

**Rejection of the Application**  
**by QANU - Quality Assurance Netherlands Universities (QANU)**  
**for Renewal of Inclusion on the Register**

Register Committee

Ref. RC20/A40

Ver. 2.0

Date 2017-11-22

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<b>Application of:</b>	02/05/2016
<b>Agency registered since:</b>	14/05/2011
<b>External review report of:</b>	December 2016
<b>Review coordinated by:</b>	European Association for Quality Assurance of Higher Education (ENQA)
<b>Review panel members:</b>	Henrik Toft Jensen (chair) Maria E. Weber (secretary) André Vyt (academic) Simona Dimovska (student)
<b>Decision of:</b>	16/11/2017
<b>Registration until:</b>	31/12/2016
<b>Absented themselves from decision-making:</b>	Karl Dittrich, Ann Verreth
<b>Attachments:</b>	<ol style="list-style-type: none"> <li>1. <a href="#">Confirmation of eligibility, 09/03/2016</a></li> <li>2. <a href="#">External Review Report, 31/10/2016</a></li> <li>3. <a href="#">Request to the Review Panel, 10/04/2017</a></li> <li>4. <a href="#">Clarification by the Review Panel, 24/04/2017</a></li> <li>5. <a href="#">Additional representation, 28/09/2017</a></li> </ol>

1. The application of 02/05/2016 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 09/03/2016 having considered clarification received from QANU on 25/02/2016.
3. The Register Committee considered the external review report of December 2016 on the compliance of QANU 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 (letter of 24/04/2017).
5. The Register Committee invited QANU to make additional representation on the grounds for possible rejection and considered QANU's additional representation of 28/09/2017.

## Analysis:

6. In considering QANU's compliance with the ESG, the Register Committee only took into account *assessments of degree programmes* and *assessments of research units* where they concern PhD training programmes and the supervision of PhD candidates. Assessments in sectors outside higher education and supporting QA of institutions of higher education are not within the scope of the ESG and, thus, not pertinent to registration on EQAR.
7. The Register Committee found that the report provides sufficient evidence and analysis on QANU's level of compliance with the ESG.
8. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

### ESG 2.4: Peer-review experts

In considering assessment of research units/PhD training programmes the panel remarked that the group of external experts do not include a student member. The panel explained that QANU does not assume responsibility for the nomination and selection of expert panel members, but that this is done by the higher education institution concerned.

In its decision for inclusion (14/05/2011), the Register Committee flagged for attention QANU's selection criteria for assessment committee members. Considering this matter the panel noted that QANU does not have any guidance or formalised procedure concerning the process for the selection and composition of panels.

The Register Committee formed the view that QANU has not addressed the flag and underlined that the agency has not met one requirement of the standard, namely including a student member in the assessment of research units/PhD training programmes.

The agency explained in its additional representation that in the selection and composition of panels for degree programmes QANU refers, when necessary, to the NVAO procedure. The requirements for the composition of panels are included in the framework for limited programme assessment, which is used for all assessment programmes in the Netherlands. QANU did not see the need to introduce separate guidelines so as to avoid confusion. The Register Committee considered that there is a consistent approach in the selection of panel members for limited programme assessment and that the framework is in line with the requirement of the standard.

In the assessment of research units QANU explained that was unable to assume responsibility for the nomination and selection of panel members as the formal framework placed the responsibility with other organisations. While QANU is part of the working group that revises the Standard Evaluation Protocol (SEP) and had argued for including a PhD

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candidate in the evaluation panels, the requirement was not endorsed. The current version of the SEP will be valid from 2015 to 2021.

While the Register Committee acknowledged the attempts made by the agency to introduce students in the assessment of PhD training programmes, the current version of the SEP does not make provision for the involvement of students.

**The Committee was thus unable to concur with the panel's conclusion of compliance and considered that QANU complies only partially with ESG 2.4.**

### ESG 2.7: Complaints and appeals

QANU has a formal procedure in place in case of appeals and complaints regarding the assessment of degree programmes. The panel noted that the board of QANU decides whether an appeal is justified and whether it leads to a revision of the panel's report.

In case of assessment of research units/PhD programmes the panel noted that QANU has not developed any complaints and appeals procedures. The agency explained that it only saw itself providing a supportive role and that 'institutions are owners of the assessments of research units'.

The Register Committee was not persuaded by the agency's explanation and underlined that a complaints and appeals procedure should be in place, as per the requirement of the standard, for all external quality assurance activities carried out by the agency, therefore also for the assessment of research programmes units / PhD training programmes.

In its additional representation, the agency added that it did not find appropriate to develop an appeals' procedure as the assessments of research units and PhD training programmes do not lead to decisions by QANU. Nevertheless a complaints procedure was developed by the Director for the assessment of research programmes units / PhD training programmes and published by the agency following its external review.

While the Register Committee noted the newly published complaints for assessment of research units/PhD training programmes, the Committee underlined that the possibility to issue a complaint is not available for assessment of degree programmes and that the new procedure has yet to be externally reviewed by a panel.

The Committee also underlined the possible conflict of interest in having complaints (in the case of research units/PhD training programmes) and appeals (in the case of assessment of degree programmes) handled by the Board of QANU, instead of an independent complaints and appeals committee.

**The Register Committee was therefore unable to concur with the panel's conclusion of 'substantially compliant' and considered that QANU complies only partially with the standard.**

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### ESG 3.1 Activities, policy and processes for quality assurance

In its decision of initial inclusion, the Register Committee flagged for attention the consistent publication of a concise mission statement. While QANU has revised and updated its mission statement the panel found that the mission had not always been systematically translated into action that can guide the agency's daily activities. The Committee therefore concluded that the flag was only partially addressed.

The panel further noted that stakeholder involvement is not fully ensured as QANU's governing board is mainly formed by academics. Students and employer representatives are not represented in the board.

In its eligibility confirmation, the Register Committee asked QANU and the review panel to address how the agency ensures a clear separation between its consultancy activities and the agency's assessment procedures. The panel noted that QANU provides consultancy services and writing of critical reflections in order to support its midterm reviews (p. 16-17). The Register Committee was unclear if QANU had policies in place to avoid carrying out consultancy activities and later assessments for the same degree programmes, and have therefore asked the panel to clarify this matter.

In its clarification response, the panel explained that the agency had no formal, financial or personal connections with any of the institutions it conducts assessment for. While the panel did not refer to any specific regulation or policy on how QANU ensures a distinction between its external quality assurance activities and its other fields of work, the panel was satisfied to learn from its interviews with the agency that there were no overlaps between consultancy and external QA activities.

In its additional representation QANU stated that its new quality policy will help better connect the mission to the agency's regular activities.

Considering the involvement of stakeholders in its governance and work, QANU stated its intention to invite representatives of students and employers in one of the Board's annual meetings and that it also considers involving employer representatives in QANU's different activities.

The agency further explained that its consultancy activities were separated from its regular formal assessments, i.e. the agency would not accept assignment for consultancy activities if there is an assessment of the degree programme; staff involved in the degree programme assessment sign a declaration of independence which ensures that if they had been previously involved in a midterm review of a programme they could not act as a secretary in the assessment of the same programme.

**The Committee acknowledged the steps taken by QANU to address its compliance with standard 3.1, but found that progress in involving stakeholders has not been significant. The intended changes were still**

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in development and they yet have to be implemented and externally reviewed by a panel.

The Register Committee therefore concurred with the panel that QANU is only partially compliant with standard 3.1.

### ESG 3.4 Thematic analysis

In its decision for inclusion, the Register Committee flagged QANU's systematic approach to system-wide analyses.

While QANU has not produced thematic analysis in its strict sense, the panel noted that the agency published reports at the request of research universities and state of the art reports for programmes that are assessed in clusters. The panel noted that QANU did not have a systematic approach towards producing thematic analysis and that the agency views this activity to remain mainly in the responsibility of NVAO.

In its additional representation, QANU's underlined that its core activity is to conduct assessments, and due to its limited size, financial resources and scope QANU's ability to conduct thematic analyses in a systematic way was limited. The Board of QANU had nevertheless considered the recommendations of the panel and stated that it would adapt its approach to thematic analysis.

**The Register Committee welcomed QANU's plans but underlined that the situation as reviewed by the external panel was the basis for its decision.**

**The Register Committee therefore concurred with the view of the panel that QANU only partially complies with standard 3.4.**

### ESG 3.6 Internal quality assurance and professional conduct

The panel confirmed that the agency had some procedures and processes in place aiming to support, reflect and improve its own day-to-day operations (i.e. Quick Reference Guide, annual reports, bi-weekly staff briefings, evaluation of assessments). The panel found that QANU did not have an internal quality assurance policy or an integrated quality management system (related to i.e. human resources, briefing of panels, collegial feedback on draft reports).

In its additional representation the agency argued that the necessary components of a quality policy are in place and described briefly in QANU's Quick Reference Guide. In terms of a cohesive and integrated quality plan the agency stated that it had started developing such a plan that will be an integration of the processes and procedures QANU has in place.

Given the commendations by the panel on the internal quality assurance processes, e.g. good procedure for monitoring and improving the quality of the staff, good quality of assessment reports, QANU stated it did not understand the Committee's conclusion of partial compliance.

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Having considered the external review report and QANU's representation, the Register Committee concurred with the panel that QANU complies with the standard.

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9. 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:**

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

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

11. After duly considering QANU's additional representation, the Register Committee concluded that QANU only achieved partial compliance with a number of standards. QANU thus fails to meet some key requirements of the ESG and, in its holistic judgement on the basis of the documentation available and QANU's representation, the Register Committee remained unable to conclude that QANU complies substantially with the ESG as a whole.
12. The Register Committee therefore rejected the application.
13. QANU has the right, according to §3.21 of the Procedures for Applications, to undergo a focused review addressing those issues that led to rejection, and to reapply within 18 months based on that focused review.

14. QANU has the right to appeal this decision of the Register Committee in accordance with the Appeals Procedure (available on the EQAR website at <http://www.eqar.eu/application.html>). Any appeal must reach EQAR within 90 days from receipt of this decision.

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Quality Assurance Netherlands Universities (QANU)

Sietze Looijenga

Catharijnesingel 56

3511 GE Utrecht

The Netherlands

Brussels, 9 March 2016

## Confirmation of Eligibility: Application for Renewal of Registration

Application no. A40 of 5/2/2016

Dear Sietze,

We hereby confirm that the application by Quality Assurance Netherlands Universities (QANU) for renewal of registration is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by ENQA fulfils the requirements of the EQAR Procedures for Applications.

We confirm that the activity "*assessments of degree programmes*" is within the scope of the ESG.

In the application form, QANU stated that it did not consider "*assessments of research programmes*" to be within the scope of the ESG. We sought clarification from QANU and considered the information you kindly provided.

Based on the information at our disposal, we came to the conclusion that assessments of research programmes might be within the scope of the ESG as far as they concern PhD training programmes and the supervision of PhD candidates. Even though PhD candidates are considered staff rather than students, PhD training falls within the area of "learning and teaching in higher education" as defined in the ESG, given that PhD qualifications are part of the Qualifications Framework of the European Higher Education Area (QF-EHEA).

QANU's self-evaluation report and the external review report should thus analyse whether the assessments of research programmes can be considered within the scope of the ESG, in the light of the subject of these assessments and QANU's role in them, and comment on the extent to which they are in compliance with the ESG.

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

European Quality Assurance  
Register for Higher Education  
(EQAR) aisbl

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

*ESG 2.5 Selection criteria for assessment committees [ESG 2005: standard 2.4]*

*The further development of the nomination and selection process for assessment committee members with a view to addressing the shortcomings identified in the external review report.*

*ESG 3.4 System-wide analyses [ESG 2005: standard 2.8]*

*The further development and a more systematic approach to the system-wide analyses published by QANU.*

*ESG 3.2 Mission statement [ESG 2005: standard 3.5]*

*The consistent publication of a concise mission statement.*

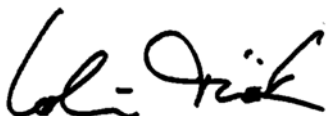
We confirm that "assessments in sectors outside higher education" are not external quality assurance activities within the scope of the ESG, based on the understanding that the programmes concerned are not part of the three cycles described in the QF-EHEA.

We further confirm that the activity "supporting QA of institutions of higher education" is not an external quality assurance activity within the scope of the ESG. QANU's self-evaluation and the external review report should, however, address how QANU ensures a clear separation between such consultative activities and the agency's assessment procedures.

We will forward this letter to ENQA in its capacity of coordinator of the external review. We, however, underline that it is QANU's responsibility to ensure that the coordinator and review panel take account of the present confirmation and analyse all mentioned activities in the external review report.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. QANU 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

**Subject:** Application for Registration/Renewal: Quality Assurance Netherlands Universities**From:** "looijenga@qanu.nl" <form\_engine@fs22.formsite.com>**Date:** 2/5/2016 1:26 PM**To:** applications@eqar.eu

Quality Assurance Netherlands Universities - QANU has submitted an application for Renewal of EQAR Registration to EQAR.

<b>Reference #</b>	9038362
<b>Status</b>	Complete
<b>Login Username</b>	sietze.looijenga
<b>Login Email</b>	looijenga@qanu.nl
<b>I, as the authorised representative of the Applicant, am submitting an application for: *</b>	Renewal of EQAR Registration
<b>Applicant name in English: *</b>	Quality Assurance Netherlands Universities
<b>Acronym *</b>	QANU
<b>Applicant name in local language:</b>	d.n.a.
<b>Website *</b>	<a href="http://www.qanu.nl">http://www.qanu.nl</a>
<b>VAT Number:</b>	NL812807820B01
<b>First name: *</b>	Sietze
<b>Surname: *</b>	Looijenga
<b>E-mail: *</b>	<a href="mailto:looijenga@qanu.nl">looijenga@qanu.nl</a>
<b>Additional e-mail:</b>	<a href="mailto:ondersteuning@qanu.nl">ondersteuning@qanu.nl</a>

<b>Phone: *</b>	+31 30 230 3100
<b>Street and number: *</b>	Catharijnesingel 56
<b>Postcode:</b>	3511GE
<b>City: *</b>	Utrecht
<b>Country: *</b>	Netherlands
<b>ENQA membership:</b>	Full member
<b>Memberships of other regional or international organisations in the field of quality assurance (e.g. INQAAHE, CEENQA, ECA etc.):</b>	INQAAHE
<b>Brief general description of the Applicant (max. 500 characters):</b>	QANU is a quality assurance agency which aims at assessing degree and research programmes offered by universities in the Netherlands. QANU contributes to the national system of external quality assurance in higher education by providing insight in the quality of education and research, enabling universities to account for their activities in these areas and to further improve the quality of their education and research. QANU works with committees of independent peers.
<b>1. Name of the external quality assurance activity *</b>	Assessments of degree programmes
<b>Please describe this EQA activity: *</b>	QANU assesses degree programmes offered by universities in the Netherlands. QANU follows the frameworks defined by the NVAO, the Dutch-Flemish Accreditation Organization. QANU conducts assessments at the request of the universities. QANU's reports serve as the basis for the decisions taken by the NVAO on re-accreditation of existing degree programmes. QANU's reports are published on the NVAO's website, together with the NVAO's decisions.
<b>Link to review reports: *</b>	<a href="http://www.nvao.net">http://www.nvao.net</a>

<b>Level: *</b>	<ul style="list-style-type: none"> <li>• Programme</li> <li>• Joint programme</li> </ul>
<b>Type of review: *</b>	Evaluation
<b>Please choose: *</b>	Done (I have described all EQA activities of the Applicant)
<b>1. Please choose: *</b>	The Applicant DOES NOT recognise EQA activities or decisions of other agencies
<b>2. Please choose: *</b>	The Applicant does not make EQA decisions based on reviews carried out by other bodies.
<b>Within EHEA (please include home country as well) *</b>	Netherlands
<b>Please choose: *</b>	The Applicant carries out activities outside the scope of the ESG
<b>1. Name of the activity outside the scope of the ESG: *</b>	Assessments of research programmes
<b>Please describe this activity carried out by the Applicant: *</b>	QANU also conducts assessments of scientific research programmes. These assessments follow the Standard Evaluation Protocol, a protocol developed by the Royal Academy of Sciences (KNAW), the Netherlands Organization for Scientific Research (NWO) and the Association of Universities in the Netherlands (VSNU). QANU provides secretaries for the committees of peers who assess the research programmes and co-ordinates the work of these committees.
<b>Choose: *</b>	Repeat table (to include additional activities)
<b>2. Other activity carried out by the Applicant (not within the scope of the ESG): *</b>	Assessments in sectors outside higher education
<b>Please describe this activity carried</b>	QANU contributes to assessments of education programmes in sectors outside higher education. For instance, QANU is involved in the assessments of the programmes for general practitioners offered by the

**out by the Applicant: \*** university hospitals in the Netherlands and in the assessment of the boards of schools for primary education. These activities show that QANU's experience and expertise are relevant for sectors outside higher education as well.

**Choose: \*** Repeat table (to include additional activities)

**3. Other activity carried out by the Applicant that is not within the scope of the ESG: \*** Activities supporting QA of institutions of higher education

**Please describe this activity carried out by the Applicant: \*** QANU occasionally carries out activities supporting the quality assurance of institutions of higher education, including workshops or seminars relating to aspects of QA or secretarial support for internal QA activities such as mid-term reviews.

**Choose: \*** Done (I have described all activities of the Applicant)

**The coordinator of the external review of QANU is: \*** The European Association for Quality Assurance in Higher Education (ENQA)

**Year \*** 2016

**Month \*** March

**Year \*** 2016

**Month \*** June

**Year \*** 2016

**Month \*** October

**Annex 1 - Signed Application Form (access here the PDF, DOC or ODT version of the form) \*** [EQAR Signed Application Form.pdf \(53k\)](#)

**Annex 2 - Draft Terms of Reference of the external review (PDF document only)** [Draft ToR ENQA-coordinated review of QANU.pdf \(100k\)](#)

**I, as the authorised representative of the Applicant, declare that I have completed the present Application Form truthfully and provided correct and up-to-date information: \*** Yes, I am ready to submit the form.

**Last Update**

**Start Time**

**Finish Time** 2016-02-05 06:26:47

EQAR  
Att. Karl Dittrich, Chair of the Register Committee  
Oudergemselaan 36  
1040 Brussels  
Belgium

Catharijnesingel 56 - 5e  
3511 GE Utrecht  
Postbus 8035  
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030 230 31 00  
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date 27 September 2017  
reference  
phone +31 30 230 3100  
e-mail [looijenga@qanu.nl](mailto:looijenga@qanu.nl)  
subject QANU's Application for Inclusion on EQAR

Dear Mr. Dittrich,

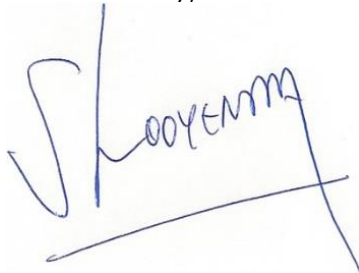
On 5 February 2016, QANU applied for a renewal of our inclusion on the European Quality Assurance Register (EQAR). In June 2016, QANU was assessed by an ENQA Review Team chaired by Henrik Toft Jensen, former rector of Roskilde Universitet (DK). On the basis of the assessment report produced by the ENQA Review Team, QANU's membership of ENQA was reconfirmed in November 2016.

On 29 June 2017, we received a letter from your predecessor, Eric Froment, informing us that EQAR's Register Committee was unable to conclude that QANU substantially complies with the Standards and Guidelines for Quality Assurance in the European Higher Education Area, and inviting us to make additional representation before the Register Committee makes a final decision on our application.

I hereby present our additional representation, responding to the issues raised in the deferral of our application by the Register Committee.

I sincerely hope that the additional information presented will enable the Register Committee to come to a positive conclusion on our application for inclusion on EQAR. Of course, if you have any questions, please don't hesitate to contact me.

Yours sincerely,



Sietze Looijenga  
director

Chair of the Review Panel

Henrik Toft Jensen

– via email –

Brussels, 10 April 2017

**Application by Quality Assurance Netherlands Universities (QANU) for renewal of registration on EQAR**

Dear Henrik,

QANU has made an application for renewal of inclusion 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 March 2017 on which QANU's application is based.

The EQAR Register Committee's rapporteurs have been considering the application and the external review report.

We would appreciate if you could clarify, in consultation with the panel members as necessary, the following matter in relation to the consideration of QANU's application.

In considering QANU's consultancy services, the panel notes that consultancy services are provided in order to support the so-called mid-term reviews and writing of critical reflections (p. 16-17). Could you please elaborate if the panel has considered if QANU has policies and processes in place to avoid carrying out assessments and consultancy activities for the same degree programmes?

We would be grateful if it would be possible for you to **respond by 24 April 2017**, and we would appreciate if you could let us know earlier should that not be feasible.

Please note that EQAR will publish this request and your response together with the final decision on QANU'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 any your assistance you may be able to provide

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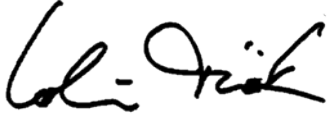
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and I shall be at your disposal if you have any questions in relation to this request.

Kind regards,



Colin Tück  
(Director)

Cc: Maria E. Weber (panel secretary)  
ENQA  
QANU

To eqar

From Henrik Toft Jensen

Chair of the Review Panel for QANU 2016

QANU assessments and consultancy service.

Based on interviews and the self-evaluation report the panel has considered that QANU has policies and processes in place to avoid carrying out assessments and consultancy activities for the same degree programmes.

The self-evaluation report stress the following at page 43:

QUAU has no formal, financial or personal connections with any of the institutions it conducts assignments for..... Both panel members and the secretary sign a form before the assessment, thereby declaring that they are able to conduct the assessment independently because they have no formal, financial or personal connections with the institutions or programmes to be assessed either.

In the interviews we asked about a possible overlapping of the assessment and consultant activities, and QANU declared that there were no overlapping concerning the two activities in the same programme.

Henrik Toft Jensen

## **Additional representation relating to QANU's application for inclusion on the European Quality Assurance Register (EQAR)**

EQAR's Register Committee made an analysis of the assessment report produced by an ENQA Review Panel chaired by Henrik Toft Jensen, former rector of Roskilde Universitet (DK), to decide whether QANU qualifies for a renewal of its inclusion on the European Quality Assurance Register (EQAR). In a number of cases, the Register Committee was unable to concur with the conclusions of the ENQA Review Panel. In its deferral of our application, the Register Committee explains why. The Register Committee's considerations relate to five standards from the European Standard and Guidelines. In this document, QANU summarises the considerations and responds to them. We start, however, with a few introductory remarks that describe how we have responded to the recommendations phrased by the Review Panel that visited us in June 2016.

### **Introductory remarks**

When QANU's Board chose to opt for a renewal of QANU's ENQA membership, it also decided that the recommendations of the ENQA Review Panel that would assess QANU would have to be implemented in a systematic way. After the presentation of the Review Panel's preliminary findings on the last day of its site visit in June 2016, QANU's Board decided to set up an action plan to address the recommendations formulated by the Review Panel in a systematic way. Since then, the follow-up of the Review Panel's recommendations is a permanent item on the Board's agenda. QANU received the final version of the Review Panel's assessment report on 12 December 2016. QANU uses this final version as the starting point for the development of the action plan.

As components of this action plan, QANU is developing a quality policy and a communication policy. The quality policy will essentially be an integration of the processes and procedures that QANU has in place, explicitly linking them to QANU's mission and vision. In addition, the quality plan also foresees a more systematic approach to QANU's strategy, namely the annual development of strategic aims emerging from the mission and vision.

Between January and September 2017, a core team of staff members, including QANU's director, the co-ordinators of education and research assessments, several staff members who act as co-ordinators of assessments and as secretaries of assessment panels, a project support staff member and a secretary, participated in a series of workshops dealing with internal and external challenges QANU faces. One of the external challenges is how to respond to the most recent changes in the system of external quality assurance, another one is related to the increasing competition between quality assurance agencies in the Netherlands. The internal challenges relate, among others, to the need for a further elaboration of our processes and procedures and to the necessary reduction of the high workload of QANU's staff. The outcomes of these workshops will be fed into the quality policy and the communication policy that we are developing.

In 2014, QANU decided to implement a new project management software system to further support the management of the assessments that we conduct. This software system will automatically produce important data that provide information about our performance and that enable us to analyse the assessments with more depth than before. In addition, it will also provide means to standardise processes and procedures and thereby to make these processes and procedures more transparent and reliable. It will be closely linked to our quality policy. Unfortunately, the implementation of this software system has incurred a delay and we are still unable to use the full potential of this system. As a result, the actualisation of several processes and procedures has also fallen behind.

## **ESG 2.4: Peer-review experts**

The ENQA Review Panel noted that the panels that assess research units and PhD programmes do not include a PhD candidate (a student member). It also noted that QANU does not have any guidance or formalised procedure for the process of selection and composition of panels.

The Register Committee underlined that QANU has not met one requirement of the standard, namely including a student member in the assessment of research units and PhD programmes. The Register Committee was therefore unable to concur with the Review Panel's conclusion ('substantially compliant') and concluded that QANU only partially complies with standard 2.4.

### **QANU's response:**

The Register Committee's deferral refers to the Review Panel's remark that QANU does not assume responsibility in the nomination and selection of panel members. A more appropriate formulation would be that QANU is unable to assume responsibility in the nomination and selection of panel members, because the formal framework serving as the starting point for assessments of research units and PhD programmes places this responsibility elsewhere.

The framework for assessments of research units and PhD programmes is the Standard Evaluation Protocol (SEP). This protocol is a joint product of three organisations: the association of universities in the Netherlands (VSNU), the Royal Academy of Sciences (KNAW) and the Netherlands Organisation for Scientific Research (NWO). As a rule, the SEP is valid for a period of six years. The current version is valid from 2015 until 2021. New versions of the SEP are the result of evaluations of the protocol that is in force in a working group of stakeholders. The first discussions about the current version of the SEP were held recently.

The current Standard Evaluation Protocol states (p. 6): "The board [of a university] appoints an assessment committee. The committee should be impartial and international. The committee must be capable, as a body, to pass a judgement regarding all assessment criteria." The SEP also lists the conditions for the composition of an assessment committee. It does not contain any conditions regarding the inclusion of a PhD candidate.

QANU's co-ordinator of research assessments is a member of the working group that evaluates the Standard Evaluation Protocol. On various occasions, she has argued that panels conducting assessments of research units and PhD programmes should include a PhD candidate. She will continue to do in the upcoming evaluations of the current protocol. She is, however, not in a position to enforce the inclusion of a PhD candidate in the panels as a formal requirement in the SEP. It is up to the owners of the protocol, the VSNU, KNAW and NWO, to decide whether panels should include a PhD candidate.

We fully realise that the lack of a PhD candidate in panels that assess research units and PhD programmes creates a tension with the European Standards and Guidelines. We are, however, unable to meet the requirement to include a PhD candidate in the panels ourselves. We do not have the formal means to enforce this. We feel that it should not be held against us that the panels assessing research units and PhD programmes do not include a PhD candidate. QANU will continue to argue that the SEP should contain a requirement to include a PhD candidate. In QANU's view, this is the best way to implement the Review Panel's recommendation to *strive* for the inclusion of PhD candidates in panels in the assessment of research units and PhD programmes.

At the time of the assessment by the ENQA Review Panel, QANU did not have a formalised procedure or guidance for the process of selection and composition of panels that assess degree programmes because the NVAO had developed a guideline specifically for this purpose and QANU decided not to introduce a second document for the same purpose to avoid

confusion or unnecessary discussion. The NVAO's guideline for the composition of assessment panels described the procedure for submitting a panel to the NVAO for approval and listed the areas of expertise that a panel as a whole should have. The NVAO used this list as the starting point for its assessments of panel compositions. QANU referred to the NVAO's guideline whenever necessary and provided support and assistance to (clusters of) degree programmes that were in the process of composing an assessment panel, informing them, for instance, about the areas of expertise a panel should have.

At the beginning of 2017, when the NVAO introduced its new assessment frameworks, the guideline for the composition of assessment panels was abolished. The NVAO included the requirements for the composition of a panel in the new framework for limited programme assessments, the framework used for all assessments of programmes offered by universities in the Netherlands. QANU's procedure still is to refer to the NVAO's framework and to provide support and assistance when necessary. At the moment, we see no need to introduce a separate guideline for the selection and composition of panels.

### **ESG 2.7: Complaints and appeals**

The ENQA Review Panel noted that QANU did not develop a complaints and appeals procedure for assessments of research units and PhD programmes. The Register Committee is of the opinion that a complaints and appeals procedure should be in place, because the requirement of the standard holds for all external quality assurance activities carried out by the agency.

#### **QANU's response:**

Since the ENQA Review Panel did not formulate specific recommendations on this issue, QANU undertook no immediate action on the basis of the final Review Panel's assessment report. After receiving EQAR's deferral of our application, QANU's director decided to develop a complaints procedure for assessments of research units and PhD programmes. The draft version of this procedure is available already. It will be discussed in the meeting of QANU's Board which is scheduled to take place on 4 October and be published on QANU's website as soon as the Board has approved the procedure. The Board agreed that it is not appropriate for QANU to develop an appeals procedure, because the assessments of research units and PhD programmes do not lead to decisions or have consequences that are open to appeal.

### **ESG 3.1: Activities, policy and processes for quality assurance**

The ENQA Review Panel found that QANU has not always systematically translated its mission statement into action that can guide our daily activities. The panel also noted that QANU's Board mainly consists of academics and does not contain representatives of other stakeholders such as students and employers.

In addition, the Review Panel observed that QANU "provides consultancy services and writing of critical reflections in order to support its midterm reviews". It is not clear to the Register Committee whether QANU has policies and processes in place to avoid carrying out assessments and consultancy activities for the same degree programmes. At the request of the Register Committee, the chair of the Review Panel elaborated on this issue. The chair's clarification did not entirely convince the Register Committee: it could not assure itself whether policies and processes are in place to avoid carrying out assessments and consultancy activities for the same degree programme.

#### **QANU's response:**

As mentioned earlier, we are currently developing an explicit quality policy, following the recommendations of the Review Panel. This quality policy will take QANU's mission as a starting point and it will explicitly relate our mission to the daily activities we carry out.

In the first meeting after the finalisation of the Review Panel's assessment report, the Board discussed the issue of its own composition. The Board decided that it wants to establish a more formal relation with two important stakeholders, the employers and the students. As a start, it decided to invite representatives of the two major student organisations in the Netherlands, LSVB and ISO, for an annual discussion in one of the Board's meetings. The Board is also considering involving representatives of employers in QANU's activities, for instance by organising workshops or conferences that address issues related to employability or to the preparation for the labour market.

While QANU is bound by the applicable frameworks, we also want to investigate the possibility of introducing a somewhat broader perspective in our assessments. We are aware that this will be a challenge, since it is not a priori clear that institutions of higher education are interested in a broader perspective. QANU is nevertheless convinced that a relation with students and employers is useful and that their perspective should somehow be taken into account in our assessments.

When it comes to the independence of QANU's staff, QANU's policy is that staff members who play a role in a formal assessment of a degree programme have to be able to sign the NVAO's Declaration of Independence. This declaration lists the conditions that apply to panel members and secretaries to a panel alike, one of them being that either a panel member or a secretary has not had a formal, personal or financial relation with the programme to be assessed for a minimum of five years. This means that a staff member who is involved in, for instance, a midterm review of a programme is not allowed to act as a secretary in an assessment of the same programme for a period of five years after the midterm review.

At the level of the agency as a whole, QANU's policy is that consultancy activities are not allowed to interfere in any conceivable way with a formal assessment. This means that QANU would not accept an assignment for consultancy activities from a degree programme if QANU would be conducting a formal assessment of that programme at the same time. Since the amount of consultancy activities is limited, there have not yet been situations in which QANU had to refuse an assignment.

We hope that this clarification convinces the Register Committee that we take the principle of independence very seriously and that we have policies and processes in place to avoid carrying out assessments and consultancy activities for the same degree programme.

We are aware that this policy is not referred to explicitly on our website and have therefore decided to update the information available on other activities such as supporting midterm reviews and consultancy activities.

The sentence from the Review Panel report quoted by the Register Committee is somewhat ambiguous. It is a matter of principle for us that our staff members do not write self-assessment reports for degree programmes. We consider this to be a task of a programme itself. We occasionally provide workshops or training sessions for programmes that start their preparations for an assessment, in which we explain, among other things, what the standards in the assessment framework amount to and which information a self-assessment report should contain. QANU checks whether self-assessment reports contain all the necessary information, but it does not contribute in writing to these reports.

### **ESG 3.4: Thematic analysis**

The ENQA Review Panel established that QANU does not have a systematic approach towards producing thematic analysis and that the agency views this activity to remain mainly in the responsibility of NVAO.

The Register Committee underlined the panel's recommendation of a more proactive and formalised approach with regard to thematic analysis and concurred with the view of the Review Panel that QANU only partially complies with standard 3.4.

**QANU's response:**

Until now, QANU has not had a formalised approach towards producing thematic analyses. As mentioned in the Review Panel's report, QANU produced several documents in the last few years that are based on analyses of QANU's experience with assessments. These documents can be considered thematic analyses that contributed to the discussions about the development of the system of external quality assurance in the Netherlands.

QANU does not receive any funding from the government, the ministry of education or other stakeholders in higher education. QANU's core activity is to conduct assessments at the request of, and paid by, institutions of higher education. Until now, QANU has not received any assignments for thematic analyses in a strict sense. If QANU were to conduct thematic analyses in a systematic way, we would have to fund them ourselves. The size and scope of thematic analyses that QANU is able to conduct is therefore limited.

In QANU's opinion, the Review Panel's remark that QANU *views* the production of system-wide analyses mainly in the responsibility of the NVAO is not entirely appropriate. We feel that this is not a view, but a fact that derives directly from the structure of the system of external quality assurance. The Act on higher education identifies the NVAO as the organisation that supervises the system of external quality assurance. The NVAO is the only organisation that is in a position to produce thematic analyses that are really system-wide, because the NVAO is the only organisation in the Netherlands that has an overview of the system as a whole.

QANU's Board discussed the Review Panel's assessment of ESG 3.4 and decided that QANU should aim at producing more analyses that are based on QANU's experience and at presenting or publishing these analyses. In this respect, QANU has adapted its approach with regard to thematic analyses.

**ESG 3.6: Internal quality assurance and professional conduct**

The Register Committee deferral states that the Review Panel found that QANU did not have an internal quality assurance policy or an integrated quality management system (related to i.e. human resources, briefing of panels, collegial feedback on draft reports).

The Register Committee feels that QANU lacks a formalised and integrated approach of internal quality assurance. It does not agree with the Review Panel's assessment of standard 3.6 ('substantially compliant') and concludes that QANU only partially complies with this standard.

**QANU's response:**

We are convinced that we have and apply the necessary components of a quality policy. In most cases, these components are described briefly in documents that are included in our Quick Reference Guide. We agree with the Review Panel's conclusion that these documents should be further elaborated and formalised and that the processes and procedures should be integrated more strongly in a cohesive quality policy. QANU has already started developing a quality plan that integrates the processes and procedures we use.

With regard to HRM, for instance, we monitor and improve the quality of our staff in a systematic way. QANU's director conducts a cycle of performance interviews with all staff members which focus on personal development in relation to past performance. The outcomes of these interviews can be that a staff member follows a course or training programme to further develop specific knowledge or skills. We also have an elaborate procedure for selecting new staff members and preparing them for the work they will have to do. The Review Panel

praised this procedure explicitly in the presentation of its preliminary findings at the end of its site visit. In its final report, the Review Panel refers to these procedures as "good practice": "The review panel recommends formalising the good practice in place (mentoring, shadowing, collegial feedback and support processes in place) in written documentation" (p. 29).

In its final report, the Review Panel commends the good quality of our assessment reports. In addition, it especially commends the "internal processes defined with the aim to achieve constant and concise reports" (cf. p. 43). The core of these processes is the procedure of collegial feedback on draft reports. Again, this procedure can be elaborated in more detail in writing, but we have it and we use it and the Review Panel explicitly expressed its appreciation for it.

The Review Panel states that "valuable processes, e.g. related to human resources, briefing of panels, collegial feedback on draft reports, etc. are, as far as evidence was discussed and demonstrated, lacking written formalisation" (cf. p. 28). We feel that it is somewhat unfair to rephrase this statement in the way the Register Committee has done in its deferral. QANU agrees with the Review Panel that processes and procedures have not been sufficiently formalised in writing, but this cannot be taken to imply that these processes and procedures do not exist. To the contrary: the fact that they have not been formalised is actually proof of their existence. More than that: the Review Panel is quite positive about these processes and procedures, it calls them "valuable", mentions one of them explicitly in its summary of commendations and several others in an appreciative way in its report.

One of the components of the internal quality assurance that is lacking at the moment is a systematic evaluation of QANU's assessments. In the past, QANU has used several methods to carry out such evaluations, including an anonymous evaluation using an online questionnaire and an open invitation to provide feedback to QANU's director, but none of these methods provided information that was representative and useful. In most cases, the number of responses was very limited. The evaluations by representatives of degree programmes seemed to be related to the outcomes of the assessment. The question therefore is whether the evaluations could be considered entirely reliable.

QANU continues to look for a method that provides representative and reliable information about the views of panel members and representatives of degree and research programmes on QANU's performance. Over the last few months, QANU conducted structured interviews with staff members of universities who have been involved in several assessments, for instance staff members at faculty level who served as QANU's contact persons for all assessments within that faculty. These interviews provided useful information. The analysis of the information from these interviews was completed recently and will be discussed by QANU's Board in its meeting on 4 October. We are considering the option to conduct such interviews regularly, for instance once a year.

QANU considers the Review Panel's assessment of this standard ('substantially compliant') as fair, because the Review Panel is positive about the components of our system of internal quality assurance, but it justly criticises the lack of integration and formalisation of these processes and procedures. Unfortunately, we do not really understand why the Register Committee could not follow the Review Panel's conclusion.

### **Conclusion**

We hope we have been able to demonstrate that QANU complies sufficiently to the criteria for inclusion on the European Quality Assurance Register. We also hope that the Register Committee will come to a positive conclusion on QANU's application for inclusion. We acknowledge and understand that the Register Committee conducts a separate and independent analysis of our application, but we would find it disappointing and difficult to understand that the Register Committee would come to a conclusion that runs counter to the conclusions of both the Review Panel and the Board of ENQA.