



NVAO • ACCREDITATION ORGANISATION
OF THE NETHERLANDS AND FLANDERS

ENQA REVIEW 2022

SELF-ASSESSMENT REPORT

JANUARY 2022



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Part I - Background

1 Preface

The following self-assessment report (SAR) intends to demonstrate that the Accreditation Organisation for the Netherlands and Flanders (Nederlands-Vlaamse Accreditatieorganisatie; NVAO) carries out its tasks and activities in compliance with the 2015 European Standards and Guidelines in the European Higher Education Area (ESG). The aim of the review for NVAO is to enhance the quality of our activities, to renew membership of ENQA and the continuation of registration in EQAR.

The past two years have been unusual due to the covid-19 pandemic, its repercussions on the primary processes, evolutions within the NVAO Board, and debates about the future developments of the systems and the organisation itself. Nevertheless, we managed to adapt to rapid and unforeseen changes, and our focus has always been on safeguarding the quality of higher education and fostering the quality culture within institutions in the Netherlands, Flanders and beyond. We continually strive to improve the quality of our activities and share our progress with stakeholders and peers.

This is NVAO's fourth ENQA review and self-assessment report. Since its inception, NVAO has collaborated internationally in accordance with the Bologna Declaration's aim to establish a European dimension in quality assurance (QA). We have a long tradition of exchanging knowledge and expertise on QA methodologies. Compliance with the ESG is a self-evident part of our and our stakeholders' activities.

This SAR is to be read in conjunction with the 2017 ENQA review report. We recommend that readers read the 2017 report first in order to better understand the references in the 2021 SAR. In this document, we present the changes that have occurred at NVAO since the last review and give an update about NVAO's current activities. The SAR reflects on how our activities continually align with the ESG, includes internal quality assurance and professional conduct (ESG 3.6) as an enhancement-area and aims to inform the readers about our current approach to ESG 2.1.

This report is divided into eight chapters, and follows the structure outlined in the Guidelines for ENQA Targeted Reviews:

- Chapter 2 describes the development of the SAR, and the internal processes initiated to prepare NVAO for the review, application for ENQA membership and registration in EQAR.
- Chapter 3 addresses the changes within the organisation and its higher education context that have occurred since the previous review (2017).
- Chapters 4 and 5 provide an overview of the main findings and recommendations from the 2017 review and the developments since this review.
- Chapters 6 and 7 present the developments in the two nations of NVAO's remit.
- The final chapter (8) concludes the report with an overview of NVAO's current challenges and areas for future development.

In chapters 6 and 7 we critically reflect on the QA systems in the Netherlands and Flanders respectively by means of separate SWOT analyses. Chapter 8 provides a joint SWOT analysis for NVAO as an organisation.

We are confident that we can demonstrate that NVAO still adheres to the ESG in its activities and look forward to fruitful discussions with the review panel members early 2022.

On behalf of NVAO,

Sander van den Eijnden
Chair

Wouter Duyck
Vice-chair

2 Development of the self-assessment report

The SAR was composed in a collaborative effort of a number of NVAO staff members and the NVAO Board. During the preparations for the upcoming ENQA review, it became apparent that NVAO may be eligible for the new targeted review process. The Managing Directors of the two departments discussed this option with representatives from both ENQA and EQAR, especially considering the current and possible future organisational structure of NVAO (see 3.2).

In order to accommodate the reader, we decided that the SAR would be most readable if information about our activities in the nations in which we operate was divided over separate chapters, reflecting the two departments within NVAO. Therefore, we opted for a slight adaptation of the prescribed Guide of Content for the SAR and assigned specific parts of the report to developments and activities in either department. Each department developed the part of the SAR that concerned their specific activities, and together we wrote the chapters 1 to 5, as well as the Conclusions.

Considering that we would opt for a targeted review, we tried to keep the project as lean and mean as possible. The Managing Directors for the Netherlands and Flanders led the project teams within their respective departments and had regular contact with each other about the formal preparations of the ENQA review. The project teams coordinated the writing of the SAR. The project team for the Dutch department (NVAO-NL) consisted of an Executive Board member, the Managing Director, the Head of Department, two policy advisors and a secretary; at the Flemish department (NVAO-FL) the Managing Director and a policy advisor took care of the development of the SAR, while regularly consulting colleagues within the department as well as external stakeholders, i.e. VLIR and VLHORA.

The SAR is based on procedures and documents that have been developed in recent years in collaboration with a larger number of staff members. Preparations for the ENQA review started in December 2020 and for the SAR in May 2021. Draft versions of the SAR were written and first discussed with the colleagues in September 2021. In October, a semi-final version of the SAR was presented to colleagues. Subsequently, an updated version of the SAR was presented to the NVAO Executive Board and the NVAO General Board at the end of October. The feedback from colleagues and both Boards have made this SAR clearer and more focused.

3 Changes since the last full review (2017)

3.1 Changes regarding higher education and quality assurance systems

Since 2017, the main structure of the systems for higher education in the Netherlands and Flanders has remained unchanged. Both distinguish between academic (research-oriented) and professionally oriented programmes and institutions, which are either publicly or privately funded. NVAO's activities focus on the quality of and quality assurance procedures surrounding programmes offered at EQF levels 5 to 7: associate degree/HBO5, bachelor and master programmes.

Although the main educational structure is still the same, the context in which NVAO operates has seen considerable changes regarding the quality assurance procedures that are in operation. Both in the Netherlands and Flanders, new legislation regarding accreditation of higher education programmes and institutions, and new accreditation frameworks have come into effect. New protocols were developed for activities concerned with advisory work and decision making based on specific evaluations. For specific information regarding recent changes in higher education and the quality assurance systems in the Netherlands and Flanders, we refer to chapters 6 and 7 respectively.

In March 2020, all pending assessments were suspended due to the outbreak of the covid-19 pandemic and the Dutch, Belgian and Flemish governments enforced restrictive measures. In close consultation with the government authorities, associations for universities, universities of applied sciences and university colleges, and student unions, we implemented measures in both nations to continue the assessment of quality of higher education. Dutch and Flemish institutions made great efforts to continue their education and accreditation processes online. Thanks to their efforts as well as those of our own staff members, we were able to continue our activities from a distance. The experiences from the last two years will undoubtedly continue to influence the way we will perform our activities in the future.

3.2 Changes in the organisational structure

The general outline of the organisational structure as described in the 2017 ENQA review report is still valid. NVAO is governed by a General Board currently consisting of nine members, three of whom form the Executive Board. Currently, in the Executive Board one member is from The Netherlands and two are from Flanders. This is a temporary situation as one Dutch member recently left NVAO (December 2021). All members of the General Board are appointed by the Flemish and Dutch Ministers of Education. By treaty, the Committee of Ministers ('Comité van Ministers'), comprising the Ministers of Education of the Netherlands and Flanders, supervises NVAO's activities.

As noted by the previous ENQA panel, the organisational structure of the NVAO office changed in March 2017, when two departments were created: one for activities in the Netherlands and one for those in Flanders. The split into two departments was a logical consequence of the changes in the activities NVAO performed in the Netherlands and Flanders, and evolutions in the respective frameworks for quality assurance. The composition of both departments is still mixed, with Dutch and Flemish colleagues working together within the departments. Each department is headed by a Managing Director; the Dutch department also has a Head of Department. There has not been a major change in the size of the NVAO office, which currently has a staff of ca. 52 fte: NVAO-NL comprises about 29 fte, the NVAO-FL department 12 fte and a team of support services serving the Board and the two departments comprises 11 fte.

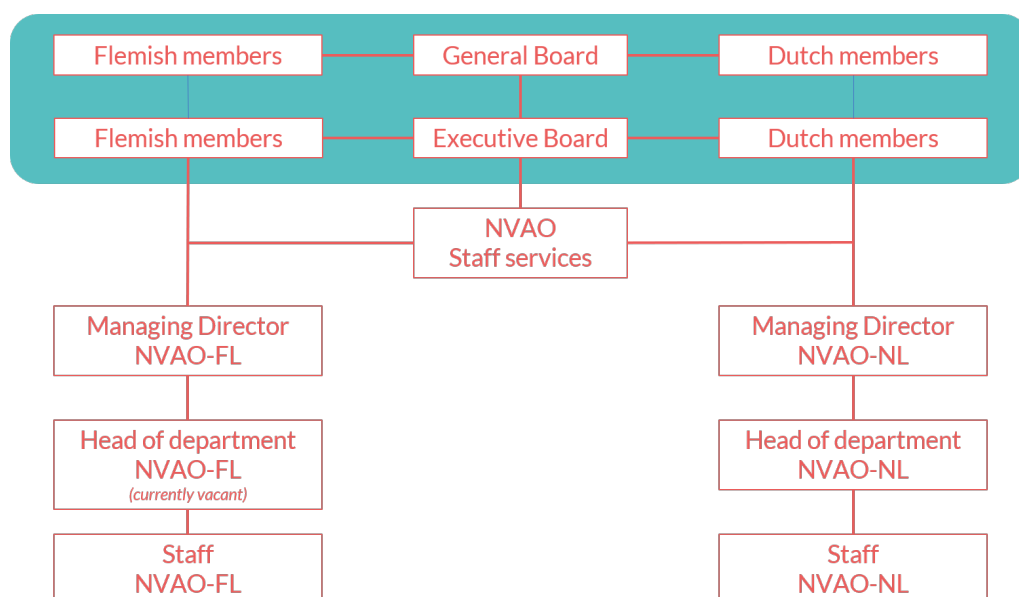


Figure 1. Organogram showing NVAO's organisational structure.

In 2019, NVAO changed the way in which decisions are validated by the NVAO Board by introducing the Mandate Decree. In this regulation, the General Board mandates a selection of its powers to the Executive Board in order to make the decision-making process more efficient. NVAO created an audit committee with three members from the General Board to monitor this new mandate procedure. Each year this committee takes a random sample of four Dutch and two Flemish assessment procedures and checks whether the decision-making has been carried out correctly and according to the applicable frameworks. So far, the audit committee concluded that all decisions had been made correctly and only identified minor points of improvement.

For activities in the Netherlands, the Executive Board may further mandate some of its powers to the Managing Director of NVAO-NL. In this way, the decision-making process becomes even more efficient. In October 2021, the Executive Board carried out an audit regarding the decisions made by the Dutch Director under mandate. Such a mandate was not desired for Flanders because NVAO-FL prefers to make accreditation decisions in an international or binational context. Binational collaboration within the organisation is strengthened by involving Board members from both nations in the decision-making preparations.

Originally, 2020 was supposed to be a prelude to the new strategic plan 2021-2025. The covid-19 pandemic and its effects on NVAO's primary processes drastically changed the activities in 2020. We changed to home office and focused on organising our procedures online whenever national restrictions required this. In addition, changes in the Executive Board slowed down the development process. The discussions about NVAO's strategic developments until 2025 were further influenced by the request of the Committee of Ministers to develop a future-proof organisational model for NVAO. These developments as well as the observation that the mission, vision and strategy from the 2017-2020 strategic plan (Annex 1) were still relevant, led to a formal extension of that strategic plan. The development of a new strategy awaits possible changes in NVAO's organisational model.

In 2020, a debate started about designing a new organisational structure for NVAO ('NVAO 2.0'), following the 15th anniversary of the treaty between the Netherlands and Flanders. The current organisational structure was evaluated to assess whether it was still fit for the future and it was found to be too restrictive in some respects. To better

respond to the different needs in Flanders and the Netherlands, the Ministers requested NVAO to develop a new structure that provides greater organisational independence for the Netherlands and Flanders while still having the benefits of the existing added value for cooperation and the good reputation of NVAO.

The new structure must be supportive and in line with the needs of both quality assurance systems instead of hindering them. In addition, the structure should serve the quality assurance systems, not the other way around. It is important to note that the core tasks of NVAO should not be impacted by the changes in the organisational structure. The continuity of the quality assurance systems is to be guaranteed at all times. In addition, we will take care that our quality assurance procedures are aligned to the standards as defined by the ESG at all times, and that enhancements remain focused on the integration of the Dutch-Flemish cooperation. The future model is still a topic of discussion, but any changes are not expected before the end of 2023.

Part II - Focus Areas

In this chapter, we give an overview of the main findings and recommendations from the previous review. We discuss and give insights into the developments that were made since this review.

For more detailed insights about the developments in Flanders and the Netherlands, we refer to the respective parts. We provide an overview of the changes in both nations, followed by the obligatory ESG 2.1 (Consideration of internal quality assurance). For both NVAO departments, we have selected an enhancement area on which we will focus in the upcoming years. To conclude the parts of the Netherlands and Flanders, we provide a SWOT-analysis for each department and its related national context. These analyses were put together using input that was gathered in consultation with our team members in both departments.

4 Profile, manner of functioning and EQA activities of the agency related to the focus areas of Part 3 of the ESG

4.1 Follow-up on recommendations

4.1.1 ESG 3.1

The panel recommended that NVAO prepares coherent development plans on the future short-term and long-term development of accreditation processes in Flanders and the Netherlands, on the basis of comprehensive evaluations of the NL- and FL-pilots and taking into account expectations about quality assurance in higher education by all relevant stakeholders (ESG 3.1).

The recommendation of the 2017 panel has to be considered in the context of the rapid developments the QA systems underwent at the time of the previous ENQA review, mainly due to external factors and political developments. NVAO has always been an active partner in the development of long-term development plans for the QA systems under its remit. We work within political and legal realities where changes and events can lead to unforeseen developments. Nevertheless, NVAO is included in all preparatory phases of new or changed legal tasks or stipulations.

We actively take part in discussions with stakeholders about the future directions of quality assurance and quality enhancement. Through visits and (online) meetings, we engage with representatives from institutions, student unions and the professional field. In addition, we are involved in the preparation, realisation and evaluation of several pilots in higher education (e.g., flexible education based on learning outcomes, and a lighter form of programme accreditation in the Netherlands; nursing education at level 5 in Flanders). In the Netherlands, NVAO also participated in the development of the strategic agenda for higher education and research 'Fit for the future' (2019).¹ In Flanders, NVAO closely collaborated with a wide range of stakeholders and the Flemish government to develop the new QA system and changes in the law on higher education, which were unanimously approved by the parliament.

As mentioned in section 3.2, the development of a new strategy awaits possible changes in NVAO's organisational model. The new organisational strategy will set out our course in an ever-changing context and take into account current and expected developments both in the Netherlands and Flanders, as well as within our organisation. The way NVAO is organised has to support the QA systems in both nations. Our primary processes should not be influenced by the organisational changes.

4.1.2 ESG 3.4

The panel recommended that NVAO reviews the approach to thematic analysis and in consultation with stakeholders, identifies a common purpose and a means to regularize processes and priorities in this area (ESG 3.4).

The aim of our thematic analyses is to inform institutions and other stakeholders about developments in higher education, so they may improve the educational quality of programmes and the internal quality assurance processes within higher education institutions. NVAO intends to enhance the learning capacity of institutions in several ways: by sharing good practices and providing insights into larger processes, by

¹ <https://www.rijksoverheid.nl/documenten/publicaties/2020/02/12/summary-strategic-agenda-for-higher-education-and-research>

analysing accreditation reports, and by publishing an analysis of processing times, opportunities for success, do's and don'ts.

In the Netherlands, we have recently produced a thematic analysis on the special feature 'Small-scale and intensive education' awarded in the period 2012-2020. By providing an overview of panel reports on a specific topic, we indicate good practices and make the available information more accessible to stakeholders. The analyses may also support policy makers who develop new legislation on higher education. Furthermore, we cooperate with the Inspectorate and the Higher Education Efficiency Committee (CDHO) to explore new ways in which we can use 'big data' to conduct thematic analyses. An example is the current investigation on the effect of covid-19 on higher education in the Netherlands and on the accreditation system (publication expected in February 2022). Together with the Ministry of Education and associations for universities and universities of applied sciences we agree on the research and inquiries planned in a specific year. Any additional research performed aside from this agreement has to be approved by all parties involved.

In Flanders, we distinguish two types of thematic analyses. The first kind is results in what we refer to as an overview report. An overview report is published after a set of similar assessment procedures has been finalised, in order to provide stakeholders with a more macro-level perspective. In the period 2017-2022, NVAO Flanders published 4 overview reports: Institutional Review (2017), Teacher Training (2019), Associate Degrees (2019) and Online Assessments (2021). These overview reports consist of four chapters: an introduction, a justification explaining the rationale and organisation of the procedures, an overview of the main findings and considerations, and, finally, a chapter presenting NVAO's insights and policy proposals. The second type of thematic analyses are system-wide analyses. These are part of the QA system and are organised annually. The main purpose is to identify good practices in a theme or topic related to educational quality. System-wide analyses provide insight into the state of affairs regarding a specific aspect or aspects of educational policies and make this information available to the higher education community, to external stakeholders (e.g., from the professional field), and by extension, to society at large. A system-wide analysis results in an overview report that brings together and shares the outcomes of the analysis. This gives added value and serves as inspiration to Flemish institutions and programmes. The system-wide analysis also serves as a means of recommendation to institutions or programmes that want to adopt a similar practice. In 2021, NVAO Flanders published the report of the first system-wide analysis on cocreation with the professional field (2020-2021).²

4.1.3 ESG 3.6

The NVAO is recommended to remain alert on loose loops in the plan-do-check-act-cycle of the quality assurance system (ESG 3.6).

During the previous ENQA review, the panel noted that a small number of activities was not evaluated or monitored systematically. The panel referred specifically to the training for secretaries and the publication of assessments reports after a final decision has been made. The panel's observations have helped us to develop improved quality assurance (IQA) processes. We have reviewed our procedures and the way the plan-do-check-act cycle related to them is conducted, which has led to an update of the IQA system within NVAO.³ The amendments were aimed at gaining a better perspective of the extent to which NVAO realises its values and strategic goals. In addition, it questions stakeholders regarding their satisfaction with the way NVAO conducts its procedures.

² https://foqus.h5mag.com/cocreatie_werkveld/cover (English version in progress).

³ For more information on NVAO's current processes for internal quality assurance we refer to sections 6.2 (NVAO-NL) and 7.2 (NVAO-FL).

The points of departure for NVAO's IQA system remain unchanged and are as follows:

- The NVAO mission and strategy constitute decisive aims and objectives in the quality assurance system;
- NVAO must set an example as a self-critical quality assessor that meets the ESG and statutory requirements;
- In terms of aims and objectives, quality assurance is effective and efficient, with an eye for such concepts as autonomy, ownership and trust, and for the reduction of administrative burdens. The internal quality assurance system is structured like a PDCA cycle;
- Quality assurance is supportive to the work of the NVAO staff;
- Quality assurance, including the ensuing actions, constitutes a matrix for, and must facilitate, a quality culture.

We intend to foster a quality culture both internally and externally. Internally, by creating a work environment that stimulates an appropriate mindset, attitude, norms and values among staff, who bear responsibility for the systematic improvement of processes. Externally, by involving stakeholders in our internal quality assurance activities and by responding to external signals regarding the quality of our processes whenever there is reason to do so. Finally, we pay attention to operational excellence and development in response to external signals from e.g., ENQA and the Dutch Inspectorate of Education.

For NVAO-NL, a working group set up a modified structure for the IQA system that includes a wider range of stakeholders and new means for collecting data. For each of NVAO's assessment procedures, a coordinator monitors and analyses the outcomes twice a year. In addition, peer review groups are in place to discuss practices among colleagues who deal with specific activities such as initial accreditations, regular accreditations as well as institutional audits during the periods these were held. We intend to prevent loose loops by summarising all evaluation outcomes in a yearly IQA report and monitoring their follow-up in regular staff meetings. This report is discussed within the team and measures for improvement are listed by the management. This practice started early 2021 and is set to be repeated in 2022.

Our internal QA system for NVAO-FL hinges on the team's quality culture with much attention for self-reflection. The quality of our work is a self-evident item for all our discussions, and information on all our operations (such as own insights, feedback from stakeholders, ...) is shared with everyone in the team. By doing this, every team member shares their insights with the colleagues. We value discussions about the quality of our work, see ourselves as accountable to our stakeholders and continuously strive for quality and quality enhancement in all our endeavours. To counter potential loose loops, we make sure that every internal QA action result in a document or a contact moment. The loose loops, referred to in the last review, were the actions that did not lead to a document or contact moment. As a remedy, we introduced two-monthly IQA intervention sessions where all potential loose loops are identified, discussed, and shared in a formal way.

With regards to the specific loose loops that the panel noted in 2017, we would like to add that the training for secretaries has been reviewed together with participants. The results of this evaluation have led to an update of the training that better accommodates the needs of secretaries and NVAO. To ensure that reports are published in time, we developed a tool that can automatically upload the Board's decision and the report to our website as soon as a procedure is declared as finished within the system.

5 Design and implementation of the agency's EQA activities related to the focus areas of Part 2 of the ESG

5.1 Follow-up on recommendations:

5.1.1 ESG 2.3

The panel recommended that NVAO remains sensitive regarding issues of implementation as experienced by stakeholders and adopts a clearer terminology to differentiate between substantively different approaches to follow up on decisions (ESG 2.3).

The 2017 ENQA panel noted a number of issues regarding ESG 2.3. It understood from stakeholders that they experienced problems with the clustering of programme assessments among Dutch universities of applied sciences, the late publication of reports about the Flemish institutional reviews, the differentiation between judgements in the accreditation of Dutch existing programmes, and the experienced administrative burden surrounding accreditation. In addition, the panel considered the procedures regarding the follow-up of recommendations from assessment panels to be unclear.

In 2017, the clustering of assessments for similar programmes within Dutch higher professional education was a rather new procedure, introduced in 2016. The aim of this approach is to foster the comparability of the programme assessments within a specific discipline, by consulting a single panel that assesses all programmes within the cluster. Assessment agencies and institutions experienced an increase of workload due to the complexity of the evaluation and sometimes unfavourable operational conditions, especially where multiple assessment agencies are involved in the preparation of the assessments. We discussed this topic with our stakeholders during our regular meetings to come to an appropriate solution that does justice to the intention of clustered assessments. The composition of the sub-panels reviewing the various programmes within an assessment cluster may vary, for example, because specific expertise is required, because independency is at stake, or because it is advisable to spread the site visits across multiple panel members. However, sufficient continuity and personal overlap between the various panel compositions are still required to achieve a comparative manner of assessment and consistency in the judgements. We monitor the coordination between sub-panels within an assessment cluster when panel compositions are proposed and when we receive the assessments reports. In addition, the experiences with clustered assessments continue to be a topic in our meetings with stakeholders.

With the introduction of the new legal framework in the Netherlands (see section 6.1.2), the differentiation between judgements in the accreditation of Dutch existing programmes (formerly from 'unsatisfactory' to 'excellent') was abolished. Assessment panels score the assessment standards as 'meets the standard', 'partially meets the standard' or 'does not meet the standard' and recommend a final conclusion: 'positive', 'conditionally positive' or 'negative'. The assessment frameworks include clear rules as to when a panel may draw which conclusion.

The experienced administrative burden surrounding accreditation continues to be a point of attention. In meetings with representatives from institutions and other stakeholders, we stress that the assessment frameworks provide a lot of freedom with regards to how programmes organise their accreditation process. Recently the Dutch Ministry of Education developed a brochure in collaboration with NVAO and CDHO ('Ruimte in regels': 'Room in regulations'⁴) to provide institutions more insight into the

⁴ https://www.nvao.net/files/attachments/.5085/Ruimte_in_Regels_8_juli_2021.pdf

rules and regulations surrounding quality assurance procedures. The brochure shows the actions that are mandatory, specifies regulations that provide room for an individual interpretation, and includes answers to frequently asked questions. In addition, it gives examples of how specific programmes have designed their quality assurance processes. Thus, we stimulate institutions to think about the organisation of (internal) quality assurance and intend to contribute to a better balance between quality and the experienced burden surrounding accreditation.

With regards to the follow-up of recommendations, we underline the necessity to be clear about decisions and their follow-up. The NVAO frameworks distinguish between conditions ('voorwaarden') and recommendations ('aanbevelingen'). We follow up on conditions within a set period of time, since they indicate that a programme or institution has not yet met the minimum standards for programme accreditation, institutional audit or institutional review. Recommendations, however, are suggestions for improvements intended for quality enhancement. The follow-up of recommendations is therefore up to the institutions themselves and the next assessment panel that reviews a programme. Considering the debate about the experienced administrative burden we consider it unacceptable to organise a separate follow-up on recommendations. Also, NVAO wants to respect the autonomy of higher education institutions. And most importantly, the QA systems in the Netherlands and Flanders are based on trust.

The new Dutch legislation on accreditation (see section 6.1.2) accentuates the distinction between conditions and recommendations. The new assessment frameworks (2018) emphasise the uniformity in decisions through consistent use of terminology for all procedures and decisions. A final conclusion 'Conditionally positive' indicates that the panel judges that the programme meets the generic quality standard to a significant extent, but that improvements are required in order to fully meet the standard and that such improvements are feasible within a period of maximum two years. Regardless of the outcome, a panel may give the programme recommendations for further quality enhancement.

The Flemish QA system (2019-2025) makes a clear distinction between conditions and recommendations. Each of the assessment frameworks state: "Any quality deficiency must be explicitly substantiated by reference to (a) condition(s) that must be met to remedy the deficiency. In addition to conditions, recommendations may also be formulated." Recommendations do not indicate a quality deficiency. When a panel formulates conditions, they will also need to formulate a timeframe within which these conditions are to be met and assessed. Each decision which includes (a) condition(s) is therefore followed-up with a new assessment of the programme or institution. Recommendations are followed up by the relationship manager and discussed during the (two yearly) 'Tour of Flanders' in which a board member, the managing director and the relationship manager visit the institution and meet with its management.

5.1.2 ESG 2.5

NVAO is recommended to reflect on the grading system as presently applied and to consider making it as straightforward as necessary for the purpose of yes/no/conditional accreditation (ESG 2.5).

The panel's recommendation referred to the situation in the Netherlands, where existing programmes and distinctive features were graded as 'unsatisfactory', 'satisfactory', 'good' or 'excellent'. This differentiation in outcomes was originally a strong political desire to stimulate institutions to enhance the quality of their education. However, at times panels found it difficult to determine whether the quality of a programme was 'satisfactory', 'good' or 'excellent' and the NVAO Board adjusted a

couple of scores. Stakeholders considered the practice of differentiated judgements to be unnecessarily complicated.

The ENQA review in 2017 helped us to convey the message to our stakeholders that using clear and explicit criteria that can be used consistently is crucial. The Inspectorate of Education also emphasised this aspect in the evaluation of the Dutch QA system. Subsequently, we pleaded that grading of outcomes should not be part of the legislation that drives the NVAO practice. The political debate that followed led to the abolishment of differentiated grading in the Dutch system. Assessment panels now score the assessment standards as 'meets the standard', 'partially meets the standard' or 'does not meet the standard' and recommend a final conclusion: 'positive', 'conditionally positive' or 'negative'. The assessment frameworks include clear rules as to when a panel may draw which conclusion.

The Flemish QA system already had a straightforward grading system at the time of the review in 2017. For programme accreditation and institutional review, three decisions are possible: 'positive', 'positive with limited validity' or 'negative'. For both programme accreditation and institutional review, a definition of a positive decision with limited validity is included: this means that conditions are imposed that specify what the programme or institution must achieve in order to maintain a positive decision after the limited validity has expired. An initial accreditation can only lead to a positive or negative decision. A positive decision with limited validity is not possible.

5.1.3 ESG 2.6

It is recommended that NVAO analyses the actual and potential readership of its reports and their needs, and develops new means to reach a readership among students and employers (ESG 2.6).

In 2017, ENQA concluded that NVAO was compliant on ESG 2.6. EQAR's Register Committee, however, concluded that NVAO complied only partially with ESG 2.6. In its response to NVAO's follow-up report (2019), the ENQA Board emphasised that reporting remained a point of attention.

The 2017 ENQA panel concluded that the readability of assessment reports was hindered by the heterogeneity of style. Especially where reports are written by different parties, this may make the reports less 'user friendly' to a large public, in particular students and employers.

The current Dutch assessment frameworks contain a clear description of the assessment report's setup, including "a brief, concise summary aimed at a wider reading public". The renewed secretary training pays explicit attention to readability of reports. We analyse the reports and give direct feedback to secretaries where appropriate. For reports on existing programmes, our policy advisors not only check the panels' judgements of compliance to the assessment standards, but also look at the overall quality of the report and whether it adheres to the instructions given in the frameworks.

For processes where NVAO policy advisors act as coordinators (e.g., initial programme accreditation, institutional audits), a standardised format is used. The format for initial programme accreditation reports was renewed after evaluation of reports by a working group in the project 'Back to Basics' (2019). The aim of the project was to deliver a format for assessment reports that would better meet the expectations of a heterogeneous target audience consisting of institutions, governments, students, employers and other interested parties. To this end, the project group looked at the usability and readability of NVAO's reports and investigated (inter)national criteria and examples of assessment reports. The result is a pilot with a report format that consists of two parts: a full report aimed at the NVAO Board and at institution or programme,

and a concise report aimed at the general public (max. 6 pages). The concise report contains a summary in English if the full report is written in Dutch and vice versa. Both reports will be published on our website. The use of the new format is discussed with external secretaries, and we expect that assessment agencies will follow this set-up – thus contributing to a more homogeneous way of reporting.

To share and make reports more easily available to students and other stakeholders, we agreed with Studiekeuze123 that they install a direct link on their website to the accreditation reports of each individual programme or institution. Studiekeuze123 is the national platform for (new) students where they can find up-to-date information about all Dutch study programmes, institutions and the cities where these institutions are based.

Upon introducing the new QA system in Flanders, an in-depth analysis of the potential readership of the reports and the needs of the stakeholders was made. Institutional review reports are clearly targeted at expert readership and stakeholders. They provide information to all stakeholders.

At the end of 2020, early 2021, we have rethought how to write assessment reports to be more in line with the philosophy of the QA system 2019-2025. The new style better reflects the evaluation process and research of the panel and each part has a clear and distinctive purpose. The assessment report now consists of several components, each with their target audience.

For the initial accreditation and programme accreditation, the reports are divided into two parts. The assessment report starts with an abstract, as in scientific papers. This abstract is written for a broad target audience. It is short and accessible. The panel's decision about the (potential) quality of the programme is stated in a very short paragraph, supplemented with insights into the most important elements that led to that decision. Finally, any recommendations or conditions of the committee are listed here. The core of the report is a research report, which is specifically geared towards the readership of the institution and the programme. The panel's message is directed towards them, in line with the institution's and programme's context, since they may use this feedback, including the recommendations, for enhancement. It has a narrative structure, in which the panel's research and research questions form the common thread and guide the structure of the report. The current quality assurance system is based on confidence that the (potential) quality of the degree programme is satisfactory. Consequently, the panel's research, and thus the report, focuses more on development opportunities than on guaranteed quality.

5.1.4 ESG 2.7

The panel recommended that NVAO develops a complaint procedure and opens a section 'Complaints and appeals' on its website with appropriate formats for complaints and appeals (ESG 2.7).

The 2017 ENQA panel concluded that NVAO was partially compliant on ESG 2.7. Although the panel was satisfied with the procedures on appeals against decisions, it considered the lack of a solid and formal comprehensive complaint procedure an omission, even if some elements of complaint-handling were there and informal handling of complaints by NVAO normally sufficed.

Following up on the 2017 panel's recommendation, we updated our policy on complaints and appeals (Annex 3), and our website now includes a dedicated section on complaints.⁵ Visitors to our website can now easily find this section in the menu at the

⁵ <https://www.nvao.net/en/appeal-procedures>

top of the page. The complaints procedure has been given a position alongside the appeals procedures for the Netherlands in Flanders.

On the page, all the complaints and appeal procedures are presented:

- **NVAO's Complaints Procedure for External Complaints**
This relates to complaints about services and working methods of NVAO. A specific procedure relates to conduct of panel members and employees during Flemish assessment procedures.
- **Internal Appeal Procedure**
Internal appeals against (intended) decisions are processed by an Advisory Council that NVAO has set up to this end.
- **External Appeal Procedure**
Boards of institutions can lodge an appeal with the Council of State of the respective country against decisions taken following an internal appeal procedure.

At the bottom of the page, students are redirected to more information about filing a complaint about their institution or study programme.

6 The Netherlands

6.1 Higher Education System

As mentioned in section 3.1, the overall structure of the Dutch higher education system has remained the same since 2017. Academic universities and universities of applied sciences offer associate degree (EQF-5; 120 EC), bachelor (EQF-6; 180 EC at academic universities and 240 EC at universities of applied sciences) and master (EQF-7; 60-180 EC) programmes, in fulltime, parttime or dual variants. Over the last couple of years, the number of students in Dutch higher education has risen to more than 800,000 students in all types and variants of programmes. Probably due to the outbreak of the covid-19 pandemic, the number of students increased even more in the academic year 2020-2021, up to +4.6% at fulltime applied bachelor programmes and +9.2% at fulltime academic master programmes. This growth is mainly the result of an increase in Dutch students; the number of international students also increases every year, but at a slower rate.

Compared to 2017, the formal status of the short-cycle associate degree (ad) programmes has changed. These programmes started in 2006 as a pilot, to stimulate life-long learning mainly among professionals with a vocational degree. Since 2013, associate degrees were part of bachelor programmes at universities of applied sciences and often consisted of an adaptation of the first two years of the related bachelor programme. As of 2018, associate degree programmes have an independent status. Figures show great interest in this type of programme, with the number of first-year students rising about 25-30% each year to almost 5,000 students and a total number of ad students of over 17,500 in 2020. If desired, graduates may continue studying in the bachelor programme after obtaining an associate degree, without much delay.

Other developments in the Dutch higher education system concern the regulations regarding transnational education, pilots with regard to flexible education, and quality agreements.

- Before 2018, students who studied at a foreign campus of a Dutch institution had to spend at least 25 percent of their programme on Dutch soil in order to receive a Dutch degree. A change in the Higher Education Act now allows Dutch institutions to provide an entire programme at a foreign campus (transnational education), on the condition that the programme offered abroad is largely equal to the accredited programme in the Netherlands.
- In the period 2016-2022, institutions may participate in a series of pilots that intend to make higher education more attractive to professionals by offering flexible programmes. The pilots mainly involve parttime and dual study programmes at universities of applied sciences. Especially the so-called Experiment Learning Outcomes proves to be successful: about 400 programmes of 21 institutions have redesigned their programmes in order to enable flexible and individual trajectories. The programmes attract more students than regular programmes and the connection to the professional practice has improved.
- In 2015, the study grant for higher education students was replaced by a loan system with the intention to invest the money saved in the quality education at publicly funded institutions. The Ministry of Education, associations of the institutions and student unions agreed on the frameworks that determined how the institutions should invest the extra funds ('quality agreements'). They are to be spent on one of the following six topics: more intensive and small-scaled education; more and better guidance for students; study success; educational differentiation; fitting and adequate educational facilities; and/or further professionalisation of teachers. The institutions involved have developed their own plans for the period 2019-2024, in consultation with their participation councils in order to involve students and faculty in the improvement of their own education.

The covid-19 pandemic has had a major impact on Dutch higher education. From March to June 2020, all education had to be organised online, and after a restart on location in September institutions closed again mid-December. The government and institutions took multiple measures to limit the possible negative consequences for students: secondary school pupils were exempted from taking national exams in 2020, students were allowed to start a successive programme while finishing their previous degree, and the binding recommendations on continuation of studies ('bindend studieadvies'; BSA) were postponed or made less strict. The pandemic has given a boost to digital innovation and the effects of the pandemic are still visible today, with institutions providing more online and hybrid education than before.

6.2 Quality Assurance System

NVAO assesses the quality of education and of quality assurance at Dutch higher education programmes and institutions, as specified in the Higher Education and Research Act ('Wet op het hoger onderwijs en wetenschappelijk onderzoek'; WHW). Accreditation is mandatory for all new and existing programmes in higher education. It entitles the programmes to be registered in the national registers of higher education, to grant legally recognised degrees and diplomas, and – when offered by publicly funded institutions – to receive public funding. External quality assurance applies to institutions (institutional audit; optional) as well as to new and existing programmes (accreditation; mandatory). A positive outcome on the institutional audit entitles institutions to apply limited frameworks for accreditation.

Apart from its core tasks, NVAO advises the Minister of Education about other applications. In recent years, these applications included transnational education, flexible education (admission to the Experiment Learning Outcomes), quality agreements, and teacher training schools. We do so on the basis of an assessment by an independent panel of peers.

The protocol for the assessment of transnational education came into effect in 2018. The assessment of Dutch programmes that are offered at a campus abroad is connected to the regular procedure for programme assessment. Institutions provide a regular self-evaluation report, which is updated and supplemented with information about the programme's foreign campus. The programme indicates which aspects differ from the programme as offered in the Netherlands. Assessment panels pay specific attention to staff, the location, the services, and the examination board because these are likely to vary across campuses. The panel issues a judgment for the transnational programme as a whole: 'meets the standard', 'partially meets the standard' or 'does not meet the standard'. The NVAO Board advises the Ministry of Education about the programme as offered on a campus abroad.

We consider the assessment of quality agreements and teacher training schools not to be within the scope of the ESG because they do not deal directly with teaching and learning in higher education as such. The assessment of quality agreements is in fact an institutional financial audit, focusing on how institutions (plan to) spend the so-called study advance grants. The procedure for teacher training schools evaluates the organisation of the collaboration between schools for primary and secondary education and institutions for teacher training (e.g., universities and universities of applied sciences).

The outcomes of institutional audits and accreditation procedures in the previous years show a stable positive quality standard. These figures do not yet reflect any possible impact of the covid-19 pandemic on the quality of education. The accreditation decisions made in 2020 were still based on site visits that took place before the outbreak of the pandemic. Procedures that were planned in Spring 2020 were suspended and the Ministry of Education granted institutions an extra year to

hand in assessment reports on existing programmes that were originally due in November 2020. In consultation with stakeholders, NVAO designed a special arrangement for the accreditation of new programmes, which started again online in Summer 2020. NVAO initiated a joint analysis with the Inspectorate of Education to investigate the effect of covid-19 on higher education in the Netherlands and on the accreditation system. A report is to be delivered in early 2022.

The guidelines and standards for the assessment of institutions and programmes are laid out in NVAO's assessment frameworks. Separate protocols describe the procedures for additional procedures, such as the assessment of extensions of course durations, joint programmes or joint degrees, of distinctive (quality) features, research master's programmes, and transnational education. These procedures are an addition to the regular frameworks and may be combined with regular assessment procedures; being accredited is a prerequisite for applying for an additional procedure.⁶

The NVAO assessment frameworks were updated in 2018 after the Dutch parliament accepted the Dutch Accreditation Act 2018 ('Wet accreditatie op maat'). This act aims to ensure that institutions experience more confidence and less administrative burden in accreditation procedures. It distinguishes activities aimed at external accountability for quality and activities that stimulate improvement in education. The act also intends to endorse staff and student ownership of programmes and further promote a quality culture within institutions. It formally anchors in legislation the trust in the existing high quality of Dutch higher education that was the basis of NVAO's 2016 assessment frameworks.

The current assessments frameworks were developed in consultation with stakeholders and are based on respect for the autonomy of the institutions that bear primary responsibility for their quality. The standards for institutional audits and accreditation have remained virtually the same compared to the 2016 frameworks, but some aspects have changed:

- Programme accreditation no longer expires after six years. NVAO periodically determines whether or not the accreditation can be maintained on the basis of an assessment report supplied by the institutions. The assessment procedure is similar to that of the previous framework: programmes are assessed by a panel of independent experts (often assisted by an assessment agency) who follow the standards of the relevant framework and is conducted at least every six years. NVAO sets the deadlines by which clusters of similar programmes are to hand in the panels' assessment reports. In the event of shortcomings that can be remedied within two years, NVAO will award conditional accreditation. New programmes receive accreditation for the first time for a set period of six years.
- The differentiated grading of outcomes in accreditation (formerly from 'unsatisfactory' to 'excellent') was abolished in favour of a final conclusion that is 'positive', 'conditionally positive' or 'negative'. The assessment frameworks include clear rules as to when a panel may draw which conclusion.
- Assessment reports outline the strengths and points for improvement of the programmes; however, NVAO will not take these into consideration in its accreditation decision.
- In line with the societal debate on the added value of providing English language teaching in higher education programmes, a specific provision has been included to safeguard the quality of programmes being taught in a language other than Dutch. This provision stipulates that the programme must justify its choice of language and that its teachers must be capable of teaching in such language. This also applies to programmes that bear a foreign language name.
- The frameworks specify the expertise required of panel secretaries, who write assessment reports on behalf of assessment panels. Starting from January 2022,

⁶ Descriptions of the procedures as well as the respective protocols can be found on <https://www.nvao.net/en/procedures/the-netherlands>

NVAO will perform a yearly check to see whether the secretaries in its register still meet the requirements.

- The frameworks stress that existing documents suffice to demonstrate quality, expertise and knowledge of those who substantiate the education provided. Institutions and programmes are not required to provide more than is outlined in the frameworks.

We installed transition arrangements for institutions that had already started the preparations of their accreditation procedures at the time of publication of the new frameworks.

Future developments

We work in close contact with our stakeholders and regularly organise meetings with them to stay up to date about developments and to discuss how the QA system in the Netherlands should evolve. Stakeholders include institutions, the associations for universities and universities of applied sciences (both publicly and privately funded), student unions, the Inspectorate, the Ministry of Education, the Education Council, the organisation for internationalisation in education (Nuffic) and the centre for international credential evaluation (IDW). In addition, we meet periodically with representatives from assessment agencies to discuss the system, developments and site visit trajectories. Independent secretaries are invited to meetings and trainings where we discuss recent developments and points of attention in the assessment procedures; these meetings are prepared together with a group of secretaries. Since the outbreak of the covid-19 pandemic, these meetings have been organised online.

The Inspectorate of Education evaluated the quality of the accreditation system in 2018 and looked specifically at the procedures for accreditation of new and existing programmes and for institutional audits. The outcome was generally positive: the system functions adequately, safeguards the basic quality of programmes and stimulates programmes and institutions to improve themselves. The Inspectorate made several recommendations to the NVAO, Ministry, institutions and other stakeholders within the system. Some of these recommendations were followed-up on in the new legislation and assessment frameworks (e.g., the abolishment of the judgements 'good' and 'excellent' in programme accreditations). Others have been incorporated more firmly in trainings for panel chairs and secretaries (e.g., further professionalisation of panels) or taken up in collaboration with other parties (e.g., an update of the cooperation protocol between NVAO, the Inspectorate and CDHO, describing the roles of each organisation and how we work together.⁴ Yet others require a change in legislation, such as the recommendation that NVAO organises national analyses of all assessments within the system; such a task is currently not a legal task of NVAO.

More than 30 years have passed since the first visitations and almost 20 years since the establishment of NVAO. The system has seen many changes since the early days, but the main aspects of the current system (institutional audits and programme accreditation) have been in place for ten years. We, as well as most external stakeholders, feel it is time for a new step in the development of the QA system that strengthens the ownership of and confidence in institutions and their programmes. In January 2021, we reported our findings gathered in several meetings with internal and external stakeholders to the Minister of Education.

We are in favour of introducing a system of institutional accreditation for all recognised institutions (public and private) in higher education and feel that such a system may meet the need for more authority and autonomy to institutions. Institutional accreditation would mean that institutions (or in bigger organisations: faculties, schools or institutes) are assessed in a procedure that is more comprehensive than the current institutional audit, and that encompasses at least the following topics: governance and internal QA, the (achieved) quality of programmes, the vision and educational policy,

and the capacity for learning. Such a system could also respond more easily to developments such as modular and flexible education, 'unbundling' of programmes and differentiation. A positive result gives the institution the right to organise their own programme accreditations, which would still need to comply with the ESG. Although we expect that institutional accreditation will not decrease the actual administrative burden, it may have a positive effect on the experienced burden because the actors feel a greater ownership in the process. For NVAO, institutional accreditation may bring a different role and possibly stronger cooperation with the Inspectorate for Education: it may bring a greater focus on data analysis, requiring additional data to come to substantiated decisions in a more comprehensive institutional audit.

A pilot for a lighter form of programme accreditation started in September 2018. In this pilot, NVAO only assesses the quality of the intended and achieved learning outcomes of programmes of the participating institutions, while the institutions themselves organise the assessment of the quality of the learning environment and examination. We developed a protocol that describes NVAO's tasks in the experiment: (1) advising the Minister of Education about the admission of institutions to the experiment and (2) accrediting programmes that participate in the experiment. The protocol is based on the regular assessment frameworks for programme accreditation. Three universities of applied sciences take part in this experiment, which runs until 2024. An evaluation of the pilot is planned for 2022. Meanwhile, we continue our talks with stakeholders in the Dutch higher education sector to develop a QA system that is fit for the future.

6.3 ESG 2.1: Consideration of internal quality assurance

Compliance with the ESG is a basic principle for NVAO and the NVAO frameworks, which are determined by the legislation laid out in the Higher Education and Research Act. The standards and guidelines of ESG Part 1 are addressed in the frameworks for the institutional audit and for accreditation for new and existing programmes. Assessment agencies that organise accreditation procedures for existing programmes must follow NVAO's assessment frameworks, and by doing so they comply with the ESG. This practice has not changed since the previous ENQA review in 2017.

We consider compliance with Part 1 of the ESG primarily as the responsibility of institutions. They implement the elements of Part 1 in their vision and policies on education and quality management. In line with the principle of generic standards, we consider that ESG Part 1 provides characteristics that allow institutions the freedom to choose their way of implementing these elements.

The institutional audit complements the limited programme accreditation and covers elements of ESG Part 1 primarily at institutional level. Institutions that have not obtained a (conditionally) positive result on the institutional audit have to apply the extensive framework for programme accreditation; this framework covers all elements of the ESG.

As mentioned in section 6.1.2, the current assessment frameworks are an adaptation of the 2016 frameworks; the content of the standards for institutional audits and accreditation have remained virtually the same compared to the 2016 frameworks. These frameworks were specifically designed with ESG 2015 in mind.

The following table shows that the assessment frameworks cover all standards of ESG Part 1. We refer to Annex 6 for a description of the standards and a full explanation of the mapping of our 2018 assessment frameworks to the ESG.

Table 1. Mapping of the standards of ESG Part 1 against the NVAO-NL frameworks.

ESG Part 1 (standards)	Institutional audit (standards)	Programme accreditation and initial accreditation	
		Limited framework (standards)	Extensive framework (standards)
(1) Policy for quality assurance	1,2	*	9
(2) Design and approval of programmes	1,2	1,2	1,2,3,4,9
(3) Student-centred learning, teaching and assessment.	1,2	1,2,3,4	1,2,3,4,10,11
(4) Student admission, progression, recognition and certification	2	1,2,4	1,2,5,9,11
(5) Teaching staff	2	2	6
(6) Learning resources and student support	2	2	7,8
(7) Information management	3,4	*	9
(8) Public information	2	2	8
(9) Ongoing monitoring and periodic review of programmes	3,4	*	9
(10) Cyclical external quality assurance	3,4	*	9

* Covered in the institutional audit.

The mapping between our assessment frameworks and the standards of ESG Part 1 shows that the ESG are well-integrated into our procedures for institutional audit and programme accreditation. In other words, there is a clear link between internal and external quality assurance.

6.4 Enhancement area: Internal quality assurance and professional conduct (ESG 3.6)

NVAO is accountable to stakeholders and has various processes in place for internal quality assurance (IQA) related to defining, assuring and enhancing the quality and integrity of activities. Together, they form an integrated policy that covers all of our activities and is in line with our strategy and mission. We aim to foster a quality culture among staff members and involve internal and external stakeholders in our IQA procedures. Our IQA distinguishes between two levels: a strategic and an operational level. A new policy document on our IQA system was developed in 2019.

IQA on a strategic level

At the strategic level, we distinguish more and less formal initiatives. On the formal side, we engage in regular consultations with associations of universities and universities of applied sciences, student unions, the Ministry of Education and the Inspectorate of Education. In addition, we participate in periodic surveys by the Inspectorate of Education and apply for a review by ENQA. More informal initiatives that keep us informed of the perception within institutions of the accreditation system and our performance include informal meetings with administrators of higher education institutions (e.g., after the appointment of new Board members), regular meetings

organised by NVAO for staff members of institutions (e.g., seminars on the details of procedures and interpretation of assessment frameworks), and the 'Round of the Netherlands': informal meetings with larger groups of administrators, staff members and students from institutions. The 'Round of the Netherlands' is organised to receive feedback on NVAO's performance, to collect experiences with quality assurance, and to gauge expectations in the institutions regarding the development of the accreditation system. In 2020 two online sessions were held in this 'Round'; this was followed by sessions in 2021.

Whenever deemed necessary, we also evaluate specific tasks or procedures. An example of this was the external evaluation (2020) of the assessments of the implementation of the quality agreements in 2019 and 2020. The relatively high number of negative outcomes in the first round of assessments in this procedure prompted NVAO to commission an external evaluation. This evaluation was presented to the Minister of Education. The handling of the quality agreements was also the subject of an internal analysis by NVAO.

IQA on an operational level

While the many moments of consultation with stakeholders provide NVAO with a good insight into the quality of its handling of procedures, this is complemented at an operational level by a formal IQA system. This system comprises all NVAO procedures and activities and our most important stakeholders: panel members, secretaries to the panels and institutional coordinators of accreditation procedures. The operational level also involves regular assessments of the performance of assessment agencies, which play an important role in the Dutch accreditation system as they organise the majority of the programme assessments on behalf of institutions. This evaluation is based on a systematic analysis of how our staff members appreciate the quality of assessment reports.

Since the 2017 ENQA review, we further developed our IQA policies as a follow-up on the ENQA review, our new strategy and the formation of two departments for the Netherlands and Flanders. The new policy document (2019; see Annex 7) outlines the shared principles as well as the specific working methods in the two departments. The policy continues the lightweight and effective nature of the existing system and its cyclical approach (PDCA), which was deemed mature by the previous ENQA review panel.

An important development in our IQA policy was the focus on monitoring the achievement of NVAO's strategic goals and core values, as outlined in the 2017-2020 strategy: greater emphasis on trust, ownership, transparency, consistency and a reduction of administrative burden. In addition, we still question stakeholders about their satisfaction with the manner in which NVAO conduct its procedures.

The new IQA policy also prescribes internal audits on the deferment of decision-making by the General Board and the Board (see section 3.2). In 2020, the first audits took place by the NVAO Board regarding the decisions taken by the Director NVAO-NL under mandate; a similar audit was held by the General Board for the decisions mandated to the Board of NVAO. The result of the audits was positive in both cases, with some minor recommendations on the documentation of the decision process.

The policy responds to the recommendation of the 2017 ENQA review to 'close the loop-holes' in our PDCA-cycle, mainly by integrating the outcomes of various surveys in a summary IQA report, and outlining the handling of improvements by the Management Team and the NVAO Board. Until the implementation of the new system in 2019, the previous system remained operational. Regular surveys were held for all procedures and the results communicated to our staff.

A working group consisting of the coordinators of the various NVAO procedures designed and implemented new surveys and organised focus group meetings with stakeholders. Together with the IQA coordinator, the working group developed tools to analyse the results from the surveys and prepare annual quality reports for the Management Team (MT). The MT discussed this report with the NVAO Board and the implementation of improvement measures with the NVAO staff in early 2021. Annex 8 contains a management summary of the results of the first round.

In the course of 2020 and 2021, a new round of evaluations and audits were carried out. A specific survey was developed for evaluating the switch to online assessments due to covid-19 in the summer of 2020. A sophisticated tool was developed in Excel to analyse the data from the surveys and produces visual presentations of the results in the annual report.

Experiences with the new IQA policy

The first round of implementation made it evident that the new surveys and other tools were effective. It also became clear that the frequency of the rounds of analysis and reporting should be reduced in comparison to the plans outlined in the IQA policy as the workload of the IQA activities is considerable. The IQA working group had to reduce its number of meetings to ca. four per year. During the development of the new tools and the first report, the group met more frequently. The reduced number of meetings in combination with online communication was sufficient for the ongoing concern issues.

For the discussion and implementation of operational improvements and the consistency of handling of procedures, weekly sessions are organised by the coordinators of the different procedures, as well as case-based peer-review sessions. The increased availability and use of online tools such as Teams also improved the internal communication on practical matters and the exchange of experiences, especially during the covid-19 lockdown periods. At first, the weekly sessions only covered the accreditation of new programmes (initial accreditation), but this was later extended to regular accreditation procedures and related activities. A separate session is held for those staff members involved in approving assessment panels. The sessions are linked to specific Teams sites, where summaries of the conclusions of the meetings and related information are shared and recorded. This remains available for our staff.

The annual IQA report and the formal handling by the NVAO Board was deemed sufficient for more general monitoring and improvement. The monitoring of management information on the various processes and deadlines involved in the handling of procedures was built into a new IT system for handling applications. This system allows an easy dashboard style overview of the various terms and deadlines in the procedures.

All individuals working for NVAO are expected to base their professional actions on their commitment to higher education, and to perceive integrity as an intrinsic value. In 2021, we updated our policy on integrity, including regulations for external complaints (see 5.1.2). Following a change in the formal status of NVAO staff and Board members, our Integrity Code (former version from 2015) was renewed and is now in line with the Code of Conduct of the Dutch government. This applies to Board and staff members, as well as to anyone who performs activities on behalf of NVAO. One of our staff members was formally appointed as confidant in case of integrity breaches. Part of the Integrity Code is an updated Code of Conduct that is applicable to panel members and secretaries involved in accreditation procedures. In line with the GDPR, our Privacy Statement specifies how we process and use personal data and the rights for individuals who wish to manage and check their own data.⁷

Results

⁷ <https://www.nvao.net/en/privacy-disclaimer>

The first report of the re-designed IQA system presented interesting results as indicated in the management summary. The results were generally in line with those from earlier surveys, but the positive appreciation for NVAO's strategic goals was new information. The focus groups provided a lively addition to the online surveys.

This round was more of a zero-degree benchmark to identify areas of strength and weakness. As indicated in the summary, the results were overall positive and revealed that stakeholders recognise NVAO's strategic themes. External stakeholders value NVAO, especially on the aspects professionalism and expertise. The surveys also brought to light the areas in which we can and should improve, such as the communication with our stakeholders and the consistency of our own approach.

In January of 2021, the outcomes of the first round of surveys were discussed with the NVAO staff. The Management Team listed a number of measures to be taken in response to the evaluations. The environment in which NVAO operates and the nature of our procedures make it hard to steer towards specific targets. Results from the surveys will be compared in subsequent reports to chart the improvement on vital areas. The comments in the surveys and in live sessions such as focus meetings will be another strong indicator of whether we are on track and whether improvements are noticed and produce the desired effect. The report of the 2021 evaluations shows continuity in the quality levels and the attainment of strategic goals. The follow-up of the surveys is integrated as much as possible in the regular internal staff meetings on handling procedures and maintaining consistency.

Concluding remarks

All in all, we feel that the combined IQA activities at strategic and operational level provide a good insight into how our key stakeholders evaluate our performance. We invest strongly in informal contacts with our stakeholders; members of the Board and Management Team spend a large amount of time and effort on maintaining these contacts. All major NVAO procedures are evaluated regularly; the new IQA policy is an adequate improvement of previous policies and provides a robust set of principles for the evaluation of our strategy. The new set of surveys and the tools for processing the data from surveys provide a solid basis for gaining insight into our performance on strategic goals as well as into the satisfaction of its stakeholders. Our IQA system also proved to be very useful in evaluating the switch to online assessments after the outbreak of the covid-19 pandemic.

The current IQA system focuses mainly on the formal procedures handled by NVAO, where we would like to see our strategy recognised in its operational quality. Supporting activities such as the initial training and the follow-up sessions for secretaries, or communication sessions with representatives from institutions are interactive and provide enough room for feedback from participants and stakeholders. This feedback is also taken along in the planning of new activities. We feel this has no place in the current format of the IQA report.

Challenges regarding our IQA activities include the high workload, combined with limited staff capacity and funding. It has always been a challenge to keep our IQA 'lean and mean'. The system should not add 'burden' to our stakeholders and also be feasible with limited involvement of NVAO staff. This requires prioritising certain activities. The validity and effectiveness of our IQA system have been critical and were also the main subject of the 2021 ENQA Progress Visit. The implementation of new online tools for IQA besides the surveys needs consideration and we would like to organise a midterm review.

It is difficult to measure the effect of specific improvement measures: our procedures and operations are complex, and the response rates and low frequency make the surveys not suitable for advanced statistical analysis. Developing and maintaining a quality culture seems more effective. We have stepped up our internal feedback and

calibration sessions on the various procedures, making sure we communicate well internally and maintain consistency. Instead of strict and formal schemes for monitoring improvement, we rely on the professionalism of our staff and our quality culture. We have also made choices in implementing our new IQA policy to keep it feasible. Finally, the awareness of quality issues and strategic goals can be further enhanced at all levels in NVAO. Maintaining a balanced approach remains a challenge and we look forward to discussing this with the ENQA review panel.

6.5 SWOT analysis

This section analyses NVAO's strengths, weaknesses, opportunities and threats in conducting external QA, specifically for NVAO-NL. The SWOT is based on internal and external analyses that were developed in the first half of 2021, as part of the ongoing improvement and organisational development of the Dutch department. The SAR project team for NVAO-NL decided not to organise an additional SWOT session specifically for the ENQA targeted review, because the 2021 analyses already covered relevant topics.

STRENGTHS

- NVAO has authority and its expertise is valued in the field of higher education in the Netherlands. Commissioned by the Dutch government we develop and implement new frameworks, and perform various tasks related to quality assurance.
- We have reliable internal processes and systems supporting accreditation processes.
- Stakeholders report positively on NVAO's staff. As reported in IQA 2019-2020, "The first round of institutional audits under the new system warrants the conclusion that NVAO is appreciated in the field, especially when it comes to professionalism and expertise."

WEAKNESSES

- (More) attention is needed for clear instruction, explication and skills that are needed when using new (ICT) systems.
- Our communication requires a more professional approach. We would benefit from more structure and documentation in internal communication, and clearer external communication related to our profile.

OPPORTUNITIES

- Changing provision of higher education (e.g., flexible education, lifelong learning, micro-credentials) asks for new modes of QA, such as institutional accreditation, possibly replacing programme accreditation.
- NVAO is involved in discussions on internationalisation and QA regarding new types of higher education provision, such as the European Universities and transnational education.

THREATS

- NVAO has limited control over programmes assessments that are coordinated by assessment agencies on behalf of institutions.
- The Ministry of Education regularly changes laws and regulations (e.g., regulations on the use of foreign languages, flexible education), affecting NVAO's work. Sometimes these changes increase our workload, and require a further clarification in our QA work.
- We experience a high and increasing workload, limited personnel capacity and funding, and see challenges in terms of staff development (retiring employees are a potential brain drain).

Analysis and strategic choices

In view of this SWOT analysis, NVAO needs to remain a flexible and agile organisation. We are actively involved in the discussions with the Ministry of Education about future developments in Dutch higher education. We continue investing in our staff, as they are key in maintaining our highly valued position in the field. This is of special attention because of our increasing workload as well as the foreseen development in our staff, combined with a possible development towards institutional accreditation replacing programme accreditation. Additional tasks may require different skills from our staff while they could also make individual work packages more diverse and possibly more attractive. Action has already been undertaken to develop a strategic plan on staff policy.

Although we have limited control over programme assessments coordinated by assessment agencies, we ensure the quality of these assessments by monitoring the quality of assessment panels. Panel members and secretaries need to meet set requirements regarding expertise and independence and must have been formally approved before they can perform their tasks. Furthermore, we regularly meet with representatives from agencies, analyse the quality of reports, and discuss recent developments in higher education with external secretaries. Last but not least, we have invested in increased ownership and professionalisation within higher education institutions.

7 Flanders

7.1 Developments in Flanders

Since the last ENQA Review in 2017, the results of the then ongoing pilot resulted in a new legal framework for the QA system new legislation. The underlying methodology was already taken into account in the review in 2017. The legal framework was approved unanimously by the Flemish parliament in 2018. The QA system came into force in September 2019 and is now being applied. The activities surrounding the institutional review are therefore not new quality assurance activities. The implementation of this follows directly from what has been assessed under the previous review. For the sake of completeness, a correspondence matrix has been included in Annex 13. In 2020, due to the covid-restrictions, our assessment frameworks were rewritten in order to establish a legal base to conduct our regular assessment procedures through online tools.

The cooperation that NVAO Flanders had sporadically with Luxembourg has become more structural in recent years. The responsible ministers of Luxembourg, The Netherlands and Flanders agreed in 2021 to formalise the collaboration between NVAO and Luxembourg. The activities in Luxembourg are however not new for the Flemish department; the same methodologies are applied in Luxembourg as in Flanders. For NVAO Flanders, this has been a unique opportunity to build on our previous work within the Benelux framework and to apply some of our methodologies in a different context.

Quality Assurance System (2019-2025)

The QA-system is focused on the institutions' responsibility to account for the quality of their programmes. It creates a clear and structured system where assessment procedures align with an institution's track record. For example, this system gives trust to those institutions that were part of the four previous QA systems. This means their programmes already underwent a minimum of three and up to seven cycles of programme assessments. The QA system is flexible enough to make sure we can tailor the procedures to the specific context of each programme and/or institution.

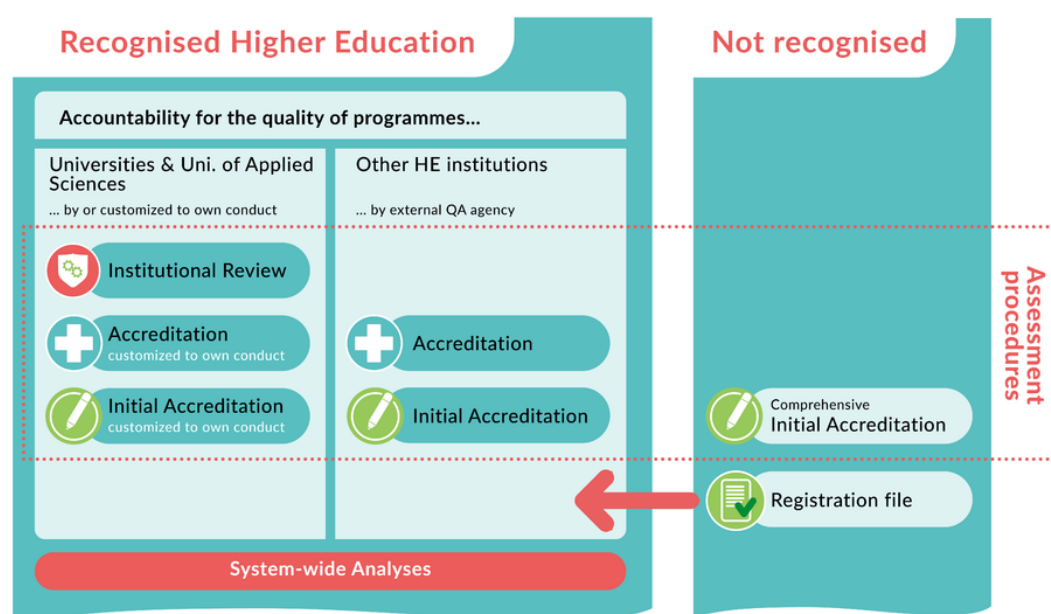


Figure 2. Overview of the Quality Assurance System for Flanders (2019-2025).

The QA System focuses on the quality of individual programmes and their accountability. This is achieved either through the institutional review that enables universities and universities of applied sciences to account for the quality of their already accredited programmes themselves, or through programme assessments of new programmes, initially accredited programmes and programmes offered by other institutions. An overview of the QA system is available in each assessment framework and on our website.⁸

7.1.1 Luxembourg

The Ministry of Education and Sciences of Luxembourg invites Quality Assurance agencies to put forward proposals for scheduled assessments. Since 2016, NVAO has undertaken 15 assessments of institutions and programmes in Luxembourg. For each of these, NVAO presents the appropriate assessment framework in its proposals and makes sure the procedures align with the ESG.

7.2 ESG 2.1 Consideration of internal quality assurance

Each assessment framework stipulates the following: “The quality of programmes is assured in an internationally accepted manner. This entails that the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015) are followed. The quality features [which are included in the legal framework] are a translation of the ESG elements that typify high-quality higher education programmes.

The quality features can be found in Annex 10. They were included in the Codex Higher Education to ensure alignment with the ESG across all QA procedures in Flemish higher education.

Table 2. Overview of how the quality features align with ESG part 1.

		QF 1	QF 2	QF 3	QF 4	QF 5	QF 6	QF 7	QF 8
1 Standards for internal Quality Assurance									
1.1	Policy for quality assurance								
1.2	Design and approval of programmes	x	x						
1.3	Student-centred learning, teaching and assessment			x		x	x		
1.4	Student admission, progression, recognition and certification				x			x	
1.5	Teaching staff			x					
1.6	Learning resources and student support				x				
1.7	Information management							x	x
1.8	Public information							x	x
1.9	On-going monitoring and periodic review of programmes								x
1.10	Cyclical external quality assurance							x	

⁸ <https://www.nvao.net/en/the-quality-assurance-system-of-flanders>

ESG 1.1 Policy for quality assurance	HE institutions are legally obliged to ensure the quality assurance of their educational activities. This includes permanent monitoring and the involvement of internal and external stakeholders and external, independent experts in their quality assurance processes. ⁹ Each procedure starts here.
ESG 1.2 Design and approval of programmes	Quality features 1 (learning outcomes) and 2 (curriculum) align with this standard. In each of our procedures, our panels assess the purpose of the programme, the intended learning outcomes and how the programme or institution aims to achieve the intended learning outcomes.
ESG 1.3 Student-centred learning, teaching and assessment	Quality features 3 (staff), 5 (teaching and learning environment) and 6 (assessment) align with this standard. Our panels check whether the learning environment is student-centred and enables students to take an active role in the learning process. In addition to that, also the assessment is considered. Through the coherent questions, the panel can assess how programmes intend to achieve this.
ESG 1.4 Student admission, progression, recognition and certification	Quality features 4 (services, facilities and counselling) and 7 (information about all stages of study) align with this standard. Institutions need to have a policy for orientation, guidance, study guidance, test policy, RPL policy, student assessment regulations, ... In each of our procedures, our panels look at admission, progression and certification.
ESG 1.5 Teaching staff	Quality feature 3 (staff) aligns with this ESG-standard. Teachers have to enable students to achieve the intended learning outcomes. In each of our procedures, our panels assess the personnel policy and recruitment, selection, promotion and professionalisation of teachers. Also, opportunities for staff mobility in the context of internationalisation are taken into account.
ESG 1.6 Learning resources and student support	Quality feature 4 (services, facilities and counselling) aligns with this standard. In each of our procedures, our panels check the student services, study funding opportunities and student guidance.
ESG 1.7 Information management	Quality features 7 (information about all stages of study) and 8 (public information) align with this standard. Institutions collect relevant information (such as student progression and credit attainment) and provide it to the relevant authorities and to us through the Higher Education Database (<i>Databank Hoger Onderwijs</i>). Institutions are also expected to publish information about the quality of their programmes. In all our procedures, our panels can assess information management and BI-tools. NVAO shares information about the institution and/or programmes with our panels through the institutional

⁹ Codex Higher Education, art. II.122, §1.

portfolio, which presents data, mainly on students and staff, in a concise manner.

**ESG 1.8
Public Information**

Quality features 7 (information about all stages of study) and 8 (public information) align with this standard. As mentioned above, institutions are expected to publish information about the quality of their programmes. This public information is part of the research the review panel of the institutional review undertakes. The panel also assesses the own conduct of the institution. Institutions also provide other information on their website such as figures, ECTS, ... In collaboration with the ministry and the students, institutions also publish key data on a shared website.¹⁰

**ESG 1.9
On-going monitoring
and periodic review of
programmes**

Quality feature 8 (public information) aligns with this standard. Institutions monitor their programmes and have a policy to do the monitoring and periodically review of their programmes. The assessment framework for the institutional review requires institutions to demonstrate this either at regular intervals or continuously. The result of this monitoring is shared with the stakeholders through public information. This is checked by our panels during the institutional reviews.

**ESG 1.10
Cyclical external
quality assurance**

Each programme follows a fixed path to ensure that it undergoes external quality assurance in line with the ESG on a cyclical basis. NVAO publishes a calendar to ensure this cyclicity.¹¹

7.3 Enhancement area: Internal quality assurance and professional conduct (ESG 3.6)

Over a period over ten years, the Flemish system for Internal Quality Assurance (IQA) changed from a broad traditional and quantitative approach to an approach that is more clearly linked to our quality culture. We have strong IQA processes related to defining, assuring and enhancing the quality and integrity of our activities. This was confirmed during our ENQA Progress Visit in January 2021. The experts also noticed that every member of our team was engaged in this kind of processes. The quality of our work is a self-evident topic in all our discussions and information on all our operations are shared with everyone in the team. We value discussions about the quality of our work, see ourselves as accountable to our stakeholders and continuously strive for quality and quality enhancement in all our endeavours.

By linking our IQA to our quality culture we have empowered our team members and made all of them responsible for our IQA. It is in the nature of our work to follow-up all our quality assurance procedures, to share information directly and to integrate new insights promptly into our daily work. We realise that a quality culture is not always tangible. Some of our rituals, such as feedback sessions after every external meeting, and cultural transmitters, such as our obligatory meeting notes, are not always identifiable as part of our quality culture.

¹⁰ Programme in figures (*Opleiding in cijfers*), <https://data-onderwijs.vlaanderen.be/opleiding-in-cijfers/?T=&L=&l=&tchk=1631086734870>

¹¹ <https://www.nvaio.net/nl/kalenderbeoordelingenvl>

We have chosen to select this topic as an enhancement area, because we are looking for feedback on our approach and because our IQA is one of the most important elements in making the quality culture that we are so proud of tangible. The more we can develop further, the more strongly we can anchor our quality culture in our organisation and in our HE system as a whole. We want to lead by example. Anchoring, so that this quality culture lasts even when our staff changes and the QA system develops further. We are a small team and we work in a niche environment. This is potentially a threat to our quality culture. However, we are aware of this and that is why we have recently focused strongly on initiatives to embed the knowledge available within the Team, by further developing the system for Internal quality assurance.

We are happy to present these choices to the ENQA review team for discussion.

During a review of all the processes and instruments, we decided to tie all our internal quality assurance together in a formal way. We chose to set up this system for internal quality assurance as lean as possible. The reason for this is that we want to capitalise on the quality culture present in our Flemish team. A quality culture facilitates continuous adjustment of daily activities whenever required. This quality culture is in the genes of the team. It is passed on quite naturally to new colleagues and facilitated by the great emphasis on that quality culture that we also want to transfer to the Flemish institutions through our quality assurance system.

A first way to define, assure and enhance the quality of our activities, is to test them against formal, legal documents in which all the processes and activities of NVAO are written down. In the **Rules of Governance Principles**, the tasks, duties and authorities of the General Board, the Executive Board, the Management Team and the Advisory Council are specified. **The Code of Integrity** deals with the ways team members should act and perform during their work activities. NVAO Flanders' **Code of Ethics** bundles the rules of conduct and guidelines for panel members in NVAO's assessment procedures. This code applies to all persons who perform tasks on behalf of NVAO in the capacity of "panel member". By signing this code, our panel members agree to abide to the provisions and principles listed in the code. The code contains four basic principles: diligence, professional and appreciative conduct, confidentiality and data protection and a chapter about independence.

The second way to make sure that NVAO Flanders can define, assure and enhance the quality of the activities we undertake, is the development of a new internal quality assurance policy for the Flemish team. This policy uses different sources of information to reflect upon the internal quality assurance of our processes and activities.

Surveys

The first source of gathering information is through surveys. At the **end of each assessment procedure**, two surveys are sent. One survey is addressed to the panel members who have conducted the assessment. In this survey they can reflect on the assessment procedure, on the activities of and the panel itself, the process coordinator ... The survey asks for strengths of the assessment procedure and it gives the opportunity to address experienced weaknesses.

A second survey is sent to the institution or programme the assessment procedure was conducted for. By doing this, the remarks of the institution can be considered in the evaluation of the process.

Surveys are conducted for several other occasions. After a **training for panel members** or secretaries, the participants are

asked to give their opinion about the training. The feedback is used to strengthen the training sessions in the future.

A last kind of surveys is sent out **after events**. NVAO Flanders organises 'SAMENaries' (a word play on the Dutch translation of *together* - *samen*). In this kind of seminars, we discuss new changes in the world of higher education together with the people responsible for quality assurance of the institutions. Through the surveys, we can reflect on past seminars and identify new topics to be discussed in the upcoming 'SAMENaries'.

Intervision

The following Intervisions have an internal focus:

Procedural Intervisions take place every week. At the start of the week, on Mondays, the group of policy advisors and policy support gather to discuss the current assessment procedures. Issues that are experienced by one or more team members are discussed. This kind of intervision focuses on our daily work.

Team Meetings are also organised on a weekly base. In addition to the procedural intervision on Monday, the whole team gathers on Tuesdays for the Team Meeting. In this meeting, organisational and strategic issues are discussed. This meeting is used to confirm new decisions and to inform the Team.

Methodological Meetings are held regularly. In these meetings, the Flemish team gathers to develop new methodologies and to strengthen consistency.

Internal Quality Assurance Intervisions are held every two months. Every action regarding internal QA that does not lead to a formal document or moment, is discussed during these Intervisions. In that way, we can assure that there are no loose loops in our internal QA system. Every action now has a formal end.

The next Intervisions are externally focused:

Intervision sessions with the chairs of the panels who conducted the assessments, are organised by NVAO Flanders after a round of assessment procedures. This is a valuable source of information for both the chairs of the panel, and for the NVAO. The chairs can exchange impressions, good practices, ... The NVAO can learn about these findings to enhance the quality of the procedures in the future.

Stakeholder Intervisions are held regularly to consult stakeholders in support of our primary activities. In Flanders, there is the Resonance group that consists of the universities (VLIR), Flemish Council of University Colleges (VLHORA), the Cabinet and the Ministry of Education, the student union (VVS), with assessment agency VLUHR-KZ as an observer. The nature of the meetings with these groups is to receive feedback and to consult the stakeholders on important policy changes planned by

NVAO or on the developments in the system of external quality assurance.

The 'Tour of Flanders' is an additional intervention, organised by NVAO Flanders to follow-up on past procedures. This meeting is attended by the Director of the Flemish team of NVAO, by (an) NVAO board member(s), the relationship manager and by the representatives of the board from institutions.

Another way to inform all the stakeholders about the quality of our assessment procedures, is by publishing the NVAO Flanders' **overview reports**. These reports are written after a large group of assessment procedures of one kind have been conducted.

Since 2017, NVAO Flanders has published the following overview reports:

- Institutional review (2017)
- Teacher Training (2019)
- Associate Degrees (2019)
- Online Assessments (2021)
- Co-creation with the Professional Field (2021)

In the last chapter of the overview reports, NVAO shares what we have learned about the past assessment procedures. The strengths of the past procedures are mentioned, but most importantly also the points where improvement is possible.

7.4 SWOT analysis

SWOT analyses are a regular part of our activities. We regularly brainstorm about the challenges that NVAO Flanders faces and what the opportunities are for the future. Weaknesses and threats are then identified in order to find suitable solutions to deal with them. In addition to internal discussions, many informal and formal discussions were held with various stakeholders. Informal feedback on the functioning of NVAO is expressed, among other things, in our bimonthly resonance group meetings, in the feedback we receive from the institutions after the assessment procedures, via the relationship manager of the institution, and during SAMENaries. In addition, in the run-up to writing this self-evaluation report, we also held our two-yearly feedback sessions with our main stakeholders such as the VLIR and VLHORA. The final analysis was again presented to colleagues from NVAO Flanders.

STRENGTHS

- Strong ties with all relevant stakeholders, including short lines of communication. The Relationship manager, as a liaison between NVAO and the institution, even strengthened ties.
- Ability to establish an innovative QA system with unanimous support from both higher education institutions as well as parliament.
- Solid international orientation, including direct exchange and staff mobility with other agencies and international crosspollination with Flemish higher education.
- Our processes and core tasks are lean, unambiguous and planned well ahead of time; flexible, agile and transparent.
- An established quality culture, characteristic for our daily work. The internal organisation is based upon strong co-operation and partnership. Our team has the will and the competency to innovate.
- Stakeholders are most pleased with the openness, approachability, and willingness to listen and learn.

WEAKNESSES

- The financial allocation model regularly creates uncertainty.
- The new QA system combined with tailor-made procedures increased the workload.
- Staff continuity and expertise vs the required flexibility when the workload changes.
- A small team, in a niche field and with high specialization, makes us vulnerable.
- The alignment of formal demands of IQA with our quality culture.

OPPORTUNITIES

- Finding the right balance between political goodwill and agenda setting.
- Demand from stakeholders to continually investigate the scope of our quality assurance: to expand, to rethink, to contract, to include. International activities allow us to test new elements for the QA-system in Flanders.
- Greater engagement and co-creation with the professional field, wider profiling within the educational field.
- Room for reflection and development of team members within the field of higher education.
- Further development of internationalisation & anchoring these activities. (international frameworks; European Approach, CeQuint)

THREATS

- Political volatility in government and parliament can put authority and position of NVAO under pressure. NVAO has felt the external pressure to only conduct procedures and not involve in policymaking.
 - (Unpredictable) funding mechanism from the side of the Flemish authorities.
 - Staff turnover/attractiveness (e.g., demographic developments).
 - Extensive autonomy and Appreciative Approach increase pressure on NVAO, weighs on balance authority/ “consultancy”.
 - Concerns among stakeholders about NVAO's changing governance structure. And the weakened international cooperation/interaction with the Dutch department (Loss of scale, expertise, reputation).
 - Developments in the EU & Higher Education
-

8 Conclusions

8.1 SWOT analysis for the organisation

STRENGTHS	<ul style="list-style-type: none">• We are widely recognised as an authority in QA, both within our nations and internationally.• Our working methods ensure an independent decision-making process, strengthened by the cooperation within our binational board.• The development within the organisation to more differentiation enables us to react quickly to innovation and (nation-specific) QA changes.• We have strong ties with our stakeholders, from students and HEIs to governments and businesses.
WEAKNESSES	<ul style="list-style-type: none">• Our QA systems require a high level of expertise of our staff and onboarding of new staff takes a considerable amount of time and effort.• Variable workloads require staff flexibility but can undermine staff continuity.
OPPORTUNITIES	<ul style="list-style-type: none">• Our QA systems support innovation in higher education (e.g., flexible education, lifelong learning, micro-credentials), offering ample development opportunities for our staff and strengthening our position amongst stakeholders.• Potential changes in our national QA systems may align the systems and foster the Dutch-Flemish cooperation on QA-related topics.
THREATS	<ul style="list-style-type: none">• As a treaty organisation the relationship with the competent authorities is not always evident and subject to changes.• As a binational organisation based in the Netherlands, new (para)legal and fiscal questions are raised regularly and demand a lot of time and effort.

8.2 Final remarks

NVAO operates in a context that is developing rapidly, both in the Netherlands and in Flanders. Many developments are characterised by some form of customisation (e.g., flexible programmes, tailor-made degrees), a greater interest in international collaboration, and social responsibility. New types of education, as well as unexpected events, bring new challenges for everyone involved in the higher education sector, and require appropriate tools for quality assurance and quality enhancement. In addition, political decisions affect our responsibilities and the role we play in safeguarding the quality of higher education.

As education and QA procedures related to education change, we must move along to support institutions, programmes and students. In both nations, we approach new cycles in our QA systems that call for thorough preparations and possibly big changes. We continuously stay in touch with our stakeholders about our duties in the respective QA systems in which we operate. Thanks to a greater sense of ownership among students,

teachers and educational staff members, institutions are awarded more autonomy in arranging the QA of their programmes. This leads to a different role for NVAO with a greater focus on policymaking and on data analysis to inform our societies and encourage mutual learning among institutions.

During the 2017 ENQA review, we discussed whether NVAO was coming together or drifting apart. We conclude that the different contexts in which we operate have led to a greater division between the Dutch and Flemish departments. Nevertheless, we intend to continue inspiring and learning from each other. We are currently investigating what design would serve the higher education communities in both nations best. Despite the challenges, we still share our main goal, which is to foster a quality culture to safeguard and enhance the quality of higher education, for the benefit of society as a whole.

9 Glossary of Terms

CDHO	Higher Education Efficiency Committee (Commissie Doelmatigheid Hoger Onderwijs)
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
EQF	European Qualifications Framework
ESG	European Standards and Guidelines
IQA	internal quality assurance
MT	Management Team
NVAO	Accreditation Organisation for the Netherlands and Flanders (Nederlands-Vlaamse Accreditatieorganisatie)
NVAO-FL	NVAO department Flanders
NVAO-NL	NVAO department the Netherlands
PDCA	Plan-Do-Check-Act
QA	quality assurance
SAR	self-assessment report

10 Annexes

- Annex 1: NVAO Strategy 2017-2020
- Annex 2: NVAO-NL Appeals Regulation
- Annex 3: Regulations for complaints and appeals
- Annex 4: NVAO List of complaints and appeals
- Annex 5: NVAO-NL Assessment Frameworks
- Annex 6: NVAO-NL Mapping of assessment frameworks against ESG 2.1
- Annex 7: NVAO-NL-FL Internal Quality Assurance System 2019
- Annex 8: NVAO-NL Internal Quality Assurance – NVAO-NL Management summary
- Annex 9: NVAO-FL Assessment Frameworks (2019-2025)
 - Annex 9.1 Assessment framework Initial Accreditation
 - Annex 9.2 Assessment framework Initial Accreditation customised to own conduct
 - Annex 9.3 Assessment framework Comprehensive Initial Accreditation
 - Annex 9.4 Assessment framework Programme Accreditation
 - Annex 9.5 Assessment framework Programme Accreditation customised to own conduct
 - Annex 9.6 Assessment framework Institutional Review
 - Annex 9.7 Assessment framework European Approach
 - Annex 9.8 Organisational framework system-wide analysis
- Annex 10: NVAO-FL Overview Quality features
- Annex 11: NVAO-FL Matrix compliance ESG
- Annex 12: NVAO-FL Internationalisation activities 2017-2021
- Annex 13: NVAO-FL Compliance ESG-Institutional Review (IR)

Colofon

ENQA REVIEW 2022

Self-Assessment Report

NVAO • Accreditation Organisation of the Netherlands and Flanders
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Nederlands-Vlaamse Accreditatieorganisatie
Accreditation Organisation of the Netherlands and Flanders

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