the limited number of themes and standards that are assessed offer programmes the room to stress distinctive features and forms no hindrance to innovation in terms of content or didactics.

9.3.3 *Swift recognition of NVAO's position in the international world of quality assurance agencies*

Partly thanks to the bi-national cooperation, NVAO has acquired a recognised position in the international world of quality assurance agencies in a short space of time. Arising from its mission, NVAO made the explicit choice to be extremely active in the international sphere and this is reflected in its important participatory role in ENQA and the international organisation, INQAAHE. In addition, NVAO is one of the founding partners of ECA. Many bilateral and multilateral cooperation projects exist between the ECA partners. NVAO is involved in most of these projects. Without doubt, the most important project is the mutual recognition of

accreditation decisions. NVAO is playing a leading role in this project through the Dutch-Flemish example and also through its exemplary cooperation with the Dutch and Flemish ENIC-NARICs⁵⁵, the competent bodies responsible for the recognition of foreign qualifications.

9.3.4 Qualities of NVAO staff

The qualities of NVAO staff should be listed as a final strength. Not only did NVAO choose its staff itself with complete autonomy, but in the recruitment and selection of policy advisors attention was also paid to knowledge of higher education, teaching and quality assurance. NVAO employs specialists in various fields of both academically and professionally oriented programmes. Moreover, expertise is available in the area of private institutions and distance learning programmes. There is complete integration of Dutch and Flemish policy advisors in the internal organisation and in the handling of applications: all members of staff assess both Dutch and Flemish applications. In addition, there are lawyers specialised in Dutch and Flemish legislation on education.

Due to the large number of programmes that will be assessed in the Netherlands and Flanders (probably over 4600), NVAO cannot help but show signs of a bureaucratic machinery. However, the degree of professionalism of the staff that carry out the preparations for the decisions is high, so that taken as a whole the individual quality of NVAO assessments is and remains high.

9.4 Weaknesses of the accreditation system

NVAO distinguishes three weaknesses in the accreditation system.

9.4.1 Sanctions imposed by the accreditation system as the cause of uncertainty among programmes

The major drawback – and thus the greatest weakness – of the system is the uncertainty that it causes. The sanctions are severe: the withholding of funding, the withholding of the right to award recognised degrees and the withholding of the right to enrol new students. Additionally, there is also the fact that students of non-accredited programmes no longer receive study finance.

With regard to sanctions, legislation in the Netherlands and Flanders differs on a crucial point. While the Flemish Government allows non-accredited programmes to request an adjustment period (based on an adjustment plan) with retention of the right to enrol students, the Dutch system has no such option. This means there is a risk that panels in the Netherlands could be less likely to deliver unsatisfactory judgments, because the panels might well be aware of the severity of the resultant sanctions for the programmes.

NVAO is therefore a firm supporter of the inclusion of a statutory adjustment period in the Netherlands: in this way, the fear regarding giving and receiving an unsatisfactory judgment would be considerably lessened and programmes would be granted the time (if limited) to make necessary improvements.

⁵⁵ European Network of Information Centres on Recognition and Mobility / National Academic Recognition Information Centres.

It has been observed that through this fear of negative decisions, programmes produce an overabundance of evidentiary material. Handbooks, policy papers, procedures, protocols and regulations, etc. could hinder gaining insight into the content and output of the programmes. Moreover, far more ‘evaluation’ seems to be taking place. The danger of too much evaluation and too many surveys is quite real: the first signs of ‘tiredness’ in these areas have already been observed. On the one hand, this is a result of the sanctions of the systems, and on the other, the programmes’ evaluation processes often lack focus: they are not sure what they want – and need – to evaluate.

9.4.2 ‘Interference’ resulting from the layering of the assessment system

A second significant weakness is the lack of clarity that arises as a result of the layering of the assessment system. NVAO has to base its accreditation decisions on the reports of the quality assessment agencies. The position of the quality assessment agencies of VLIR and VLHORA is clear: these organisations have been designated by the legislative as statutory assessors. In the Netherlands the situation is, however, far less clear. In principle, the legislative in the Netherlands intended to allow the creation of a free market for quality assessment agencies in the expectation that in this way a quality improvement and price reduction mechanism would come into play. Every year, NVAO has to draw up a list of quality assessment agencies that it believes are capable of properly executing the assessment procedure. In practice, however, the ‘list’ appears to work as a form of recognition: a great many programmes, and sometimes the quality assessment agencies themselves, find it unacceptable that NVAO asks questions or makes comments about the reports. They particularly question the use of verification committees that, based on ‘reasonable doubt’ about the assessment by a quality assessment agency, reassess a limited number of standards or themes.

The quality assessment agencies are in a difficult position. The programmes expect the quality assessment agencies to ‘help’ them to cross the accreditation threshold, especially given the high costs they incur for internal and external assessment. NVAO, however, expects a transparent and well-reasoned assessment on which it can base its own decision.

9.4.3 Absence of clustered assessments of programmes at universities of professional education (NL)

In Flanders, the legislative has stipulated clustered assessment for programmes in the same discipline. Consequently, there is a greater degree of comparability between the same or similar programmes. In the Netherlands, clustered assessment is not stipulated, but the universities have decided that they will nonetheless assess in this way. The comparability of Dutch programmes with professional orientation has thus been significantly reduced, even more so because different quality assessment agencies can assess programmes in the same discipline and quality assessment agencies can use different panels to assess the same type of programmes. A disadvantage of clustered assessment is that the space of time between the production of a self-evaluation report and the actual site visit, and subsequently the accreditation, becomes very long: two years seems to be a normal time frame, while the space of time for programmes at university colleges (FL) can take up to a year longer.

9.5 NVAO’s weaknesses

NVAO has identified two weaknesses in its performance.

9.5.1 ‘Interference’ as a result of NVAO’s pro-active attitude

NVAO desires to be able to formulate an independent assessment and has adopted a pro-active attitude. An example of which would be posing additional questions. On occasion,

these questions create tensions. Quality assessment agencies point out that certain questions do not seem to be of a substantial nature and appear inconsistent. Moreover, the degree to which NVAO should be able to pronounce an independent judgement is being brought into question by the umbrella organisations, institutions and sometimes by the quality assessment agencies. NVAO, however, lays claim to its position as supervisory body with complete conviction. It desires to play a clear validating role during decision-making rather than simply providing a rubber stamp. It is aware that the many questions put to the institutions and the quality assessment agencies exacerbate the lack of clarity but it also believes that these questions are necessary for proper, diligent decision-making.

In this respect, the open nature of the assessment frameworks presents a risk: the predictability of the decision-making is reduced for the programmes and quality assessment agencies. As a result, with a view to more certainty, the quality assessment agencies and institutions have increasingly operationalised the frameworks into detailed protocols with countless verification points.

In the autumn of 2006, to prevent further operationalisation, NVAO policy advisors screened the assessment protocols of a number of quality assessment agencies in the Netherlands for superfluous verification points (aspects which NVAO would not consider in its assessment). The quality assessment agencies' assessment protocols will be amended based on these analyses.

NVAO has noted that institutions are/were often not capable of utilising with self-confidence the room allowed in the accreditation and initial accreditation frameworks when presenting their programmes. This also involves a learning process: learning to deal with frameworks and the implicit freedom these offer. The programmes need/needed to build up the necessary expertise. NVAO has been unable to remove the uncertainty present at a number of institutions. Despite the fact that in 2004 and 2005 various conferences were held in the Netherlands and Flanders, at which, among other things, aspects NVAO considers important in assessment reports were examined, and the fact that the decisions were posted on the website, the feeling continues to prevail with institutions that the assessments and decisions concerning their programmes take place based on subjective impressions.

In Flanders, by means of hearings, NVAO can examine and resolve any lack of clarity in the assessment process or the decisions themselves. To date, this has taken place in a limited number of cases.

9.5.2 Exceeding the procedural timeframes

The legislatures of Flanders and the Netherlands have imposed strict time limits on NVAO within which accreditation and initial accreditation applications must be processed. The legislative in Flanders has imposed sanctions for exceeding these procedural timeframes, while in the Netherlands the legislative has not done so. The time limits for Flemish applications are met in most cases. They are, however, too tight, if hearings have to take place or a programme temporarily withdraws an application for an initial accreditation. The time limit in the Netherlands for processing accreditation applications is even tighter and in practice is frequently not met (cf. Annex 3: Analysis of the processing terms). In addition, NVAO has been assigned a number of additional tasks that could cause delays in the primary process (cf. Paragraph 5.8 Additional tasks). NVAO sees a necessity for a more detailed analysis of processing terms, the working method and the necessary capacity.

9.6 Points for attention

NVAO has identified eight points for attention for the accreditation system and its performance.

9.6.1 Realising consistency in decision-making

In the period 2003-2009, NVAO has to assess over 3.000 programmes in the Netherlands and in the period 2005-2012 over 1.600 programmes in Flanders. Due to these large numbers the risk arises of a lack of consistency in the decisions and decision-making.

The more closely higher education institutions check whether NVAO assesses their programmes in the same way, the more attention is paid to consistency. In a context in which an external appeal has become part of the set of usual administrative instruments, legal validity and legal certainty receive constant attention. NVAO advances the consistency of decision-making by setting down procedures and organising internal and external meetings. In this way accreditation and initial accreditation decisions can be monitored for correctness. However, this will not alter the fact that in some decisions more additional questions will be asked than in others or that a hearing will possibly be organised and/or more comments made. On the other hand, NVAO believes that it delivers tailored work, according to the seriousness of its questions regarding the generic quality of a given programme. This notwithstanding, the danger exists that NVAO will have to set down decisions in an increasingly more formal and formalistic way.

9.6.2 Quality of panels

Since the Netherlands and Flanders chose for a system of programme accreditation and in the Netherlands clustered assessment is no longer prescribed, there has been a significant increase in the number of panels that are needed. This puts the quality of the panels under considerable pressure. This pressure is increased by the large number of new programmes that have to be assessed. A significant proportion of the legitimacy and functioning of the accreditation system rests with the quality of the assessors. The question for NVAO is whether the level of the panels can remain sufficiently in line with the weight of the assessments. International expertise within the panels is already scarce in a number of cases. From academic universities in particular it is heard that peers are less inclined to participate in assessments if the sanctions for not being granted accreditation remain so severe.

9.6.3 Relationship with the Inspectorate of Education in the Netherlands

As far as the Netherlands is concerned, the Inspectorate of Education supervises the accreditation system in its entirety. It does so by conducting systematic investigations into the functioning of the accreditation system in the Netherlands and analysing NVAO's work (particularly the assessments regarding the quality of programmes in the Netherlands and the way in which these are reached and investigating complaints about NVAO). The results of the Inspectorate's investigations are published in either the Inspectorate's annual Education Report or in separate reports.

The Inspectorate has a varied set of instruments for investigating legitimacy and efficiency within higher education institutions based on the Supervision of Education Act [Wet op het onderwijsstoezicht] (WOT). The set of instruments offers possibilities in addition to the accreditation decisions. For reasons of complementarity, NVAO and the Inspectorate of Education meet often to consult about common policy and individual dossiers. In this respect, one of the points for attention for the Inspectorate and NVAO is that the institutions should be confronted as little as possible by different supervisors who are working alongside one another.

9.6.4 Mutual recognition of accreditation decisions

At the international level, NVAO has mainly committed itself to establishing the mutual recognition of accreditation decisions as an impetus to the mutual recognition of degrees and qualifications by governments. Although it appears that NVAO and a number of organisations in European countries will arrive at the mutual recognition of accreditation decisions by the end of 2007, this only applies to a limited number of countries. A strong international effort will be needed to arrive at larger scale - and for students, programmes and institutions, more meaningful - mutual recognition.

9.6.5 Informative role in respect of students, the labour market and society

A clear issue of concern is the informative role NVAO can play in respect of students, the labour market and society. The information purpose is currently restricted to making accreditation decisions and initial accreditation decisions known. In the future, this role could be made more visible by releasing information that is easily accessible, nationally and internationally. More than is the case now, comparative overviews of quality and profiles of programmes could be used. NVAO would like to investigate what form of publication would be best suited to this end.

9.6.6 Counteract (undesired) effects from supplementary legislation

In recent years, in the Netherlands, it has been observed that in politics attention has mainly been paid to the possible negative consequences of the system (reduction of the accreditation burden / reducing red tape and the 'alleged' higher costs of the system) and the possible changes to the accreditation system in the Netherlands after 2009. Decisions about repairs to the system (the introduction of an adjustment period and reversing the position of the macro-efficiency check) have, however, not been made.

9.6.7 Improper use of assessment scores

In order to compare programmes, various bodies and institutions in the Netherlands and Flanders add up the judgements delivered to programmes by panels. This method of working is invalid for three reasons: first, it is not set down when a particular assessment should be delivered. For example, the difference between a satisfactory judgement and an unsatisfactory one could be greater than the difference between a satisfactory judgement and a good one. Second, the assessments are conducted by different panels that could apply the four-points scale for accreditation and the two-points scale for initial accreditation in different ways. Moreover, the quality assessment agencies each observe their own definitions for an assessment of good. Third, the different standards do not carry the same weight.

9.6.8 Degree mills

Just like other European and American accreditation organisations, NVAO is regularly confronted with requests for accreditation from what is referred to as 'degree mills'. These institutions, that mostly operate internationally, issue fake degrees or degrees that do not correspond with the required qualifications. In some cases, these institutions were accredited by 'accreditation mills'. These 'accreditation mills' grant accreditation at a charge to degree mills or institutions of inferior quality. The strategy of degree mills is that they look for an organisation that can grant them accreditation in order to gain credibility. In the Netherlands and Flanders, there are several institutions like this that also operate in international networks. An illustration of this practice is, for example, an institution in the Netherlands of which the teaching staff and management were issued a degree from a U.S. degree mill (or from an institution that was not accredited).

Unravelling these networks is a very labour-intensive process. Besides, the question arises whether these malpractices can be tackled on the basis of existing legislation. What needs to be considered is to proportionally spend more time and effort in processing these suspect applications.

10 Evaluation of accreditation activities

As set down in Chapter 2, the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, the *Criteria for membership of ENQA* and the requirements of the *ECA Code of Good Practice* are followed in the evaluation of NVAO's accreditation and initial accreditation activities. These are set out against each other.⁵⁶ This clearly demonstrates that in order to completely satisfy all ECA and ENQA requirements, evaluations of the criteria 'European Collaboration', 'Quality Enhancement' and 'Active Contribution to ENQA' are also necessary.⁵⁷

The tables below show in which paragraphs of the present report NVAO meets the criteria of Parts 2 and 3 of the ESG, the three remaining ECA / ENQA criteria and its own mission. In addition, the relationship with the analysis in the previous chapter is indicated.

Table 13: ENQA Standards and Guidelines and their realisation by NVAO

ENQA Standards and Guidelines	Realisation by NVAO
2.1 Use of internal quality assurance procedures: <i>External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.</i>	In order to enhance the quality of programmes, the internal quality assurance system (and the corresponding focus on measures for improvement) was incorporated as a theme in the (initial) accreditation frameworks. (From paragraph 6.8: Quality improvement of programmes) A strength of the system: 9.2.1 Improving the quality of programmes
2.2 Development of external quality assurance processes: <i>The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.</i>	When drawing up the frameworks, NVAO had to take into account the assessment criteria previously stipulated in Dutch and Flemish legislation. Based on these, a number of themes with underlying standards and criteria were formulated. NVAO applies different frameworks for the Netherlands and Flanders both for accreditation and initial accreditation. However, these frameworks have been made as similar as possible. Differences mainly stem from differences in the higher education systems of the Netherlands and Flanders rather than differences in quality standards.

⁵⁶ The NVAO provides a document in which the *ECA Code of Good Practice*, the *European standards for external quality assurance agencies* and the *ENQA Criteria for membership* are set against each other.

⁵⁷ By satisfying the ENQA and ECA criteria, NVAO also meets the criteria of INQAAHE.

ENQA Standards and Guidelines	Realisation by NVAO
	<p>The quality standards and the assessment rules are almost identical in both frameworks. To accommodate to the diversity of programmes offered both in the Netherlands and Flanders and the autonomy of institutions, NVAO refrained from drawing up detailed and normative/prescriptive frameworks. On the contrary, these frameworks have been conceived to be all-purpose and accessible.</p> <p>The Dutch and Flemish (initial) accreditation frameworks were designed after consultation with representatives of institutions and programmes and experts involved in assessment procedures. A specific section of the Flemish accreditation framework relates to the possibility of recognising the equivalence of an accreditation decision by an international organisation. For the Netherlands, there are supplementary protocols for research master's programmes and for extended master's programmes.</p> <p>All frameworks are available online on NVAO's website (http://www.nvao.net). (From paragraph 6.1: Frameworks)</p>
	<p>A strength of NVAO:</p> <p>9.3.2 Transparency of the accreditation and initial accreditation frameworks</p>
<p>2.3 Criteria for decisions:</p> <p><i>Any formal decisions made as a result of an external quality assurance activity should be based on explicit, published criteria that are applied consistently.</i></p>	<p>All frameworks are available online on NVAO's website (http://www.nvao.net). (From paragraph 6.1: Frameworks)</p> <p>NVAO decisions and the assessment reports are made public. It is NVAO's aim that relevant information in the assessment reports and decisions should be easily accessible for the general public. (From paragraph 6.7: Publication and readability of reports and decisions)</p> <p>NVAO enhances consistency in decision-making by following the procedures in the internal handbooks and by organising</p>

ENQA Standards and Guidelines	Realisation by NVAO
	<p>internal meetings. The clustered assessment of programmes by the same quality assessment agency further contributes to consistency.</p> <p>(From paragraph 6.5: Consistency in decision-making)</p> <p>Weaknesses of the system:</p> <ul style="list-style-type: none"> 9.4.2 ‘Interference’ resulting from the layering of the assessment system 9.4.3 Absence of clustered assessments of programmes at universities of professional education (NL)
	<p>Weakness of the NVAO:</p> <ul style="list-style-type: none"> 9.6.1 Realising consistency in decision-making 9.5.1 ‘Interference’ as a result of NVAO’s pro-active attitude
<p>2.4 Processes fit for purpose:</p> <p><i>All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.</i></p>	<p>In the (initial) accreditation procedure there are roughly three steps that can be distinguished. First, the writing and submission of the self-evaluation report (in the case of accreditation) or the programme dossier (in the case of initial accreditation) by the institution. The second step is the actual site visit and the assessment by the quality assessment agency. The third step is the decision-making by NVAO. At any moment during the course of this process, the institution can decide to withdraw its application. If NVAO takes a negative accreditation decision, the institution will be granted an improvement period. In case new programmes want to receive public funding, the initial accreditation procedure will be combined with a macro-efficiency check.</p> <p>(From paragraph 6.3: Steps in the (initial) accreditation procedure)</p>

ENQA Standards and Guidelines	Realisation by NVAO
	<p>Weakness of the system:</p> <p>9.4.1 Sanctions imposed by the accreditation system as the cause of uncertainty among programmes</p> <p>Points for attention:</p> <p>9.6.6 Counteract (undesired) effects from supplementary legislation</p> <p>9.6.7 Improper use of assessment scores</p>
<p>2.5 Reporting:</p> <p><i>Reports should be published and should be written in a style that is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.</i></p>	<p>NVAO decisions and the assessment reports are made public. It is NVAO's aim that relevant information in the assessment reports and decisions should be easily accessible for the general public. For this reason, assessment reports and decisions have a fixed format. For initial accreditations carried out by NVAO, the process coordinator sees to it that the format is adhered to. The style used in assessment reports can vary, because the responsibility for drawing up these reports lies with different quality assessment agencies in both the Netherlands and Flanders and with the assessment panels that vary in their composition.</p> <p>(From paragraph 6.7: Publication and readability of reports and decisions)</p>
<p>2.6 Follow-up procedures:</p> <p><i>Quality assurance processes which contain recommendations for action or which require a subsequent action plan should have a predetermined follow-up procedure that is implemented consistently.</i></p>	<p>Dichotomous decisions are made in the Dutch-Flemish system. These decisions are unconditional. Therefore, no improvement actions have been set down that have to be followed up.</p>
<p>2.7 Periodic reviews:</p> <p><i>External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.</i></p>	<p>The assessment of programmes by NVAO takes place once every six years in the Netherlands and once every eight years in Flanders. In the case of new programmes, the assessment takes place within six years (the Netherlands) and within four years (Flanders) after the beginning of the programme. These cycles are stipulated in Dutch and Flemish legislation. Within a set period before the accreditation term</p>

ENQA Standards and Guidelines	Realisation by NVAO
	<p>has expired, the institution should submit an assessment report together with its application for accreditation to NVAO. The timeframe between the time of publication of the accreditation decision and the time of application is stipulated (by law). In addition, in Flanders, there is also a timeframe within which the whole assessment procedure has to be completed.</p> <p>(From paragraph 6.4.4: Time limits regarding assessments)</p>
	<p>Within NVAO, the period within which accreditations in Flanders need to be reassessed (8 years) is considered too long. The 6-year re-assessment timeframe for accreditations in the Netherlands is considered adequate. However, the 6-year re-assessment timeframe for initial accreditations in the Netherlands, is considered too long. Here the 4-year timeframe for initial accreditations in Flanders is considered adequate.</p> <p>(From paragraph: 6.4.6: Appreciation)</p>
	<p>A weakness of NVAO: 9.5.2 Exceeding the procedural timeframes</p>
<p>2.8 System-wide analyses: <i>Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments, etc.</i></p>	<p>In practice, NVAO's role in stimulating debate is illustrated by its ten or more visits a year to institutions in the Netherlands and Flanders. During these visits, discussions are held with the management of the institution on, among other things, their experiences with the accreditation system and the analysis of a series of accreditation decisions for a number of their programmes. The initiative for these visits comes from NVAO.</p> <p>In addition, members of the NVAO Executive Board often give presentations at conferences. NVAO organises a conference itself every two years either in the Netherlands or in Flanders. Apart from these conferences, several smaller workshops are organised relating to specific themes. During conferences and workshops NVAO holds discussions, gives presentations on</p>

ENQA Standards and Guidelines	Realisation by NVAO
	<p>its procedures and disseminates 'good practices'. The goal of these activities is quality improvement in higher education. Furthermore, the NVAO newsletters issued every two months give more information on several issues regarding (initial) accreditation. These activities are further described in the Communication Strategy 2006-2007.</p> <p>(From paragraph 5.3.1: Mission)</p>
	<p>In cases of clustered assessments of similar programmes in Flanders, VLIR and VLHORA have assigned themselves the task to also make an analysis of the cluster of these programmes, beside the individual assessment for each programme. In the Netherlands, QANU is the only quality assessment agency that applies this working method as well. This clustered assessment contributes to the national comparability of results between programmes and thus stimulates consistency. A disadvantage of this clustered assessment is that the period between the drawing up of the self-evaluation reports and the accreditation decision can amount to more than two years, and in the case of programmes offered at university colleges in Flanders, even up to three years.</p> <p>(From paragraph 6.5.4: Clustered assessments)</p>
<p>3.1 Use of external quality assurance procedures for higher education:</p> <p><i>The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.</i></p>	<p>Point for attention: 9.6.5 Informative role in respect of students, the labour market and society</p>
	<p>Cf. the description in the ENQA Standards 2.1 to 2.8.</p>

ENQA Standards and Guidelines	Realisation by NVAO
<p>3.2 Official status: <i>Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.</i></p>	<p>NVAO's major task is (initial) accreditation of higher education programmes both in the Netherlands and Flanders. NVAO makes independent judgements and takes autonomous decisions. The Committee of Ministers supervises the functioning of NVAO, but has no power over NVAO operations or decision-making. (From paragraph 5.2: Tasks and official status)</p>
<p>3.3 Activities: <i>Agencies should undertake external quality assurance activities (at the institutional or programme level) on a regular basis.</i></p>	<p>Strengths of NVAO: 9.3.1 Swift acquisition of the position of supervisory body 9.3.3 Swift recognition of NVAO's position in the international world of quality assurance agencies</p> <p>In the Netherlands, the legislative opted for an open system of quality assessment agencies. In Flanders, the umbrella organisations for university colleges and universities have been recognised as quality assessment agencies by law. They are, respectively, the Council of Flemish university colleges (VLHORA) [Vlaamse Hogeschoolraad] and the Flemish Interuniversity Council (VLIR) [de Vlaamse Interuniversitaire Raad]. The underlying basis of this decision was that this allowed university colleges and universities in Flanders to retain their ownership of the quality assurance system. The assessment of programmes is carried out by assessment panels. Both in the Netherlands and Flanders, in the accreditation procedure, these panels are selected by the quality assessment agency. Panel members should be independent. In the Netherlands, their independence is monitored by the quality assessment agency prior to the assessment procedure, whereas in Flanders, it has to be examined previously by a separate Recognition Commission [Erkenningsscommissie]. NVAO also monitors the independence of panel members while judging the assessment report. (See paragraph 6.3.2. 'The external assessment by the quality assessment</p>

ENQA Standards and Guidelines	Realisation by NVAO
	<p>agency' for the assurance of independence in the initial accreditation procedure) NVAO has developed several protocols by which quality assessment agencies have to abide. NVAO also takes great care to assure the quality of the judgements. (From paragraph 6.2: Quality assessment agencies in the Netherlands and Flanders)</p>
	<p>On the basis of the information provided in the assessment reports, NVAO should be able to reach a well-evidenced decision. In the case of accreditation, NVAO assesses the quality of the assessment report and the working method of the quality assessment agency. Standard procedures have been established for that purpose. If NVAO cannot make an independent positive decision on the basis of the assessment report, this application is submitted to further scrutiny. Subsequently, there are still several ways for NVAO to reach a well-evidenced decision: NVAO can ask additional questions or claim additional information, organise hearings or even reject the assessment report. The procedure that applies is different in the Netherlands and Flanders due to the differences in legislation.</p>
	<p>Both in the Netherlands and Flanders, the (initial) accreditation procedure is subject to fixed time limits concerning assessment and decision-making. In some cases and for various reasons the deadlines for these terms are not met either by the institutions, the quality assessment agencies, or NVAO itself. Possible actions or sanctions for exceeding these deadlines also differ in the Netherlands and Flanders. (From paragraph 6.4: NVAO decision-making)</p>
	<p>A weakness of NVAO: 9.5.2 Exceeding the procedural timeframes</p>

ENQA Standards and Guidelines	Realisation by NVAO
<p>3.4 Resources: <i>Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.</i></p>	<p>NVAO has a (General) Board of which the chair and three other board members separately comprise the Executive Board. NVAO also has an Advisory Council. The preparation of policy decisions is done by the staff. This includes staff members (policy, legal and communication advisors) and support staff (policy secretariat, finances and personnel, records department and general services). The staff are managed by the director. See the organisational chart on the next page. (From paragraph 5.4: Staff Management of NVAO)</p>
	<p>NVAO is financed both by the Netherlands and Flanders (60% by the Netherlands and 40% by Flanders) and has an annual budget of approximately € 6 million. The work force is limited (about 35 fte). NVAO is located in The Hague. (From paragraph 5.5: Financing, work force and location of NVAO)</p>
	<p>A strength of NVAO: 9.3.4 Qualities of NVAO staff</p>
<p>3.5 Mission statement: <i>Agencies should have clear and explicit goals and objectives for their work, set down in a publicly available statement.</i></p>	<p>NVAO's mission is clearly dependent on legislation. This mission has been incorporated in the NVAO Quality Statement., which was approved by the board on 10 April 2006. During the spring of 2007, NVAO also drew up a Strategic Policy Statement. (From paragraph 5.3: Mission and strategic policy)</p>
<p>3.6 Independence: <i>Agencies should be independent to the extent that they have both autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.</i></p>	<p>The Committee of Ministers supervises the functioning of NVAO, but has no power over NVAO operations or decision-making. (From paragraph 5.2: Tasks and official status)</p>

ENQA Standards and Guidelines	Realisation by NVAO
	<p>In order for members of the Board and policy advisors to be considered independent, NVAO has ruled that they cannot participate in applications from institutions that they have been associated with in any form over the last two years. For programmes a period of five years is applicable.</p> <p>Members of the Board are completely independent in taking decisions. If there is a specific application where this cannot be guaranteed, the member of the Board will withdraw from the decision-making process for the programme concerned.</p> <p>(From paragraph 5.4.3: Independence of the Board and of the policy advisors)</p>
<p>3.7 External quality assurance criteria and processes used by the agencies:</p> <p>The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:</p> <ul style="list-style-type: none"> – a self-assessment or equivalent procedure by the subject of the quality assurance process; – an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency; – the publication of a report, including any decisions, recommendations or other formal outcomes; – a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report. 	<p>In the (initial) accreditation procedure there are roughly three steps that can be distinguished. First, the writing and submission of the self-evaluation report (in the case of accreditation) or the programme dossier (in the case of initial accreditation) by the institution. The second step is the actual site visit and the assessment by the quality assessment agency. The third step is the decision-making by NVAO. At any moment during the course of this process, the institution can decide to withdraw its application. If NVAO takes a negative accreditation decision, the institution will be granted an improvement period. In case new programmes want to receive public funding, the initial accreditation procedure will be combined with a macro-efficiency check.</p> <p>(From paragraph 6.3: Steps in the (initial) accreditation procedure)</p> <p>Point for attention: 9.6.1 Realising consistency in decision-making</p>

ENQA Standards and Guidelines	Realisation by NVAO
<p>3.8 Accountability procedures: <i>Agencies should have procedures in place for their own accountability.</i></p>	<p>Both in the Netherlands and Flanders, institutions can lodge an appeal against (initial) accreditation decisions taken by NVAO. (From paragraph 6.6: Appeal procedures)</p>

ENQA Standards and Guidelines	Realisation by NVAO
<p>11. The accreditation organisation collaborates with other national, international and/or professional accreditation organisations (ECA Code of Good Practice).</p>	<p>Hence, from the outset, NVAO was assigned the task to play an important role in internationalisation. In order to adequately fulfil this international role, NVAO formulated five objectives that outline its international policy. These objectives are:</p> <ul style="list-style-type: none">a. Playing an active membership role in international networks of accreditation and quality assurance organisations (INQAAHE, ENQA, ECA);b. Occupying an international leading position in promoting the Dutch and Flemish accreditation frameworks and higher education system so as to strengthen the international position of the Dutch and Flemish higher education institutions;c. Cooperating with other accreditation organisations in order to achieve mutual recognition of accreditation decisions;d. Contributing to the creation of a European Qualifications Area where the competent authorities automatically recognise degrees from accredited programmes and institutions;e. Pro-actively follow up on international developments in quality assurance and higher education. <p>(From paragraph 7.1: Objectives of NVAO's international policy</p> <p>Each of the targets has been suitably elaborated.</p> <p>(Cf. paragraph 7.2: Objectives in practice)</p> <p>A strength of the system:</p> <p>9.2.2 Swift international recognition of the position of the Dutch-Flemish accreditation system through the establishment of a bi-national accreditation organisation</p> <p>Point for attention:</p> <p>9.6.4 Mutual recognition of accreditation decisions</p>

ENQA Standards and Guidelines	Realisation by NVAO
<p>16. Accreditation procedures and methods must be geared towards the enhancement of quality (ECA Code of Good Practice).</p>	<p>In order to enhance the quality of programmes, the internal quality assurance system (and the corresponding focus on measures for improvement) was incorporated as a theme in the (initial) accreditation frameworks. When assessing this theme, the assessment panel will take into account the recommendations for improvement from earlier assessment procedures. In addition, in its decision NVAO will draw the institution's attention to necessary improvement measures and, in side letters, to possible future problems.</p> <p>In the Netherlands, the assessment procedure for research programmes had a positive side effect on the relation between education and research.</p> <p>(From paragraph 6.8: Quality improvement of programmes)</p> <p>A strength of the system:</p> <p>9.2.1 Improving the quality of programmes</p>
<p>12. The agency is willing to contribute actively to the aims of ENQA (ENQA membership criterion).</p>	<p>NVAO participates in the annual General Assembly and as a rule is always present at ENQA Workshops. In the last few years NVAO has participated in the Transnational European Evaluation Project II (TEEP II) and organised the meeting of the General Assembly of 2006 in Brussels. One of NVAO's Executive Board members is also an ENQA board member.</p> <p>(From paragraph 7.2.1: Active membership of international networks in accreditation and quality assurance)</p> <p>A strength of NVAO:</p> <p>9.3.3 Swift recognition of NVAO's position in the international world of quality assurance agencies</p>

Table 15: Mission and its realisation by NVAO

Mission	Realisation by NVAO
<i>The Accreditation Organisation of the Netherlands and Flanders (NVAO) independently ensures the quality of higher education in the Netherlands and Flanders by assessing and accrediting programmes and contributes to furthering this quality.</i>	Cf. the description under ENQA Standard 3.3.
<i>In addition, NVAO contributes to raising quality awareness within higher education and advancing the position of higher education in the Netherlands and Flanders in the national and international context.</i>	Cf. the description in the ECA Code of Good Practice 16. Cf. the description under ENQA Standard 2.8. Cf. the description in the ECA Code of Good Practice 11.

11 Summary

The main purpose of this self-evaluation report is to enable an external review committee to assess whether or not NVAO satisfies the *Standards and Guidelines* (ESG) of the European Association for Quality Assurance Agencies (ENQA) and the *Code of Good Practice* of the European Consortium for Accreditation in higher education (ECA). Chapter 1 of this report contains details in this regard. In addition, the report should allow the committee to formulate proposals aimed at reducing the differences between the Dutch and Flemish accreditation regulations and practice. (This was a specific request of the Committee of Ministers.) Finally, the report is intended to cast a critical eye over the current accreditation system and the functioning of NVAO.

Chapter 2 clarifies the three steps involved in the preparation of the external review: first, agreements were made with the Committee of Ministers regarding the approach; subsequently, the self-evaluation report was written and finally preparations were made internally at NVAO prior to the visit of the committee.

The structure of higher education in the Netherlands and Flanders is set down in the Dutch and Flemish Act. This legislation concerns the actual implementation of the Bologna Declaration in the Netherlands and Flanders.

Chapter 3 describes the higher education systems of the Netherlands and Flanders, supported by a series of key figures for higher education.

Chapter 4 explains the history of external quality assurance systems in the Netherlands and Flanders and the background leading to the current accreditation system. This background information is relevant for gaining a better understanding of the current accreditation system and NVAO's position and task.

The accreditation systems of the Netherlands and Flanders involve both the accreditation of offered programmes and the assessment of new programmes (initial accreditation). The functioning of NVAO is set out in Chapter 5, starting with the Treaty between the Netherlands and Flanders. In addition to its duties, status, mission and strategic policy statement, this chapter describes the organisation of the NVAO staff, the financing, scope, and the location and work space of NVAO. Special attention is given to the positioning of NVAO's stakeholders. Finally, this chapter examines the system of internal quality assurance and NVAO's additional tasks.

Within the accreditation procedure, Dutch and Flemish legislation strongly emphasise the role of the quality assessment agencies in the Netherlands and Flanders. Steered by these agencies, panels carry out the assessment of programmes that are already offered. Based on the assessment reports (submitted by the institutions) NVAO delivers an independent decision regarding the question whether or not the programme meets the quality requirements. As a rule, the assessment of new programmes (initial accreditation) is in the hands of panels composed by NVAO.

Chapter 6 explains NVAO's working method (the (initial) accreditation frameworks, quality assessment agencies and the steps of the (initial) accreditation processes, the decision-making of NVAO and the related consistency, possibilities for appeal, the transparency and readability of the assessment reports and finally the quality improvement effect for programmes). NVAO delivers a number of evaluation comments for each aspect (in the paragraphs under 'Appreciation').

In the explanatory note to the Treaty under which the Dutch and Flemish governments established NVAO, reference is explicitly made to the international dimension in which NVAO should become active and to the great importance of international transparency and independent quality assurance. The choice for cooperation between the Netherlands and Flanders is in line with this international perspective.

The international policy objectives are set out in Chapter 7, as well as the implementation in practice and future prospects in the field of internationalisation. The starting point here is that the international activities of NVAO should be in line with those of the institutions. For this reason, NVAO has entered into dialogue with the institutions.

As a result of the Bologna Declaration of 1999, the then ministers of Education of the Netherlands and Flanders agreed to harmonise the Dutch and Flemish accreditation systems with one another and to establish a joint organisation for making accreditation decisions. Both ministers expected this cooperation to have a positive impact, especially at the international level.

Chapter 8 sets out the objectives in the areas of international cooperation and visibility and indicates the ways in which the pursuit of the objectives takes shape in practice. The chapter closes with NVAO's appreciation which shows that NVAO itself considers the cooperation within a bi-national organisation to be positive.

In Chapter 9, NVAO weighs up the strengths and weaknesses of the system and the performance of NVAO. In this respect, it also identifies a number of points for attention.

According to NVAO, the current quality assurance system has two strengths: its quality improvement effect on programmes and the swift international recognition of the position of the Dutch-Flemish higher education quality assurance system due to the establishment of a bi-national accreditation organisation. NVAO distinguishes four strengths in its own performance: the swift acquisition of the position of supervisory body, the generic (open) nature of the accreditation and initial accreditation frameworks, the quick recognition of the position of NVAO in the international sphere of quality assurance organisations and the quality of NVAO's staff.

NVAO distinguishes three weaknesses in the current system: the consequences of negative accreditation decisions as the cause of uncertainty among programmes (specific to the Netherlands), interference arising from the layering of the assessment system and the absence of clustered assessment of higher education programmes offered at universities of professional education in the Netherlands. NVAO identifies two weaknesses in its own functioning: interference arising from its pro-active attitude and exceeding procedural timeframes. In Chapter 9, NVAO notes eight points for attention for the accreditation system and its own performance: realising consistency in decision-making; quality of the panels; relationship with the Inspectorate of Education in the Netherlands; mutual recognition of accreditation decisions; NVAO's informative role in respect of students, the labour market and society; counteract (undesired) effects from supplementary legislation; improper use of assessment scores; and degree mills.

The tables in Chapter 10 specify in which paragraphs of this report NVAO satisfies the criteria of the ESG, ECA / ENQA and its own mission. In addition, the relationship with the strengths and weaknesses analysis and points for attention of the previous chapter is indicated. The tables illustrate that NVAO more than satisfies the ESG, ECA/ ENQA criteria but there are a number of weaknesses and points for attention where improvements can be made, either in the current accreditation system or in the future with the development of a new system.

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Annex 2: Abbreviations

ACQUIN	Akkreditierungs-, Certifizierungs- und Qualitätssicherungs-Institut
ASIIN	Fachakkreditierungsagentur für Studiengänge der Ingenieurwissenschaften, der Informatik, der Naturwissenschaften und der Mathematik e.V.
ANECA	Agencia Nacional de Evaluación de la Calidad y Acreditación
Awb	General Administrative Act
Certiked	Certiked VBI BV: Organisation for the certification of knowledge-intensive services – Quality Assessment Agency – Private Company with Limited liability
CFI	Central Funding of Institutions Agency
CROHO	Central Register for Programmes of Higher Education .
CTI	Commission des Titres d'Ingénieur de France
DNV	Det Norske Veritas – Quality Assessment Agency –
DVC	Dutch Validation Council
ECA	European Consortium for Accreditation in higher education
ENIC	European Network of Information Centres on Recognition and Mobility
ENQA	European Association for Quality Assurance in Higher Education
FHR	Österreichischer Fachhochschulrat
FIBAA	Internationale Stiftung für Qualität bei Bachelor en Masterstudiengängen; Foundation for International Business Administration Accreditation
FL	Flanders
HETAC	Higher Education and Training Awards Council
hbo	higher professional education
HBO-raad	The Netherlands Association of Universities of Applied Sciences
Hobéon	Hobéon Group – Quality Assessment Agency –
INQAAHE	International Network for Quality Assurance Agencies in Higher Education
ISO	Dutch National Students Association
KNAW	Royal Netherlands Academy of Arts and Sciences

LSVb	National Union of Students (Netherlands)
NAO	Accreditation Organisation of the Netherlands
NARIC	National Academic Recognition Information Centres
NL	the Netherlands
NOKUT	Nasjonalt organ for kvalitet i utdanningen
Nuffic	Netherlands organization for international cooperation in higher education
NVAO	Accreditation Organisation of the Netherlands and Flanders
NVAO i.o.	Accreditation Organisation of the Netherlands and Flanders in formation
NQA	Netherlands Quality Agency – Quality Assessment Agency –
NQAI	National Qualifications Authority of Ireland
ÖAR	Österreichischer Akkreditierungsrat
OCW	Ministry of Education, Culture and Science (Netherlands)
OZM	research master's programme
PKA	Pa stwowa Komisja Akredytacyjna (the Polish Accreditation Agency)
PAEPON	Platform of recognised private institutions in the Netherlands
QANU	Quality Agency Netherlands Universities – Quality Assessment Agency –
SER	Social and Economic Council of the Netherlands
SERV	Flemish Social and Economic Council
VLHORA	Council of Flemish university colleges
VLIR	Flemish Interuniversity Council
VSNU	Association of Universities in the Netherlands
wo	academic university education
WOT	Supervision of Education Act
ZEvA	Zentrale Evaluations- und Akkreditierungsagentur Hannover

Annex 3: Analysis of processing terms

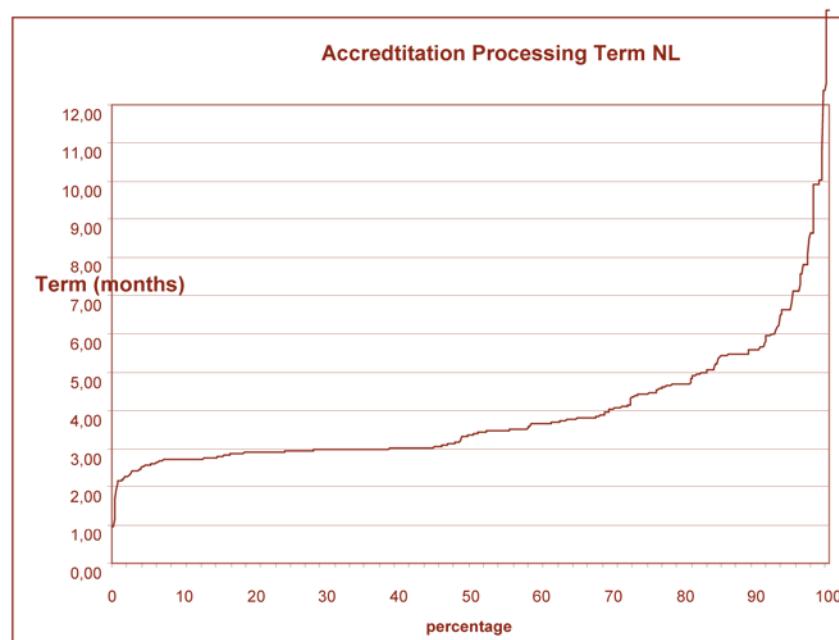
Comments

The analysis of processing terms was carried out using Xelion (an information system that was developed for tracking processing procedures). The database was, however, not complete. For example, the date of receipt had not been filled in for all applications. Such applications could therefore not be included in the analysis. The database which was used for the final analysis as at 8 March 2007 incorporated about 90% of the applications. In this respect, only applications that received a positive assessment were taken into consideration. For initial accreditation applications from Flanders, withdrawn applications were also taken into consideration.

The processing term is defined as the length of time that elapses between the date of receipt of an application and the date on which the final decision is sent to the institution.

Processing terms for applications in the Netherlands

1. Accreditation in the Netherlands



Number of applications: 772

- within 3 months: 43%
- within 4 months: 69%
- within 5 months: 83%
- within 6 months: 93%

Reasons for exceeding the 3 months' time limit:

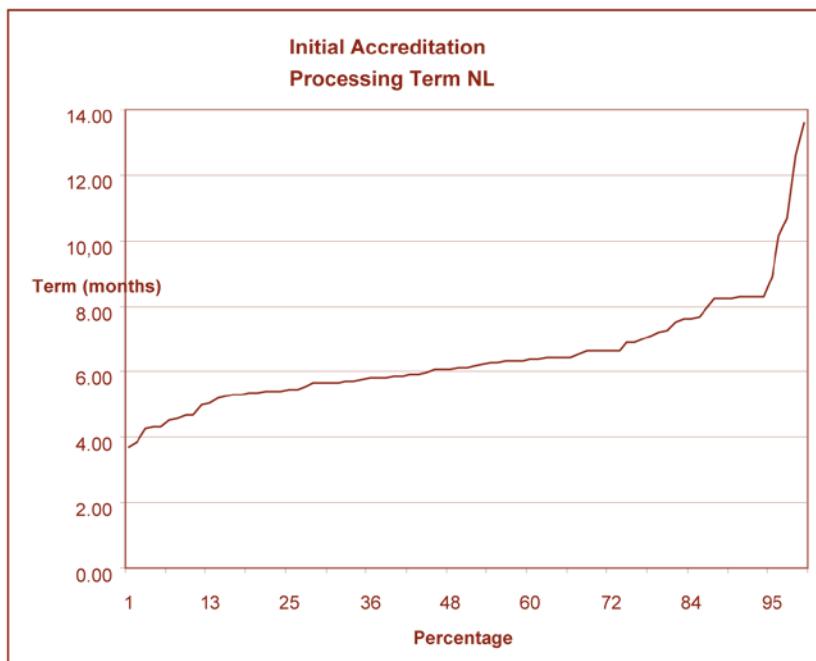
- file was not complete, additional information requested
- additional questions after the content analysis
- substantive comments from the institution about the intended decision
- clustered processing of applications
- peak work burden (applications in December)

Reasons for exceeding the 6 months' time limit:

- quality assessment agency reports submitted later than the application
- additional assessments were requested
- reports were rejected and the applications had to be resubmitted later with a new quality assessment agency report
- hearings
- verification committees

Action point: priority processing of risk applications.

2. Initial accreditation in the Netherlands



Number of applications: 179

- within 4 months: 2%
- within 5 months: 11%
- within 6 months: 45%
- within 8 months: 85%

Reasons for exceeding the 6 months' time limit:

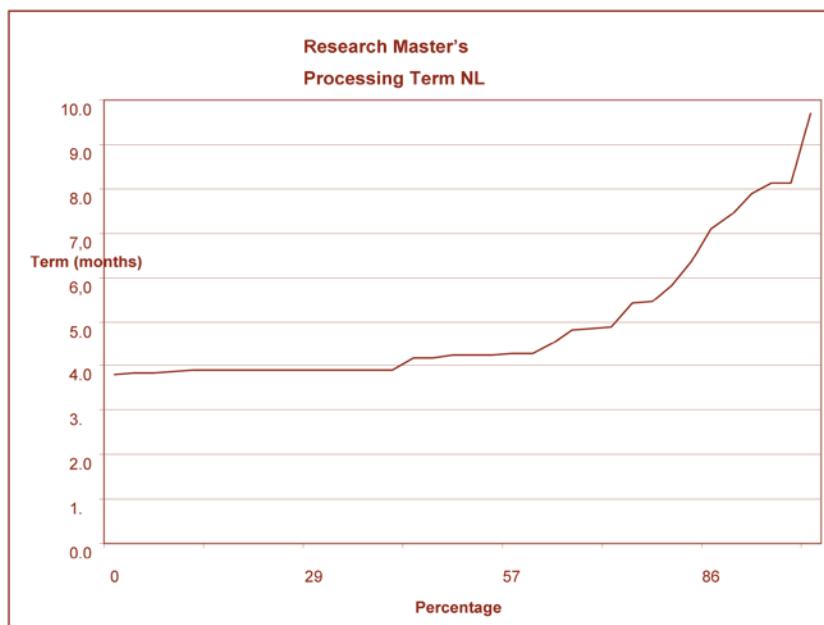
- file was not complete, additional information requested
- late composition of the panel
- additional questions from the panel
- scheduling the site visit (either delayed at the request of the institution or otherwise)
- delays in drawing up the panel report
- peak work burden

Reasons for exceeding the 8 months' time limit:

- substantive responses to the intended decision
- additional assessment by the panel
- verification committees (for initial accreditation with a quality assessment agency panel)

Action point: swifter screening of the applications for completeness and composing panels more quickly.

3. Research master's (OZM) in the Netherlands



The assessment of research master's programmes is carried out by permanent committees in cooperation with the Royal Netherlands Academy of Arts and Sciences (KNAW). The advantage is that NVAO does not have to spend time composing the panel. No site visit is made but a hearing is held. This too results in time savings.

Number of applications: 112

- within 4 months: 40%
- within 5 months: 71%
- within 6 months: 80%

Reasons for exceeding the 6 months' time limit:

- application dossier was not complete, additional information requested
- additional questions from the committee
- delay in drawing up the recommendation report

Action points: none.

Processing terms for applications in Flanders

1. Accreditation in Flanders

To date, the number of completed applications is limited to 47. With the exception of 5 of these applications, all were completed within the procedural timeframe of four months.

3 applications took some 7 months to be completed. The reason for this was organising written and oral hearings.

For two other applications, the procedural timeframe was exceeded by 1 week.

2. Initial accreditation in Flanders

To date, 11 applications have been completed.

The average processing term for all applications was 4 months.

As a rule, the processing term is 3.5 months.

3 applications took 5 months to be completed. The reason for this was that it was not possible to organise a site visit in the July-August period.

Action point: priority processing of risk-carrying applications.

COLOFON

Report of the committee for the review of the Accreditation Organization
of The Netherlands and Flanders (NVAO), september 2007
NVAO Self-evaluation report, april 2007

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