

**Approval of the Application**  
**by NVAO - Accreditation Organisation of the Netherlands and**  
**Flanders (NVAO)**  
**for Renewal of Inclusion on the Register**

**Register Committee**

**Ref.** RC20/A47

**Ver.** 1.0

**Date** 2017-11-21

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<b>Application of:</b>	30/06/2016
<b>Agency registered since:</b>	05/12/2008
<b>External review report of:</b>	30/09/2017
<b>Review coordinated by:</b>	European Association for Quality Assurance of Higher Education (ENQA)
<b>Review panel members:</b>	Andy Gibbs (Chair, academic), Obe de Vries (Secretary), Laura Beccari, Alexandra Raijmakers (student)
<b>Decision of:</b>	16/11/2017
<b>Registration until:</b>	30/09/2022
<b>Absented themselves from decision-making:</b>	Karl Dittrich (EQAR President) Ann Verreth (Register Committee member) Vicky Vanruysseveldt (Register Committee observer)
<b>Attachments:</b>	<ol style="list-style-type: none"> <li>1. <a href="#">Confirmation of eligibility, 19/07/2016</a></li> <li>2. <a href="#">External Review Report, 30/09/2017</a></li> <li>3. <a href="#">Request to the Review Panel, 17/10/17</a></li> <li>4. <a href="#">Clarification by the Review Panel, 23/10/17</a></li> </ol>

1. The application of 30/06/2016 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 19/07/2016.
3. The Register Committee considered the external review report of 13/09/2017 on the compliance of NVAO with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).
4. The Register Committee sought and received clarification from the chair of the review panel.

**Analysis:**

5. In considering NVAO's compliance with the ESG, the Register Committee took into account:

- *programme accreditation in Flanders, the Netherlands and the so called “Caribbean Netherlands”;*
- *initial programme accreditation in Flanders and the Netherlands;*
- *accreditation of joint programmes;*
- *institutional audits/reviews in the Netherlands and Flanders;*
- *programme assessment in Curacao, Aruba and St. Maarten*
- *assessments of special (quality) features for programmes and institutions in the Netherlands and Flanders.*

The following activities are not within the scope of the ESG and, thus, not pertinent to registration on EQAR:

- *international cooperation in the field of external quality assurance;*
- *validating Domain Specific Learning Outcomes for programmes in Flemish higher education;*
- *projects of temporary and non-structural nature related to quality assurance.*

6. The Register Committee found that the review report provides sufficient evidence and analysis on NVAO’s level of compliance with the ESG.
7. In its confirmation of eligibility the Register Committee asked NVAO and the panel to address the requirements for the recognition of other agencies, in particular how the agency ensures that the decisions taken on the basis of reviews carried out by other agencies are in line with the ESG.
8. The Committee noted that all accreditation agencies have to use NVAO’s own accreditation framework. In this manner, NVAO ensures that all reviews and the decisions based on these are in line with an ESG compliant framework. Institutions from the Flemish Community of Belgium can also choose any EQAR-registered agency for the quality assessment of existing programmes.
9. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

### **ESG 2.5 – Criteria for outcomes**

In its last renewal decision (of 1/12/2012), the Register Committee flagged for attention the criteria for outcomes on the accreditation of existing programmes and in particular the consistency of decisions based on reviews undertaken by different agencies.

The panel stated that NVAO has taken a number of steps to improve the decision-making process and found that there has been good progress in clarifying criteria for outcomes. The panel further underlined the difficulty of grading outcomes from insufficient to excellent on which further reflection by NVAO will be needed.

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The Register Committee therefore concluded that the flag was largely addressed by NVAO and concurred with the review panel’s conclusion of compliance with standard 2.5.

## Register Committee

### ESG 2.6 – Reporting

The Register Committee flagged for attention the readability of NVAO’s published reports considering its defined target audience (decision of renewal of 1/12/2012).

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The panel’s analysis show that NVAO does not have specific guidelines for organizing the content of the report. Whilst these reports can be considered clear by an expert readership, readability is generally hindered by the heterogeneity of style, which is less “user friendly” to a large public, in particular by students and employers.

The Committee underlined the recommendation of the panel that NVAO should analyse the actual and potential readership of its reports and their needs, and to develop new means to reach its target readership among students and employers.

The panel also noted that at least 10 percent of the reports and decisions made in 2016 were not publicly available. The agency explained that the publication of reports was delayed due to a temporary lack of personnel and that this issue has been fixed.

**The Register Committee stressed the publication of reports and concluded that the flag was insufficiently addressed and therefore did not concur with the review panel’s conclusion of compliance and concluded that NVAO complies only partially with ESG 2.6.**

### ESG 2.7 – Complaints and Appeals

In its analysis the panel found that the procedures on appeals against decisions are well designed but noted that the agency “lacked a solid and formal comprehensive complaints procedure, even if some elements of complaints-handling are there and informal handling of complaints by NVAO normally suffices”.

The Register Committee sought further clarification from the panel concerning the extent to which the ability of NVAO to handle complaints might be affected.

The panel explained in its response letter that the comments to NVAO were intended to highlight that the complaints procedure could be more clearly defined and communicated. The panel also learned that NVAO took the panel’s recommendation following the review and developed a comprehensive complaints procedure.

The panel confirmed that NVAO’s regulations on governing principles include indications to both complaints and “remarks”. Stakeholders, such as panel members, staff or students, may report to NVAO matters

arising during the assessment process that could affect the independence of the assessment.

The Register Committee noted that NVAO’s system of appeals is well developed and that the review panel was satisfied with NVAO’s processes for handling complaints. The Committee therefore was unable to concur with the review panel’s conclusion of partial compliance and therefore concluded that NVAO complies with standard 2.7.

10. For the remaining standards, the Register Committee was able to concur with the review panel’s analysis and conclusion without further comments.

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## Conclusion:

11. Based on the external review report and the considerations above, the Register Committee concluded that NVAO demonstrated compliance with the ESG (Parts 2 and 3) as follows:

Standard	Review panel conclusion	Register Committee conclusion
2.1	Full compliance	Compliance
2.2	Full compliance	Compliance
2.3	Substantial compliance	Compliance
2.4	Full compliance	Compliance
2.5	Substantial compliance	Compliance
2.6	Substantial compliance	Partial compliance
2.7	Partial compliance	Compliance
3.1	Substantial compliance	Compliance
3.2	Full compliance	Compliance
3.3	Full compliance	Compliance
3.4	Substantial compliance	Compliance
3.5	Full compliance	Compliance
3.6	Substantial compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

12. The Register Committee considered that NVAO only achieved partial compliance with one standards. In its holistic judgement, the Register Committee concluded that this is a specific and limited issue, and that NVAO continues to comply substantially with the ESG as a whole.

13. The Register Committee therefore approved the application for renewed NVAO's inclusion on the Register. NVAO's renewed inclusion shall be valid until 30/09/2022<sup>1</sup>.
14. The Register Committee further underlined that NVAO is expected to address the issues mentioned appropriately and to resolve them at the earliest opportunity.

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<sup>1</sup> Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.



Accreditation Organisation of the Netherlands and Flanders (NVAO)

Thomas de Bruijn

Parkstraat 28

2514 JK The Hague

The Netherlands

Brussels, 19 July 2016

## Confirmation of Eligibility: Application for Renewal of Registration

Application no. A47 of 30/06/2016

Dear Thomas,

We hereby confirm that the application by NVAO for renewal of registration is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by the European Association for Quality Assurance in Higher Education (ENQA) fulfils the requirements of the EQAR Procedures for Applications.

We confirm that the following activities of NVAO are within the scope of the ESG:

- *programme accreditation in Flanders, the Netherlands and the so called "Caribbean Netherlands";*
- *initial programme accreditation in Flanders and the Netherlands;*
- *accreditation of joint programmes;*
- *institutional audits/reviews in the Netherlands and Flanders;*
- *programme assessment in Curacao, Aruba and St. Maarten;*
- *assessments of special (quality) features for programmes and institutions in the Netherlands and Flanders.*

In the application form, NVAO stated that it did not consider *evaluations on features of programmes* to be within the scope of the ESG.

We considered the information provided and came to the conclusion that this activity might be within the scope of the ESG as far as it is part of the regular external quality assurance activities of NVAO or as a separate evaluation of study programmes in relation to learning and teaching in higher education. NVAO's self-evaluation report and the external panel's report should thus consider whether this is the case and, if so address it accordingly.

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We further confirm that while the following activities are separate external quality assurance activities they might be relevant in relation to a number of the ESG standards as follows:

- *approving of/advising on panels for programme assessments* might be relevant in relation to ESG 2.4;
- *producing thematic analyses or evaluations on the basis of assessments* could be relevant in relation to ESG 3.4;
- *drafting and maintaining frameworks for accreditation for programmes and institutions in higher education* might be relevant in relation to ESG 2.2 and ESG 2.3.

To that extent they should be taken into account in NVAO's self-evaluation and external review report.

Furthermore, the self-evaluation report and external review report should also address (1) NVAO's requirements for the recognition of other agencies and (2) how NVAO ensures that the decisions taken on the basis of reviews carried out by other agencies are in line with the ESG, especially in case the agency is not registered on EQAR.

Please ensure that NVAO's self-evaluation report covers all the aforementioned activities.

We further remind you that the following issues were flagged when NVAO's registration was last renewed, and should be addressed in your self-evaluation report and external review report:

*ESG 2.5 – Criteria for outcomes* [ESG 2005: standard 2.3]

*It should be addressed whether NVAO has clarified (within its own operational documents and without questioning the holistic nature of its judgements) the criteria and decision-making process used in making decisions on the accreditation of existing programmes in the Netherlands, including the way in which it ensures consistency of its decisions based on reviews undertaken by different agencies.*

*ESG 2.6 – Reporting* [ESG 2005: standard 2.5]

*Issues related to the readability of its reports for its defined target audience should be addressed.*

We confirm that the following activities are not within the scope of the ESG:

- *international cooperation in the field of external quality assurance;*

Based on the information provided we understand that this is an activity related to NVAO's organisation of events and participation in various networks, and therefore not a separate external quality assurance activity that should be reviewed against ESG Part 2;

- *validating Domain Specific Learning Outcomes for programmes in Flemish higher education;*
- *projects of temporary and non-structural nature related to quality assurance.*

While these activities are not relevant to your application, it is NVAO's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

We will forward this letter to ENQA in its capacity as coordinator of the external review. At the same time we underline that it is NVAO's responsibility to ensure that the coordinator and review panel take account of the present confirmation, so as to ensure that all activities mentioned are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. NVAO has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Colin Tück'.

Colin Tück  
(Director)

Cc: ENQA

Brussels, 17 October 2017

## Application by NVAO for renewal of registration on EQAR

Dear Mr Gibbs,

**NVAO** has made an application for renewal of registration on the European Quality Assurance Register for Higher Education (EQAR).

We are contacting you in your capacity as chair of the panel that prepared the external review report of 13 September 2017 on which **NVAO's** application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report. We would be obliged if you could clarify, in consultation with the panel members as necessary, the following matter in order to contribute to the consideration of **NVAO's** application:

The panel stated that NVAO *"lacked a solid and formal comprehensive complaint procedure, even if some elements of complaint-handling are there and informal handling of complaints by NVAO normally suffices"*.

Could you please clarify to what extent is the ability of NVAO to handle complaints affected? Are the possibilities to make complaints about the conduct of the external QA process or the peer-review experts carrying it out known by higher education institutions, and are such complaints properly followed-up and addressed by the agency?

We would be grateful if it was possible for you to **respond by 26/10/2017**, and we would appreciate if you get in contact with us should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on **NVAO's** application. We, however, kindly ask you to keep information related to the application confidential until the final decision has been published.

We acknowledge that it might not be possible to clarify all of the above. However, we appreciate your assistance and I shall be at your disposal if you have any questions in relation to this request.

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Kind regards,



Colin Tück  
(Director)

**Cc:** Obe de Vries (Panel Secretary)  
European Association for Quality Assurance of Higher Education  
(ENQA)  
**NVAO**

Kenmore  
Park Road  
Liverpool  
L223XF

Mr. Colin Tuck  
Director  
EQAR  
By email

21<sup>st</sup> October 2017

Dear Mr. Tuck

**Application by NVAO for renewal of registration on EQAR**

Thanks for your letter dated 17<sup>th</sup> October 2017 which observed that;

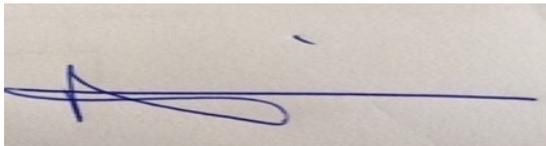
*"The panel stated that NVAO "lacked a solid and formal comprehensive complaint procedure, even if some elements of complaint-handling are there and informal handling of complaints by NVAO normally suffices".*

*And asked "Could you please clarify to what extent is the ability of NVAO to handle complaints affected? Are the possibilities to make complaints about the conduct of the external QA process or the peer-review experts carrying it out known by higher education institutions, and are such complaints properly followed-up and addressed by the agency?"*

The panel described the absence of a procedure as an omission rather than a failure. The panel heard of several instances in which NVAO officers had sought feedback and proactively managed issues in an informal manner. To this extent the panel were satisfied that NVAO were open to complaints and feedback and that concerns of stakeholders were addressed. The panel also learned that the NVAO's regulations on governing principles include a procedure for both complaints and "remarks". In Flanders, procedural complaints by any other stakeholder are only referred to in the assessment frameworks for which NVAO is responsible for the procedure. Stakeholders, such as panel members, staff or students, may report to NVAO any matters arising during the assessment process that could affect the independence of the assessment. The panel were satisfied that in line with interpretation 17 a process for handling complaints was in place. The panels comments to NVAO were intended to highlight that the complaint procedure could be more clearly defined and communicated. I understand that subsequently NVAO took the panel's recommendation to heart and immediately set up a complaints procedure.

I trust that this addresses your enquiry and if not please feel free to contact me again.

Best wishes



Andy Gibbs