

## Chapter 12

# The accreditation system in The Netherlands and Flanders

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### Introduction

The Netherlands and Flanders have been vigorous supporters of the implementation of the Bologna Declaration since 1999. Although both countries<sup>2</sup> have shown some signs of Euroscepticism at times, since 1954 they have been hardcore members of the movement striving for greater European harmony. This is quite understandable given that both countries are small (with 16 and 6 million inhabitants respectively), that neither has access to inexhaustible reserves of natural raw materials and, therefore, that they are both dependent to a large degree on trade and logistics. The area outside the borders of both countries is therefore both enormous and of enormous importance.

From the above perspective, it is understandable that The Netherlands and Flanders are great supporters of internationalization. Their very real dependence on the outside world translates into extremely open economies, into the need to be multi-lingual, the need to invest in the knowledge of other countries, cultures, political systems and societies, and into the natural ease with which the outside world is given access to Dutch and Flemish society.

Internationalization is essential, especially now that in both countries the process of transition from an economy of physical productivity to an economy based on the productivity of services and knowledge is in full swing. An extremely important part of this internationalization is taking place in the education sector. The Netherlands and Flanders have both therefore adopted active policies towards

the internationalization of the education sector. Such policies comprise the content of educational courses, attracting foreign teachers and students and, last but not least, allowing local students the opportunity to gain experience abroad.

The Dutch and Flemish governments have always strongly supported the agreements made in Bologna and subsequently in Prague (2001), Berlin (2003) and Bergen (2005). The harmonization created by the bachelors–masters structure, the introduction of the European Credit Transfer System and the obligation to establish a transparent system of external quality assurance are all in line with the aim of realizing a European Higher Education Area. This objective is also clearly in line with the policies of both countries.

Both countries, however, realize that all excellent international agreements are dependent upon the seriousness with which quality is delivered and monitored. The exchange of students and teachers and an open labour market are only feasible when diplomas and qualifications are of an equivalent, preferably indisputably high, value. The Netherlands and Flanders have therefore chosen to perform an active role in establishing the Dublin Descriptors (which attempt to set down an operational definition of the levels for bachelors and masters degrees). For this reason, both countries decided to introduce an accreditation system. Such a system, which can take many and varied forms, awards a quality hallmark that should offer the guarantee that the assessed organization, institution or part thereof, offers programmes that meet the qualifications for bachelors and masters courses.

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<sup>2</sup>Strictly speaking, Flanders is not a country, but a region within Belgium. Because of the legibility of the text we refer to both The Netherlands and Flanders as countries.

An explanation of the Dutch and Flemish accreditation system follows, together with the experiences gained, criticism of the system and possible changes to the system. The point of view adopted to this end is that no system is perfect and that continuous learning and development is necessary to achieve quality improvement, quality assurance and accountability.

### **The accreditation system**

The Netherlands and Flanders have both had well-functioning external quality assurance systems for a relatively long time. At the end of the 1980s, an internationally highly acclaimed assessment system for the entire higher education sector (for both academic research universities and universities of applied sciences) was introduced in The Netherlands. An equivalent system was introduced in Flanders a few years later. Both countries have therefore already had quite a lot of experience with quality assurance at the programme level. At the core of this system lay a committee composed largely of peers from international university circles. Once every 6 years, this committee would give an assessment of the quality of the programmes with the clear objective of improving quality. This was the primary aim of the assessment system; there was far less focus on accountability. The system functioned well, but a number of flaws became increasingly evident: it slackened, as over the course of time the intelligent and creative sector of higher education understood how to play the game only too well; it certainly did not always lead to the improvements that were considered necessary because administrative sanctions were not in place and in fact the sector was actually assessing itself; and school managements were only shaken up for a limited amount of time because only a small number of people were actually involved in the assessment.

The Dutch and Flemish governments, however, considered it advisable not to develop the accreditation system alongside the assessment system, but rather to set accreditation at the top of the assessment system, regarding it as an independent ruling that the quality level of the assessed programmes

is satisfactory. For this reason they established the binational Accreditation Organisation of The Netherlands and Flanders (NVAO). The choice was made for binationality under conventional law because both countries considered their size to be a risk to keeping sufficient distance in the assessment procedure and because they felt that together they could play a more important role at an international level, a level, moreover, for which a great deal of the Bologna legislation still has to be developed.

Both countries have retained their respective sovereignty over their national higher education sectors. Although the accreditation frameworks, assessment rules and accreditation methods are almost identical, the basis and legitimacy of the accreditation decisions lie in Dutch and Flemish law respectively. The common NVAO was, however, established by convention and is therefore a binational organization governed by public law.

The Board of the NVAO meets on a monthly basis and it may consist of nine Dutch and six Flemish members, but currently The Netherlands and Flanders are equally represented with six Board members each. Four members of the Board make up the Executive Board: two Dutch and two Flemish representatives. The organization has one Director and employs 35 FTEs (full-time equivalents), ranging from highly qualified policy advisors who hold PhDs, to a large group of staff who man the 'engine room' of the NVAO: the archive and secretarial staff who prepare the accreditation decisions.

The NVAO has an annual budget of €5.6 million, of which The Netherlands contributes 60% and Flanders 40%. The NVAO is monitored by the Committee of Ministers that consists of the Dutch and Flemish Ministers/Secretaries of State responsible for higher education. The Committee of Ministers appoints Board members, approves the budget and gives its approval to the annual report and annual financial statements.

The programmes applying for assessment pay a small fee (€500) for the request for accreditation and a larger amount for the quality assessment of the new programme (up to a maximum of €10 000 in The Netherlands and €5000 in Flanders), but these revenues (which are in part intended as a disincentive for unbridled numbers of requests) are deducted

from government subsidies so that the budget of the NVAO has a maximum limit.

The Netherlands and Flanders have both chosen to accredit programmes. A number of reasons formed the basis for this decision.

- The programme is the organizational unit for which a student enrolls and which is registered by the government.
- Owing to the assessment system, the higher education systems of both countries are already used to programmes being assessed.
- Students and the labour market are able to recognize programmes.
- In The Netherlands, the higher education system is deinstitutionalized; in other words, academic research universities are able to offer higher professional education programmes and universities of applied sciences are able to offer academic research programmes. These programmes have to be assessed separately.
- It applies for The Netherlands that a large part of the higher education sector consists of privately funded institutions that are recognized by the government. The quality of the programmes offered by such institutions has never been subject to any external quality assessment.

The choice to have programmes accredited naturally has a significant impact in terms of numbers. In The Netherlands, from 2004 to 2010 some 3500 programmes will be assessed; in Flanders, from 2005 to 2013, the number is some 1200. In pure numbers of programmes alone, the NVAO is facing a considerable task.

### How the system works

The combination of the numbers of programmes to be assessed and the commitment of both national governments to remain in close proximity to the assessment system, has resulted in the actual assessment of programmes being conducted by other organizations known in Flanders and in The Netherlands as quality assessment agencies. The Flemish legislature consciously limited the number of these quality assessment agencies: only the

Flemish Interuniversity Council (the VLIR) and the Flemish University Colleges Council (the VLHORA) were designated as quality assessment agencies. In the past, both of these organizations carried out assessments.

On the other hand, the Dutch legislature adopted a free market approach to quality assessment agencies. Every year, the NVAO has to draw up a list of organizations that, in its opinion, are capable of carrying out sound assessments. Seven organizations have been placed on the list for 2006: QANU (Quality Assurance Netherlands Universities) and NQA (National Quality Assurance Ltd, the privatized former quality assurance organizations of the Dutch umbrella organizations of academic research universities and universities of applied sciences); Hobéon, Certiked and DNV (Det Norske Veritas), three commercial organizations that work largely with applied sciences programmes; and two German organizations, the FIBAA (Foundation for International Business Administration Accreditation) and ASIIN (Akkreditierungsagentur für Studiengänge der Ingenieurwissenschaften, der Informatik, der Naturwissenschaften und der Mathematik e.V).

The Flemish and Dutch assessment organizations must comply with protocols in which regulations are set down regarding their independence, the composition of panels and the methods to be used. Needless to say, the organizations must make use of the NVAO accreditation frameworks and assessment rules. Each organization has drawn up its own protocols within which they have refined the NVAO frameworks and made them operational.

The NVAO has expressly kept the accreditation framework broad. It comprises six subjects for assessment and these are subdivided into a total of 21 aspects. The subjects for assessment are:

1. The objectives of the programme (consisting of three aspects in The Netherlands and two in Flanders)
2. Curriculum (consisting of eight aspects in The Netherlands and nine in Flanders)
3. Commitment of staff (three aspects)
4. Facilities (two aspects)
5. Internal quality assurance (three aspects)
6. Academic outcomes (two aspects)

The aspects are assessed on a four-point scale: unsatisfactory, satisfactory, good and excellent. The four grades were adopted to encourage programmes to set a high standard and to continue to strive for improvement. The assessment of 'excellent' was included in order to identify best practices so that interested programmes could orient themselves by such excellent assessments and possibly benchmark the programmes concerned.

The six subjects are assessed on a dichotomous scale: either satisfactory or unsatisfactory. The assessment panels are expected to weigh up their assessment of the relevant aspects in order to come to an assessment of a subject. These considerations are simply a formality if all the aspects of a subject are positive, but they do become relevant when one or more of the aspects is assessed as 'unsatisfactory'. In such instances, the panel is asked to justify why the unsatisfactory assessment(s) of some aspects resulted in an assessment of unsatisfactory for the subject. A single unsatisfactory assessment for a subject is sufficient to withhold accreditation!

The NVAO expressly avoided drawing up an accreditation framework with many assessment criteria. The reason for this is that the NVAO desires to allow the programmes as much latitude as possible for differentiation and to show the distinctive features of the programmes. The more criteria that are assessed, the greater the chance that programmes will become oriented towards these criteria and this would encourage the uniformity of programmes. This is not what the Flemish and Dutch higher education sectors are aiming for and certainly not what students want either!

The accreditation procedure actually begins with the drawing up of the programme self-evaluation report. This may take the traditional form of a self-study in which the programme attempts to provide a sound analysis of strengths and weaknesses as well as listing actions for improvement and the outcomes achieved. However, self-evaluation reports are increasingly taking the form of a management review in which the programme policy guidelines, evaluations, course material, papers and the like are prepared and submitted to the panel for its perusal and assessment. The more advanced programmes submit their details to the panel digitally, together

with a password for gaining access to the files.

The visiting assessment panel subsequently gets to work using the self-evaluation data provided. A panel must consist of a minimum of four persons and must incorporate at least the following expertise: domain expertise, disciplinary expertise, educational expertise, auditing expertise, familiarity with international developments in the subject and a student. Needless to say, each panel member may be an expert in more than one area.

The panel makes a 1 or 2 day assessment visit to the programme during which time it at least speaks to representatives from the field of work, management, teachers, alumni and students. At the end of the visit, the panel may report its findings, but it will not yet deliver its assessment. The assessment is set out later in a written report that is submitted to the programme for comments and any corrections of factual errors.

The Dutch universities and Flemish institutions allow the assessments to be carried out in clusters: all programmes from one discipline or domain are examined together by the same panel (or members thereof) and are assessed in a single extremely extensive report. Although this increases comparability, it leads to a quite substantial extension of the assessment process. On occasion, 20 or more programmes have to be assessed and this may lead to a 2 year gap between the initial visit of the panel and the publication of the assessment report. Needless to say, programmes with one or more serious defects will object to the long completion time of the inspections!

On the basis of the assessment report, a programme subsequently requests accreditation. On the basis of a report, the NVAO comes to its own assessment of the question of whether or not a programme meets the basic quality requirements. To this end, the composition and the quality of the panel and its methodology are evaluated, and, most importantly, the arguments and grounds underlying the panel's assessment are examined. Grounds and arguments are therefore essential. Previously in the assessment system, the panels had largely been making suggestions for improvement, while the accreditation system, in the first instance, is asking for accountability.

The NVAO can only make a dichotomous assessment: a programme is either accredited or not. Provisional accreditation is not possible in either system. If accreditation is withheld, the consequences are severe: the programme forfeits the right to issue qualifications, loses funding and its students are no longer eligible for student grants. The Flemish legislature does, however, contain an escape clause: programmes that are subject to a negative accreditation decision may, within 1 month of the decision, submit an improvement plan to the Flemish government. The government in turn may subsequently allow the programme an adjustment period of 1, 2 or 3 years.

In order to minimize the risk of incorrect assessments by the NVAO and the resultant severe consequences, during the accreditation process the programmes are informed of the intended decision of the NVAO, on which they may react before receiving notification of the final decision 2 weeks later. This 'hearing' is in principle aimed at technical improvements and supplements, but in the Flemish procedure it has taken on a deeper significance because the procedure is very similar to the procedure for filing a notice of objection.

The legal tools of lodging an objection to and appealing against a decision apply to the final decisions of the NVAO. In The Netherlands, this procedure takes place through lodging an 'objection' with the NVAO and subsequently appealing to the Council of State. In Flanders, the objection has to be lodged with the Flemish government, and the Belgian Council of State is the designated appeal body.

The positive and negative decisions of the NVAO are made public so that NVAO and panel assessments are available to all parties concerned.

### **Differences between Flanders and The Netherlands**

In the above, a number of references were made to the differences between the accreditation systems of The Netherlands and Flanders. The role of the quality assessment agencies was mentioned, along with the lack of an adjustment period in The Netherlands and the obligation to assess

programmes in clusters in Flanders, but not in The Netherlands.

There are, however, more differences that should be mentioned in order to understand properly how the accreditation system works, which are detailed below.

1. The Netherlands commenced its accreditation procedures 2 years earlier than Flanders.
2. The accreditation term in Flanders is 8 years, while it is 6 years in The Netherlands.
3. The NVAO sets great store by the independence of the panels. In The Netherlands, the quality assessment agencies (VBIs, *Visiterende en Beoordelende Instanties*) are currently legal and material for-profit organizations. The VBIs have no formal ties to higher education institutions and may therefore even appoint the panels. In Flanders, the umbrella organizations of academic research universities and universities of applied sciences are designated by law as evaluation organizations. This means that the appointment of panels is placed outside these organizations and takes place through the Recognition Commission appointed by the government.
4. An extremely important difference is indicated by the way in which the masters phase is structured in both countries. In the bachelors phase, the two countries do not differ in orientation: both have professional and academic bachelors degrees. However, Flanders has only a single category of masters degree, namely the academic masters degree, while in The Netherlands, the binarity is continued into the masters phase as well. The Dutch system has both professional masters degrees and academic masters degrees: the level is equivalent, but the orientation is different.

The consequence of this difference is that, in each country, different innovations are asked of programmes and institutions. In The Netherlands, the new concept of the 'professional masters degree' needs to be elaborated further, while in Flanders, for each masters degree, a strong link between research and education is required. The latter is leading towards a strong process of academization in

**Table 1. Differences between the accreditation systems of The Netherlands and Flanders**

The Netherlands	Flanders
1. A free market of independent quality assessment agencies that the NVAO has to place on a list annually	1. The umbrella organizations of research universities (VLIR) and universities of applied sciences (VLHORA) carry out the evaluations
2. The VBIs themselves appoint the panels	2. The Recognition Commission evaluates the independence and expertise of the panels
3. Accreditation term: 6 years	3. Accreditation term: 8 years
4. Each programme is independently assessed; assessment in clusters is on a voluntary basis	4. Obligatory assessment in clusters
5. No adjustment period after a negative accreditation decision	5. The Flemish government may allow an adjustment period
6. Distinction between professional and academic masters degrees	6. Only one type of masters degree: the academic masters degree
7. In practice, a great deal of discretionary power lies with the administrative bodies	7. Stringent and strict regulations for the general procedures of the NVAO

Flemish universities of applied sciences that wish to offer masters programmes.

- Finally, we have the not unimportant difference that Flanders is part of Belgium, whereby a careful balance is necessary between various parts of Belgium. Flanders is bound by constitutional legislation that naturally assumes equivalency between Flanders and Wallonia. In addition, it applies for every advisory board that the decisions and the way in which they are made must meet stringent legal and state, and administrative, requirements. Dutch administrative practice appears to allow for greater discretionary power which naturally makes for more administrative latitude.

These differences are summarized in Table 1. Although the above may give the slight impression that there are actually two accreditation systems, the fact must be stressed that, in both countries, the NVAO has the power to make decisions. In addition, owing to the almost identical nature of the accreditation frameworks and assessment rules and the fact that the NVAO makes no distinction between Dutch and Flemish requests in its administration and procedures, there is, in practice, only a single accreditation system for The Netherlands and Flanders.

### Experiences of the accreditation system

The Netherlands and Flanders have varied experiences with the system owing to the difference in data with which the accreditation systems actually had to start working. In The Netherlands, the first accreditation files were submitted as early as 2004, and over 600 decisions have since been made. In Flanders, the first files were only submitted late in 2005 and only ten of these have been completed. The experiences listed here are largely based on the way the system works in The Netherlands. As is to be expected, the experiences are mixed. For the sake of the learning effect, more attention will be paid here to the points for improvement that can be noted for the system rather than to the positive aspects:

- The system was approved and accepted quickly. New systems always give rise to debate. The players are (partially) new, the rules of the game are new and the interpretation of the rules is new as well. Bearing this in mind, it can be said that the accreditation system was approved quickly without too much administrative fuss. The VBIs and the NVAO have already assessed a large proportion of the programmes of universities of applied sciences. Academic research universities and the private sector are experiencing more problems: for academic

research universities, a great number of informal procedures have to be formalized; for the private sector, external quality assessment is something new, and a great deal of effort is needed to meet the requirements of the accreditation system.

It is worth noting that the Dutch political scene has clearly distanced itself from this matter: up until now, even the negative assessments delivered have led to little or no visible political activity! It would appear that an independent accreditation decision creates distance between the higher education sector and the political arena. This is a healthy development for both sectors.

2. The accreditation system has become more expensive. In the context of a new mid-term review, the Dutch Higher Education Inspectorate conducted a study into the costs of the accreditation system. This study showed that the external costs of the system have doubled in comparison with the assessment system. The increase in costs is a result of the costs of the NVAO itself (€3.5 million) the costs of the VBIs (over €5.5 million) and the VAT (value added tax) to be paid for the service provided by the VBIs (€1 million). Although the total sum that has to be paid for the external operations of the system does not amount to more than 0.36% of the total budget of the academic research universities and universities of applied sciences, the fact that the costs have doubled is regarded as a negative aspect.
3. The accreditation system leads to considerably more bureaucratic red tape. All those concerned naturally want to put their best foot forward in the new system. The NVAO, the VBIs and the programmes themselves do not want to run the risk of being accused of not taking their personal role in the system seriously enough. These envisaged roles are strengthened by the severity of the sanctions that are linked to failing to gain accreditation in the Dutch system, as described above. In particular, the fact that the NVAO does not take over the assessment reports of the VBIs as they stand, but rather regularly puts forward additional questions and requests extra

information, which leads to misunderstandings and complaints. This is emphasized further under those circumstances in which the NVAO voices that it has “serious doubts” about the VBI panel’s decisions and sets up its own verification committee to investigate doubtful assessments further.

The fear of losing accreditation and the fact that the VBIs are between the hammer of the customer programmes (paying for an assessment) and the anvil of the NVAO (that critically examines the VBI reports) results in a great deal of documentation being requested and delivered, whereby within the programmes and institutions there is an ever-growing bureaucracy of quality assurance staff and an increasing amount of material to be delivered and assessed.

Accreditation is therefore running the risk of becoming identified with bureaucracy. This could crucially damage the legitimacy of the system. Therefore, this point is one of the reasons that The Netherlands has now already commenced actions aimed at reducing the accreditation burden (see below).

4. The improvement function is becoming less visible. One of the achievements of the visitation system was the visibility of the proposals for improvement that the assessment panels set down in public reports. Owing to the active position adopted by the NVAO in closely examining the VBI reports, in these reports the VBI sets out much fewer points for improvement, especially if these points could be regarded by the NVAO as criticism of the quality of the programme in question. In this way, the informative function of the VBI reports for future students and employers is reduced.

At the same time, the VBIs have noted in all openness, that, owing to the fact that programmes do not wish to run risks with the NVAO, many more improvements are made before an assessment than are made afterwards. Based on self-evaluations, quick scans or baseline measurements by the VBIs, the institutions are working hard to remove critical elements. As a result, during the official assessment, it is found

that the quality of the programme has clearly improved. This procedure is no bad thing for the quality of the higher education sector, but there is a huge contrast between the practice of removing shortcomings beforehand, whereby relatively few problems have to be set down in the reports, and the former practice, whereby many suggestions for improvements were made in the reports.

5. The composition of the panels is more problematic. The introduction of the bachelors–masters system has led to a significant increase in the number of programmes in both The Netherlands and Flanders. At academic research universities in particular, many specializations have been converted into independent masters programmes. This means that the number of programmes to be assessed in The Netherlands and Flanders has more than doubled compared with the era before bachelors–masters. The Dutch experiences with composing panels are more negative than in the past on two points. Because the programmes of universities of applied sciences no longer have to be assessed in clusters, but are each assessed separately, almost 2000 panels have to be set up. This can lead to a difference in quality between the panels. This is an unpleasant development for the programmes themselves and for the assessment by the NVAO, as well as for the informative function of the panel reports.

For the assessments of the programmes of academic research universities which are still assessed in clusters, it is noted that, because of the heavier assessment burden and the fact that the panels can no longer restrict themselves to ‘a constructive talk about the subject’, as well as the severe consequences of a negative assessment, many people who are considered as prospective panel members flatly refuse to take on the role. The result is that possible ‘lesser gods’ are included on the commissions, and this has a negative impact on the legitimacy of the system.

6. Programmes are less adventurous. An unexpected, but nonetheless no less serious, development appears to be that programmes

are only implementing educational innovations once they have been granted accreditation. Some blame this on the severity of the sanctions involved with failing to gain accreditation (‘let’s not take any risks’); others indicate that the results of meaningful educational innovations can only be seen over the course of time, whereby the assessment, which is, after all, largely aimed at accountability, is considered to be too vulnerable.

7. The mutual comparability of programmes is lessening. It was indicated above that there are disadvantages to assessing programmes in clusters. The assessment of programmes separately (as is the case for universities of applied sciences in The Netherlands) is not without one definite disadvantage: namely the significant reduction in the mutual comparability of the programmes. The impact of the large number of programmes to be assessed on the quality of the panels has already been described. It should, however, also be pointed out that, although the VBIs use the NVAO frameworks and NVAO assessment rules, they also partially keep to other procedures. Two VBIs, the former quality assurance departments of the Association of Universities in The Netherlands (VSNU) and The Netherlands Association of Universities of Applied Sciences (HBO-raad), QANU and NQA have stuck relatively closely to their familiar assessment processes. The new players, Hobéon, Certiked and DNV, have chosen a more audit-like approach. Moreover, it can be noted that some VBIs assess standard practices as ‘good’, while others assess them as ‘satisfactory’. It is not feasible for the NVAO to remove these differences, unless uniform definitions are adopted. In the opinion of the NVAO, however, this would lead to greater uniformity, while the legislature desired diversity and a significant number of programmes expressly choose VBIs. A particularly close look is being taken at the method of approach regarding quality assurance: a VBI is chosen that is in line with the culture and vision of the programme/institution concerned.

8. The level of international acceptance of the system is high. The NVAO is convinced that the Dutch and Flemish accreditation system is valued internationally. After all, both countries have been known for quite some time for their transparent system of external quality assessments and have implemented the recommendations of Bologna and later ministerial conferences with complete conviction. Although every system has its idiosyncrasies, this system is internationally understood, and sister organizations of the NVAO are convinced of the quality by the way in which the system has been designed and the way in which assessments are made. The NVAO is a known player in connection with ENQA, the European Network For Quality Assurance Agencies, and is a leading player in ECA, the European Consortium for Accreditation.

### Improvements in the short term

The NVAO, and other parties involved in the accreditation system as well, are naturally extremely apprehensive about the system losing legitimacy. For this reason, early in 2006, a conference was held about the possibilities for reducing the accreditation burden in the short term. The conference was convened on the initiative of the State Secretary responsible for Higher Education and was attended by representatives of the Ministry of Education, Culture & Science (OCW), the NVAO, VBIs, Dutch umbrella organizations of academic research universities and universities of applied sciences, private educational institutions and students, the Higher Education Inspectorate, employers' associations, institutions and the Flemish Ministry of Education. The NVAO had prepared seven proposals that were discussed at the conference and these were accepted with the usual comments and reluctance. The reservations were largely related to the fact that no data were available yet on the impact of the proposals. The State Secretary did, in any case, announce that no fundamental changes

would be made to the system before 2010. By that time, all existing programmes in The Netherlands should have been accredited. Only then would any fundamental changes be made to the system (see below). The proposals of the NVAO that will be looked at in terms of their impact in the spring of 2007 are listed here.

1. In order to assess the quality of the panels and to prevent the NVAO from having to penalize reports or programmes afterwards because of a possible lack of quality on the part of the panels, the NVAO, if the VBI so requests, will give an assessment of the composition of the panel. This could put the NVAO in a difficult position if the panel concerned were to deliver a good or convincing report, but could also increase the legitimacy of the system due to the possibly greater authority of the panels.
2. The institutions will be allowed the opportunity to cluster the programmes of any single institution so that the administrative burden remains limited to one statement of details and documentation instead of several identical statements.
3. The VBIs will be allowed the opportunity to split the assessment of (clusters of) programmes into assessments of the more process-related facets and subjects (e.g. quality assurance and facilities) and, on the other hand, the facets and subjects of the programme(s) that are more content-oriented. The intention of this is, in particular for the teachers, to add more weight to the discussions of programme content. Needless to say, both assessments must be carried out, presented and accounted for by a single panel.
4. The NVAO and the VBIs will once again tackle the operationalization of the NVAO framework and examine whether or not the operationalization proposed by the VBIs in 2003/2004 and approved by the NVAO is too detailed and could lead to a heavy administrative burden.
5. The NVAO and the VBIs will examine whether or not it is still necessary and desirable to continue to assess full-time, part-time and dual

<sup>3</sup>Owing to the fact that the Dutch government abdicated in November 2006, the new Higher Education Bill has been withdrawn.

variants of programmes separately for every aspect and subject. The growing flexibility of educational courses and the ever more varied combinations of working and learning seem likely to make the requested distinction redundant.

6. The NVAO will look at the possibilities of adjusting its own internal procedures so that programmes can be assessed more swiftly.
7. The NVAO and the VBIs will discuss a number of completed accreditation requests to clarify the way in which the NVAO interprets the VBIs' texts and to allow the VBIs to provide an explanation of their procedures and the formulations they use.

In addition, the State Secretary also stated that he was prepared to examine the matter of incorporating a provision for adjustment into Dutch law in the near future. In any case, this will be incorporated in the New Higher Education Bill that is expected to be dealt with by Parliament in the course of 2006 and which should come into force in 2007<sup>3</sup>.

The Flemish experiences with the accreditation system have not been so clear as to warrant a discussion of changes to the system. The first signs, however, do appear to indicate that, for the Flemish assessments as well, too much documentation and information has to be submitted (see the Dutch adjustment example above), that in Flanders too, the costs for accreditation compared with assessment have risen sharply and that criticism of the long completion time of the assessment (as a result of the cluster assessment of identical programmes) is growing significantly.

### **Towards a new system in The Netherlands?**

Both The Netherlands and Flanders expressly opted for the accreditation of programmes. At the same time the legislature set down in law when programmes should be accredited. In The Netherlands, all programmes should be accredited by 1 January 2010, and by 1 January 2013 in Flanders. The Ministers/Secretaries of State that are responsible in both countries have stated that fundamental changes to the accreditation system

will not be considered until all programmes have been accredited in accordance with the timeframe set down by law.

Nevertheless, it is understandable that legislatures and other involved parties are already wondering whether two periods for the accreditation of programmes are advisable and whether at the end of the first programme accreditation period the decision should not be made for a different accreditation system. The Dutch government already appears to have answered the question by opening a discussion about the next phase of accreditation, whereby an attempt will be made to reduce the accreditation burden on institutions and programmes that are able to show that they have a robust and sound quality assurance system and have good quality at their disposal. The Dutch government envisages a system with two important components: on the one hand, institutions will have a 'duty of care' in terms of quality and, on the other hand, the NVAO will have the task of designing an accreditation system that is largely based on risk profiles. The duty of care for institutions is likely to mean that programmes will be assessed externally with a certain regularity and that the assessment reports will be made public. Institutions that properly fulfil their duty of care may receive an exemption from the accreditation obligation from the NVAO: in practice, this would mean that the institution would accredit the programmes itself.

The NVAO is expected to monitor the functioning of the system on the basis of risk profiles, random testing and other tools. Institutions that appear not to fulfil the duty of care in a proper way or that are shown to deliver programmes of a lesser quality will again have to comply with the accreditation obligations. Moreover, the NVAO will be able to implement the accreditation obligation for certain types of programme or allow the accreditation obligation to lapse.

The NVAO itself does not support continuing in the same way after the completion of the first round of programme accreditation. If the programme accreditation system works, by 2010 the chaff will have been separated from the wheat: the Dutch higher education system should then only comprise accredited programmes that meet basic

quality standards. The system can therefore be more trust-based.

## Conclusion

Flanders and The Netherlands have designed accreditation systems on the administrative–legislative drawing tables that have begun to function quickly in practice. This is in itself an enormous achievement because the institutions were at the same time busy converting their programmes to fit into the bachelors–masters structure and to meet all kinds of other transformations arising from the Bologna agreements. The administrative performance is even more noteworthy because the accreditation system meant a break with the improvement-oriented system of assessment that was carried out by the sector itself. In the first place, accreditation means accountability and failure to meet the requirements set down will result in the relevant sanctions. The higher education sector has accepted this change in system relatively easily and appears to have implemented it.

Needless to say, the introduction of an entirely new system cannot take place without encountering unexpected and undesirable effects. Fear and uncertainty, bureaucracy and paperwork are in themselves logical consequences of a new system with severe sanctions. All of these consequences, however, pose a threat to the legitimacy of the system. It is therefore not surprising that, in The Netherlands, the first concrete suggestions for changes in the implementation of the system have already been made. It is to be expected that the same consequences

will arise in Flanders, and that Flanders too will move on to making changes in the procedures of the quality assessment agencies and the NVAO.

In the current Dutch and Flemish system, accreditation is talked about in terms of a basic quality level that is either present or not. This does not seem very ambitious and could eventually encourage uniformity in the quality of programmes. To enable more emphasis to be placed on the distinctive features and diversity of programmes, the legislatures in both countries have made it possible for special quality features to be assessed. To date, little use has been made of this possibility and the NVAO has not yet recognized a single special quality feature. However, it would seem to be only a matter of time before this changes. It will then become more clear that programmes actually desire to distinguish themselves from one another and that attempts are indeed being made to show differences in programme quality.

The Dutch and Flemish accreditation systems appear to be functioning well in practice. Although teething problems do occur, they seem to be repairable. However, responsivity is required from all the players in the system: proper attention must be paid to what institutions and programmes have to say; they are, after all, subject to the system. Ultimately, it will, however, have to be seen that The Netherlands and Flanders can convincingly show that their programmes meet the accepted quality level for bachelors and masters degrees. If that is the case, both countries will have every right to proclaim themselves international players to be reckoned with in the important field of higher education.

