



M Compliance and Integrity in International Military Trade
Faculty of Military Sciences, Netherlands Defence Academy

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Summary

Standard 1. Intended learning outcomes

The panel concludes that the master's programme CIIMT has a clear profile and aims to study the management of strategic military trade control. The classroom with military and non-military (inter)national students adds to the reflection on this issue from multiple perspectives. The panel noted that there is a need within the professional field for educating compliance officers who can solve managerial challenges regarding trade control of military and dual-use items in an interdisciplinary way. The programme's graduates clearly meet this need. The panel advises the programme to further explicate key elements of the programme, making the programme's profile and added value even clearer and more appealing to upcoming students and the professional field. Furthermore, the panel advises the programme management to invest in strengthening connections with both internal and external stakeholders, amongst others with the purpose of increasing support of the military workfield for students participating in the CIIMT programme and to help increase student numbers.

The intended learning outcomes align with the requirements for academic master's programmes. The panel advises to connect the ILOs more explicitly to the programme's profile and further align the ILOs with the curriculum, assessment and the needs of the military and non-military professional field. The panel is pleased to note that the programme has a well-functioning advisory board that helps keep the programme up to date and relevant to the working field.

Standard 2: Curriculum; orientation

In the CIIMT programme, students enhance their academic skills by learning research and communicative skills, presenting and academic writing in courses. Students receive guidance on thesis topics from faculty researchers and are provided with a course on research methods. The panel finds that academic skills are sufficiently integrated into (parts of) the curriculum, but notes that academic skills could be better integrated and made more visibly throughout the curriculum by implementing an academic skills learning line. In that way, the build-up of academic skills in courses could become even more logical throughout the programme towards the thesis trajectory and could give academic contextualization to every course and assessment.

The programme has a strong connection to professional practice, with many students employed in a military or defence-related context. Assignments and discussions are tied to current events and practical work situations. The panel advises the programme to implement an experiential skills learning line, through which students structurally develop scenario thinking skills that allows critical thinkers to quickly solve compliance and export control challenges.

Standard 3: Curriculum; content

The CIIMT curriculum provides a clear build-up of modules, with attention to both the external and internal business environments relevant to organizations that operate in the domain of trading military or dual-use items, and fitting the intended learning outcomes of the programme. The panel learned that students experience some difficulties finishing the thesis, because unlike the prior course modules students conduct the thesis module mainly by themselves, which can be challenging next to a job. The panel advises to use the further academic contextualization of courses, with the implementation of an academic skills learning line, to prepare students even better for writing their thesis.

Standard 4: Curriculum; learning environment

The panel appreciates that a variety of teaching methods is used within the modules, and that staff is very approachable and open to interaction with students to create a student-centred environment. The programme offers ample opportunities for students to create their own learning path within the programme. According to the panel, the choice for an English name and language of instruction is well substantiated and consistent with the related international professional field.

Standard 5: Intake

The panel finds the admission requirements appropriate, sufficiently addressing relevant previous education, English language proficiency, and experience in the professional field. The programme has a clear deficiency programme, which enables prospective students to prepare for the CIIMT programme. The panel is positive about the consent that commanding officers and/or HR have to give to the application of students.

Standard 6: Staff

The panel appreciates the quality of the teaching team, noting that all teachers hold a doctoral degree or are in the process of obtaining this degree, and have a strong connection to current research and the professional field. The staff also has sufficient didactic training. The panel finds there is sufficient staff available for education.

Standard 7: Facilities

The panel is positive about the facilities and determines they are clearly sufficient for the realization of the programme.

Standard 8: Tutoring

The programme has established an appropriate system of guidance, with sufficient room for informal guidance and information exchange in a small-scale setting. The panel notes that students are satisfied with the guidance and information provision they receive. It concludes that student guidance within CIIMT is well-organized but could be enhanced during independent learning weeks and the thesis trajectory. In line with this, the panel advises the programme management to set up a pre-established thesis trajectory with fixed contact moments and deadlines. The feasibility of the programme is in order. Challenges for students to complete the programme are mostly job-related. Therefore, the panel recommends the programme to strengthen the Advisory Board with a commanding officer as ambassador of the programme with the purpose of advocating the programme's workload and added value towards the working field.

Standard 9: Quality Assurance

The panel concludes that the quality assurance system for the CIIMT programme is well-established, concentrating on both quality control and improvement. Each course is evaluated once every six years (three rounds of the programme), and through use of annual module evaluation, student feedback is also gathered continuously. Feedback reaches management quickly, allowing them to act adequately to implement improvements. The programme has sufficient feedback loops in place, from student to programme management and staff, and from Advisory Board to programme management, to provide for a well-functioning Plan-Do-Check-Act cycle.

Standard 10: Student assessment

The panel concludes that the assessment system in place for the CIIMT programme ensures validity, reliability, and transparency. Assessments align with learning outcomes, testing knowledge and skills through various appropriate methods. The intended learning outcomes can be translated even further into

the assessment plan and communicated to students. Course assessments have a clear link to practice and are sufficiently academic in focus. The panel suggests the creation of an academic skills learning line to further enhance assessments' academic contextualization and create a more logical connection and build-up towards the thesis. The panel advises to finish the AI policy soon, to aid students and teaching staff in dealing with AI. The Board of Examiners is committed to its role and actively involved in safeguarding the quality of assessment. The theses were assessed in an appropriate way, although in some cases the grades were higher than the panel itself would have given. The panel suggests structurally bringing in an external reviewer or making use of external benchmarking with the FMS, to safeguard adequate grading in all cases.

Standard 11: Achieved learning outcomes

The panel evaluated all five available theses from CIIMT students and found their level generally appropriate for a master's degree. The panel suggests improving the theoretical and methodological underpinning of thesis research by providing clear guidelines regarding theoretical foundation and methodology, and linking these more explicitly to the intended learning outcomes. CIIMT graduates are able to approach practical issues and problems concerning compliance and strategic trade control from an academic perspective, which in the opinion of the panel is of value for the professional field.

Score table

The panel assesses the programme as follows:

Master Compliance and Integrity in International Military Trade Faculty

Standard 1: Intended learning outcomes	meets the standard
Standard 2: Curriculum; orientation	meets the standard
Standard 3: Curriculum; content	meets the standard
Standard 4: Curriculum; learning environment	meets the standard
Standard 5: Intake	meets the standard
Standard 6: Staff	meets the standard
Standard 7: Facilities	meets the standard
Standard 8: Tutoring	meets the standard
Standard 9: Quality Assurance	meets the standard
Standard 10: Student assessment	meets the standard
Standard 11: Achieved learning outcomes	meets the standard

General conclusion positive

Prof. dr. Philip Vergauwen
Chair

Drs. Jessica van Rossum
Secretary

Date: 27 September 2024

Introduction

Procedure

Assessment

On 26 and 27 June 2024, the master's programme Compliance and Integrity in International Military Trade (CIIMT) of the of the Netherlands Defence Academy (NLDA) was assessed by an independent peer review panel. The assessment followed the procedure and standards of the NVAO Assessment Framework for the Higher Education Accreditation System of the Netherlands (September 2018).

Quality assurance agency Academion coordinated the assessment upon request of the Faculty of Military Sciences (FMS) of the NLDA. Jessica van Rossum acted as secretary in the assessment. She has been certified and registered by the NVAO.

Preparation

Academion composed the peer review panel in cooperation with the institution and taking into account the expertise and independence of the members. On 24 April 2024, the NVAO approved the composition of the panel. The coordinator instructed the panel chair on his role in the site visit according to the Panel chair profile (NVAO 2016).

The contact person of the institution composed a site visit schedule in consultation with the secretary (see appendix 3). The programme selected representative partners for the various interviews. It also determined that the development dialogue would be made part of the site visit. A separate development report was made based on this dialogue.

The programme provided the secretary with all five theses available of graduates, comprising the period 2021-2023. Prior to the site visit, the programme provided the panel with the theses and the accompanying assessment forms. It also provided the panel with the self-evaluation report and additional materials (see appendix 4).

The panel members studied the information and sent their findings to the secretary. The secretary collected the panel's questions and remarks in a document and shared this with the panel members. In a preliminary meeting, the panel discussed the initial findings on the self-evaluation report and the theses, as well as the division of tasks during the site visit. The panel was also informed on the assessment framework, the working method and the planning of the site visits and reports.

Site visit

During the site visit, the panel interviewed various programme representatives (see appendix 3). The panel also offered students and staff members an opportunity for confidential discussion during a consultation hour. No consultation was requested. The panel used the final part of the site visit to discuss its findings in an internal meeting. Afterwards, the panel chair publicly presented the preliminary findings.

Report

The secretary wrote a draft report based on the panel's findings and submitted it within Academion for peer assessment. Subsequently, the secretary sent the report to the panel for feedback. After processing this feedback, the secretary sent the draft report to the FMS in order to have it checked for factual irregularities.

The secretary discussed the ensuing comments with the panel chair and changes were implemented accordingly. The panel then finalized the report, and the coordinator sent it to the FMS of the NLDA.

Panel

The panel assessing the master's programme Compliance and Integrity in International Military Trade at the Netherlands Defence Academy consisted of the following members:

- Prof. dr. P.G.M.C. (Philip) Vergauwen, professor Strategic Management Accounting & Control at Solvay Brussels School of Economics & Management of the Free University of Brussels (chair);
- Prof. dr. A.W. (Albert) Veenstra, professor International Trade and Logistics at Rotterdam School of Management;
- Prof. dr. Ir. J. (Jan) Leysen, professor Management at Royal Military Academy (KMS) in Brussel;
- Dr. P.D. (Paul) Holtom, head of the Conventional Arms and Ammunition Programme at United Nations Institute for Disarmament Research (UNIDIR);
- T. J. (Tom) Hillenaar BSc, master student Transport and Supply Chain Management at Vrije Universiteit Amsterdam and Engineering and Policy Analysis at Delft University of Technology (student member).

Information on the programme

Name of the institution:	Faculty of Military Sciences of the Netherlands Defence Academy
Status of the institution:	Legal body providing higher education
Result institutional quality assurance assessment:	Not applicable
Programme name:	Compliance and Integrity in International Military Trade
CROHO number:	60966
Level:	Master
Orientation:	Academic
Number of credits:	60 EC
Specializations or tracks:	None
Location:	Breda
Mode of study:	Parttime
Language of instruction:	English
Submission date NVAO:	1 November 2024

Description of the assessment

Previous accreditation panel's recommendations

The accreditation panel that reviewed the master's programme Compliance and Integrity in International Military Trade (CIIMT) for initial accreditation in 2019 made several recommendations. It advised to establish a better connection within the programme between the export control and compliance perspective and the procurement perspective, to improve the alignment of the learning outcomes with the content of the curriculum and the expectations of prospective students and the work field, and to set up an advisory board for the development of the programme. The panel found that the programme has taken these recommendations to heart and used them to improve its quality. The programme is still in the process of addressing some of these recommendations, which will be discussed further on in the report.

Standard 1. Intended learning outcomes

The intended learning outcomes tie in with the level and orientation of the programme; they are geared to the expectations of the professional field, the discipline, and international requirements.

Findings

Profile and aims

The master's programme Compliance and Integrity in International Military Trade (CIIMT) is offered by the Faculty of Military Sciences (FMS), the part of the Netherlands Defence Academy (NLDA) that is responsible for organizing the NLDA's academic programmes. The master's programme aims to train 'officer scholars' by integrating scientific-based and practice-based knowledge. It educates students to become academic professionals who are able to generate and implement problem solving strategies and management decisions to stimulate compliance and integrity in the control of international trade in military and dual-use (civil and military) goods and services. The master's programme aims to be of interest for military and non-military professionals who are engaged and involved in the international trade of military and dual-use items either on the demand side (Ministry of Defence, governmental, NATO, EU) or on the supply side (defence-related and dual-use industry), as well as (inter)national regulatory agencies and research centers. Due to the international dimension of strategic trade controls, the programme aims for international students to work next to Dutch students.

In view of the complexity of the international trade of military and dual-use goods and services, the rapid evolvement of export control, and its importance to procurement processes, defence organizations are in need of innovative thinking practitioners. Such practitioners are able to find creative solutions to problems, based on in-depth understanding and from an interdisciplinary perspective. The programme is concerned with analyzing, controlling, and improving international military trade. More specifically, managerial questions regarding strategic trade control of military and dual-use items are studied. Studying the management of strategic trade control requires an interdisciplinary approach, which encompasses economic, political, ethical, legal, strategic and security dimensions on (inter)national and organizational level.

The panel appreciates the profile and aims of CIIMT, which has a clear focus on analyzing, controlling, and improving the management of strategic military trade control. From the documentation and interviews with stakeholders from the working field, the panel understood there is a substantial need within the professional

field to educate compliance officers who can solve managerial questions regarding trade control of military and dual-use items in an interdisciplinary way. Students mentioned in the interview during the site visit that the programme offers a global view and in-depth understanding of compliance and military trade, broader than solely trade control. They find the comprehensive way of looking into these matters useful and include that into their jobs.

The panel notes that in-depth understanding of the terms military trade and compliance with strategic trade controls within the programme is necessary, and points out that the programme can be even more explicit in framing these key elements. In particular, the programme could link compliance more clearly to supply chain management for the trade in military goods and services and the operations aspect of the programme. In that way, the programme's profile and added value can become even clearer and more appealing to upcoming students and the professional field.

Next to that, the panel sees the need to further strengthen connections with both internal and external stakeholders and advises the programme management to invest in this. On the one hand, strengthening connections with internal stakeholders could create better understanding and support from the military defence workfield for participating students in the CIIMT programme. On the other hand, strengthening connections with external stakeholders could help attracting international and non-military students and could help increase student numbers.

Intended learning outcomes

The objectives and aims of the master's programme CIIMT have been translated into a set of six intended learning outcomes (ILOs, see appendix 1) that describe the knowledge and skills that students should acquire throughout the programme. The panel examined these ILOs and found them to be at a sufficient academic level for a master's degree. For example, graduates are expected to be able to conduct scientific research, and to reflect critically on and adapt their changing work environment or military engagement. The ILOs are linked to the Dublin descriptors for master's programmes. Following its earlier suggestion to further clarify the key elements and profile of the programme, the panel advises to connect the ILOs to the programme's profile. The ILOs are aligned with the curriculum, assessment and the needs of the military and non-military professional field. In line with this, the panel advises to even better visualize and explicate the alignment with each of these aspects than already happens by using a clear matrix and less extensive ILOs.

Professional field

Following the previous accreditation panel's recommendation, the programme established an advisory board. Its members come from four different fields relevant to CIIMT: Ministry of Defence, defence-related and dual-use industry, academic research, and policy making. The members are all experts in their fields. The advisory board meets twice a year with the programme board to discuss the future content of the master's programme, past student evaluations, and possible research directions. The panel appreciates this and believes that this is important to keep the programme up-to-date and relevant to the needs of the professional field.

Considerations

The panel concludes that the master's programme CIIMT has a clear profile and aims to study the management of strategic military trade control. The classroom with military and non-military (inter)national students adds to the reflection on this issue from multiple perspectives. The panel noted that there is a need within the professional field for educating compliance officers who can solve managerial challenges regarding trade control of military and dual-use items in an interdisciplinary way. The programme's graduates clearly meet this need. The panel advises the programme to further explicate key elements of the

programme, making the programme's profile and added value even clearer and more appealing to upcoming students and the professional field. Furthermore, the panel advises the programme management to invest in strengthening connections with both internal and external stakeholders, amongst others with the purpose of increasing support of the military workfield for students participating in the CIIMT programme and to help increase student numbers.

The intended learning outcomes align with the requirements for academic master's programmes. The panel advises to connect the ILOs more explicitly to the programme's profile and further align the ILOs with the curriculum, assessment and the needs of the military and non-military professional field. The panel is pleased to note that the programme has a well-functioning advisory board that helps keep the programme up to date and relevant to the working field.

Conclusion

The panel concludes that the programme meets standard 1.

Standard 2. Curriculum; orientation

The curriculum enables the students to master appropriate (professional or academic) research and professional skills.

Findings

Academic skills

By integrating scientific-based and practice-based knowledge, the CIIMT programme aims for students to develop as academic professionals who are able to generate and implement problem-solving strategies and management decisions to further compliance and integrity in strategic trade control. Students enhance their research and communicative skills by reading scientific articles and completing assignments that stimulate critical reading and analysis as well as by doing exercises in presenting and academic writing. Literature is provided at an advanced level intended for researchers, and the assignments are focused on problem-solving through increasingly independent research and various means of reporting. Furthermore, students participate in debates and conduct presentations.

As to the development of both research and professional skills, part of the programme focuses on designing, monitoring and auditing internal compliance programmes to enable students to deepen their academic and professional understanding. Hereby, students apply academic methods and tools to their own working environment. Moreover, CIIMT contains a course on research methods. Before starting their thesis research, students participate in the Integration Project, in which they analyze the (re)design of an internal compliance programme or code of conduct. During the Integration Project and thesis work, students are asked to conduct self-directed critical analyses integrating different views, and develop an original approach towards the research subject or internal compliance programme.

Teaching staff in the CIIMT programme are involved in research within the FMS, and integrate their research results in the courses they offer students. Before students start their thesis trajectory, FMS researchers present potential research topics from their respective areas of expertise to students in a thesis information session, providing students the opportunity to connect their interest for a thesis topic to research conducted by FMS teaching staff.

The panel has studied the role of academic skills in the programme and discussed this with students, alumni, and teaching staff members of the programme. It concludes that academic skills are sufficiently integrated into the CIIMT curriculum, and that students are guided by active researchers who are able to use the latest scientific insights in their courses and supervision, although it is not always made explicit in courses. The panel adds that academic skills could be better integrated and made more visibly throughout the curriculum by implementing and optimizing a coherent academic skills learning line. In that way, the build-up of academic skills in courses could become even more logical throughout the programme towards the thesis trajectory and could give academic contextualization to every course and assessment.

Professional skills

CIIMT has a strong connection to professional practice (both per design and per delivery). Students typically pursue the programme alongside employment in a military or defence-related context. Assignments are linked to current events, and professional skills within the courses focus on discussion and reflection on practical work situations. The panel concludes that the programme is strongly embedded in the military and strategic trade control context, and is therefore closely related to the professional field. The panel considers this to be a strong aspect of the programme. In addition, the panel advises the programme to implement an experiential skills learning line, through which students develop scenario thinking skills to analyze and act on non-compliance and strategic trade control related cases. In this way, the programme can structurally embed competence skills that allows critical thinkers to quickly solve compliance and export control challenges. By making it a fluent and coherent learning line, the programme could integrate experiential skills development throughout the curriculum, and also relate it explicitly to the intended learning outcomes.

Considerations

In the CIIMT programme, students enhance their academic skills by learning research and communicative skills, presenting and academic writing in courses. Students receive guidance on thesis topics from faculty researchers and are provided with a course on research methods. The panel finds that academic skills are sufficiently integrated into (parts of) the curriculum, but notes that academic skills could be better integrated and made more visibly throughout the curriculum by implementing an academic skills learning line. In that way, the build-up of academic skills in courses could become even more logical throughout the programme towards the thesis trajectory and could give academic contextualization to every course and assessment.

The programme has a strong connection to professional practice, with many students employed in a military or defence-related context. Assignments and discussions are tied to current events and practical work situations. The panel advises the programme to implement an experiential skills learning line, through which students structurally develop scenario thinking skills that allows critical thinkers to quickly solve compliance and export control challenges.

Conclusion

The panel concludes that the programme meets standard 2.

Standard 3. Curriculum; content

The contents of the curriculum enable students to achieve the intended learning outcomes.

Findings

The 60 EC curriculum is designed to be completed part-time over a two year period and consists of compulsory courses only. The programme is based on an estimated weekly study load of twenty hours over the course of two years. The curriculum is based on an outside-in perspective, starting the first four modules with a focus on the external environment and after that shifting the modules' focus to the internal environment of (military) organizations compliancy. Modules 1-4 consist of four courses of each 5 EC (20 EC), and provide an interdisciplinary context from which export control in international trade of military and dual-use items can be understood. Students become aware of the external business environment relevant to organizations that operate in the domain of trading military or dual-use items. They discuss topics such as EU and US export control and sanction law, defence industrial base, and international trade. After finishing this part of the programme, students know the context and preconditions of doing business in defence markets regarding trade controls.

Next, the programme's attention shifts to the internal environment of a (military) organization, and focuses on how organizations can organize themselves to become compliant. It also investigates how to deal with noncompliant behavior and conflicts of interest within and between organizations in international trade in military and dual-use goods and services. To this end, students learn to develop and maintain internal compliance programmes. In modules 5-8 (20 EC), students learn to integrate practice-based knowledge and skills from their own experience in the field with science-based knowledge of information systems and internal control, learn about research methods most relevant to studying trade control in the international trade of military and dual-use items, and study and discuss complex managerial challenges and controversies.

Module 9 (5 EC) consists of the Integration Project, in which students investigate and report on the (re)design of an internal compliance programme or code of conduct in relation to a specific business environment of their own choice with the use of appropriate research methods. Next to this, students work on their research proposal in preparation of their thesis writing in module 10 (15 EC). The selection of the research topic is to align with the expertise of the CIIMT staff. In addition, students are encouraged to select a research topic that is closely related to the content of the different course modules to ensure that they have enough background knowledge. Students complete the thesis by conducting independent research and writing an independent research report in accordance with the FMS scientific requirements as specified in the Education and Quality Manual. Students are supported in the thesis process by peer exchange in research circles and by an individual supervisor. During the thesis period, the supervisor and student have regular meetings about general progress and to discuss possible emerging difficulties.

The panel studied the structure and content of the curriculum and a selection of courses, and concludes that the programme has a clear build-up and fixed structure, which provides students with appropriate perspectives on the external and internal business environments relevant to organizations that operate in the domain of trading military or dual-use items. The curriculum fits the intended learning outcomes of the programme. During the site visit, the panel discussed the thesis trajectory because it learned that many students experience difficulties finishing the thesis with implications for completion rate (see also Standard 8). While during the modules 1-9 the curriculum is structured and students are more or less taken by the hand, students conduct the thesis module mainly by themselves. Students do have contact moments with their supervisor and do have peer exchange, but this is substantially less frequent than during the prior

modules. The panel learned from the programme management that it is already looking into ways for students to more gradually conduct the thesis module by performing the literature review already during module 9 prior to the thesis writing process in module 10. They also plan to offer more contact moments during the last part of the thesis trajectory. The panel advises to deepen the integration of academic skills throughout the curriculum, for instance by implementing an academic skills learning line, to prepare students better for writing their thesis. By that means, the academic skills in the curriculum can more fluently build up to the thesis as a logical end product of the master's programme.

Considerations

The CIIMT curriculum provides a clear build-up of modules, with attention to both the external and internal business environments relevant to organizations that operate in the domain of trading military or dual-use items, and fitting the intended learning outcomes of the programme. The panel learned that students experience some difficulties finishing the thesis, because unlike the prior course modules students conduct the thesis module mainly by themselves, which can be challenging next to a job. The panel advises to use the further academic contextualization of courses, with the implementation of an academic skills learning line, to prepare students even better for writing their thesis.

Conclusion

The panel concludes that the programme meets standard 3.

Standard 4. Curriculum; learning environment

The structure of the curriculum encourages study and enables students to achieve the intended learning outcomes.

Findings

Teaching methods

The CIIMT programme is offered in a small-scale environment. It typically accommodates around twelve students per year. Half of them comes from the Ministry of Defence, the other half from external organizations. The limited class size encourages discussions between lecturers and students, promotes peer interaction, and facilitates engagement between military and non-military students. In addition, the small class size allows for active student participation, direct interaction with lecturers, and individual feedback on assignments and thesis.

Each CIIMT module consists of a period of independent study during which students read literature, work on assignments and prepare for the contact week. During the independent learning weeks, every week an online lecture is scheduled. In the contact week the learning material is deepened and enriched by teachers and guest speakers through information and discussions. The contact week is followed by an experiential learning week, in which students apply what they learnt in their own working environment and complete assignments. During the experiential learning week, students complete their assignment based on reflection questions to enhance their understanding of the connection between theory and daily practice. Up until they start their thesis research, students spend about sixty percent of their time studying independently, guided by pre-selected critical text reading and assignments, such as writing essays and papers. Another example of an assignment students participate in is a simulation game, in which students learn how much political power politicians get with certain decisions and the economical aspect of the trade in military goods and services. Approximately forty percent of student time is accounted for by the contact weeks, online lectures,

and communication and collaboration with teachers and peers, in which students participate in debates and give presentations. For each module, a course guide provides information about the required hours of self-study, literature, the themes that will be discussed during the contact week, as well as the assessment formats and assignments.

The panel found that the small scale of the programme encourages interaction between students and teaching staff and students can bring in a lot of their own workfield experience. This creates a learning environment in which course content is complemented by case material from the student's working field and from which students can further benefit in enlarging their knowledge and skills. The panel appreciates that a variety of teaching methods is used to deliver the modules, and that the staff is very approachable and open to interaction with students to enhance the learning effect and create a student-centred environment. Next to that, the panel learnt from the conversation with teaching staff that they engage the community of export control and compliance to find interesting guest lecturers, who have recently done relevant research.

Student-centredness

The programme has a fixed curriculum with no electives. If students are interested in additional (extracurricular) courses, the programme management can give them advice on this. After discussing this with students, the panel learnt that students are content with the fixed set-up of the programme. In the students' view, the programme offers ample possibility to create their own learning path within the programme. For example, they can choose topics of their own interest for papers and thesis as long as it fits within the FMS research areas related to compliance and integrity in trade control in military and dual-use goods and services. The panel values that the programme stimulates students to choose topics of their interest for assignments and the thesis and in that way adjust it to the students own learning path. Next to that, programme management and teaching staff encourage students to bring in their own (organizational) challenges to study it from several perspectives in an interdisciplinary way. In that way, students are enabled to develop solutions and, together with the teaching staff, act as each other's sparring partners concerning processes regarding (the management of) external control in international military trade.

Language of instruction

To prepare students for working in the international (military) professional field, the CIIMT curriculum, literature and assessments, including all graded elements of the programme, are offered in English. Except for native English speakers, applicants need to present an English language certificate to ensure that students master the English language sufficiently to participate in the programme successfully. Additionally, English language proficiency (level C1) is one of the academic staff recruitment requirements.

During the site visit, the panel discussed the use of English as the language of instruction and the programme name with the programme management. The panel considers English an appropriate choice given the international orientation of the professional field.

Considerations

The panel appreciates that a variety of teaching methods is used within the modules, and that staff is very approachable and open to interaction with students to create a student-centred environment. The programme offers ample opportunities for students to create their own learning path within the programme. According to the panel, the choice for an English name and language of instruction is well substantiated and consistent with the related international professional field.

Conclusion

The panel concludes that the programme meets standard 4.

Standard 5. Intake

The curriculum ties in with the qualifications of the incoming students.

Findings

The Program Board admits students on the basis of their prior education, experience in the professional field, and English language skills. The entry requirements are listed in an admission policy in the Teaching and Examinations Regulations. The Program Board ascertains whether an applicant meets these criteria, in consultation with the Board of Examiners. The programme is open to students with an academic bachelor's or master's degree in a field relevant to CIIMT, namely (business) economics, (international) law, organizational or management sciences, or behavioral sciences. Dutch military students can apply with a bachelor's degree in Military Management Studies, Military Technological Studies, War Studies, or specific variants of the former KIM or KMA officers' education. For NATO+ students, comparable entrance qualifications apply. In addition to a relevant degree, the programme requires applicants to provide a certificate of proficiency in the English language in order to participate successfully in the programme. There are a variety of acceptable certificates and in exceptional cases, the Board of Examiners may waive the language requirement. Completion of a relevant bachelor's or master's degree taught entirely in English may also lead to an exemption.

As to the experience in the professional field, prospective students preferably have two or three years working experience in export control of international trade of military and dual-use goods and services. Because the programme combines and integrates elements of a more general compliance master's programme with a specific application of strategic trade, students can also have professional expertise in for example R&D, sales, engineering, or logistics. To stimulate effective study progress for Dutch Ministry of Defence (military and civilian) students, commanding officers and/or the HR division have to consent to their application, in order to reduce the risk of interference from deployment, extensive training, and exercises.

A deficiency programme is offered to applicants from the programme's primary target group who are not yet eligible in the opinion of the Program Board and Board of Examiners but who have remediable deficiencies. Students follow this deficiency programme to increase their knowledge level on the core disciplines relevant to the programme, and introduce them to the most important relevant research methods. The Program Board selects the mandatory courses by identifying the knowledge gaps of prospective students. Students must pass the exams of the selected courses to be able to admit to the programme. The complete deficiency program takes a maximum of 35 ECTS.

The panel has examined the admission requirements of the programme and concludes that they are appropriate for the content of the programme. The requirements take sufficient account of relevant previous education, English language proficiency, and experience in the professional field. Furthermore, the panel appreciates the clear set-up of the deficiency programme, which helps prospective students to gain the expected knowledge with a tailor-made programme. The panel is positive about the consent that commanding officers and/or HR must give to the application of students, to stimulate students' active participation to the programme next to their job.

Considerations

The panel finds the admission requirements appropriate, sufficiently addressing relevant previous education, English language proficiency, and experience in the professional field. The programme has a clear deficiency programme, which enables prospective students to prepare for the CIIMT programme. The panel

is positive about the consent that commanding officers and/or HR have to give to the application of students.

Conclusion

The panel concludes that the programme meets standard 5.

Standard 6. Staff

The staff team is qualified for the realisation of the curriculum in terms of content and educational expertise. The team size is sufficient.

Findings

The CIIMT programme is taught by seven staff members, including full professors, associate professors and a lecturer. Six of them hold the position of professor or associate professor, and one is PhD researcher. Five have obtained their UTQ. Teaching staff members are affiliated to the Faculty of Military Sciences. To maintain the programme's interdisciplinarity, CIIMT's teaching staff is complemented by guest lecturers from adjacent domains related to organizational and management studies and defence economics.

The FMS Education and Quality Manual stipulates that teaching staff in all degree programmes are involved in research, as demonstrated by their PhD degrees and publications in the field of military sciences, defence economics or trade compliance. According to the FMS personnel policy, academic staff should devote thirty percent of their time to research, sixty percent to teaching and the remaining ten percent to management and administration. Guest lecturers and colleagues who are asked to share their practice-based knowledge with students are supervised by FMS staff with a PhD.

Course evaluations include assessments of individual teaching staff members, covering didactic and academic skills, as well as their understanding of the military context. Student assessments of the teaching staff show that the lecturers are highly valued. The high appreciation of the teaching staff was confirmed during the student interview, where the teachers were praised for their knowledge of their respective disciplines as well as their approachability and responsiveness to the needs of students.

The panel is positive about the quality of the teaching team. The teachers are valued by the students for their knowledge of their specific disciplines and for their approachability and didactic skills. The staff combines education with state-of-the-art research. All teaching staff members, except for one, have at least a PhD and all staff members are actively engaged in research in the field of military sciences, defence economics or trade compliance. Given the small scale and part-time nature of the programme, the panel finds there is sufficient staff available to provide education besides active participation in research.

Considerations

The panel appreciates the quality of the teaching team, noting that all teachers hold a doctoral degree or are in the process of obtaining this degree, and have a strong connection to current research and the professional field. The staff also has sufficient didactic training. The panel finds there is sufficient staff available for education.

Conclusion

The panel concludes that the programme meets standard 6.

Standard 7. Facilities

The accommodation and material facilities are sufficient for the realisation of the curriculum.

Findings

During the independent learning weeks, students predominantly make use of several online educational facilities. In order to facilitate students' search for information and to reduce the number of information sources, these complementary platforms are accessible directly or indirectly through the electronic learning environment Moodle. Moodle serves as a platform and overview for all courses. FMS teaching staff members create and maintain their courses and students can easily access course-related information.

During the contact weeks, students and staff use the premises of the FMS in Breda for the physical lectures, mainly the faculty building 'Isaac del Prat Pavilion' and the Higher Defence College. Next to that, students can make use of the NLDA library, which specializes in military scientific literature and is of national importance in the field of war studies. It provides FMS staff and students with access to a range of publications, with a physical collection of approximately 200,000 titles and access to over 25,000 e-journals in more than 75 databases. Access to the entire collection is facilitated through a discovery metasearch tool that is available online. Through its digital connection via Worldcat, the NLDA library is linked to thousands of other libraries worldwide.

During the visit to Breda, the panel visited some of the facilities and found them well suited for teaching the CIIMT programme. Interviews with the students and alumni showed the panel that they are satisfied with the facilities. Students have access to an ample amount of study places and there are enough classrooms.

Considerations

The panel is positive about the facilities and determines they are clearly sufficient for the realization of the programme.

Conclusion

The panel concludes that the programme meets standard 7.

Standard 8. Tutoring

The tutoring of and provision of information to students are conducive to study progress and tie in with the needs of students.

Findings

Student guidance

The programme is taught in a small-scale environment with low-threshold contact between teaching staff and students. Prior to the start of the CIIMT master's programme, the FMS provides prospective students with extensive information about the programme content, admission requirements and the deficiency programme. Once admitted, welcoming days before the start of the programme help prepare students for successful completion of the programme. Information on the programme content and relevant policies, such as admission policy, study guide, and teaching and examination regulations, are available on the website and through the programme coordinator.

Students who face private, work, or study related issues, can contact the programme coordinator, who fulfills the role of tutor. For students who risk study delay, for instance military students who have operational deployments or military training, study guidance and counseling are available based on a tailor-made basis. Due to the programme's small scale, students can easily get in contact with the coordinator. Much of the programme's informal study guidance also takes place in the classroom. Because students engage in interactive education in small groups, there is a lot of informal interaction between teachers and students. Students can therefore easily approach teachers with questions or issues.

Supervision during the master's thesis is provided by the student's supervisor. This is a teaching staff member involved in the CIIMT programme, who holds a PhD and is an active researcher. The supervisor is appointed by the programme board and guides and supports the student through the research process, by guiding the student in the formulation of the final individual research proposal, attending scheduled supervision meetings during contact week, providing advice on the execution of the thesis, providing feedback on draft written work, and being available to students besides the supervision meetings on a regular and reasonable basis. If the nature or subject of the thesis requires the input of additional FMS academic staff or an external expert from the field, the programme board may appoint a secondary supervisor with an academic degree, in which case the two supervisors meet the student together to decide how they will divide their responsibility for advice and how to arrange supervision meetings. When a secondary supervisor is appointed, the primary supervisor retains the ultimate responsibility for the supervision.

Next to that, the thesis process is supported by peer exchange in research circles. The research circle consists of a group of four students maximum and a supervisor, that communicates, reflects, and thinks critically about each student's research. The circles take place according to fixed milestones and aim to contribute to the achievement of learning outcomes by strengthening the students' academic skills and enhancing motivation and cooperation amongst them. To facilitate peer-learning, the student composition of the circles is fixed.

Students with a functional disability are informed about additional services and support to enable them to continue their education, and can make use of adaptations in teaching, examinations, and practicals. The facilities provided involve adapting the form or duration of examinations and practicals to the student's individual situation, making practical aids available, and wheel-chair accessible lecture rooms, ensuring equal access to education while maintaining academic standards. The programme coordinator ensures that students are informed on additional services and support to enable them to continue their education, advised on potential adaptations to the programme, planning and scheduling of tests or test formats, and referred to the Board of Examiners in case of likely study delay.

The panel is positive on the student guidance and provision of information in the programme, and appreciates the small-scale learning environment in which students easily get in contact with teaching staff and teaching staff knows the students well. Teachers are available for questions and there is attention for functional impairments. The panel concludes that in general the guidance offered to students is appropriate and students are satisfied with the guidance and information provided.

At the same time, the panel is of the opinion that a point of attention is the guidance and supervision during independent learning weeks and the thesis trajectory (as mentioned in Standard 3). In every independent learning week an online lecture takes places. The aim of this is to guide students through the reading materials and assignments, and give them the opportunity to ask questions. The panel adds that more

guidance could be provided to keep students focused during independent learning weeks, preparing them proactively for the contact and experiential learning week to enhance their input there and get an optimal learning effect out of that. In line with this, the independent learning weeks can be related more to the skills needed for the thesis trajectory. This would allow programme management to monitor individual student preparation better and would help assure students are “on the same page” with sufficient preparation. The panel also notes that especially during independent learning weeks and the thesis trajectory, students’ attention can slip away from studies to work. The panel noted from the interview with programme management that it is already in the process of addressing the guidance during independent learning weeks. The thesis trajectory contains contact moments with the thesis supervisor and students can participate in research circles, but in the opinion of the panel the thesis trajectory could be turned into a pre-established trajectory with fixed contact moments and deadlines during and at the end of the thesis trajectory, to prevent delays in the completion of the thesis.

Feasibility

The completion rate of the CIIMT programme is quite low, with a completion rate of the cohort 2019-2021 of 36%. The panel learned from the documents and interviews with students and programme management that students enter the programme for different reasons. More mature and experienced students are most interested in the knowledge gathered during the master’s programme, and less in receiving a MSc degree. In turn, younger participants are more motivated to receive the degree as a steppingstone for the rest of their (military) career. For instance, students who are interested in gaining more knowledge about export controls, arms embargoes and economic sanctions follow only the first three modules. Other students can experience challenges in completing the programme, because their job is demanding or their study is interrupted by military operations or training. Specially completing the individual thesis trajectory with less concrete deadlines and structure can be challenging in those cases.

Overall, the panel concludes that the programme is feasible: the programme offers a clear and logical build-up, a reasonable workload and appropriate guidance and information, which makes it possible for students to graduate in time. The panel learned from interviews with students and work field representatives that the job setting can be demanding for students, and commanding officers do not always prioritize their employees studying the programme. Therefore, the panel recommends the programme to strengthen the Advisory Board with a commanding officer with the purpose of advocating the programme’s workload and added value to the working field, and in this way making it easier for students to combine the programme with their job. The panel also suggests to connect the thesis to the student’s workfield, which can help secure the commanding officer’s support for military students.

Considerations

The programme has established an appropriate system of guidance, with sufficient room for informal guidance and information exchange in a small-scale setting. The panel notes that students are satisfied with the guidance and information provision they receive. It concludes that student guidance within CIIMT is well-organized but could be enhanced during independent learning weeks and the thesis trajectory. In line with this, the panel advises the programme management to set up a pre-established thesis trajectory with fixed contact moments and deadlines. The feasibility of the programme is in order. Challenges for students to complete the programme are mostly job-related. Therefore, the panel recommends the programme to strengthen the Advisory Board with a commanding officer as ambassador of the programme with the purpose of advocating the programme’s workload and added value towards the working field.

Conclusion

The panel concludes that the programme meets standard 8.

Standard 9. Quality Assurance

The programme has an explicit and widely supported quality assurance system in place. It promotes the quality culture and has a focus on development.

Findings

Quality assurance for all FMS degree programmes is outlined in the Education and Quality Manual (EQM). Responsibility for quality assurance within the FMS lies with the Faculty Board, but based on agreements made within the faculty, day-to-day responsibility for the programme is delegated to the CIIMT Program Board. The Program Board has been tasked to monitor and ensure the coherence and overall programme structure of the CIIMT programme and is therefore responsible for its overall evaluation.

Each FMS programme has a Program Committee. The Program Committee is a joint committee consisting of equal numbers of students and teaching staff. The main task of the Program Committee is to monitor the quality and feasibility of the curriculum and to identify problems in order to ensure the quality and feasibility of the programme. To this end, they evaluate all the assessment components within the programme. Overall, the Program Committee monitors the quality and informs the Program Board of their findings and required improvements. The Program Board assesses all evaluations, and reports to the Faculty Board regularly, at least during the annual reviews. The Faculty Board checks the consistency and feasibility of evaluation plans and provides directions to the Program Board.

Educational support for the programme is provided by the Education Support Section of the NLDA, a faculty-wide department that is not linked to specific programmes and is therefore in a more independent position to provide feedback. The Education Section oversees the evaluation of courses in a six-year cycle (three rounds of the programme) according to an evaluation schedule, as well as following specific events such as changes in course coordinators or curriculum revisions. Each newly developed course is also evaluated after its first iteration. During the pilot group, as the entire programme and each individual course within the master was new, each course was evaluated by the Education Support section. In the following cohorts, the courses were evaluated by students using a set of evaluation questions in in-class focus discussions together with the teacher, to formulate a qualitative evaluation. These evaluations focus on methods, didactic skills, teaching materials, tests and assessments, learning effects, lectures, and course results. The aim is always to close the Plan-Do-Check-Act cycle for each element of the programme. The student evaluation reports are the starting point, after which the lecturers, the Program Board and the Program Committee provide a written analysis and, where possible, formulate points for future improvement. Evaluation results, including student feedback and lecturer reflections, are shared internally and are available to students via Moodle.

The panel has reviewed the quality assurance system and concludes that it is well established. The Quality Manual provides sufficient tools for quality control and improvement. The panel learnt from staff and students that the programme has sufficient feedback loops in place, from student to programme management and staff, and from Advisory Board to programme management, to provide for a well-functioning Plan-Do-Check-Act cycle. Next to that, the panel was pleased to note that staff has ample opportunity to respond to student evaluation, and staff communicates back to students what is done with their feedback. Due to the small scale of the CIIMT programme, student feedback reaches management quickly, enabling them to either act promptly to implement improvements or seek solutions to problems. Course evaluations and the accompanying advice from the Programme Committee are used to adjust courses for the next cohort.

Considerations

The panel concludes that the quality assurance system for the CIIMT programme is well-established, concentrating on both quality control and improvement. Each course is evaluated once every six years (three rounds of the programme), and through use of annual module evaluation, student feedback is also gathered continuously. Feedback reaches management quickly, allowing them to act adequately to implement improvements. The programme has sufficient feedback loops in place, from student to programme management and staff, and from Advisory Board to programme management, to provide for a well-functioning Plan-Do-Check-Act cycle.

Conclusion

The panel concludes that the programme meets standard 9.

Standard 10. Student assessment

The programme has an adequate student assessment system in place.

Findings

System of assessment

The assessment system within CIIMT follows the FMS-wide quality manual EQM, which covers assessment validity, reliability, transparency, suitability and comparability of different exam sessions (e.g. initial exams and resits). Assessment is designed in such a way that the tests are appropriate to the level and learning objectives of the content being assessed. The programme assesses knowledge through written (take-home) exams and skills through products such as essays, papers and presentations.

Every half year, the Program Board and the Board of Examiners jointly organize a review session with all lecturers of the programme. In this meeting, not only the course evaluations are discussed, but also all examinations (and their results) that have been taken are presented by the responsible lecturer. The team of lecturers then reflects on these examinations (way of examination, content, alignment with the learning objectives). In addition, this meeting also aims to create a shared vision of the desired level and standards of the courses and the examinations.

The panel has studied the assessment system and discussed it during the site visit. It concludes that the system adequately ensures the validity, reliability, and transparency of assessment and that the programme uses varied and appropriate assessment methods to test students' knowledge and skills. The panel was also pleased to see as good practice that for module 4 a clear assessment matrix is used, and suggests implementing this for every module. The panel noticed the constructive alignment of assessment is in order, and adds that the intended learning outcomes can be translated even further into the assessment plan and communicated to students, to make sure all is aligned and students know well what to expect from assessments. The panel found that course assessments have a clear link to practice, which it appreciates. While these assessments are also sufficiently academic in focus, the panel believes that the creation of an academic skills learning line (see Standard 2) could enhance their academic contextualization and create a more logical connection and build-up towards the thesis.

In addition, the panel suggests that the programme management think about tightening the control of take-home exams and maybe convert these into on-site or online exams. The panel notes this in view of the rapid development of AI writing tools and the possibilities for their use in take-home exams. The programme management is working on an AI policy and in the meantime doesn't have a clear answer on how to deal

with AI in assessment. The panel is of the opinion that finishing the AI policy soon would help in determining how to react adequately to the use of AI, and would be useful to students and teaching staff in knowing what is and isn't allowed in this respect. Policies on plagiarism and fraud are already clearly set out in the TER.

Board of Examiners

The CIIMT Board of Examiners oversees the quality of assessment within CIIMT. This is a programme-specific Board consisting of a chair and two members, including one external member. It assesses the applications for admission and safeguards assessment within the programmes, for example by setting rules for the proper conduct of tests and exams, monitoring the alignment of assessments with the intended learning outcomes and undertaking comparative research to verify the written feedback and the grades awarded. It also takes regular samples of course assessment and theses to check the validity and transparency of the grading. The Board of Examiners controls the quality of the examiners, and provides a list of examiners. Teachers are only allowed to examine when, in the opinion of the Board of Examiners, they are sufficiently skilled to do so. Furthermore, the Board of Examiners investigates cases of fraud and plagiarism.

During the site visit, the panel spoke with the Board of Examiners and found that the Board of Examiners was committed to its role and actively involved in safeguarding the quality of assessment in both the courses and theses.

Thesis assessment

Students write their thesis under supervision of an FMS staff member involved in the CIIMT programme (see standard 8). Based on the selected subject and problem definition by the student and in consultation with the Board of Examiners, the Program Board recommends a primary supervisor. A second supervisor can be involved, in which case the two supervisors meet the student together to decide how they will divide their responsibility for advice and how future meetings are to be arranged. When a secondary supervisor or an expert is appointed, the primary supervisor retains the ultimate responsibility for the leadership of the supervision. The supervisor provides the student guidance and advice during the thesis stage, including the individual research proposal. The student is entitled to a maximum of thirty hours of supervision, and to assistance of an external expert of ten hours. Formal assessment is carried out by the thesis supervisor. This process is supported by peer exchange in research circles in which students receive formative feedback.

To transparently assess the final thesis, a rubric expressing the performance requirements, criteria, levels of quality, and according grades is annexed to the TER. The thesis is conducted under the supervision of an examination committee consisting of a minimum of two examiners. The supervisor and the examiner independently assess the thesis on the basis of nine rubrics. In addition, an external validation on part of the theses has been conducted, for which external reviewers from civil universities assessed selected anonymous theses according to CIIMT assessment criteria.

Prior to the visit, the panel evaluated the assessment of all five available theses of CIIMT students. It concludes that thesis assessment was carried out in an insightful and transparent manner, with a helpful rubric for substantiating the grades. The panel noticed a tendency to grade a bit generously, but detected no structurally over-generous grading. In line with this, the panel suggests to structurally bring in an external reviewer, who has experience in reviewing theses, or make use of external benchmarking with the FMS, to safeguard adequate grading in all cases.

Considerations

The panel concludes that the assessment system in place for the CIIMT programme ensures validity, reliability, and transparency. Assessments align with learning outcomes, testing knowledge and skills

through various appropriate methods. The intended learning outcomes can be translated even further into the assessment plan and communicated to students. Course assessments have a clear link to practice and are sufficiently academic in focus. The panel suggests the creation of an academic skills learning line to further enhance assessments' academic contextualization and create a more logical connection and build-up towards the thesis. The panel advises to finish the AI policy soon, to aid students and teaching staff in dealing with AI. The Board of Examiners is committed to its role and actively involved in safeguarding the quality of assessment. The theses were assessed in an appropriate way, although in some cases the grades were higher than the panel itself would have given. The panel suggests structurally bringing in an external reviewer or making use of external benchmarking withing the FMS, to safeguard adequate grading in all cases.

Conclusion

The panel concludes that the programme meets standard 10.

Standard 11. Achieved learning outcomes

The programme demonstrates that the intended learning outcomes are achieved.

Findings

The panel studied all five available theses of CIIMT students, and found them of an appropriate level for a master's programme. In general, the panel found thesis quality to be up to standard, and thesis topics to be relevant for the working field. In some cases, the panel noted that the theoretical and/or methodological underpinning of the executed research could have been strengthened. Therefore, the panel suggests to consider the use of guidelines regarding theoretical foundation and methodology with which theses must comply, in order to support both students and examiners. The panel is of the opinion that linking theoretical foundation and methodology more to the intended learning outcomes could provide a useful framework for the content and theoretical foundation of the thesis in further safeguarding thesis quality.

The panel interviewed an alumnus and professional field representatives who expressed enthusiasm and pride in the programme and were satisfied with the programme and its added value. They found the programme to be a relevant mix of practice-based compliance context and academic research elements. They considered the added value of the programme to also lie in teaching critical and academic analysis. Professional field representatives note a need for academics who are able to solve problems in export control, by means of critical thinking and in-depth understanding of the challenges of full compliance in a real-life, dynamic organizational context, and who can look forward and oversee the bigger picture to prevent problems later on. In both their and the panel's view, CIIMT offers a well-fitting programme for this. The alumnus and professional field representatives added that the crucial elements of the programme could be made more explicit throughout the intended learning outcomes, curriculum and communication about the programme, to provide prospective students and the working field clarity of the added value of and need for this programme. The panel agrees with this and advises the programme management to work on this.

Considerations

The panel evaluated all five available theses from CIIMT students and found their level generally appropriate for a master's degree. The panel suggests improving the theoretical and methodological underpinning of thesis research by providing clear guidelines regarding theoretical foundation and methodology, and linking these more explicitly to the intended learning outcomes. CIIMT graduates are able to approach practical

issues and problems concerning compliance and strategic trade control from an academic perspective, which in the opinion of the panel is of value for the professional field.

Conclusion

The panel concludes that the programme meets standard 11.

General conclusion

The panel's assessment of the master's programme Compliance and Integrity in International Military Trade is positive.

Development points

1. Visualize and explicate the alignment of the ILOs with the curriculum and assessment by using a clear matrix and having fewer, more precise ILOs;
2. Further explicate military trade and compliance as key elements of the programme and define these concepts more clearly;
3. Strengthen the advisory board further with a commanding officer, who can function as ambassador of the programme towards the working field in addressing workload of students, and assist in finding thesis topics that relate to daily work;
4. Integrate academic skills even better and make them even more visible throughout the curriculum and clearly build this up towards the thesis module, by means of giving academic contextualization to every module and assessment, for instance by implementing an academic skills learning line;
5. Develop an experiential skills (scenario thinking) learning line;
6. Further improve guidance and supervision during independent learning weeks;
7. Improve guidance and supervision during the thesis module, and establish a pre-determined thesis process with fixed contact moments and deadlines;
8. Finish the AI policy at short notice to keep up with AI developments, especially regarding assessment;
9. Make use of an external reviewer or external benchmarking withing the FMS, to safeguard adequate grading in all cases.

Appendix 1. Intended learning outcomes

Generic attainment level 1:		Dublin descriptor
Each CIIMT graduate is able, to use state of the art scientific knowledge and new insights to understand relevant managerial themes and questions regarding export control of military and dual-use goods and services		Knowledge and insight
The graduate:		
1.1	from a defence economic perspective can elaborate and reflect on factors that influence international trade in military and dual-use goods and services and the conditions determining whether such international trade will be beneficial and to whom;	
1.2	understands the relevance of law and legal knowledge for managers and is able to reflect on the interrelatedness between law and business in an international context. Thereby developing the legal awareness required to analyze export compliance aspects of international trade in defence markets;	
1.3	understands key concepts in (inter)national law and regulations that govern trade in military / dual-use goods and services, and developments thereof, as well as the aims and functioning of institutions in the field of arms control, and can identify the most important export/import laws and regulations as well as their effects on organizations operating in the context of international trade of military and dual-use goods and services;	
1.4	understands, can elaborate and reflect on relevant and recent theories and models for managing compliance and integrity in (military) organizations, with specific attention to organizations in the context of arms export control. Ethical and organizational insights gained from this course serve as input to module 5 and 6;	

1.5	has a broad understanding and knowledge concerning theoretical and practical elements relevant to develop an Internal Compliance System. The graduate can apply both knowledge and skills to set-up an effective and efficient Internal Compliance System for organizations in the field of trade compliance. He/She can motivate and substantiate choices made in the design of an Internal Compliance System;	
1.6	has knowledge of all theoretical and practical elements that are relevant to monitor and audit an Internal Compliance System. The student can apply the	
	knowledge and has the skills to effectively and efficiently plan, perform, report on audits of an Internal Compliance System for any given organization (both operational and compliance audits). He/She can motivate and substantiate choices made in the different stages of the audit process. The compliance audits can aim for assurance as well as to provide advice for improvements of an Internal Compliance System;	
1.7	understands, can elaborate and reflect on individual, organizational and cultural factors that motivate and underpin compliant (ethical) and non-compliant (unethical) behavior. With specific regard to organizations in the context of arms export control, attention will focus on the consequences of (non-) compliant behavior. Amongst others, students will gain insight into the proceedings and meaning of investigations into suspected trade law violation(s). Students learn how to handle a non-compliance investigation from an internal and external perspective.	

Generic attainment level 2:		Dublin descriptor
Based on the integration of scientific and practice based knowledge, insight in research methods and experience in the field, each CIMMT graduate is able to conduct research and generate knowledge on export control of military and dual-use goods and services – both independently and in cooperation with others		Applying knowledge and insights as an academic researcher
The graduate is able to:		
2.1	independently formulate a problem, research model as well as a conceptual model and to gather literature;	
2.2	make responsible and well-argued theoretical and methodological choices;	

2.2	independently select relevant empirical research strategies, data collection and –analysis methods;	
2.3	apply both qualitative and quantitative methods and techniques for data analysis;	
2.5	write consistent and coherent research reports;	
2.6	reflect critically on theoretical, methodological and empirical decisions.	

Generic attainment level 3:		Dublin descriptor
Each CIIMT graduate is able to analyze the need for and able to design an effective and efficient Internal Compliance Program based upon a real-life enforcement case		Applying knowledge and insights as an academic professional
The graduate:		
3.1	understands the key components of an Internal Compliance Program;	
3.2	is able to compose and analyze an organizational compliance risk profile and define adequate internal controls and safeguarding measures;	
3.3	is able to define system requirements for a compliance program depending on the specific organizational context;	
3.4	is able to design a compliance program adequate for the specific requirements of an organization;	
3.5	is able to evaluate the reliability, effectiveness and efficiency of an existing compliance program, define needs for optimization and advice management thereon;	

Generic attainment level 4:		Dublin descriptor
Each CIIMT graduate is able to abstract, analyze, structure and relate complex data into relevant information to identify underlying core questions and themes to gain an overall picture		Forming judgements
The graduate is able to:		
4.1	reflect critically on a course of action, measures or decisions based on theories and models;	
4.2	(is able and) aware of the need to account for the own courses of action;	
4.3	to distinguish aspects from various domains when studying a problem as well as to integrate these aspects;	

4.4	critically assess existing research and reflect on the findings;
4.5	question research assumptions and findings;
4.6	assess organizational and societal implications;
4.7	form a judgment regarding ethical, normative and societal impact regarding international trade in military useful goods and services.

Generic attainment level 5:		Dublin descriptor
Each CIIMT graduate is able to communicate ideas, perspectives and findings, both orally and in writing, both in an academic context as well as within the professional field.		Communication
The graduate is able to:		
5.1	cooperate effectively and professionally within various groups, thereby acknowledging different interests, positions and roles;	
5.2	express ideas and visions in reference to the target group;	
5.3	deliver a well-structured presentation on independent or group work regarding research or a problem in the field, both in Dutch and in English;	
5.4	use a variety of (mostly ICT-) tools in adequate communications.	

Generic attainment level 6:		Dublin descriptor
Each CIIMT graduate is able to consider, reflect and account for their own learning, <i>Bildung</i> and actions.		Learning skills
The graduate is able to:		
6.1	independently gain and apply knowledge;	
6.2	reflect critically on theories and methods in use;	
6.3	reflect and assess critically his/her own findings and courses of action;	
6.4	become aware of a need for life-long learning.	

Appendix 2. Programme curriculum

Module	EC	Title	Discipline	Leids Level
1	5	International trade in defence markets	Defence economics, international relations, political sciences	400
2	5	International business in defence markets and law	Law, defence economics, organization theory; international relations, political sciences	400
3	5	A legal perspective on strategic trade	Law, ethics, defence economics	500
4	5	Managing compliance and integrity in military organizations	Ethics, system theory, organization theory, defence economics	500
5	5	Designing internal compliance programs	Information systems, internal control	500
6	5	Research methods	Research methods	500
7	5	Monitoring and auditing internal compliance programs	Information systems, internal control, auditing	500
8	5	Managing relationships in non-compliance contexts	Organization theory, ethics, change management, management control	500
9	5	Integration project related to aspects of ICP in business environments	All previous modules	600
10	15	Master Thesis (including individual research proposal)	All previous modules	600
Total	60			

Appendix 3. Programme of the site visit

Wednesday 26 June 2024

Time	Activity
11.45 – 12.30	Reception of the visitation panel, followed by a shared (informal) lunch around 12:00 PM.
12.30 – 14.00	Internal meeting visitation committee.
14.00 – 14.45	Meeting with formally substantive responsible.
14.45 – 15.15	Internal meeting visitation committee.
15.15 – 16.00	Meeting with the teaching staff
16.00 – 16.15	Internal meeting visitation committee.
16.15 – 17.00	Meeting with CIIMT students
17.00 – 17.15	Internal meeting visitation committee.
17.15 – 17.45	Guided tour of facilities at FMW/KMA
18.30 -	Dinner at restaurant

Thursday 27 June 2024

Time	Activity
08.45	Departure from hotel
09.00 – 09.30	Internal meeting visitation committee; opportunity for drop-in session
09.30 – 10.00	Meeting with the Board of Examiners
10.00 – 10.30	Internal meeting visitation committee
10.30 – 11.15	Meeting with professional field and alumni representatives
11.15 – 11.30	Internal meeting visitation committee
11.30 – 12.15	Final meeting with formally and substantive responsible
12.15 – 13.00	Lunch; Internal meeting visitation committee
13.00 – 15.00	Discussion on development
15.00 – 16.30	Drafting of preliminary findings by the visitation committee
16.30 – 17.30	Oral feedback on initial observations

Appendix 4. Materials

Prior to the site visit, the panel studied 5 theses. Information on the theses is available from Academion upon request. The panel also studied other materials, which included:

- Self-evaluation report
- Learning objectives
- Study Guide 2023-2024
- Student chapter
- Staff members
- Teaching and Examinations Regulations 2023-2024
- Education Quality Manual
- Education Quality Manual
- Annual reports SWOON 2019-2022
- Thesis guide
- Exams en resits schedule
- Previous QANU en NVAO reports
- Interview on Development questions and topics PB CIIMT
- Annual reports BoE CIIMT
- Designation of examiners
- Course files per module:
 - MODULE 1: INTERNATIONAL TRADE IN DEFENCE MARKETS 2023-2025
 - MODULE 2: INTERNATIONAL BUSINESS IN DEFENCE MARKETS AND LAW 2023-2025
 - MODULE 3: A LEGAL PERSPECTIVE ON STRATEGIC TRADE 2023-2025
 - MODULE 4: MANAGING COMPLIANCE AND INTEGRITY IN MILITARY ORGANIZATIONS 2023-2025
 - MODULE 5: DESIGNING INTERNAL COMPLIANCE PROGRAMS 2021-2023
 - MODULE 6: RESEARCH METHODS 2021-2023
 - MODULE 7: MONITORING AND AUDITING INTERNAL COMPLIANCE PROGRAMS 2021-2023
 - MODULE 8: MANAGING RELATIONSHIPS IN NON-COMPLIANCE CONTEXTS 2021-2023
 - MODULE 9: INTEGRATION PROJECT RELATED TO ASPECTS OF ICP IN BUSINESS ENVIRONMENTS 2021-2023
 - MODULE 10: MASTER THESIS