

ENQA AGENCY REVIEW

NETHERLANDS QUALITY AGENCY (NQA)

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EXECUTIVE SUMMARY

The Netherlands Quality Agency (NQA) requested ENQA coordinate a review to enable it to renew its membership of ENQA. The review evaluated whether and how the activities of the agency within the agreed scope of the review met the expectations of the *European Standards and Guidelines for Quality Assurance in the EHEA* (ESG).

NQA wrote to ENQA to request a review by ENQA against the ESG. The terms of reference were agreed and published in July 2022; they are included here as Annex 2. A site visit was arranged for 22-24 February 2023 (details are set out in Annex 1).

NQA is a private company, founded in 2003 and based in Utrecht, working as a quality assessment agency offering programme accreditation services mainly to universities of applied sciences in the Netherlands. Programme level accreditation forms part of the accreditation framework established in the Netherlands by the relevant Ministry and Nederlands-Vlaamse Accreditatie Organisatie (NVAO), the national quality assurance organisation.

NQA's mission, given in its self-assessment report (SAR), is 'to contribute to the continuous improvement of the quality of education regarding primary education, secondary education, senior secondary vocational education and training, higher education (professional and research) and company training.' The key activities of NQA falling within the scope of the review are the assessments it organises of degree programmes of institutions of higher education and the assessment of international degree programmes. The results of the assessments it undertakes lead to a report that the programme uses to gain re-accredited by NVAO.

Programme accreditations for universities of applied sciences form around 95% of its business. However, in addition, NQA offers different consultancy and other services to the same client group; it is also seeking to extend its work into other educational sectors and to develop additional services.

Principal areas of strength to emerge from the review process were the quality of NQA's internal process documentation, including that supporting assessments and the internal quality manual, and the professionalism of its staff. Assessment panels are created with care and the complexities, especially for programme clusters, approached with sensitivity and integrity. The agency has established a valued role within the Dutch system, serving the needs of the system and of its individual clients. The main areas requiring consideration or action were: stakeholder involvement; extending transparency through wider publication of certain documentation; the greater use of its information resources to produce thematic analyses and deeper consideration of ways in which the agency seeks to meet the ESG in its own right.

The panel concluded that overall NQA is compliant with the ESG.

Compliance against the individual standards were judged to be:

Compliant with 11 standards: 3.2, 3.3, 3.5, 3.6, 3.7, 2.1 2.2, 2.3, 2.4 2.5 and 2.6;

Partially compliant with three standards: 3.1, 3.4 and 2.7.

Overall, the panel has commended seven examples of good practice and made ten recommendations alongside nine suggestions for improvement or further development.

INTRODUCTION

This report analyses the compliance of the Netherlands Quality Agency, (NQA) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. It is based on an external review conducted between July 2022 and May 2023. The review was conducted to enable NQA to renew its ENQA membership.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in compliance with the ESG (second edition, as adopted at the meeting of Ministers representing member states of the EHEA in Yerevan in 2015).

NQA underwent its first review by ENQA in 2018 and achieved ENQA membership as a result. It submitted a follow-up report in August 2020 which was approved by the ENQA Board in March 2021. NQA applied to be registered on the EQAR following the 2018 review but was not accepted.

As this is NQA's second review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews (2021)* aim at constant enhancement of the agencies.

SCOPE OF THE REVIEW

Two external quality assurance activities were identified in the terms of reference for this review:

- Assessments of degree programmes of higher education institutions as an external quality assessment agency
- Assessment of international degree programmes.

No activities were identified in the terms of reference as excluded from the review. However, the terms of reference note that NQA also offers consultancy and training services. The SAR indicates that research evaluations are its second most important activity, clearly stating that these do not have a direct link to learning and teaching and thus do not fall within the scope of the ESG. The SAR also lists a number of other activities that fall outside the scope of the ESG, these include: the assessment of professional associations, a methodology for the assessment of study programmes, one for an NQA hallmark and a process to certify institutions' internal quality processes.

MAIN FINDINGS OF THE 2018 REVIEW

The 2018 review found NQA to be fully compliant with four ESG standards, substantially compliant with seven and as partially compliant with three ESG standards (as set out in the table below).

ESG standard		Fully compliant	Substantially compliant	Partially compliant	Not compliant
3.1	Activities, policies and procedures for quality assurance			√	
3.2	Official status	√			
3.3	independence		√		
3.4	Thematic analysis			√	
3.5	Resources		√		
3.6	Internal quality assurance and professional conduct		√		
3.7	Cyclical external review of agencies	√			
2.1	Consideration of internal quality assurance		√		
2.2	Designing methodologies fit for purpose	√			
2.3	Implementing processes	√			
2.4	Peer review experts		√		
2.5	Criteria for outcomes		√		
2.6	Reporting		√		
2.7	Complaints and appeals			√	

Alongside two commendations, 15 recommendations were made and a further 15 suggestions for development.

The main areas for action in the findings from the 2018 review can be grouped around a number of themes:

- Many of the recommendations and suggestions relate to the involvement of and relationships with stakeholders, communication and impact. These include: the establishment of an advisory committee, the involvement of international experts, the production of thematic analyses, communication with authorities and stakeholders and further ways to disseminate and to make its outputs accessible to stakeholders.
- A second significant grouping are connected to the particular operational circumstances of the agency and limited size. These include matters such as the impact of uneven workflow, nature of its internal procedures, the publication of reports, diversification of revenues, the extent to which staff and panel members are enabled to participate in feedback, reflection and mutual learning.
- The third main grouping is process-related: the degree of emphasis on ESG Part I in assessment methodologies, strengthening the training of panel members, the establishment of a complaints procedure, the collection of feedback following assessments, ways to ensure there is no conflict between its assessments and any consultancy activity, as well as greater formalisation of strategic planning.

In the SAR NQA provides information about the ways in which it has responded to the recommendations, including providing explanations where it has elected not to act on recommendations from 2018. It also notes that the consequences of public health measures due to the Covid pandemic had to be prioritised during 2020 and 2021 and that this has impacted on other plans, the timing of progress and the nature of the agency's development.

REVIEW PROCESS

The 2023 external review of the Netherlands Quality Agency (NQA) was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews (2021)* and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of NQA was appointed by ENQA and composed of the following members:

- Ronny Heinze (Chair), Deputy Director for International Development, Agency for Quality Assurance through Accreditation of Study Programmes, Germany, ENQA nominee;
- Rowena Pelik (Secretary), Independent consultant, former Director of Strategic Projects at the Quality Assurance Agency for Higher Education, UK, ENQA nominee;
- Ilse De Bourdeaudhuij, Full professor and Director of Education, Ghent University, Belgium, Academic (EUA nominee)
- Iuliu Gabriel Cocuz; PhD student in Medicine, Doctoral School of Medicine and Pharmacy, University of Medicine, Pharmacy, Sciences and Technology George Emil Palade of Targu Mures (Romania), Member of the European Students' Union Quality Assurance Student Experts Pool (ESU nominee)

Alexis Fábregas Almirall, Project Officer, ENQA, acted as the review coordinator.

NQA wrote to ENQA to request a review by ENQA against the ESG. The terms of reference were agreed and published in July 2022. The self-assessment report (SAR) was submitted to ENQA and was received by the panel on 28 November 2022. The panel was formally briefed by ENQA on 9 January 2023; kick off meetings were held on 1 and 6 February 2023 and the preliminary discussion held between the panel and representatives of the agency on 6 February 2023. A site visit took place 22-24 February 2023. The report was drafted between February and April. It was sent to the agency to be checked for factual accuracy in April.

The panel discussed the findings of the review and the judgements against each standard in depth and came to a consensus view on each. A number of the annexes to the SAR were submitted in Dutch. The panel requested that a small number of these were provided in English, and these were made available alongside the additional information requested by the panel. The panel met representatives from all the groups it wished to meet, with some individuals joining onsite meetings on-line. The panel, therefore, had access to the documents and stakeholders it wished to consult during the review process.

Self-assessment report

The agency delivered the first version of the SAR to ENQA on 24 October 2022. This was screened by ENQA to ensure it complied with the guidelines and the guidelines for the content of the SAR and was provided to the panel on 28 November 2022.

The panel considered the SAR to be more descriptive than reflective. It was disappointed that NQA's evaluation of its assessment process and their documentation was not analysed more fully. The panel learned that the SAR underwent several internal feedback rounds, nevertheless, it considered it would have benefited from the participation of external critical friends.

NQA explained during the site visit that commercial sensitivities impacted what it put in the SAR as a publicly available document, particularly with regard to its plans for future development. The panel understood and accepted this rationale.

NQA states in its SAR that it considers its internal quality assurance to be 'highly appropriate' and to lead to improvements, for example, annual updating of documentation. Although the SAR does not provide examples to illustrate the outcome and impact of NQA's internal quality assurance processes, the panel explored examples in meetings during the onsite visit and were provided with positive instances.

The panel found the accompanying annexes covering NQA's process and procedures to be of high quality and very useful in gaining an understanding of its ways of working.

Site visit

The site visit took place over three days at the offices of the agency. During the site visit the panel held 11 meetings. It met a range of staff from NQA, including the CEO, auditors and administrative staff, alongside external expert and student reviewers and those working for NQA as external secretaries on an ad hoc basis. Staff from HEIs included senior staff, programme-level staff and quality assurance officers; the panel also met representatives from NVAO. Fuller details are provided in annex I.

The panel found all those whom it met to be open and constructive, questions were answered in a spirit of frankness. The quality of the dialogue was good throughout the site visit with the level of engagement with the panel and the process was very positive. This openness and the thoughtful reflection in meetings fully overcame the issues with the SAR and ensured that the process was effective in both fulfilling the assessment against the standards of the ESG and in supporting quality enhancement through the dialogue.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

The higher education system in the Netherlands is a binary system with academic or research universities and universities of applied sciences and is fully aligned with the Bologna system. Research universities offer bachelor, master and doctoral awards (EQF levels 6 to 8) whereas universities of applied science may offer associate/short-cycle programmes alongside professional bachelor and master (EQF levels 5 to 7). Both sectors include both specialist providers and those offering a wide range of disciplines.

In 2021 there were 13 government funded research universities with 340,346 registered students (40.9% of total student numbers) and 36 government funded universities of applied sciences with 492,518 registered students (59.1%). The number of students has been rising and, over the period 2017-2021, the applied sciences sector saw an overall 9% increase in student numbers. The vast

majority of its students study at bachelor level (93% in 2021, with associate degrees and master representing 4% and 3% respectively).

There are about 60 private HEIs which focus primarily on life-long learning, short programmes and dual trajectories.

Associate degrees were given a distinct status from 2018, prior to this they had often constituted the first two years of a bachelor degree programme. Students may enter the labour market after completing an associate degree or may progress on to a bachelor programme.

NQA operates within the applied sciences sector of the system. This reflects its history as its origins are as that sector's quality assurance organisation before quality assurance was moved to be independent of the higher education sector itself.

QUALITY ASSURANCE

Nederlands-Vlaamse Accreditatie Organisatie (NVAO), the Accreditation Organisation of the Netherlands and Flanders, was initially Netherlands-only (as NAO) and was established following the introduction of programme accreditation through an amendment to the Dutch Higher Education and Research Act in 2002. Although NVAO was rapidly reconstituted to embrace both the Netherlands and Flanders the quality assurance systems are not identical.

NVAO has the legal power to award accreditation; it sets the Framework detailing the standards within which HEIs and external quality assurance operates in the Netherlands. The overall system reflects the basic four elements set out within the ESG, thus, each activity is based on a self-assessment, expert peer reviewers (including a student), a site visit and a published report. All final decisions are made by NVAO which also publishes the reports.

NVAO sets the overall schedule for programme accreditations within which programmes or programme clusters must work. Existing study programmes undergo accreditation on a six-year cycle with accreditation confirming the right to award a recognised degree and to receive public funding. For these established programmes accreditation no longer automatically expires after six-years but it may be withdrawn following a negative outcome or where appropriate and timely remedial action is not undertaken.

The current quality assurance system in the Netherlands has been revised or adjusted a number of times since it began operating in 2003. The main change has been the introduction of a voluntary institutional audit in 2011. This is conducted by NVAO and considers four standards at institutional level; a successful outcome means that programme accreditation will only focus on a limited number of the accreditation standards – referred to as the limited framework – thus easing the burden and degree of duplication at programme level. Institutions which have not undergone a successful institutional audit still have their programmes assessed against all the accreditation standards (referred to as the extensive framework). A second change, also made in 2011, was that the initial assessment of new programmes was made the exclusive responsibility of NVAO; new programme accreditations are for six years.

Following subsequent evaluations of the functioning of the system various adjustments have been made to the accreditation system, intended to improve consistency, extend ownership by the HEIs themselves and reduce the administrative burden on them. These changes include the introduction of cluster-groups of similar programmes and a re-designation of one of the standards.

A new Framework came into effective in 2017 with the transition completed by May 2018. Under this framework the extensive framework for programme accreditation contains 11 standards and the limited framework for programme accreditation (for those with a successful institutional audit) involves 4 standards.

Further adjustments were made later in 2018 – with a change in the wording of the outcomes in audit and accreditation reports and change to a three-point judgement scale for each of the standards (of ‘meets’, ‘partially meets’ or ‘does not meet’). The overall conclusion is couched as positive, conditionally positive or negative. NVAO makes the final judgement based on the report and discussions, where necessary, with the chair, panel and institution.

In summary, there are three types of external quality assurance activity:

1. institutional audit (review)
2. the evaluation and accreditation of new programmes and
3. the re-accreditation of established programmes (divided into those conducted under the limited framework and those under the extensive framework).

NVAO is responsible for the final decision on all three. NVAO is fully responsible for the first two, conducting both institutional audits and the evaluation of new study programmes. NVAO sets the framework and schedule for the process for re-accreditation, but it is not undertaken by NVAO.

The re-accreditation process for established programmes is owned by the programme seeking to maintain its accreditation i.e. formal responsibility rests with it. However, it must be undertaken under the auspices of an external panel secretary recognised by, and registered with, NVAO. Secretaries coordinate the process and produce the resulting report. Recognised panel secretaries may operate as individuals, directly contracted by a programme, or may be employed by a quality assessment agency. Quality assessment agencies themselves are an accepted part of the system but are not formally mentioned in the law underpinning it.

As responsibility lies with programmes, they may conduct the process themselves i.e. appoint a secretary and, with them, create the panel for approval, organise the process etc. However, it is far more usual for programmes to work together with a quality assessment agency, of which there are a number, drawing on its expertise and resources to oversee and manage the process. Agencies typically have panel secretaries who are staff members and a number who work with them on an ad hoc basis to help manage variable demand.

Alongside making the final decision on the outcome of the accreditation based on the report, the expert panel for accreditations/accreditation clusters must be submitted to NVAO by a given deadline for approval; panels are actively scrutinised by NVAO. Thus, it has input through the recognition of the secretaries, the approval of panels and in the final decision on accreditation.

NVAO explained that, starting from 2022 the checks to ensure that secretaries continue to meet its requirements for registration are yearly; it also provides training and continued professional development.

NETHERLANDS QUALITY AGENCY

The Netherlands Quality Agency was established in 2003 when responsibility for quality assurance was made independent of the higher education sector, (prior to this assessment was

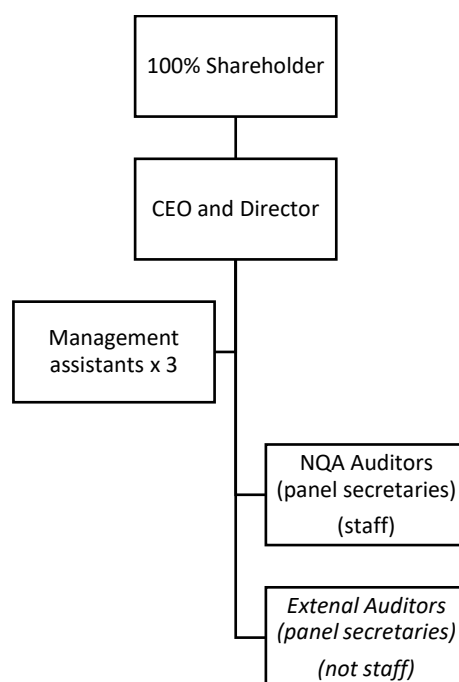
carried out by sector-owned predecessor bodies). It is a private company, 100% owned by a single director, the panel was informed that the owner-director is not operationally involved. NQA is managed by a CEO and director who has worked in this role since 2010.

NQA mission, as stated in the SAR, is 'to contribute to the continuous improvement of the quality of education regarding primary education, secondary education, senior secondary vocational education and training, higher education (professional and research) and company training'. Its vision for quality as given on its website is the continual investment in the professionalisation of its staff and the substantive standardisation of processes with 'Procedures and working methods [that] are balanced and uniform and guarantee a consistent process and production level.'

NQA explained to the panel that its vision was aligned with its ambitions to expand its work into other educational sectors. In practice its work is dominated by the higher education sector and its ambitions 2023-2028 are primarily focused on that sector. In terms of its vision for quality, the panel saw clear evidence of this vision in practice, in the culture of the organisation and in its day-to-day activities. It supports the professional development of its staff, had established standardised processes, making extensive use of appropriate technologies, and keeps these under review.

NQA'S ORGANISATION/STRUCTURE

NQA is a small organisation with a flat structure. There is no independent board, advisory committee or equivalent governance. It does not have internal committees or decision-making bodies. All staff report to the CEO.



The small size of the organisation enables ready communication and is supported by regular whole-team meetings.

NQA'S FUNCTIONS, ACTIVITIES, PROCEDURES

The primary work of NQA is the organisation and coordination of degree programme assessments on behalf of programmes to enable them to apply to NVAO for confirmation of accreditation.

Over the period 2017 to 2021 NQA has undertaken a total of 561 such assessments. There was one assessment of a programme overseas, which took place in 2018. As outlined above, programme accreditations are carried out in accordance with a schedule set out by NVAO and may be conducted under its limited framework, covering four standards, or the extensive framework of 11 standards. The number of assessments has varied over this five-year period due to the nature of the schedule and impacts of the Covid-19 pandemic. NQA organises assessments of associate degrees, bachelor and master programmes, with the majority being at bachelor level and under the limited framework. The numbers are set out in the table below:

Year	Associate degrees	Bachelor programmes	Master programmes	Limited framework	Extensive framework	Total programmes
2017	7	79	20	84	22	106
2018	5	84	9	91	8	98
2019	23	104	9	124	12	136
2020	8	82	8	90	8	98
2021	15	88	20	100	23	123
Total	58	437	66	489	72	561

International assessments are carried out on the same basis and for the same purpose as those within the Netherlands (with none carried out by NQA since 2018).

In terms of activity outside the scope of the ESG the number of research evaluations over 2017-2021 for universities of applied sciences is set out below:

Year	Research evaluations
2017	4
2018	4
2019	4
2020	5
2021	10
Total	27

NQA also carries out, or plans to carry out, other activity outside the scope of the ESG. As outlined above, this includes the certification of internal audit processes, a hallmark for study programmes, assessment services for professional associations, as well as other consultancy and training. NQA has not carried out a certification of an institution's internal audit processes, although it has developed a methodology to do so. Since these activities are not included in the scope of the review, the SAR does not provide information on volumes of activity for the award of its hallmark for study programmes nor for the assessments it has developed for professional associations, similarly numbers are not given on the training and consultancy offered.

NQA'S FUNDING

NQA is a private company, it does not receive public funding, its primary income is derived from the assessment activity it undertakes for universities of applied sciences. Minor income streams include some consultancy with the same sector and, more recently, some research evaluations. All income has to be won by obtaining contracts from clients and competing for tenders.

The schedule of programme assessments is set by NVAO and the volume of activity has varied by year because of variations in the schedule; there were also delays due to the Covid-19 pandemic before activity was moved online. This has meant that income has varied as have the overall financial results. The forward planning of programme assessments will mean that activity is more even over the period 2023-2025.

Over the five-year period from 2017 NQA has seen its operating results range from a substantial surplus to a projected deficit, however, it is clear that with variations in the schedule known, these variations are fully taken into account in financial planning. Overall, only around 5% of turnover is derived from activity other than programme assessments.

NQA lists its clients on its website and, alongside working with the publicly funded HE sector in the Netherlands at home (over 50 institutions) and abroad (four institutions), NQA indicates that it works with 39 non-government funded HEIs plus a further two abroad and some 20 other organisations.

FINDINGS: COMPLIANCE OF NQA WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

2018 review recommendation:

- The review panel **recommends** establishing an advisory committee with the participation of different relevant stakeholders
- The review panel **recommends** the formalisation of a strategic plan to reflect on its objectives.

Evidence

NQA is a private limited company. It works independently within the accreditation framework set by NVAO, which is the only legal entity recognised by the Ministry of Education, Culture and Science as a Quality Assurance Authority in Higher Education in the Netherlands. Further details on how NQA works within the Dutch system is provided in the section on ESG 3.3 below.

The activity of NQA is set by its mission stated in the SAR: 'to contribute to the continuous improvement of the quality of education regarding primary education, secondary education, senior secondary vocational education and training, higher education (professional and research) and company training'. This mission statement is not publicly available on NQA's website. NQA also provided the panel with its Ambitions 2023-2028, this document essentially sets out the agency's strategic plans, it is not publicly available as NQA regards it as commercially sensitive.

The agency is directly managed the CEO of the agency, and it has no board or advisory council. The main activities of the agency stated in the SAR, and confirmed by the site visit, are the coordination of the assessment of the programmes, consultancy, and training. The final decision-maker for the operation of NQA is the director, who reports to the owner. There are no regulations regarding this interaction and this relationship was not subject to discussions during the site visit as NQA indicated early on that there would not be any relevance. There is no further structure involving any external stakeholders in terms of supervision, advice or reporting.

NQA functions within the NVAO accreditation framework. Under this system, panel secretaries are trained and recognized by NVAO. NQA is contracted by an HEI client and will then allocate a secretary to coordinate the review. Its secretaries are either appointed members of staff (referred to as NQA auditors) or are external secretaries hired for a specific review or set of reviews. Secretaries oversee

and organise the review on behalf of the commissioning programme or HEI. Under the system in the Netherlands there is no obligation to hire an agency to coordinate an assessment for a programme, a programme may manage its own assessment, based on hiring a secretary.

As it is stated in SAR and confirmed during the site visit, NQA has done 561 programme assessments in the last years (2017-2021).

The ENQA review from 2018 recommended the establishment of an advisory committee with the participation of different relevant stakeholders. Based on discussion with the director, NQA sees its stakeholders as NVAO, the Ministry of Education, Culture and Science (although there is no direct involvement with the Ministry), the HEIs which have a contract with it and its peer review experts.

From the discussion with representatives of the HEIs, they believe that NQA has an important role in their activity in terms of quality assessment. Those representatives of HEIs met by the panel clearly reported that are satisfied by the activity performed by NQA. They acknowledged that they do not have a role, beyond aspects of the operational, in providing their opinion in NQA's activity.

During the site visit the panel explored the relationship between assessment and consultancy. The SAR indicates that consultancy and assessment is separated, and this was confirmed by the director during the site visit. It was also confirmed that a 5-year rule underlies the approach to conflict of interest with regard to consultancy.

Analysis

The panel has assessed in detail the activities, policies and processes for quality assurance done on a daily basis by NQA. The focus of NQA is the assessment of the programmes from universities of applied sciences. This is reflected in the high number of assessments done between 2017 and 2021, even in the COVID-19 pandemic. The mission and objective of NQA are stated in the SAR and also in Ambitions 2023-2028. None of these is available on NQA's website. It was, however, evident in meetings with staff that there is a clear and shared perception of the mission and objective and that this is reflected directly into their daily work. The panel notes the information in the SAR about the relatively less formal nature of NQA's approach to planning and regards NQA's Ambitions document as an acceptable strategic plan and response to the recommendation from 2018. The panel also accepts the commercial sensitivity of future plans but would encourage NQA to make its mission statement publicly available through its website.

NQA's director is its principal decision-maker. The panel investigated the checks and balances used by NQA to prevent all matters from being shaped primarily by the single perspective of the director and CEO. Office team meetings involving all staff are organised weekly and it was clear to the panel from meetings that these enable open discussion, that staff feel that their voice is heard. Further, it was also evident to the panel that staff are empowered in their work and trusted to perform.

NQA does not involve its stakeholders in its governance. The panel confirmed that NQA does not have an advisory board or committee. The recommendation from the review in 2018 to establish an advisory committee with the participation of different relevant stakeholders has not been followed up and has not been established by NQA. In the SAR NQA explains that it does not see the added value in such a board or committee, however, the panel cannot fully agree with the explanations outlined. Clearly a traditional model of stakeholder involvement may not be appropriate for NQA due to the limited nature of its mandate. However, alternative ways of stakeholder involvement are open and could be tested and explored. NQA's stated future ambitions will be less easy to identify, develop, pursue and realise without this kind of stakeholder involvement. Even if theoretically possible to

develop such ideas and offers as an agency, such proposals are unlikely to develop their full potential without a clear stakeholder footprint. To this extent this clear shortcoming of NQA structure is also a limiting factor of its future development. For NQA more formal stakeholder involvement might not be a quick win, but is a strategic requirement connecting them more holistically to the sector. Consequently, the panel continues to urge NQA to consider a way to enable it to take advantage of fuller, regular collective discussion with its stakeholders and to involve them in its governance work.

NQA explained that it has a connection with the individual HEIs which are its clients and stakeholders. Client HEIs opinions are taken into consideration, an evaluation form is sent to the commissioning programme after each review for it to complete, and there are regular account management meetings with each client. However, the HEIs are not consulted periodically or collectively in order to gain a wider perspective on NQA's work as a quality assessment agency.

The wider entities considered by NQA as stakeholders, in reality have only a small involvement in NQA activity. As NVAO sets the accreditation framework, they have some meetings with agencies like NQA, but their opinion is not a strong word for NVAO; NVAO uses these meetings to provide feedback to NQA on its work. The Ministry of Education, Culture and Science does not recognise quality assessment agencies in law and so it has no direct role with NQA. Consequently, its context puts NQA in a specific situation whereby it has less access to some traditional stakeholders. Hence it is even more important for the agency to develop its own approach to meaningful stakeholder involvement in line with the spirit of the ESG instead of neglecting their relevance.

The commitment of NQA to seek to ensure that there is not a conflict between its assessment and its consultancy services was explained in the SAR and in meetings, together with the approaches NQA utilises to underlie that commitment. Consultancy and other services outside assessment, such as training, form a small part of the overall business profile and the approach is generally satisfactory. The approach is focussed on the separation of the involvement of individuals within the organisation. Within the review the panel found no evidence for concern. However, putting the decision with regard to consultancy on what is acceptable and what is a conflict of interest in the hands of the CEO who, by definition, needs to consider business interests is structurally weak and vulnerable. Consequently, NQA is advised to formalise and publish its internal conflict of interest processes and procedures. This will be especially important should consultancy and other forms of activity increase as planned.

Panel recommendations

1. The panel **recommends** that NQA develops formal ways to involve stakeholders in its governance, above and beyond their involvement through direct client relationships.
2. The panel **recommends** that NQA makes its mission statement publicly available through its website.
3. The panel **recommends** that NQA should develop a suite of clear processes and statements (which are then published on the website) that outline how the consulting and assessment parts of their operations are separated and no conflict of interest or compromise of independence is ensured.

Panel suggestion for further improvement

1. The panel **suggests** that additionally NQA should consider establishing mechanisms to enable it to have collective discussions with a range of stakeholders. This would enable shared learning, debate about options and possibilities and generate insights that would enhance assessment activity and support the development of further products and services.

Panel conclusion: Partially compliant

ESG 3.2 OFFICIAL STATUS

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

Evidence

NQA is set up legally as a limited company in the Netherlands. It is a private company, 100% owned by a single individual who is not operationally involved.

The SAR outlines the system of quality assurance in the Netherlands. The Ministry of Education, Culture and Science recognises NVAO as is the body formally responsible for the quality assurance system and quality assurance decisions in higher education in the Netherlands. NVAO defines the overall quality assurance framework and makes all final decisions. It approves and maintains the register of recognised panel secretaries; all programme accreditations must be conducted by a recognised panel secretary. Panel secretaries may be contracted directly by a programme or be employed by a quality assessment agency.

Since 2011, the formal position of assessment agencies (such as NQA) has been eliminated from legislation (Higher Education and Research Act) and the linked NVAO assessment frameworks. Meetings confirmed that formal official status for NQA (and similar agencies) is absent, with NVAO as the formal decision-taking and regulatory body. However, the significant role of NQA and similar agencies was also confirmed by NVAO and by representatives from HEIs met by the panel.

Quality assessment agencies such as NQA, therefore, operate at a different level within the system. They must work within the framework set by NVAO. Such agencies play a significant role in the system even though they do not have a defined role in it under legislation.

In operational terms quality assessment agencies are recognised, for example, in the meeting with NVAO the panel heard that it met with each quality assessment agency each year and provided feedback on their work. Across the system around 90% of all programme accreditations are coordinated by a quality assessment agency.

Universities of applied sciences make extensive use of NQA's services. NQA conducts assessments of programmes on behalf of the programme. NQA assessments result in a report, produced by the panel secretary, based on the judgements of an expert panel. It is the programme that submits the report to NVAO which is the body responsible for decisions on programme accreditation or reaccreditation based on the report.

Analysis

Due to the legal context in the Netherlands, NQA is not recognised in legislation by the Ministry of Education, Culture and Science. NVAO is the legally recognised organisation responsible for setting the accreditation framework in the Dutch higher education system. Within this, the reports produced through agencies such as NQA are the basis for decisions on accreditation or reaccreditation of programmes. Evidence showed that representatives of HEIs met by the panel see NQA as a trusted partner in their accreditation process. With 561 programme assessments undertaken between 2017 and 2021 by NQA is an indicator of its status as a trusted agency which has a real impact in supporting quality assurance at programme level.

In practical and operational terms, therefore, both HEIs and NVAO recognise NQA as a quality assessment agency with an effective and beneficial role in quality assurance in higher education. Consequently, the panel considers that NQA is recognised as a quality assessment agency in the Dutch educational system and meets the standard as well as by being a registered company with a clear legal identity.

Panel conclusion: Compliant

ESG 3.3 INDEPENDENCE

Standard:

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

2018 review recommendation:

- The review panel **recommends** establishing stricter internal procedures in order to further organise consulting and assessments.
- The review panel **recommends** that NQA stresses the importance of including some international experts in the panels to institutions being reviewed. (see 2.4)

Evidence

NQA clearly outlines in the SAR that it is, organisationally, an independent agency, with a private character and, as such, is totally independent of the government or the Ministry of Education, Culture and Science with which it has no links. The agency is managed by a director who, similarly, has no formal links to the government.

The SAR, supporting information and meetings all detail how, in undertaking assessments NQA has operational independence from the HEIs/programmes that contract it as an assessment agency. The review panels are formally proposed to NVAO by programmes within the Dutch higher education system (as set out in Assessment framework for the higher education accreditation system of the Netherlands. September 2018).

Programmes may suggest individuals for a panel, NQA can also propose panel members from their expert's pool to the programme. NQA undertakes much of the work to create a panel for its clients, drawing on its pool of experts, and checks panel composition to be sure that any conflict that may

affect the independence of the review is avoided. Within the Dutch system, all the panel members are required to sign a conflict-of-interest declaration. The proposed panel is submitted to NVAO, who will undertake a second check for possible conflicts and may raise queries, before formally accepting and appointing it.

Evidence in the SAR and from meetings confirmed the separation of commercial and assessment activity, further supporting operational independence (see 3.1).

The conclusions of the assessments are those of the panel and are agreed by all the panel members (i.e. there is independence of formal outcomes). Based on input from the process, the appointed secretary from NQA writes the report. The report is then sent to the panel members and to agree before being finalised. The programme that contracted NQA for assessment has no implication in writing the report (beyond factual accuracy). After the panel agrees on the conclusions of the report the report is sent for factual errors to the programme and is then sent by the programme, as owner of the process, to NVAO for its final decision of accreditation or reaccreditation.

Analysis

This standard of the ESG is interpreted in the context of the particularities of the Dutch educational system. Based on the evidence presented, the panel confirms that NQA is organisational independent and works completely independently from the Government and the Ministry of Education, Culture and Science and has no obligation to it. NQA has its legal basis as a private company which is contracted by HEIs/programmes for assessments and sometimes for consultancy.

The evidence confirmed that NQA has established a well-organised system in order to assure their operational independence in terms of assessments done by the agency and also in terms of the required independence of panel members. Because the Dutch quality assurance system stipulates that the panel members are formally proposed by the programme, there is a clear system to assure the independence of the reviewers. Review panel members must sign a conflict-of-interest form to confirm that they do not have any conflict of interest regarding the assessment. NQA will manage this on behalf of programmes where it is involved and, prior to this, checks for possible conflict of interest between the chosen experts and the programme that is going to be assessed. Once submitted to NVAO, the proposed expert panel is scrutinised by NVAO before being confirmed and appointed. The panel considers that the independence of the experts is assured by the system and that NQA adds clear value to the process. It should be stressed that the secretary conducting an assessment must have no previous connection with the assessed HEI and this practice is also carefully ensured by NQA.

Panel conclusion: Compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

2018 review recommendations:

- The review panel **recommends** that NQA includes thematic analysis as one regular activity in its planning.
- The review panel **recommends** using a part of the budget and the experience and knowledge of internal and external secretaries gained from various assessment procedures in order to conduct those thematic analyses.

Evidence

In the SAR NQA identifies a range of thematic work which it has conducted, but also places responsibility for undertaking thematic analyses within the Dutch system with NVAO as it both makes accreditation decisions and publishes reports from the whole higher education sector.

NQA refers in the SAR to a number of thematic pieces and similar activities, and its participation in the thematic analyses of others, despite the fact that not it is not paid for all such work. NQA produced a thematic analysis in Sept 2022 on the Experiment Learning Outcomes which is published on its website. NQA also identifies other thematic activity in the SAR including yearly lectures on developments of its assessment procedures, and participation in accreditation cluster groups.

Within the Dutch system different assessment agencies are usually involved in the assessment of degree programmes in a specific domain and no single agency has a complete overview, thus, NQA explains that NVAO is in the better position overall to execute the thematic analyses. NQA states that it would welcome further thematic analyses by NVAO and recognising the value of this work.

NQA further mentions in the SAR that the degree programmes ask them to do the assessment and have little interest in the thematic analyses, and also do not pay for them. Nevertheless, NQA states in the SAR that it has formulated the goal of undertaking a thematic analysis once every two years and furnishing the necessary means to make this possible. Covid is mentioned by NQA as the reason why this has not been realised to date. However, in the SAR no information is given on what the original plans were for the thematic analyses and when they would have been executed.

During the site visit, the director and the agency staff report that they already executed several thematic analyses, herewith following the recommendations of the previous ENQA review. They refer to the talk with student organisations to optimise the work of students in review panels, and the analysis on Experiment Learning Outcomes. They emphasised the small size of the organisation, that the work is not paid for and being financially limited in what they can do.

In looking back when drafting the SAR NQA identified more thematic work than they had realised they had undertaken. The director said that this was unexpected and that they were glad, with the benefit of listing their output over a number of years, that they met the recommendation of the first ENQA review more thoroughly than they had thought.

In terms of forward plans, the director and the agency staff report during the site visit that they were considering executing a thematic analysis on programmatic testing and a staff member had been identified as responsible person to develop this for publication in 2024. It was stressed that this will be a hands-on type of report, not scientific research. When the report is ready it will be shared with the stakeholders.

Analysis

The analysis on Experiment Learning Outcomes published in 2022 on the website is a good example of what thematic analysis can mean for NQA. This was clearly a useful piece of work that provided valuable insights for the sector.

However, in the view of the panel most of the examples of thematic analysis listed in the SAR are not thematic analyses as defined in the standards, although they create added value and are worthwhile pieces of work. For instance, a requested analysis of three BA programmes Midwifery does not really qualify as a thematic analysis as it does not describe or analyse the general findings of the external quality assurance activities.

It was clear from meetings that the plans mentioned in the SAR, following up on the 2018 review, to execute a thematic analysis every two years were yet to be fully fleshed out and realised. When plans for the future are not made more specific, including a clear timeline, this increases the likelihood that it will be postponed and the panel would encourage NQA to draw up firm forward proposals.

The panel recognises the limitations of the fact that different assessment agencies are involved in the assessment of degree programmes in a specific domain, and that no single assessment agency has a complete overview, but also notes the richness of the information resources available to NQA as the basis of thematic analysis. Similarly, the panel notes the argument that thematic work is not possible because, on a simple level, NQA is not paid for it and there may be little apparent willingness to do so. However, it also considers that demand could be created by working with HEIs.

NQA has not fully taken up the recommendations of the 2018 review to proactively engage in producing and publishing its own thematic analysis that would describe and analyse the general findings of NQA's external quality assurance activities. The panel would like to stress again that it remains important for any agency, as a form of its own quality assurance, to evaluate the findings in reports and reflect on any common themes arising from them. The experience of other agencies has shown that such work is of interest to the higher education sector and can encourage it to engage in debates about quality including challenges, changes and enhancements.

NQA is involved in many programme assessments, so it has enough material and information to regularly reflect upon the general findings of its external quality assurance activities. With greater stakeholder involvement in NQA, this reflection can be generated together with stakeholders from HEIs (programme chairs, quality assurance staff etc.) to provide the greatest added value for these 'clients'. The added value of thematic analyses, where a published report is combined with, for example, critical reflection sessions once a year with HEI representatives, or with workshops on good practices, may also be an additional service given to HEIs who choose NQA. Stakeholders met by the panel commented on the knowledge base available to the agency recognising the value it contains for them.

Panel recommendations

1. The review panel **recommends** that NQA includes regular thematic analysis in its plans.
2. The review panel **recommends** using the experience and knowledge of internal and external secretaries gained from various assessment procedures to conduct those thematic analyses.

Panel suggestion for further improvement

- I. The panel **suggests** NQA organises activities (for example: workshop sessions or events) to exploit the knowledge and insights resulting from the regular thematic analysis of the findings of its assessments. Such activities would benefit NQA as well as its HEI stakeholders.

Panel conclusion: Partially compliant

ESG 3.5 RESOURCES

Standard:

Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

2018 review recommendation:

- The panel **recommends** to NQA to look at measures to keep valuable staff members engaged in the organisation during the periods with a low workload.
- The panel **recommends** that NQA increases the interaction between internal and external secretaries.

Evidence

According to the SAR, the income of NQA is derived fully from the fees it charges to institutions for services provided. It is an independent and private organization, that operates fully independently from any kind of public funding or indirect payment through the government or governmental bodies. The annual budgets presented indicate from 2018 onwards an annual surplus that saw a substantive decrease in 2021. The budgets include the options of financial losses for individual years. The panel carefully reviewed the relationship between number of assessments carried out and financial stability, and also learned from the SAR as well as the interviews on site, that in the past the number of assessments fluctuated considerably due to the requirements institutions had to meet under the schedule set by NVAO. This resulted in fluctuations in income for the agency. The panel learned that as part of NQA's internal financial planning, financially strong years would be used to create the financial pillow for years with fewer assessments. This was confirmed orally during the site visit by NQA management and - with regard to the fluctuation in the schedule - also by NVAO.

The panel learnt, both from the SAR and from meetings, that due to new scheduling, the annual fluctuations are expected to reduce with the number of programmes to be reviewed per year distributed more evenly. This new schedule forms the baseline of the financial projections from 2023 to 2025.

Regarding human resources, the panel found relative stability in the permanent staff of the agency with a longstanding Director, three experienced staff members working in the secretariat and a team of around seven internal auditors who are supported by a flexible group of 5 to 7 external auditors. As described in the SAR and confirmed during the interviews, one of the internal auditors acts as the key contact for the external auditors. Relevant information from staff meetings is actively forwarded to the external auditors from the coordinator. Interviews with the external auditors indicated that they feel well integrated and respected. Interviews with institutions indicated that they are not aware of

the distinction between internal auditors and external secretaries and do not feel any difference if an assessment is supported by an internal or external auditor.

The internal quality manual and the supporting procedures linked to employees were comprehensive and included matters such as recruitment and selection, onboarding, performance and assessment and training and development. The panel were told in meetings that both internal and external secretaries shadow an assessment before co-ordinating one.

Analysis

The panel carefully reviewed the presented financial statements, and also requested additional documents, providing a more in-depth view of the income of NQA over past years, as well as the outlook for the next three years. The numbers indicate that NQA works based on financial stability. The core staff provides a solid basis for its operation, and the available flexibility through external auditors enables the organisation to benefit from additional human resources should the number of assessments require it.

Other areas of operations present less than 5% of the turnover of NQA and are consequently of limited importance at this time. Initial concerns of the panel regarding the impact of financially weaker years, or even a net loss, were contextualised well during the interviews and explained to be a result of fluctuation in the assessment schedule and, as such, could be accommodated by planning. Also, considering the expected levelling in the number of procedures due to new regulations and scheduling, the panel concludes that these fluctuations do not negatively impact the financial adequateness of resources of NQA.

Existing risks to the financial situation of the agency are more of systemic nature as its core business is the coordination of programme reviews (assessments), while there is an ongoing debate in the country about potentially moving to institutional accreditation. However, the panel received consistent feedback throughout all interviews that the debate on systemic change is part of a broader discussion in the country, and no reliable projection, on specifics, or even the timeline of the change can be done.

Considering the human resources, the panel was impressed by the high quality of NQA staff, both its auditors and, in particular, the administrative team in the office. The panel perceived all interviewed staff members as positively engaged, capable of independently running their field of work while acting as a team. An open mindset and clear commitment to continuous improvement was visible during the interviews and is interpreted by the panel as a strong element of institutional identity. The impression of the panel is also supported by clear praise of the interviewed institutions for rigorous work of auditors, and also the structured and responsive nature of the work of agency administrative staff.

Based on the evidence presented, the exchange and coordination of internal and external auditors seems to be implemented well to the extent that, for the outsider in everyday operations, it is not visible if the auditor is an external or internal one. One NQA auditor acts as a communication link with external secretaries and interviews showed that this worked effectively and ensured that external secretaries were kept informed and up-to-date. The assessment schedule is due to become more even and this will remove much of the pressure of managing staff numbers and workflow reflected in a recommendation from the 2018 review.

The panel also found a good mix of new staff and more experienced ones, recognizing that the implemented onboarding procedures help new staff to arrive quickly and enable them to work independently after a short time. Existing shadowing mechanisms are the same for external and internal auditors, which further helps to mitigate potential differences between them.

The nature of the agency implies that all staff are heavily focused on operations and no particular resources are available for reflective parts of the work. The panel concludes that to a high extent this is the result of the systemic design of the accreditation system in which agencies are service providers for institutions.

Panel commendation

- I. The panel **commends** the quality of the secretaries employed by NQA, both those on staff and those employed on an ad hoc basis, and notes clients do not see the distinction between the work of internal and external secretaries.

Panel conclusion: Compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

2018 review recommendation:

- For NQA to ‘reflect about ways to intensify the communication with the authorities and other relevant stakeholders in order to collect greater feedback about procedures and their effectiveness and relevance’.

Evidence

The SAR states that NQA has an established internal quality management manual which covers business processes as well as quality assurance and is further supported by a series of separately documented more detailed specific procedures (e.g. covering personnel and financial matters). Processes covering professional conduct, including performance, appraisal, training and development, are noted in the internal quality manual which indicates that they are detailed in the staff handbook and linked process documentation. Expectations on professional conduct are also set out within the relevant assessment method manuals (see ESG 2.2 and 2.3).

The approach to continuous improvement is based on the PDCA cycle and makes use of a programme of internal audits. These audits are based on the components of ISO 9001 and systematically cover the six headings over each three-year period. The agency is ISO 9001 certificated and undertakes the necessary actions and processes to maintain its certification. NQA also draws on the Instituut voor Nederlandse Kwaliteit (Dutch Quality Institute).

The SAR additionally lists documents and processes, including routine evaluative working practices established to ‘safeguard the quality and integrity’ of its work. These include the manuals for panel members undertaking audit visits and a range of supporting documents. The manuals capture important working principles, such as ‘four-eyes,’ and reiterate the expectations set out by NVAO (for example on the independence of panel members and competence profile for the chair of the panel).

Each assessment is systematically evaluated with views gathered from members of the expert panel, the programme and from the panel secretary. The outcomes from these evaluations are used to improve service delivery and, to some extent, individual performance.

The SAR notes regular meetings between the NQA account manager and individual institutions. These are described as dynamic consultations that help shape future assessments. There is no documentation linked to these meetings that records the details of what is discussed, or which collates the outcomes, however information gained is shared in internal team meetings.

The meetings with panel secretaries demonstrated the commitment to support and training with all panel secretaries, whether they are external and contracted for particular reviews or are permanent staff, reporting that they shadowed an NQA programme accreditation before they were allowed to lead one.

The rigour and consistency of the implementation of internal quality assurance processes, including of the quality of assessment reports and assessment outcomes, is detailed under standards 2.3, 2.5 and 2.6.

Analysis

The panel found that the internal quality documentation and the processes that support the operation of assessments by NQA to be well developed and effective. Internal office procedures are very well developed, they draw on appropriate technology (online portal, data bases etc.), are streamlined and support the work of the administrative team to deliver a good client-oriented service. Of particular note were the daybook and the detailed schedules for visits. Based on the presented evidence the panel believes that procedures and processes are kept under review and actively improved as needed. The internal quality manual benefits from NQA's nature as a small organisation enabling a full range of practices to be covered effectively in a single, succinct document, in the view of the panel it is particularly comprehensive and thorough.

NQA does not, however, routinely record all aspects of practices e.g. account management meetings. Further, there are no internal organisational structures such as a quality committee or assessments committee, thus there is limited potential for the agency to demonstrate how it reviews its processes and its effectiveness, how it takes stakeholder views into account and how the collective consideration of evidence is used to revise approaches. Similarly, NQA does not have any structural means, such as an advisory board or quality committee, that enables it to bring stakeholders together and allow stakeholders to discuss and debate quality assurance with the agency.

Information is considered by NQA and views do feed into it, but much of the consideration of views and of information is undertaken by the director and primarily shared through him. However completely and competently this is done, it lacks transparency, and it is not possible to assess if the resulting decisions or outcomes are a fair and balanced result. An overview over time is also harder to establish.

The panel regarded the recommendation made in 2018 to have been mainly addressed in that assessments are routinely evaluated with evaluative questionnaires and, more recently, occasional meetings with expert panel members. Whilst NQA is not in a position to initiate regular meetings the fact that NVAO invites agencies to annual meetings and uses these to provide feedback has enabled it to gain information about perceptions of its performance. However, as noted under 3.1 above, NQA does not engage with its HEI stakeholders in ways that would enable a range of views on the

effectiveness and relevance of its procedures to be discussed. This would benefit both NQA and those with whom they work.

Two suggestions made by the review panel in 2018 remain good advice for consideration by NQA. There continues to be value in developing and publishing a code of conduct for staff and panel members, this would demonstrate the values and integrity of the agency and could serve to clarify its stance on any matters that arise. The 2018 review also noted 'that the meetings with the Director, to analyse the outcomes of the feedback, could be more formalized.' Again, this remains pertinent as it would enable the collation and analysis of feedback over time. The 2018 report suggested the development of a Quality Committee as a possible option and is one way in which stakeholder engagement in quality enhancement could be enabled.

The commitment to support and training and the willingness to invest in it, including through high cost activity such as shadowing, to ensure the quality and consistency of the work of panel secretaries is commended.

Panel commendations

1. The panel **commends** the quality of NQA's internal quality manual, the developed processes and the process documents that support their procedures.
2. The panel **commends** the professional conduct of NQA staff, noting especially the knowledge and commitment of the administrative team and that both panel secretaries and the administrative team are valued by clients.
3. The panel **commends** the commitment to support and training to ensure the quality and consistency of the work of panel secretaries.

Panel suggestion for further improvement

1. The panel **suggests** that NQA should consider developing and publishing a code of conduct for staff and panel members, this would demonstrate the values and integrity of the agency and could serve to clarify its stance on any matters that arise.

Panel conclusion: Compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

Evidence

The SAR records NQA's intention to undertake an ENQA agency review every five years to demonstrate its compliance with the ESG. The SAR includes the required section detailing how the agency has followed up on the recommendations of the previous 2018 report. In a number of instances, the information presented in the SAR provided arguments as to why NQA had not taken action on

recommendations and why it believed that the matter did not apply or why taking action would not add value to NQA.

Legislation in the Netherlands does not require external review agencies to be members of ENQA and does not require them to be registered on the EQAR. The panel heard that NQA hoped to gain from the engagement and the feedback it would provide on its work and operation.

Analysis

By virtue of undertaking this review this standard is met. From interviews with agency representatives, the panel learned that NQA was positively seeking to obtain useful feedback from participating in a peer-led periodic external review as well as to maintain its membership of ENQA.

The guidelines for 3.7 emphasise reflection and the cyclical review process as a means for assuring the agency and its stakeholders continue to adhere to the principles enshrined in the ESG, the following analysis links to the guidelines. The panel noted that NQA had made progress on some of the recommendations made in 2018 but believes that it did not always show in its consideration of other recommendations a dedication to finding ways to enable it to demonstrate its commitment to the ESG in its own right. Having said that, the panel fully accepts that the nature of the Dutch system provides a challenge to agencies in this respect and has taken this into account in assessing NQA against a number of ESG standards. The panel also acknowledges that the Covid-19 pandemic likely impacted on the ability of NQA to make as much progress as it wished in some areas. However, the panel also noted that NQA was not planning to take action on some recommendations, either because it considered that standard did not fully apply or because changes to NQA's practices would not, in its view, add value.

The panel would encourage NQA to move towards an approach built on showing well how it seeks to address all ESG standards for itself, as its responsibility for doing so is clear under ENQA's Guidelines. The panel noted that some recommendations had not been acted upon, including under 3.1 and only limited action had been taken with regard to 3.4. The panel fully understands that an agency, such as NQA, that supports an assessment framework set out by a higher-level body has to work within that wider framework, but it does also need to demonstrate that it meets the ESG in its own right. This tension is not easy to overcome, and it might raise the question on how ESG compliance can be achieved in a system with divided roles / shared actors (see Additional Observations).

The panel considered that greater critical self-reflection, more openness to different ways of working, the involvement of a fuller range of stakeholder and a more expansive notion of value could open up real opportunities for NQA to offer additional services and strengthen stakeholder relationships. This greater ownership - while being an investment - would help develop NQA as an organisation that is also an attractive (business) partner for the challenges of tomorrow.

Panel recommendation

- I. The panel **recommends** NQA develops plans to take fuller responsibility for meeting the ESG in its own right and to demonstrate how it achieves this [3.7].

Panel suggestion for further improvement

- I. The panel **suggests** that NQA further develops its capacity for critical self-reflection.

Panel conclusion: Compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part I of the ESG.

2018 review recommendations:

- The review panel **recommends** that NQA could demonstrate in its procedures and guidelines more the ties between the standards of part I ESG and the standards in the programme assessment frameworks, in order to strengthen the awareness of panels and institutes.
- The review panel **recommends** NQA to evaluate in how far the ESG standard 2.1 is effectively addressed during the programme assessments and communicate its findings to the relevant stakeholders.

Evidence

The framework NQA implements is designed and defined by NVAO within the legal requirements defined for the work in the Netherlands by the relevant laws. Consequently, the surrounding framework and requirements are out of the hands of the agency itself, its role is to operate assessment procedures on behalf of programmes within the parameters of the framework. In the SAR, the agency makes reference to the framework and charts how activity aligns with it and with the ESG. NVAO itself was subject to a full review against the ESG in 2017 and a targeted review in 2022. This chart is reproduced below:

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

The SAR and the chart also explain that the combination of reviews an institution is required to undergo collectively cover ESG part one. In cases where only the limited framework is implemented

as part of a programme review, it is not intended to cover the elements of part one of the ESG that have already been reviewed through an institutional audit. The extensive framework covers all the elements of the ESG, Part one.

NQA explains in its SAR that the recommendation to make clearer references to the elements of ESG Part I in their procedures would not work successfully, particularly where only the limited framework is implemented. NQA made reference to national legislation preventing them from doing so. In the interviews NQA management explained that, given the two-tier system with its split responsibilities and combination of a limited and extensive framework, adding references to Part I standards in their manuals, alongside the standards of the Dutch framework, would confuse programme teams and experts in their work.

During interviews with programme coordinators and reviewers the panel learned that in the procedures references to the frameworks of the Netherlands are clear, while links to the ESG could not be remembered by the interviewees. Furthermore, representatives of NVAO explained that in the design of the framework, for the Netherlands the ESG 2015 were intentionally kept in mind to assure good coverage.

The panel also consulted published reports to identify the extent of ESG coverage through the standards. The panel used the NVAO database and identified reports of reviews coordinated by NQA. The analysed reports generally follow the same structure, depending on the scope of the activity, and also indicate that the review was coordinated by NQA. They clearly reference the standards of the respective frameworks. The panel found them overall comparable with regards to level of detail and analysis.

Analysis

Carefully analysing the frameworks of NVAO implemented by NQA it becomes obvious that across the totality of the Dutch framework ESG Part one standards are clearly covered. This is not only supported by the alignment table, and also by the conclusions of previous reviews of NVAO, but also evident when carefully reading published reports. Whilst reference to the ESG is not explicit, it can be confirmed that each of the respective topics are covered with the Dutch interpretation of each standard (and that the recommendation from 2018 has been addressed).

The panel carefully considered the recommendation to make more explicit reference to the ESG in NQA procedures. Based on the conversations and published documents the panel does not agree with the NQA statement that national legislation would prevent it from doing so, however, the legislation also does not require it. With the complexity of different layers and interdependent procedures the added value of a more explicit reference can indeed be questioned. This is further supported by the fact that institutions clearly know the standards in the Dutch framework well and referred to the different standards involved in the discussions. It was equally clear that any parallel reference to the ESG was not a priority for HEIs and that they trusted the system to ensure that wider expectations continue to be met. At this point the panel concludes that with the systemic choice of the Netherlands to give large ownership and responsibility for continuous external reviews to the institutions, the main responsibility for the demonstration of the ties from ESG to the national framework and its respective communication lies with NVAO as the body defining the framework. Hence the panel believes it remains within the autonomy of NQA to decide how explicitly these links need to be within its procedures.

Panel conclusion: Compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

Evidence

NQA explains in its SAR that the NVAO framework for programmes was established following consultations with the umbrella organisations for publicly funded and private universities, as well as quality assessment agencies, student organisations, and employers' organisations. NQA itself also expressed its opinions to NVAO on the development and revision options for the accreditation and assessment framework. The interviews confirm the clear separation that was already indicated under standard 2.1 i.e. that the design of the framework lies within NVAO while the application of the methodology and much of the operational detail within this is for the programme together with any agency and secretary it works with. NVAO confirmed that, working with the client programme, agencies are free, for example, to design the nature of the site visit, its length and the overall approach; their role is to work on behalf of the programme to deliver a report that will enable it to make a decision.

It is also explained in the SAR that in the current framework, external secretaries play a larger role in the preparation of the panel and assurance of the quality of the site visit.

The panel also consulted the NVAO explanations on stakeholder involvement for the design of the methodologies published in their SAR as well as the external evaluation report.

NQA creates guidebooks based on the Dutch framework to ensure the correct implementation of the methodology; these guidebooks are regularly revised to assure fitness for purpose and reflect feedback. During the interviews, the panel learned that there is at least an annual revision of the guidebooks that also includes the experiences of the auditors over the past year and from evaluations.

Analysis

The analysis of the standard once again has to refer to the fact that NQA has limited freedom in the design of the framework, as this is 100% done by NVAO. On the basis of the analysis done, the panel can confirm that extensive stakeholder involvement was part of the designing process of the current framework of the Netherlands. The debate about the nature and detail of the approach to external quality assurance for the Netherlands is ongoing with discussions about potentially moving to a fully institutional framework. As the panel heard about these discussions from different interviews it can be concluded that there is an extensive stakeholder interest in future developments.

The panel also learned that NQA continuously ensures the fitness of purpose of its own procedures, in implementing the framework by updating its guidebooks at least once a year. This freedom and independence was also highlighted as intended and wanted by NVAO. Internal stakeholders of NQA are involved in this process through team meetings, and programmes are indirectly involved through evaluative processes (as there is constant feedback on operational issues from the clients to NQA). In this element of continuous improvement, there is no broader stakeholder involvement or collective discussion. This challenge to the agency is discussed under 3.1 above and there could be an opportunity

in the future development of the agency to also consider a more explicit (not necessarily broader) stakeholder involvement.

Panel suggestion for further improvement

- I. The panel **suggests** that, as part of a new approach towards stakeholder involvement within NQA governance and work, stakeholders should also be involved in the design and annual revision of its methodology.

Panel conclusion: Compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent
- an external assessment normally including a site visit.
- a report resulting from the external assessment.
- a consistent follow-up

Evidence

The SAR reports that, as described in NVAO's *Assessment framework for the higher education accreditation system of the Netherlands*, the accreditation of existing programmes involves a self-assessment, a site visit (or online equivalent in times of Covid), a report, and follow-up. The ways in which this is operationalised by the agency is set out in NQA's *Guidebook Audit visits in Higher Education*.

Under NQA's procedures, the programme draws up a self-evaluation report describing the programme's strengths and weaknesses and addressing the standards of the framework; this self-evaluation is based on its clear instructions and guidelines.

NVAO's framework includes the examination of output standards of student achievement, thus the expert panel selects fifteen graduates at random and the products of these graduates are provided to the panel. Before sending the information file to the members of the panel for review, NQA checks the content to assure completeness and accuracy to avoid loss of time and to ensure accuracy of the process.

A site visit (online during Covid), usually one day, is always part of the assessment process. NQA helps the programme staff with outlining the schedule for the visit. A special feature of the NQA schedules is that they start with a presentation by the degree programmes. Also, the development dialogue is implemented in the working method. Programmes confirmed that the site visit is co-created between the NQA auditor and the study programme. This client-oriented approach is considered helpful practice by programmes as they can tailor the site visit to their wishes.

The findings, considerations and conclusions of the panel are laid down in a report which is written by the auditor/secretary. In line with standard practices, the programme gets the opportunity to read the draft report and give comments on factual errors/inaccuracies. After finalisation the report is passed

to the programme which has formal responsibility for it and for its submission to NVAO. Thus, NQA's involvement normally ends at that point unless NVAO has questions on the report which involve the agency. Following the submission of the report NVAO makes a decision on accreditation. To date NVAO has followed the judgement and evaluation of the NQA panels.

The panel read several assessment reports, which were considered to be high quality and fit for purpose. The quality of NQA reports was underlined by NVAO which indicated that it could use the reports almost always 'as is' as the basis of their decisions. The quality and usefulness of the reports was also highlighted by programme chairs, and QA staff from HEIs. A reason given by them to contract NQA for their external QA was the quality of process including the panel and the report.

If NVAO's decision is conditional accreditation, the programme must have a second assessment executed by the original panel within two years in order to assess whether it realised the specified improvement(s). There is no formal follow-up process for NQA, it is the autonomy of the programme to decide upon the further steps. However, the panel learned from the interviews that in almost all cases NQA is asked to coordinate this second assessment.

The SAR reports that NQA supports the programme with every step in the process (draft version and final version of the self-assessment report of the programme, composition of panel, site visit, panel meetings with different groups, additional information...). NQA provides a detailed guidebook for audit panels and also one for study programmes on all phases and requirements. These guidebooks are highly appreciated by the stakeholders and the secretaries.

Analysis

The panel is positive about NQA's guidebooks which outline clear procedures for assessment panels and for the programmes themselves, as well as the clear support of NQA for programmes and panels as part of its approach.

During the site visit it became clear that NQA works closely with the HEIs and programmes that contract them to coordinate an assessment. The schedule of the site visit for each programme is drawn up as a co-creation between the NQA auditor/secretary and the study programme. The HEIs consider this as a good practice and underline their appreciation for this process; NVAO indicated that their expectation is a partnership between the programme and the agency it chooses to work with. The panel agrees and understands this approach, however, it also wants to highlight possible integrity risks, highlighted in interviews, for the procedures if programmes prefer to not include certain stakeholders in their site visit (e.g., examination boards). To adequately address this risk and make it clear to the HEI/programme from the beginning what is negotiable and what is not open to negotiation it is necessary that NQA publishes its guidebooks/procedures. To ensure the integrity of the process and of NQA it needs to be clear that certain things cannot be deviated from. Publishing would make the way NQA meets this standard more complete. The panel noted that at least one similar agency operating in the Netherlands does publish its procedures and does not believe that commercial imperatives prohibit this.

Panel commendation

1. The panel **commends** NQA on the quality of its process support material and process documents.

Panel recommendation

- I. The panel **recommends** that NQA publishes its procedures on its website to meet this standard more completely, for the purposes of transparency and public confidence in the quality and integrity of the procedures used to assess programmes.

Panel conclusion: Compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

2018 review recommendation:

- The review panel **recommends** to the agency strengthening the training of panel members in different ways, such as training sessions for new members and update sessions for experienced members.

Evidence

Information in the SAR and its annexes sets out the composition of peer-review expert panels, which comprise four members, three are domain or process experts and one is a student; this composition was confirmed in meetings. In the selection of peer-reviewers standard 2.4 has to be interpreted within the context of the Dutch Quality Assurance System under which responsibility for proposing the panel to NVAO formally lies with the programme being assessed. Programmes may enlist the services of a quality assessment agency or independent secretary in devising the panel. Within the Dutch system responsibility for appointing panels rests with NVAO.

The experts are selected based on the expertise, experience, and knowledge about the programme domain and/or quality assurance. The criteria for the panel composition are set by NVAO. Based on this and on the *Guidebook for assessments in higher education, appendix 3: Expertise of panel members* established by NVAO, the requirements of the panel members are very clearly specified. Programmes, secretaries and NQA have to work within this set of requirements.

The programme contracting NQA will usually propose potential panel members to NQA however they also seek to draw on, and take advantage of, the expert pool built up by NQA. As described in standard 3.3, NQA will identify panel members based on their competence and expertise and will assess any possible conflicts of interest. The experience and skill of NQA in assembling proposed panels is particularly valued by its clients where there are programmes are assessed as cluster groups. With the assessment of programme cluster groups NVAO requires that the panel members for all programmes in the cluster are submitted together by a given deadline (thus there is a balancing and negotiation task to be undertaken). Proposed panel composition is sent to NVAO for final approval.

From the interviews, the panel learned that the NQA administrative team plays a strong role in identifying panel members, this role is highly regarded by programmes and HEIs and one of the factors that leads them to contract NQA. Panels members must be independent, all the review panel members must sign a declaration of independence to avoid any conflict of interests, conflict is based on a 5-year

rule. The student experts may be nominated by the programmes which are going to be assessed, however, NQA also maintains a pool of student experts from which students are selected based on their study programmes.

In meetings it was indicated that the preparation of panel experts is undertaken by providing them with the '*Manual for panel members*' (i.e. training is through the provision of written information). The manual provides information about how the assessment should work. An additional manual is provided by NQA for student members. The auditor or secretary who is assigned to the assessment provides the panel with information about the assessment procedure and standards. Two weeks before every assessment a preliminary meeting is held between the panel members and the auditor/secretary to discuss the procedure for the assessment, this enables the auditor/secretary to support the panel with any information that is needed.

NVAO requires that the chair of a panel is trained, and they must sign a paper to confirm that they have been trained for the specific assessment; this training is normally provided by the secretary or quality assessment agency engaged by the programme. The panel learned that NVAO maintains the register of recognised secretaries and provides them with training. NVAO does not provide training for panel experts.

The panel learned from the SAR and the site visit that no international expert is included routinely in assessments, as suggested in the 2018 Review report. NQA indicated that it considers that this element of the composition of panels is up to the programme, its ambitions and needs i.e.: NQA does not regard it as its responsibility within the system to influence whether or not international experts are included. The panel also learned that some programmes (mainly those with an international dimension) do, indeed, include international experts.

Analysis

NQA composes panels for programme assessments in accordance with the NVAO accreditation framework and by the rules set by NVAO for the panel membership. Panels are composed of experienced academics or quality assurance experts and must be independent. The procedure for selecting the members is clear. Although the programme is formally responsible for composing the panel and sending their proposal to NVAO, the service provided by NQA in supporting this is highly valued by its clients and is undertaken with care and competence, drawing on its expertise and database.

The Dutch system does not require an international member to be part of programme expert panels but it does detail the need for international experience and perspectives. The panel heard in meetings that programmes with an international dimension will seek panels with international members; others take advantage of individuals from the Flemish system. In the SAR NQA indicates that it has found that the use of international panel members beyond this is not sought by programmes.

As indicated in the SAR, and confirmed from the site visit, beyond that for a panel chair, training is through the provision of a manual. The panel believes that the provision of information is not commensurate with real training for the panel experts and for student panel members. The *Manual for panel members* is sent to the experts (both new and experienced) before each review. The preliminary meeting before the assessment plays an important role in briefing the panel, it provides an opportunity to discuss any issues that the reviewers may have in terms of assessment and process. The students do not receive specific training and it was evident from the site visit that it can be difficult for a student to understand all the procedures. This did not only apply to a first assessment, for

instance information from meetings revealed that a student may not fully appreciate that there are two assessment methods, that for the extensive and that for the limited framework (see the outline of the Quality Assurance system).

The 2018 ENQA review panel recommended NQA strengthen the training of panel members in different ways, such as training sessions for new members and update sessions for experienced members; this has not been acted upon. The panel heard evidence in different meetings that training which relies solely on the provision of process documentation is not adequate. In the view of the panel, as well as providing better support for its experts, including students, NQA is missing opportunities to be gained through the provision of fuller training. Training that involves groups of experts from different teams, that enables interaction, discussion, trial exercises or role plays, can not only serve to develop the skills, competences and confidence of panel members but can also act as valuable quality enhancement and stakeholder involvement. The panel recognises that such training has cost implications however there are benefits for NQA, as well as its panel members, that could strengthen its place in a competitive market. See also Additional Observations.

The ENQA Board letter following the 2018 review emphasised to NQA the need “to stress the importance of including at least some international experts in the panels to institutions that are being reviewed.” This panel agrees that this is desirable but does not consider this as an area where NQA can have significant influence given the nature of the wider system in the Netherlands, given that programmes are formally responsible for proposing, and NVAO for appointing, panels.

Panel commendation

1. The panel **commends** the expertise and care that NQA brings to panel composition and selection in preparation for approval.

Panel recommendation

1. The review panel **recommends** that NQA further develops the training of panel members to include dedicated training for student panel members.

Panel suggestions for further improvement

1. The panel **suggests** NQA deliver fuller and more effective training for panel members through means that go beyond the passive provision of information by engaging panel members in, for example, a workshop or collective event that provides for groups of experts, experienced and new, from different teams, to interact and to discuss the training materials.
2. The panel **suggests** NQA invest in training not only to develop the skills, competences and confidence of panel members but as a valuable means to enhance the quality of its work and engage its stakeholders.
3. The panel **suggests** to the agency that those programmes which involve international students, are taught in languages other than Dutch or which are clearly international in their character are systematically assessed by panels that include an international expert.

Panel conclusion: Compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

2018 review recommendation:

- The review panel **recommends** to the agency strengthening the training of panel members about the application of the criteria and using that experience to build a more robust view about them and further improve consistency.

Evidence

NQA states in the SAR that the criteria set by NVAO set the judgements made in programme assessments and are adopted in the *NQA Guidelines for audit visits of degree programmes* and in the *Manual* for panel members. NQA goes on to explain that, to assure a consistent interpretation and application of the criteria, they are regularly discussed with its auditors, with panel members and with colleague assessment agencies.

The NQA guidelines for panel members and the manual for study programmes are well-written and clear, they are detailed enough for panel members and programmes that have no or little experience with external quality assessment. The guidelines set the opportunities but also the boundaries of the process.

To explore the response to the recommendation from 2018, across a series of meetings the panel asked about the interpretation of the criteria and whether there were any criteria that panels struggled with more frequently or judgement areas that tended to be weaker in final reports.

Analysis

The review panel is positive about the fact that the interpretation and application of the criteria is regularly discussed with auditors/secretaries, with panel members and with other assessment agencies through cluster groups where different agencies are involved and discuss the criteria with each other. As it was not clear from the SAR whether a document exists on these discussions and results, and whether these discussions lead to changes in processes or training of panel members, this was asked during the site visit. The panel was confident based on the answers of the NQA staff and on the additional documents that were provided that these discussions impacted on the manuals for panels and for programmes. The typical problems or difficulties previously experienced in the interpretations and application of standards or judgements were solved by adding explanations that resulted in more consistency and more clarity (addressing the recommendation from 2018). This has also been assisted by the change made by NVAO in the judgement outcomes – it was explained that this distinction between judgements of ‘good’ and of ‘excellent’ had led to some challenges and that the move to meets/partially meets/does not meet had been beneficial.

NQA reports in the SAR that NVAO has adopted all the judgements given by NQA audit panels. NVAO confirmed its broad satisfaction with the work that is undertaken by assessment panels supported by NQA. In the SAR it is also stated that in a few cases, NVAO has asked audit panels for

additional information on the judgements made in the peer review report. During the site visit it was clear that this additional information was related to factual issues (see also ESG 2.3).

The *NQA Guidelines for audit visits of degree programmes* and in the *Manual for panel members* include a further elaboration of the NVAO criteria to assure a consistent interpretation. This further elaboration has an added value for programmes as well as for assessment panels to make the criteria more specific and concrete.

From the SAR it was not clear whether the recommendation of the 2018 review panel to strengthen the training of panel members about the application of the criteria and using that experience to build a more robust view about them and further improve consistency, has been realised and in what way. The training aspect was discussed with the different groups during the site visit, with staff members, students, and reviewers. The panel expressed its concern about the fact that no real action was undertaken to strengthen the training of panel members (see ESG 2.4) although the impact of actions taken by NVAO and by NQA had effectively resolved the matter.

Panel suggestion for further improvement

- I. The panel **suggests** that indicative examples are added to the manual for experts to illustrate how the criteria are applied and interpreted and that, linked to 2.4, training for panel members could include the discussion of examples or exercises on judgement decisions.

Panel conclusion: Compliant

ESG 2.6 REPORTING

Standard:

Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

2018 review recommendation:

- The review panel **recommends** to the agency to publish the reports on its own website or to include the link, as NQA already enunciates in its SAR.

Evidence

The SAR outlines the content of the reports produced by the agency. The reports include contextual description, a description of the individual procedure, the evidence, analysis and findings, the conclusions, the recommendations for follow-up action and a summary. Before the report becomes final, the degree programme can point out factual inaccuracies.

As already highlighted, NQA assessment reports are considered to be of good quality by NVAO and by the HEIs and programmes. The panel read several reports and agrees that the reports are indeed of high quality. The reports are clear and easy to understand, they present the findings in a logical and organised manner. The facts are presented in a neutral and balanced way, and opinions and judgments of the panel are set out. The reports cover all relevant aspects within the assessment procedure, giving

a comprehensive picture of the programme being assessed. The reports also include actionable recommendations that address the key issues that are identified by the assessment panel.

The SAR states that NVAO's website provides a publicly available database that contains the decisions and the review reports, it is searchable, for example by institution, programme or location, but not by supporting agency. NQA explained that it does not want to publish reports on degree programmes, as formally the institution/degree programme is the owner of the report and because NVAO provides a single source and point of reference. This single point of reference approach was also confirmed by the NVAO.

NQA provides a link on its own website to the NVAO website where all the reports of all the programmes in the Netherlands can be found. On this website the NQA reports are available among all other reports. There is no search option for reports by agency, only by opening all the reports (>3000 reports). On its website NQA lists its clients (across all its activity) but does not identify the institutions where it has coordinated programme accreditations, thus it is not possible to identify which institutions involve ESG-related programme assessments, nor the programmes involved.

Analysis

Based on their structure, readability, clarity and comprehensiveness the panel commends NQA for the quality of the programme assessment reports it produces. It became obvious that the quality of the reports is a clear strength of the agency.

The ENQA review panel proposed in 2018 to include a new paragraph with the good practices of the institutions, and some references to the previous accreditation or the institutional audit, in order to know the evolution of the programme. During the site visit it became clear that the evolution and development of the programmes are now a more important part of the review and the report as there is always a 'development talk/conversation' added to each review.

In response to the 2018 review recommendation, a link to the NVAO website is now included on NQA's website. However, this does not provide a ready means to locate reports produced by NQA as all reports need to be opened, with only the NQA logo on the report shows which report is an NQA report. During the site visit, the panel asked for the reasons why this recommendation was not addressed more specifically. It was explained that NVAO preferred that reports are only available in one place i.e. on its own website. Therefore, only the general link to the NVAO website, where all reports can be found, was provided by NQA.

The panel recommends NQA take further action to meet the standard, such as to add a section on its own website listing the reports it has produced, with the specific link to each of its reports on the NVAO website. This can assure that the main outcomes of the reports become more accessible and relevant to students, employers, and other relevant societal actors, not only through the NVAO website, but also through a link on the agency's website. The panel is of the view that this would not only help to meet the standard more fully but would also make more visible the extent of NQA's work and the quality of that work i.e. that it would be commercially beneficial in promoting its work to its client base. To a certain extent the agency here truly loses the opportunity to make full use of its product and thus the result of a well-defined and implemented process (even though produced on behalf of an institution).

Panel commendation

- I. The panel **commends** NQA for the quality and consistency of the reports produced.

Panel recommendation

- I. The panel **recommends** that NQA take further action to meet this standard by, for example, listing the programme assessments it has coordinated on its own website with a link to the relevant report on NVAO's site.

Panel conclusion: Compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

2018 review recommendation:

- The review panel **recommends** to the agency developing a complaints procedure and communicate it to the institutions. That should include the establishment of an independent and competent commission that may handle any relevant issues.

Evidence

The panel was able to review the complaints and objection¹ procedure developed by NQA and published in October 2022; it is available on NQA's website. In the SAR NQA indicated that it agreed with this recommendation and, despite the time taken to take action on it, a complaints and objections procedure has now been developed and introduced late in 2022. The embedding of complaints and appeals within other outward facing documentation analysed by the panel showed that this is yet to take place, for example, there is no reference to complaints or to appeals/objections in the 2022 manual for study programme audits. The differences between what constitutes a complaint as opposed to an appeal is not clearly set out in the documentation reviewed, for example, by giving a definition of each; in a number of places complaints and objections are treated together.

There is reference to external complaints in the internal quality manual. This outlines the usual process and indicates that a complaint or any customer dissatisfaction is normally raised with the director in the first instance, with account management meetings providing an opportunity for this. It indicates that dialogue to resolve will normally be followed up by agreement in writing.

The internal quality manual states that complaints about reports or the working of review panels would be resolved through the 'so-called *adversarial system*'. How this operates is not detailed there or in the complaints procedure. The complaints procedure seeks to differentiate between what is and is not subject to objection given the two-tier system.

¹ NQA use 'objection' rather than 'appeal' in this document, however, in line with the wording of the standard 'appeal' is used in the commentary.

Complaints need to be submitted in writing. According to the complaints procedure, any concerning individuals who are employed or contracted by NQA are dealt with by the director. Reference is made to the complaint handler but how this person is identified is not specified nor is how conflicts of interest or partiality is ensured in complaint handling within such a small organisation. In other instances, a panel of three independent persons may be created. The procedure indicates that if its 'adversarial stage', as well as the subsequent handling of the complaint, does not proceed to the satisfaction of the complainant, a dispute can be submitted to a judge.

NQA reports in the SAR that no complaints have been received since 2018. Representatives from HEIs met by the panel indicated that they used the availability of direct communication with the CEO to resolve any issues that arose.

Given the complaints and objection (appeals) procedure had been newly developed there is no additional information about the operation of appeals. The panel noted that, within the quality assurance system in the Netherlands appeals against formal decisions of accreditation are handled by NVAO as the decision-making body; appeals to NQA are, therefore, about the judgements in the assessment report.

Analysis

The panel noted the time taken by NQA to develop and publish a complaints procedure. The quality and clarity of the procedure is not, in the view of the panel, at the same standard of much of NQA's process documents. It does not provide clear definitions of what constitutes a complaint, the distinction between complaints and appeals and the grounds for appeal could be explained more effectively. The documentation does highlight what falls within NQA's remit and what would be an appeal to NVAO, but this too could be explained more clearly. The term 'objections' is used rather than appeals but the two terms are not synonymous and any intended distinction or particular definition should be made clear. Various elements are not fully detailed. These include how a complaint handler is designated, the way in which conflicts of interest are dealt with within NQA, and what the adversarial system comprises. The stages or steps are not clearly set out.

Most crucially, how elements of independence are ensured is not addressed and the recommendation from the 2018 review to establish an independent and competent commission to handle any relevant issues has not been progressed. The director is the line manager for most staff and may not be, or be seen to be, impartial or independent in assessing a complaint against an individual. There is no mention of how a complaint about the director could be addressed or handled given the lack of any independent board or advisory committee.

The right to complain and to appeal should be an explicit part of manuals. The information in manuals should summarise what is a complaint and what is an appeal and where further information can be found.

The panel accepts that the strong client relationships and short lines of communication means that most expressions of dissatisfaction or potential complaints will be addressed through regular communication. This informal resolution is important. However, it is also important as part of continuous improvement and quality enhancement that areas of dissatisfaction/potential complaints are recorded in a way that enables any recurring matters or themes to be identified and discussed.

Complaints and appeals procedures need to reflect the spirit of impartiality and neutrality even where there are strong client/provider relationships. Due to the nature of this relationship the panel believes

that these regulations require a higher level of definition and to be clearer in their formulation in order to be fit for purpose and to cover a fuller range of eventualities.

Panel recommendation

- I. The panel **recommends** that complaints and appeals procedures are separated and revised more clearly and precisely to communicate the definitions and steps involved; the revision should address matters of independence or impartiality more broadly across the procedures. Reference to complaints and to appeals should be included in all manuals.

Panel conclusion: Partially compliant

ADDITIONAL OBSERVATIONS

COMPLEXITY OF ASSESSING AN AGENCY WITHIN A TWO-TIER SYSTEM

The panel would stress the importance of taking into account the context within which NQA operates and its own character as a private, for-profit organisation. The context is especially important in how compliance with the ESG is assessed, where primary responsibility for compliance lies and the degree of operational responsibility or freedom available to NQA in seeking to meet the ESG.

In the Netherlands there is what can be characterised as a two-tier system with responsibilities divided between NVAO, as the officially responsible and designated quality assurance body recognised and accountable in law, and those individuals and companies who contribute to the operationalisation of one part of the system, that of the accreditation of established programmes. The system places responsibility with programmes to work with a recognised panel secretary, however, in practice, 90% of programme assessments are still coordinated by a quality assessment agency not by an individual secretary. Thus, whatever the intended benefits of the well-established move to a secretary-based system, in practical terms the system is dominated by agencies.

NVAO has responsibility for the design and oversight of the overall system within the relevant legislation. It has responsibility for institutional-level quality assurance and the quality assurance of new programmes of study. Responsibility for the assessment of established programmes lies with the programme itself. It is required to work with a recognised panel secretary with NVAO approving panel secretaries and maintaining the register of approved secretaries. Programmes submit the proposed external expert panel conducting the assessment to NVAO which has responsibility for approving it. Programmes submit the report that is the outcome of the assessment process to NVAO which takes the decision and makes the final judgement.

Various matters can be a challenge in a divided system and in one where private companies play a significant role. An example is both the consistency of training and the provision of training. In the Dutch system Chairs must be trained with responsibility lying with the panel secretary as the recognised actor. There is no formal responsibility for the training of panel members, including student members. The quality and consistency of training within the whole system is therefore not ensured.

Quality assessment agencies such as NQA work in an enabling role supporting programmes to undertake the assessment process. They are free to design the methodology for doing so within the framework set by NVAO e.g. the details of how the process operates, the detailed design of the site visit etc. The resulting report will detail the judgement and views of the panel against the standards and come to clear conclusions. The report is not 'owned' by NQA but by the programme, its client.

As a private for-profit company, NQA has to balance rigour and consistency against notions of service delivery, the needs and demands of particular clients. It is not part of a public service and does not receive any public funding. It plays a demand-led role within the Dutch system and this has to be borne in mind and is in contrast to more supply-driven and publicly funded systems.

The panel, therefore, took these considerations into account in undertaking this review within ENQA's Guidelines.

CONCLUSION

SUMMARY OF COMMENDATIONS

Panel commendations

1. The panel **commends** the quality of the secretaries employed by NQA, both those on staff and those employed on an ad hoc basis, and notes clients do not see the distinction between the work of internal and external secretaries [3.5].
2. The panel **commends** the quality of NQA's internal quality manual, the developed processes and the process documents that support their procedures [3.6].
3. The panel **commends** the professional conduct of NQA staff, noting especially the knowledge and commitment of the administrative team and that both panel secretaries and the administrative team are valued by clients [3.6].
4. The panel **commends** the commitment to support and training to ensure the quality and consistency of the work of panel secretaries [3.6].
5. The panel **commends** NQA on the quality of its process support material and process documents [2.3].
6. The panel **commends** the expertise and care that NQA brings to panel composition, selection and approval [2.4].
7. The panel **commends** NQA for the quality and consistency of the reports produced [2.6].

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, the Netherlands Quality Agency is in compliance with the ESG.

Compliance against the individual standards were judged to be:

- Compliant with standards: 3.2, 3.3, 3.5, 3.6, 3.7, 2.1 2.2, 2.3, 2.4, 2.5 and 2.6;
- Partially compliant with standards: 3.1, 3.4 and 2.7.

Panel recommendations

1. The panel **recommends** that NQA develops formal ways to involve stakeholders in its governance, above and beyond their involvement through direct client relationships [3.1].
2. The panel **recommends** that NQA makes its mission statement publicly available through its website [3.1].
3. The panel **recommends** that NQA should develop a suite of clear processes and statements (which are then published on the website) that outline how the consulting and assessment parts of their operations are separated and no conflict of interest or compromise of independence is ensured [3.1].

4. The review panel **recommends** that NQA includes regular thematic analysis in its plans [3.4].
5. The review panel **recommends** using the experience and knowledge of internal and external secretaries gained from various assessment procedures to conduct those thematic analyses [3.4].
6. The panel **recommends** NQA develops plans to take fuller responsibility for meeting the ESG in its own right and to demonstrate how it achieves this [3.7].
7. The panel **recommends** that NQA publishes its procedures on its website to meet this standard more completely, for the purposes of transparency and public confidence in the quality and integrity of the procedures used to assess programmes [2.3].
8. The panel **recommends** that NQA further develops the training of panel members to include dedicated training for student panel members [2.4].
9. The panel **recommends** that NQA take further action to meet this standard by, for example, listing the programme assessments it has coordinated on its own website with a link to the relevant report on NVAO's site [2.6].
10. The panel **recommends** that complaints and appeals procedures are separated and revised more clearly and precisely to communicate the definitions and steps involved; the revision should address matters of independence or impartiality more broadly across the procedures. Reference to complaints and to appeals should be included in all manuals [2.7].

SUGGESTIONS FOR FURTHER IMPROVEMENT

Panel suggestions for further improvement

1. The panel **suggests** that additionally NQA should consider establishing mechanisms to enable it to have collective discussions with a range of stakeholders. This would enable shared learning, debate about options and possibilities and generate insights that would enhance assessment activity and support the development of further products and services [3.1].
2. The panel **suggests** NQA organises activities (for example: workshop sessions or events) to exploit the knowledge and insights resulting from the regular thematic analysis of the findings of its assessments. Such activities would benefit NQA as well as its HEI stakeholders [3.4].
3. The panel **suggests** that NQA should consider developing and publishing a code of conduct for staff and panel members, this would demonstrate the values and integrity of the agency and could serve to clarify its stance on any matters that arise [3.6].
4. The panel **suggests** that NQA further develops its capacity for critical self-reflection [3.7].

5. The panel **suggests** that, as part of a new approach towards stakeholder involvement within NQA governance and work, stakeholders should also be involved in the design and annual revision of its methodology [2.2].
6. The panel **suggests** NQA deliver fuller and more effective training for panel members through means that go beyond the passive provision of information by engaging panel members in, for example, a workshop or collective event that provides for groups of experts, experienced and new, from different teams, to interact and to discuss the training materials [2.4].
7. The panel **suggests** NQA invest in training not only to develop the skills, competences and confidence of panel members but as a valuable means to enhance the quality of its work and engage its stakeholders [2.4].
8. The panel **suggests** to the agency that those programmes which involve international students, are taught in languages other than Dutch or which are clearly international in their character are systematically assessed by panels that include an international expert [2.4].
9. The panel **suggests** that indicative examples are added to the manual for experts to illustrate how the criteria are applied and interpreted and that, linked to 2.4, training for panel members could include the discussion of examples or exercises on judgement decisions [2.5].

ANNEXES

ANNEX I: PROGRAMME OF THE SITE VISIT

This section includes the schedule of the meeting. For privacy reasons the interviewees should be listed by including their positions and organisations but without their names. This box to be deleted before publishing.

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
1 February 2023			
	14.00-15.00	Review panel's kick-off meeting and preparations for site visit (part 1 - online)	
6 February 2023			
	16.00-17.30	A pre-visit meeting with the agency's resource person to clarify any remaining question after the online clarification meeting (online)	<ol style="list-style-type: none"> 1. CEO 2. Senior auditor at NQA
	17.30-18.00	Review panel's kick-off meeting and preparations for site visit (part 2 - online)	
21 February 2023			
	16:30-18:30	Review panel's pre-visit meeting and preparations for day 1.	
22 February 2023			
	8.30-09.00	Review panel's private meeting	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
1	09.00-10.00	Meeting with the CEO	1. CEO
	10.00-10.15	Review panel's private discussion	
2	10.15-11.00	Meeting with the team responsible for preparation of the self-assessment report	1. CEO 2. Senior NQA Auditor
	11.00-11.15	Review panel's private discussion	
3	11.15-12.00	Meeting with key agency staff in charge of external QA activities	1. NQA auditor 2. NQA auditor 3. NQA auditor 4. NQA auditor
	12.00-12.15	Review panel's private discussion	
4	12.15-13.00	Meeting with external persons responsible for external QA activities	1. External secretary used by NQA 2. External secretary used by NQA 3. External secretary used by NQA
	13.00-14.00	Lunch (panel only)	
	14.00-14.15	Review panel's private discussion	
5	14.15-15.00	Meeting with administrative staff of the agency	Representatives from NQA administration: 1. Project management and finance 2. Panel composition and office management 3. Management assistant
	15.00-16.15	Review panel's private discussion and Wrap-up meeting among panel members and preparations for day 2	
23 February 2023			
	09.00-10.00	Review panel's private meeting	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
6	10.00-11.00	Meeting with the national accreditation agency, NVAO	<ol style="list-style-type: none"> 1. NVAO Director Netherlands and Chair of Studielink Adviesraad 2. NVAO, coordinator internal quality Assurance and policy advisor
	11.00-11.15	Review panel's private discussion	
7	11.15-12.00	Meeting with programme heads and departmental heads from reviewed HEIs	<ol style="list-style-type: none"> 1. Education Manager Bachelor of Business Administration, member of management team Business school, Hogeschool Rotterdam 2. Educationalist, Director and interim Academy VO & VMBO, NHL Stenden University of Applied Sciences, (online) 3. Lecturer & Policy Officer Communication, programme coordinator, graduated in political and economic philosophy, Hogeschool Utrecht, 4. Senior advisor Public Health and Public Health Training Royal Tropical Institute KIT (online) 5. Policy advisor education and organisation, Saxion University of Applied Sciences; previous manager academy 'people and labour'
	12.00-12.15	Review panel's private discussion	
8	12.15-13.00	Meeting with quality assurance officers of reviewed HEIs	<ol style="list-style-type: none"> 1. Team leader quality assurance and assessment and team minor coordination, Hogeschool Utrecht 2. Policy advisor Education and Quality, HZ University of Applied Sciences 3. Team leader Quality, NHL Stenden University of Applied Sciences (online) 4. Policy Advisor Quality, Avans University of Applied Sciences 5. Senior advisor Quality Assurance of Education, HAN University of Applied Sciences

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			6. Senior policy advisor Education and Quality Assurance, Hogeschool Rotterdam
	13.00-13.15	Review panel's private discussion	
	13.15-14.15	Lunch (panel only)	
9	14.15-15.00	Meeting with representatives from the reviewers' pool	<ol style="list-style-type: none"> 1. Training teacher for the 2nd stage teacher of mathematics, HAN. Review panel member of mathematics 2. Managing director, JLS International. Review panel member business economics and organisation 3. Member of expertise team 'werkplekieren', training teacher Dutch, Hogeschool van Amsterdam. Review panel member teacher education Dutch language 4. Human resource advice office, co-founder HR Versterkers. Review panel member HRM 5. Rector St. Nicolaaslyceum and Director foundation Stichting VO Amsterdam Zuid. Review panel member teacher education
	15.00-15.15	Review panel's private discussion	
10	15.15-16.00	Meeting with student reviewers	<ol style="list-style-type: none"> 1. Student Bachelor communication at Hogeschool Utrecht. Student reviewer Communication 2. Student bachelor business administration at Hogeschool van Arnhem en Nijmegen, works as Sales manager at Bronkhorst High tech. Student reviewer Mechatronica and Business Administration 3. Student bachelor maritime officer at Hogeschool Rotterdam. Student reviewer Ocean Technology and Maritime Officer 4. Student pre-master business process management and IT at Open Universiteit, and project leader I&A at Centrada

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW
			Wonen, member of OR (works council). Student reviewer Informatics and Master of ICT and Business Innovation (online). 5. Student bachelor HBO-ICT at Hogeschool van Arnhem en Nijmegen, member and chair of educational council of AIM. Student reviewer HBO-ICT
	16.00-16.15	Review panel's private discussion	
11	16.15-17.00	Meeting with heads of some reviewed HEIs/ senior representatives from HEIs	1. Director education, Van Hall Larenstein University of Applied Sciences 2. Director, Avans+ University of Applied Sciences, 3. Director Academy Technology & AMP, innovation, NHL Stenden Hogeschool,
	17.00-18.00	Review panel's private discussion and Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions	
24 February 2023			
	09.00-10.00	Meeting among panel members to agree on final issues to clarify	
12	10.00-11.00	Meeting with CEO to clarify any pending issues	1. CEO 2. Senior NQA auditor
	11.00-12.30	Private meeting between panel members to agree on the main findings	
	12.30-13.30	Lunch (panel only)	
13	13.30-14.00	Final de-briefing meeting with staff of the agency to inform about preliminary findings	CEO and available NQA staff (on-site and online)

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the Netherlands Quality Agency (NQA) by the European Association for Quality Assurance in Higher Education (ENQA)

July 2022

I. Background and context

Netherlands Quality Agency (NQA) is a quality assurance agency based in Utrecht, in the centre of the Netherlands. NQA focuses on providing services to (mainly) institutions of higher professional education. As a(n) (external) quality assurance agency, NQA particularly organizes and co-ordinates assessments of degree programmes on the basis of the formal accreditation framework that has been established by the relevant authorities, the Ministry of Education, Culture & Science and the Netherlands-Flemish Accreditation Organization (NVAO).

NQA originates from the Netherlands Association of Universities of Applied Science (in Dutch: 'Vereniging Hogescholen'). In accordance with the amended Act on Higher Education and Scientific Research (2002), assessments of (existing) degree programmes were to be conducted by independent quality assurance agencies. Subsequently, NQA was formally founded December 2003. Since the foundation NQA has performed over 1200 assessments of degree programmes (associate degree, bachelor, master) of institutions of higher professional education. The results of these assessments are laid down in a report that institutions/educational programmes use to get re-accredited by NVAO.

Assessments are the solid key objective of the activities of NQA. In addition, the company offers a variety of consultancy and training services. Clients of these services are mainly institutions of higher professional education, although also some other (educational) institutions use these services of NQA. On a yearly base these services are just 5% to 10% of our sales volume.

This application of NQA for the ENQA membership focuses on the assessment (audit/evaluation) activities. A thorough (ENQA) review of this cannot be done without a proper view of the Dutch system of higher education and the system of external quality control. An extensive description will be part of the NQA self-assessment report (SAR). In the meantime we would like to refer to a description by EP Nuffic that gives an introduction to these two elements:

Higher Education in the Netherlands

Higher education in the Netherlands is offered at two types of institutions: research universities and universities of applied sciences. Research universities include general universities, universities specialising in engineering and agriculture, and the Open University. Universities of applied sciences include general institutions as well as institutions specialising in a specific field such as agriculture, fine and performing arts or teacher training. Whereas research universities are primarily responsible for offering research-oriented programmes, universities of applied sciences are primarily responsible for offering programmes of higher professional education, which prepare students for specific professions. These tend to be more practice oriented than programmes offered by research universities.

In this binary, three-cycle system, bachelor, master and PhD degrees are awarded. Short-cycle higher education leading to the associate's degree is offered by universities of applied sciences. Degree programmes and periods of study are quantified in terms of the ECTS credit system.

System of external quality assurance

A guaranteed standard of higher education, and alignment with the Qualifications Framework for the European Higher Education Area, is maintained through a system of legal regulation and quality

assurance, in the form of accreditation. The Ministry of Education, Culture and Science is responsible for legislation pertaining to education. The agriculture and public health ministries play an important role in monitoring the content of study programmes in their respective fields. Quality assurance is carried out through a system of accreditation, administered by the Accreditation Organisation of the Netherlands and Flanders (NVAO).

According to the Dutch Higher Education Act, all degree programmes offered by research universities and universities of applied sciences must be evaluated according to established criteria. These evaluations are mostly carried out by external quality assurance agencies like NQA. Programmes that meet the criteria are accredited: i.e. recognised for a period of six years. Only accredited programmes are eligible for government funding; students receive financial aid and graduate with a recognised degree only when enrolled in, and after having completed, an accredited degree programme. All accredited programmes are listed in the Central Register of Higher Education Study Programmes (CROHO).

Since January 2011, the Netherlands has a renewed accreditation system. The process described above still applies, but beginning in 2011, higher education institutions can request the NVAO to conduct an 'institutional quality assessment' to determine the extent to which the institution is capable of guaranteeing the quality of the programmes it offers. Programmes offered by institutions that receive a positive evaluation still have to be accredited, but the accreditation procedure takes less time and is not as extensive. The latest renewed accreditation system was introduced in 2018 with smaller adjustments. The SAR of NQA will describe these newest adjustments.

NQA has been a member of ENQA since 21 June 2018 and is applying for renewal of membership.

2. Purpose and scope of the evaluation

This review will evaluate the extent to which NQA (the agency) fulfils the requirements of Parts 2 and 3 of *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will provide information to the ENQA Board to aid its consideration of whether the membership of NQA should be reconfirmed.

2.1 Activities of the agency within the scope of the ESG

To apply for ENQA membership, this review will analyse all of the agency's activities that fall within the scope of the ESG, e.g., reviews, audits, evaluations or accreditations of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). All activities are reviewed irrespective of geographic scope (within or outside the EHEA) or whether they are obligatory or voluntary in nature.

The following activities of the agency must be addressed in the external review:

1. Assessments (audits/evaluations) of degree programmes of institutions for higher education as a(n) (external) quality assurance agency.
2. Assessment of international degree programmes

3. The review process

The review will be conducted following the methodology of ENQA Agency Reviews. The process is designed in line with *the Guidelines for ENQA Agency Reviews*.

The review procedure consists of the following steps:

- Formulation of, and agreement on the Terms of Reference for the review between NQA and ENQA (including publishing of the Terms of Reference on ENQA's website²);
- Nomination and appointment of the review panel by ENQA;
- Self-assessment by the agency, including the preparation and publication of a self-assessment report;
- A site visit of the agency by the review panel;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Publication of the final review report;
- A decision from the ENQA Board on ENQA membership;
- Follow-up on the panel's recommendations to the agency, including a voluntary progress visit.

3.1 Nomination and appointment of the review team members

The review panel consists of four members: one or two quality assurance experts (at least one of which is currently employed by an ENQA member agency), an academic employed by a higher education institution, a student member, and eventually a labour market representative (if requested). One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. An additional panel member may be included in the panel at the request of the agency under review. In this case, an additional fee to cover the reviewer's fee and travel expenses is applied.

The panel will be supported by the ENQA Review Coordinator who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The ENQA staff member will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide the agency with the proposed panel composition and the curricula vitarum of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

3.2 Self-assessment by the agency, including the preparation of a self-assessment report

The agency is responsible for the execution and organisation of its own self-assessment process and must adhere to the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is expected to contain:
 - a brief description of the HE and QA system;
 - the history, profile, and activities of the agency;
 - a presentation of how the agency addresses each individual standard of Parts 2 and 3 of the ESG for each of the agency's external QA activities, with a brief, critical reflection on the presented facts;
 - opinions of stakeholders;

² The agency is encouraged to publish the ToR on its website as well.

- reference to the recommendations provided in the previous review and actions taken to meet those recommendations;
- a SWOT analysis;
- reflections on the agency's key challenges and areas for future development.
- All the agency's external QA activities (as defined under section 2.1) are described and their compliance with the ESG is analysed in the SAR.
- The report is well-structured, concise, and comprehensive. It clearly demonstrates the extent to which the agency performs its tasks of external quality assurance and meets the ESG.

The self-assessment report is submitted to the ENQA Secretariat, which has two weeks to carry out a screening. The purpose of a screening is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Agency Reviews*, is present. If the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

3.3 A site visit by the review panel

The review panel will draft a proposal of the site visit schedule which must be submitted to the agency at least six weeks before the planned dates of the visit. The schedule is to include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is usually 2,5 days. The approved schedule must be given to the agency at least one month before the site visit to properly organise the requested interviews.

In advance of the site visit (ideally at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

The review panel will be assisted by the ENQA Review Coordinator during the site visit. The review coordinator will act as the panel's chief liaison with the agency, monitor the integrity of the review process and its consistency, and ensure that ENQA's overall expectations of the review are considered and met.

The site visit will close with a final debriefing meeting in which the panel outlines its general impressions and provides an overview of the judgement on the agency's ESG compliance. The panel will not comment on whether or not the agency would be reconfirmed membership with ENQA.

3.4 Preparation and completion of the final evaluation report

Based on the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will follow the purpose and scope of the review as defined under sections 2 and 2.1. It will also provide a clear rationale for the panel's findings concerning each standard of Parts 2 and 3 of the ESG.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language, and it will then be submitted to the agency – usually within 10 weeks of the site visit – for comment on factual accuracy and grave misunderstandings only. The agency will

be given two weeks to do this and should not submit any additional material or documentation at this stage. Thereafter, the review panel will take into account the agency’s feedback on possible factual errors and finalise and submit the review report to ENQA.

The report should be finalised within three months of the site visit and will normally not exceed 40-50 pages in length.

3.5. Publication of the report and a follow-up process

The agency will receive the review panel’s report and publish it on its website once the Agency Review Committee has validated the report. The report will also be published on the ENQA website together with the statement of the Agency Review Committee validating external review reports by assessing the integrity of the review process and checking the quality and consistency of the reports. Importantly, during this process, and prior to final validation of the report, the Agency Review Committee has the option to request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome.

As part of the review’s follow-up activities, the agency commits to react on the review recommendations and submit a follow-up report to ENQA within two years of the validation of the final external review report. The follow-up report will be published on the ENQA website.

The follow-up report may be complemented by an optional progress visit to the agency performed by two members of the original panel (whenever possible). The visit, which normally takes place 2-3 years after the verification of the final external review report (and after submission of the follow-up report), aims to offer an enhancement-oriented and strategically driven dialogue that ordinarily might be difficult to truly integrate in the compliance-focused site visit. The progress visit thus does not have the objective of checking the agency’s ESG compliance or how the agency has followed up on the recommendations, but rather provides an arena for strategic conversations that allow the agency to reflect on its key challenges, opportunities, and priorities. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

4. Use of the report

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA.

To apply for ENQA membership, the agency is also requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. The ENQA Board will take a decision on the ENQA membership of the agency based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA’s website.

5. Indicative schedule of the review

Agreement on Terms of Reference	July 2022
Appointment of review panel members	September 2022
Self-assessment completed	24 October 2022
Screening of SAR by ENQA Review Coordinator	October/November 2022
Preparation of the site visit schedule and indicative timetable	December 2022

Briefing of review panel members	December 2022
Review panel site visit	Second half of February 2023
Draft of review report and its submission to ENQA Review Coordinator for verification of its compliance with the Guidelines	April 2023
Draft of review report to be sent for a factual check to the agency	April 2023
Agency statement on the draft report to the review panel (if necessary)	May 2023*
Submission of the final report to ENQA	June 2023*
Validation of the review report by the Agency Review Committee	June 2023*
Publication of report	June/July 2023*
Decision on ENQA membership by the ENQA Board	September 2023*

*dates to be confirmed

ANNEX 3: GLOSSARY

EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQF	European qualifications framework
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015
HE	higher education
HEI	higher education institution
ISO	International Organization for Standardization
NVAO	Nederlands-Vlaamse Accreditatie Organisatie (Accreditation Organisation of the Netherlands and Flanders)
NQA	Netherlands Quality Agency
PDCA	Plan-do-check-act
SAR	self-assessment report

ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY NQA

DOCUMENTS SUBMITTED WITH THE SAR

Sent electronically:

Assessment Framework for the Higher Education Accreditation System of the Netherlands. NVAO (2018)

Manual audit panel for Audit Visits in Higher education. NQA (2022)

Guidebook for assessments in higher education. NQA (2022)

NQA Ambitions 2023-2028

Accessed via NQA's portal:

Accreditatiebeoordeling opleidingen met een experimenteervariant (2022)

Addition to the follow-up report ENQA review (2020)

Deeltijdonderwijs aan de hand van Leeruitkomsten (2022)

Feedback bijeenkomst panelleden (2022)

Financiële resultaten NQA 2017-2021 (2022)

Handleiding student panellid (2022)

Inwerkprogrammema Auditoren (2021)

Klachten- en bezwaarprocedure NQA (2022)

Kwaliteitsmanagementsysteem (2020)

Onafhankelijkheid voorzitters panel (2019)

Rapportage sector schema Opleidingen Verloskeunde (2019)

Reactie NVAO op onafhankelijkheid secretarissen (2019)

Reactie op NVAO brief AVG (2019)

Richtlijnen-terugkoppeling (2018)

Ruimte binnen de bestaande kaders, discussie notitie instellingsaccreditatie (2020)

Visitaties tijdens Covid maatregelen (2020)

Visiteren in Corona-tijd (2020)

ADDITIONAL INFORMATION REQUESTED

Besluitenlijst 08-27-2020 taakcheck (1)

Besluitenlijst.22.verbeteren.evaluatie1 (1)

Besluitenlijst.2018.vervolg actie.evaluatie panel.voorzitter (1)

besluitenlijst.april2019.ontwikkelgesprek +en (1)

Besluitenlijst.team.continue verbeteren+en

Besluitenlijst2018.besluit.nav evaluatie en voorzittersrol

Besluitenlijst2022.verbeteren.evaluatie2

Besluitenlijst.2018.HANdispuut.1

Besluitenlijst.2018.HANdispuut.2

Besluitenlijst.NQA.meeting account. Saxion2019

Concept Financiële jaarstukken 2022

Directiebeoordeling.2021 en-GB

Evaluatieformulier visitaties NQA

Financiële jaarstukken 2021

Interne Audit 2021.agenderende.audit en-GB (1)

Interne audit2020.actualiseren.beschrijven.werkprocessen en-GB

Kamer van Koophandel uittreksel-handelsregister

Kwaliteitsmanagementsysteem NQA

Meerjarenprognose 2023, 2024 en 2025
Nether_Power_presentatie feedback
NVAO_Brief_klachtbrief NVAO 101
Onafhankelijkheid voorzitters panel
114A2022.301 pdf Report KIT international Health Public Health
117A2021.02 Saxion Report M ITD
117a2021.02 projectevaluatie-M-ITD (1)
117a2021.02 projectevaluatie-M-ITD
2018 Laatste stand van zaken
2019 Laatste stand van zaken
2020 Laatste stand van zaken
2021 Laatste stand van zaken
2022 Laatste stand van zaken

OTHER SOURCES USED BY THE REVIEW PANEL
NQA website

ENQA AGENCY REVIEW 2023

THIS REPORT presents findings of the ENQA Agency
Review of the Netherlands Quality Agency (NQA),
undertaken in 2023.

enqa.

European Association for
Quality Assurance in Higher Education