

# Academic Master's programme Compliance and Integrity in International Military Trade Netherlands Defence Academy

18 December 2018

NVAO extensive initial accreditation

Panel report

# Table of Contents

1	Executive summary		3
2	Introd	luction	5
	2.1	The procedure	5
	2.2	Panel report	6
3	Descr	iption of the programme	7
	3.1	General	7
	3.2	Profile of the institution	7
	3.3	Profile of the programme	7
4	Assessment per standard		9
	4.1	Standard 1: Intended learning outcomes	9
	4.2	Standard 2: Curriculum: orientation	12
	4.3	Standard 3: Curriculum: content	14
	4.4	Standard 4: Curriculum: learning environment	16
	4.5	Standard 5: Intake	17
	4.6	Standard 6: Staff	18
	4.7	Standard 7: Facilities	19
	4.8	Standard 8: Tutoring	20
	4.9	Standard 9: Quality assurance	21
	4.10	Standard 10: Student assessment	22
	4.11	Qualification and field of study (CROHO)	23
	4.12	Conclusion	23
	4.13	Recommendations	23
5	Overview of the assessments		25
Anne	ex 1: Com	position of the panel	27
Anne	ex 2: Sche	edule of the site visit	28
Anne	ex 3: Docu	uments reviewed	29
Anne		iculum of the Compliance and Integrity in ational Military Trade master's programme	30
Anne	ex 5: Desc progra	cription of possible Applicants to the CIIMT amme	31
Anne	ex 6: List	of abbreviations	32

# 1 Executive summary

The Accreditation Organisation of the Netherlands and Flanders (NVAO) received a request from the chairman of the Board of the Foundation for Scientific Education and Research at the Netherlands Defence Academy in Breda (SWOON) regarding the initial accreditation of a proposed academic master's programme entitled Compliance and Integrity in International Military Trade. NVAO convened an expert panel, which studied the information available and discussed the proposed programme with representatives of the institution and the programme during a site visit.

In its self-assessment report and during the site visit, the institution used the abbreviation for the programme name (Compliance and Integrity in International Military Trade, CIIMT). The panel will use the same abbreviation in this report.

The following considerations have played an important role in the panel's assessment.

The programme is aimed at encouraging students to adopt a critical and innovative attitude and at producing reflective practitioners who are able to understand the defence management perspective regarding export control of international trade in military and dualuse goods and services. The panel was impressed by the challenge of creating such a new niche in a domain that is developing fast. The programme itself is, therefore, also expected to be subject to further development. CIIMT is primarily designed to cater for the needs of military and civilian defence personnel, including EU, NATO+, from all services and/or commands, and Defence relevant industries, agencies, and research centres active in the field. The programme can be seen as a follow-up to the Military Management Studies bachelor's programme provided by the Faculty of Military Sciences (FMS). In the first two years, the programme will only be open to graduates of the FMS bachelor's programmes.

The panel observes that the programme combines two perspectives, that of compliance and export control, and that of procurement. The connection between these approaches needs to be improved. With respect to the objective of reaching a wider area of the field of both export control and procurement, the panel recommends installing an Advisory Board that reflects the heterogeneity and the international character of the stakeholders of CIIMT. The panel also recommends that the interdisciplinarity of the programme should be better reflected in the learning outcomes. The panel agrees with the programme as it stands now and is confident of the capacity of the FMS at the Netherlands Defence Academy to develop the programme further in response to feedback from students and the work field.

The panel agrees with the orientation chosen by the programme. The intended learning outcomes reflect a masters' level; however, in several respects, they lack alignment with the profile and the curriculum. Therefore, the panel strongly recommends that the FMS should review the alignment of the profile, learning outcomes, and curriculum to create the right expectations among students and the work field. In this respect; the panel also recommends that the compliance perspective should be addressed in the first two modules of the programme.

Both the structure of the programme and the teaching concept are supportive of the attainment of the learning outcomes. The structure and teaching concept adequately tie in with the programme objectives. The panel is positive about the qualifications of staff members, but the panel suggests the further expansion of the expertise of the staff

NVAO | Netherlands Defence Academy - Compliance and Integrity in International Military Trade Academic Master's Programme | 18 December 2018 |

regarding the practical field of export control as the programme develops. The panel is additionally positive about the general educational provisions such as classrooms and the library, which are up to standard. The programme adequately provides students with tutoring and makes use of flipping the classroom to enhance students' participation in the academic community.

Students will be involved in the quality enhancement of the programme. The quality system will provide the programme with the information that is needed to evaluate individual courses, as well as the programme as a whole. The programme provides a variety of instruments to ensure a proper assessment of the intended learning outcomes. The panel has established that the assessment system meets the required standards. The panel has reviewed a small number of assessments, which it found to be valid and transparent. It is positive about the expertise of the Board of Examiners (BoE) and its intended approach to safeguard the quality of assessment.

The panel comes to the conclusion that the programme meets all the assessment standards. Given these considerations, the panel recommends that NVAO should take a positive decision regarding the quality of the proposed Academic Master's Programme to be provided by the Faculty of Military Sciences at the Netherlands Defence Academy in Breda.

The panel accepts the proposal of the chairman of the Board of the Foundation for Scientific Education and Research at the Netherlands Defence Academy (SWOON) to register the programme in the Economics section of the Dutch Central Register of Higher Education Programmes (CROHO). The intended degree is Master of Science.

The Hague, 18 December 2018

On behalf of the assessment panel convened for the extensive initial accreditation assessment of the Compliance and Integrity in International Military Trade Academic Master's programme to be provided by the Netherlands Defence Academy in Breda,

Prof. Dr Leen Paape (Chair) Katrien Goossens (Secretary)

# 2 Introduction

# 2.1 The procedure

NVAO received a request for an initial accreditation procedure regarding a proposed academic master's programme entitled Compliance and Integrity in International Military Trade. The request was submitted by the chairman of the Board of the Foundation for Scientific Education and Research at the Netherlands Defence Academy (SWOON). It. included programme documents and was received on 23 March 2018.

An initial accreditation procedure is required when a recognised institution wants to award a recognised bachelor's or master's degree after the successful completion of a study programme. The initial accreditation procedure is slightly different as compared to the approach for programmes that have already been accredited. Initial accreditation involves, in fact, an *ex ante* assessment of a programme. The programme becomes subject to the normal accreditation procedures once initial accreditation has been granted.

To assess the programme, the NVAO convened an international panel of experts (see also Annex 1: Composition of the panel). The panel consisted of: Chair:

 Prof. Dr Leen Paape, professor of Corporate Governance at Nyenrode University and chairman of the Nyenrode Corporate Governance Institute;

Panel members:

- Prof. Dr Jan Leysen, Professor and Head of the Department of Economics, Management and Leadership, Royal Military Academy Brussels;
- Dr Paul Holtom, Senior researcher, Small Arms Survey, Geneva;
- Dr Niels van Willigen, Associate Professor of International Relations at the Department of Political Science of Leiden University;

Student member:

 Diana van Wanrooij, LLM, Student of the International and European Law Master's programme, Tilburg University (track: International Law and Human rights).

On behalf of NVAO, Thomas de Bruijn and Tinka Thede were responsible for the process coordination. Katrien Goossens (independent secretary) drafted the experts' report.

This composition reflects the expertise deemed necessary by NVAO. (Annex 1: Composition of the panel). All the panel members have signed a statement of independence and confidentiality.

The panel has based its assessment on the standards and criteria applicable to extensive initial accreditation as described in the NVAO Assessment Framework for the higher education accreditation system of the Netherlands (Staatscourant. 2016, no. 69458).

The panel adopted the following procedure. The panel members prepared the assessment by analysing the documents provided by the institution (Annex 3: Documents reviewed). Based on the analysis of the information dossier of the CIIMT programme and in consultation with the panel chair, a few requests for additional information were sent to the NLDA. The extra information in reply to the panel's additional questions has been taken into

NVAO | Netherlands Defence Academy - Compliance and Integrity in International Military Trade Academic Master's Programme | 18 December 2018 |

account at the preparatory meeting the panel organised on 25 October 2018. During this meeting, the panel members shared their first impressions and formulated questions for the site visit.

The site visit took place on 26 October 2018 at the Faculty of Military Sciences at the Netherlands Defence Academy, Breda. During this visit, the panel was able to discuss the formulated questions and to gather additional information during several sessions (Annex 2: Schedule of the site visit). Afterwards, the panel discussed the findings and considerations and formulated its preliminary assessments per theme and standard. At the end of the site visit, the initial findings were presented to the institution.

On the basis of the findings, considerations, and conclusions, the secretary drafted an advisory report that was first presented to the panel members. After the panel members had commented on the draft report, the chair endorsed the report on 18 December 2018. On 20 December 2018, the advisory report was sent to the institution, which was given the opportunity to respond to any factual inaccuracies in the report. The institution replied on 16 January 2019. Some of the suggested textual corrections were adopted. Subsequently, the final report was endorsed by the panel chair. The panel composed its advice fully independently and offered it to NVAO on 27 January 2019.

## 2.2 Panel report

The first chapter of this report is the executive summary of the report, while the current chapter is the introduction.

The third chapter gives a description of the programme including its position within the institution – the Netherlands Defence Academy – and within the higher education system of the Netherlands.

The panel presents its assessments in the fourth chapter. The programme has been assessed by reference to the themes and standards set out in the Initial Accreditation Framework. For each standard, the panel presents an outline of its findings, its considerations, and a conclusion.

The outline of the findings covers the facts as observed by the panel in the programme documents, in the additional documents, and during the site visit. The panel's considerations consist of the panel's judgments and subjective evaluations regarding these findings and their relative importance. The considerations presented by the panel underpin its concluding overall assessment.

The panel concludes the report with a table containing an overview of its assessments per standard.

# 3 Description of the programme

# 3.1 General

Country	: The Netherlands
Institution	: Netherlands Defence Academy, Faculty of Military Sciences
Programme	: Compliance and Integrity in International Military Trade
Level	: Master
Orientation	: Academic
Specialisation	: not applicable
Degree	: Master of Science
Location(s)	: Breda
Study load (ECTS)	: 60 credits (part-time)
Field of study	: Economics

# 3.2 Profile of the institution

As a part of The Netherlands Defence Academy (NLDA), the Faculty of Military Sciences (NLDA FMS) is the only military-scientific knowledge and research institute in the Netherlands. Its scientific research is mainly Defence-oriented, with scores of scientific experts in the area of Defence contributing to improvements in military operations. NLDA organises the initial officers programmes and other higher education-level programmes, and provides academic-level military education. The institute organises various master's programmes, viz. Military Strategic Studies, Strategic Border Management, and the academic master's programme in Military Technology, Processes and Systems. In addition, it supports the Dutch armed forces with the development of leadership and provides language training. The NLDA comprises seven institutes:

- Royal Navy Institute;
- Royal Military Academy;
- Institute Defence Programmes;
- Dutch Institute for Military History;
- Faculty of Military Sciences (FMS);
- Expert Centre of Military Leadership;
- Language Centre.

The NLDA is part of the Joint Support Command of the Dutch defence forces. It is headed by the Commander of the NLDA and reports to the Commander of the Joint Support Command. The Faculty of Military Sciences, as part of the Netherlands Defence Academy (NLDA), provides three bachelor's programmes and three master's programmes. Its scientific research programme aims for the improvement of military operations. The staff totals 133 FTEs. Enrolment in bachelor's and master's programme totalled 567 in 2017.

# 3.3 Profile of the programme

The goal of the FMS CIIMT master's programme is to create a niche to study managerial questions regarding export control of military and dual-use goods and services. These

NVAO | Netherlands Defence Academy - Compliance and Integrity in International Military Trade Academic Master's Programme | 18 December 2018 |

questions will encourage graduates to explore, analyse, understand, explain, control and improve the military dimension in international military trade. The programme documents indicate that no other higher education institution in the Netherlands offers a programme with a similar interdisciplinary approach to defence economic concerns (from an ethical, organisational, legal, or strategic perspective).

At the request of the Dutch MoD, CIIMT is primarily designed to cater for the needs of military and civilian defence personnel, including EU, NATO+, from all services and/or commands and Defence relevant industries, agencies and research centres, active in the field. The programme can be seen as a follow-up to the FMS bachelor's programme in Military Management Studies. By organizing CIIMT, the FMS-NLDA provides a new programme in Europe for students (also from outside Europe) who seek to gain more indepth understanding, by integrating practice-based and science-based knowledge of modern defence procurement. The programme is thought to be of interest for those currently engaged in international trade of military or dual-use goods and services either on the demand-side (MoD, governmental, NATO, EU, non-EU) or on the supply side (defence-related industry), as well as national and international regulatory agencies or research centres.

CIIMT, by integrating science-based and practice-based knowledge, aims for students to develop into academic professionals, who are able to generate and implement problem solving strategies and management decisions to further compliance and integrity in export control of international trade in military and dual-use goods and services. The CIIMT Master's programme is designed as a part-time programme, taught over the course of two years, totalling 60 ECTS credits.

# 4 Assessment per standard

This chapter presents the evaluation of the standards by the assessment panel. The panel has reproduced the criteria for each standard. For each standard, the panel presents (1) a brief outline of its findings based on the programme documents, on documents provided by the institution, and on the site visit; (2) the considerations the panel has taken into account; and (3) the panel's conclusion. The panel presents a conclusion for each of the standards, as well as a final conclusion.

The assessment is based on the standards and criteria set out in the NVAO Assessment framework for the higher education accreditation system of the Netherlands (Staatscourant 2016, no. 69458). Fundamental to the assessment is a discussion with peers regarding the content and quality of the new programme.

Regarding each of the standards, the assessment panel gives a substantiated judgement on a three-point scale: meets, does not meet or partially meets the standard. The panel subsequently gives a substantiated final conclusion regarding the quality of the programme, also on a three-point scale: positive, conditionally positive or negative.

## 4.1 Standard 1: Intended learning outcomes

The intended learning outcomes tie in with the level and orientation of the programme; they are geared to the expectations of the professional field, the discipline, and international requirements.

## Outline of findings

The FMS master's programme CIIMT is aimed at encouraging students to adopt a critical and innovative attitude and at producing reflective practitioners who are able to understand the defence management perspective regarding export controls for the international trade in military and dual-use goods and service. FMS has developed the programme in response to a need within the Ministry of Defence, other regulatory institutions, and the defence and security industry.

FMS has found that existing trade compliance and trade law programmes do not cover the specific military perspective. Legal aspects of the international trade in military and dual-use goods and services are not currently taught at law faculties in the Netherlands. Commercial courses on rules and regulations in international trade were not part of the benchmark. The CIIMT programme distinguishes itself from the above-mentioned programmes by placing more emphasis on the theoretical basis in the defence economics perspective, business ethics, internal control and regulations, information systems, and strategic management within an interdisciplinary and military context. In addition to broad and scientific-based knowledge, students develop both management and leadership skills stemming from experience in the field.

These choices are in line with the FMS-NLDA vision aiming to deliver so-called Officer Scholars. The programme thus aims to deliver academic professionals who are able to

NVAO | Netherlands Defence Academy - Compliance and Integrity in International Military Trade Academic Master's Programme | 18 December 2018 |

generate and implement problem solving strategies and management decisions to further compliance and integrity.

The panel experienced some difficulty to get a good view of the intended audience for the programme. It observed that the curriculum is built from courses on (international) regulation (including international arms trade) and courses on internal compliance (in general, within Defence), but the panel misses a clear connection between these two. The FMS indicates clearly that the programme is aimed at those currently engaged in international trade of military and dual-use goods and services either on the demand side (MoD, governmental, NATO, EU, non-EU) or on the supply side (defence related industry), as well as (inter)national regulatory agencies or research centres. In the first two years, the programme will only be open to graduates from FMS bachelor's programmes that are considered relevant by the Programme Board and/or Admission Panel.

In the FMS-NLDA view of scientific education, the programme used Schön's *reflective practitioners* paradigm as a starting point. With this paradigm, the CIIMT programme unites both management and leadership skills as well as both a scientific and a practical knowledge basis.

As CIIMT is a unique programme, the domain-specific profile could not be based on an existing professional and educational profile. CIIMT has developed a domain-specific profile using input from the MoD and MoD personnel in military procurement, benchmark findings, the professional field and relevant industries.

Because of the rapid evolution of export control and its importance to procurement processes, defence organisations are in need of professionals with the capability to combine practical and theoretical information for problem solving. Thereby, the FMS emphasises the need for an interdisciplinary approach. To prepare the professional, CIIMT has set down six MSc-level intended learning outcomes. Graduates are expected to apply strategic management on export control of international trade in military and dual-use goods and services based on scientific knowledge, new insights and an interdisciplinary perspective. This will also enable them to generate and implement problem solving strategies and set up an effective and efficient internal compliance programme for their own organisation.

The CIIMT programme covers the master's level, as described in the European Qualification Framework and the Dublin descriptors. In the dossier, the learning outcomes are explicitly and adequately linked to the Dublin descriptors.

The representatives of the professional field whom the panel met were enthusiastic about the proposed CIIMT programme. Several representatives point out that there are a lot of obstacles in the field to the exchange of knowledge, that they lack auditors and more experienced international trade regulators. They emphasise that the professional field needs critical thinkers and professionals who are able to act and speak the same language both within and outside the military. Because of the complexity of the situations, there is a need to educate the professionals as broadly as possible. They know that the CIIMT programme will not at once give them all they need. However, they are convinced that the programme as it is now is a good starting point and may adapt to changing needs in the future. Only one of the representatives whom the panel met was involved in the development of the new programme.

The group of representatives from the work field did not include the industry. There are informal contacts with the industry. The Programme Board has assured the panel that it will build a network once the programme is under way.

#### Considerations

The panel found that FMS convincingly made clear that there is a need for well educated professionals who understand the ins and outs of the management of export control of military and dual-use goods and services. The representatives from the MoD clearly supported this and the panel is also convinced that such a need is present with other actors, on the supply side, and with (inter)national regulatory agencies and research centres. The panel was somewhat surprised that there was no evidence of involvement from other institutions and services that deal with export control such as the Customs and Revenue Service, the Ministry of Economic Affairs and Climate Policy, and the Ministry of Foreign Affairs. For this purpose, the panel recommends the appointment or establishment of an independent Advisory Board in which the lacking profiles can be represented. Despite this, the panel was convinced that the CIIMT programme of FMS-NLDA constitutes a novel and defence-relevant niche and is different from other master's programmes in the Netherlands in this respect.

During the site visit, the panel asked the Programme Board to further clarify their target audience, also in relation to the intended learning outcomes. The panel understands that the CIIMT programme is viewed as a follow-up to the academic bachelor's programme in Military Management Studies. The panel notes that the intended learning outcomes highlight learning outcomes for knowledge of export control practices, yet the information dossier states that "CIIMT is for students that seek more in-depth understanding (...) of modern defence procurement". Therefore, it was unclear if the MSc is intended for export control practitioners in government institutions and commercial enterprises, or government agencies involved in the procurement of defence material. During the site visit, the Programme Board stated that compliance and integrity is a joint responsibility; furthermore, in complex cases it is often difficult to see whose problem it really is, so the programme should attract both profiles. Professionals from both profiles should learn how the system works, but also reflect on it, critically examine it and, if appropriate, redesign it. With CIIMT the FMS wants to create the possibility for professionals to think about the system.

The panel appreciates the statement that CIIMT needs an interdisciplinary approach, but it would like to see this more clearly reflected in the learning outcomes.

From discussions with the work field representatives the panel gets the idea that the programme might not completely fulfil the expectations of the field at this point in its development. The panel was surprised that courses from Cranfield University were not used for benchmark purposes (e.g. Defence and Security Export PgCert / Executive MBA for export control practitioners and Defence Acquisition MSc, Procurement and Supply Chain Management MSc for those interested in modern defence procurement). The panel understands that the programme has been set up on the basis of the available expertise, and notes that input from the industry is necessary, as is fine-tuning to the needs and expectations of the MoD. Therefore, the panel advises the programme managers to set up an Advisory Board that reflects the heterogeneity, the international character, and the interdisciplinarity of the CIIMT stakeholders. This committee can discuss and adjust the programme annually to make sure that the learning outcomes and the programme reflect the interdisciplinary approach, current developments, and the requirements and

expectations of the professional field with respect to this novel discipline of compliance and integrity in military trade.

The panel agrees with the orientation chosen by the programme but strongly recommends that the FMS review the alignment of the profile, the learning outcomes, and the curriculum. The FMS should also ensure that it raises the right expectations with students and the work field. Because the panel experienced some difficulty in getting a good view of the intended audience for the programme, they will give some suggestions on how to clarify the alignment of the programme with expectations from students, as highlighted further on in this report. The panel recognises the choices made by FMS in setting up the programme, especially as there is no established consensus in this novel domain. Based on the expertise present in FMS and the connection with the MoD, the panel is confident that the programme management will be able to steer the development of the programme in the right direction. It advises the programme to set up an Advisory Board, that in its composition reflects all those currently engaged in international trade of military or dual-use goods, to guide and monitor the development of the programme.

#### Conclusion

The panel comes to a positive assessment of this standard, but strongly recommends a review of the learning outcomes, thereby making sure that they cover the profile of the programme: for example, by replacing the emphasis on "export control" and "trade" in learning outcomes 1 and 2 by a broader term such as "regulation of international transfers of military equipment and dual-use items", or "regulation of the export and procurement of military equipment". It should also bring out the interdisciplinary perspective more clearly in the learning outcomes.

The programme meets standard 1.

# 4.2 Standard 2: Curriculum: orientation

The curriculum enables the students to master appropriate (professional or academic) research and professional skills.

### Outline of findings

The panel noted that the programme management explicitly chose to position the programme as an academic master's programme, i.e., not as an executive master's programme. The question as to the reason for this choice turned up in many of the discussions during the site visit. The programme emphasises its goal to educate "reflective practitioners" with a strong academic orientation. They should be able to find creative solutions and reflect on possible problem-solving strategies.

The curriculum as presented in the information dossier encompasses two modules on the design, monitoring, and auditing of internal compliance programmes. Furthermore, there is a module on research methods. The panel learned that all teachers are active researchers who are actively involved in the research projects of the FMS. During the interviews, the teachers gave examples of how they want to link their research with the topics of the CIIMT master's programme.

NVAO | Netherlands Defence Academy - Compliance and Integrity in International Military Trade Academic Master's Programme | 18 December 2018 |

The programme intends to include various research methods in the curriculum, related to the various disciplines presented in the curriculum. For the students to develop both research and professional skills, two modules, module 9 and 10, have been installed to enable students to deepen their professional understanding with applying academic methods and tools to their own business environment.

#### Considerations

In general, the panel is convinced that the programme has a clear academic orientation. It agrees with the programme's intention to train students to become critical thinkers and creative professionals who are capable of designing and monitoring compliance systems. The panel recognises that a critical approach and reflective thinking are present throughout the curriculum, and that there is attention to research design in the programmes, but that leaves the question as to how research methods will be taught during the programme. The panel recommends ensuring that research methods are included in module 7 on research design and being more explicit on the manner in which qualitative and quantitative research methods are actually taught. The panel recognises that the programme, with its interdisciplinary focus, offers various methods. It notes that the programme has not completely decided on which methods it will focus. The panel recommends the inclusion of doctrinal legal research as part of the research methods, as this is a vital competence in the context of military trade and export control.

The panel recognises that the teachers are involved in research projects. The link between these projects and the research element in the programme could be emphasised a little more strongly. The examples of linking teaching and research shown by the teachers indicate that this aspect is present in the planned approach for teaching in the curriculum.

Based on the previous, the panel raised the question "Why is CIIMT an academic rather than an executive master's programme?" during the site visit in various interviews. The response was that the CIIMT programme is not aiming to create researchers, but train academic professionals. The choice for an academic master also ties in with the MoD's vision to have highly educated people, because of the complexity of the subject and the threats that are becoming bigger and more challenging.

#### Conclusion

Academic skills, professional skills, and to a lesser extent, research competencies are substantiated, benefitting the orientation and level of the CIIMT programme. The interdisciplinary approach is well reflected in the CIIMT curriculum. The panel is convinced of the academic orientation and the involvement of the programme in the FMS research programme and is therefore positive on this standard. There remains some work to integrate research methods into the curriculum, but the panel is convinced FMS will be able to do this.

Overall, the panel is convinced that the curriculum reflects the deliberate choice to offer an academic rather than an executive master's programme. It comprises sufficient elements of research and critical reflection. It also appreciates that the teachers bring their research into the classroom, but this could be made more explicit and linked more to the faculty research projects. The panel recommends that the programme should specify this more clearly in the development of the programme and include doctrinal legal research as a research method.

The programme meets standard 2.

NVAO | Netherlands Defence Academy - Compliance and Integrity in International Military Trade Academic Master's Programme | 18 December 2018 |

### 4.3 Standard 3: Curriculum: content

The contents of the curriculum enable students to achieve the intended learning outcomes.

#### Outline of findings

The panel learned that the CIIMT Master's degree programme is designed as a part-time programme taught over the course of two years, totalling 60 ECTS credits. It is concentrically built up from 10 modules: both the curriculum's levels of complexity and the independent student work increase from *Leids* level 400 up to 600.

The panel understands that the programme receives its coherence in a pyramidal structure with the first four modules as foundation to learn about the outside world. Therefore, an outside-in perspective is provided from an interdisciplinary context from which export control in international trade of military and dual-use goods and services can be understood. The Programme board considers that it is good to have a holistic view that helps the student understand the environment and act as a reflective practitioner. Therefore, defence economics, law, organisation theory, ethics and system theory in military organisations are the focus of the first four modules, having regard to the compliance and regulations of military trade.

It is clear to the panel that throughout these modules the complexity and student responsibility regarding their own learning and study behaviour increases to a *Leids* level 500. Modules 2 to 8 are developed at *Leids* level 500, requiring an increasing level of independent study, research and methodological skills combined with regular tutoring sessions during contact weeks.

From module 5 and 6 on, the students will be involved in how to construct an ICP (internal compliance programme) to experience the feasibility and boundaries to redesigning, implementing, monitoring and auditing ICPs. In these modules, students and teaching staff will share their experience and acquired insights. Combined with module 8 on managing non-compliance behaviour and module 7 on the quantitative and qualitative research methods, the students attain a *Leids* level 600. From then on it will be possible for the students to organise their own interdisciplinary research for the integration module (module 9) and individual research in module 10.

#### Considerations

The panel finds that the programme has a clear structure and is concentrically built up. The mix of substantive courses and training of professional skills are a strength of the programme. Included in the programme are several relevant modules for an advanced professional degree on export controls that clearly support the majority of the chosen learning outcomes. For the first four modules, the panel strongly recommends the augmentation of attention to procurement and supply chain knowledge. Modules 4 and 8 provide excellent opportunities to work through real-life cases of non-compliance in desk exercises. In this regard, course teachers could benefit from establishing connections with practitioners involved in training conducted by the EU export control programmes, delivered by the German Federal Office for Economic Affairs and Export Control (Bundesamt für Wirtschaft und Ausfuhrkontrolle, BAFA), and Expertise France for export controls for dual-

use items and military equipment.<sup>1</sup> These connections could provide for the exchange of materials for case studies to be used for CIIMT and potential guest lecturers for module 8. The panel was excited to see one such example explicitly included in module 4. The good combination of theory and practice is also reflected very well in the assignments.

With regards to the review of existing courses, it would appear that CIIMT is more geared towards export control practitioners than to those interested in modern defence procurement. Even if CIIMT is only intended for export control practitioners, the panel still recommends some minor changes in the curriculum. The panel therefore recommends the specifying of the connection between compliance and defence procurement also in the first four modules.

The panel would also encourage inviting guest speakers for module 8 to provide simulations of cases. The panel would also recommend additional material for module 7 if the assessment will be the production of a research proposal. The panel did not always have a clear picture of where content was matched to research. During the interviews, the programme was open to changes in the curriculum, although the Programme Board stands by the choices in the curriculum; this also fits in with the FMS expertise. The programme will make use of guest lecturers to add specialist expertise in the specific field of export control and compliance, which will alleviate the points indicated by the panel.

The panel has indicated a number of elements for improvement in the choice of courses, especially from the perspective of aligning these with the intended learning outcomes. The panel recognises the choices made by the programme and respects these, especially as there is no standard for this type of programme. As it stands now, the programme suffices. Therefore, the panel finds that the programme meets the standard. The panel bases this also on its confidence in the capacity and quality of the CIIMT team to realise and improve the proposed curriculum based upon the experience and feedback of the first cohort of students. Nevertheless, it repeats its recommendation to appoint an Advisory Board, to ensure that the programme is fit for use and raises the correct expectations among all the stakeholders, and to adapt the programme to the novel, dynamic and fast evolving field of compliance in international military trade.

Considering the desired heterogeneity of the incoming student population, the panel advises a broader perspective in the content, which should not only cover export control, but also procurement. When students from government agencies involved in the procurement of defence material are also within the scope of incoming students, then the curriculum should cater for this more explicitly to maintain alignment with the learning objectives.

Conclusion

The programme meets standard 3.

<sup>&</sup>lt;sup>1</sup> More information on the European Union export control programmes for conventional arms (Arms Trade Treaty and EU Neighbourhood) and dual-use items and technology can be found at: https://export-control.jrc.ec.europa.eu/

NVAO | Netherlands Defence Academy - Compliance and Integrity in International Military Trade Academic Master's Programme | 18 December 2018 |

#### 4.4 Standard 4: Curriculum: learning environment

The structure of the curriculum encourages study and enables students to achieve the intended learning outcomes

#### Outline of findings

Students will be offered a variety of working formats. Thus, they are stimulated to gather, combine, and apply theoretical insights to further their understanding of both the interdisciplinary CIIMT domain as well as the professional field. Through several working formats they develop appropriate skills and methods and learn to reflect critically on the use of theories, models and their own findings (e.g., by discussing assignments and findings during contact weeks, reflecting on differing academic and professional debates, and questioning contradictory perspectives).

The curriculum allows students to play an active role in designing their own learning processes, and in this way installs student-centred and independent learning. CIIMT's curriculum structure influences students' study behaviour and the success of their study. From the design and working methods across the modules, it can be concluded that, up until thesis research, students spend about 60 per cent of their time studying independently, guided by pre-selected critical text reading and assignments. Approximately 40 per cent is devoted to contact weeks, communication, and collaboration with their teachers and peers.

The part-time programme is based on a weekly study load of 20 hours over the course of two years. The choice to concentrate meetings within one week makes this master's programme feasible, given the fact that the students are professionals holding full-time jobs. As can be seen in the course schedule, every module comprises an experiential learning phase in addition to a preparation phase and a feedback phase.

#### Considerations

The teaching-learning environment seemed sound to the panel. The panel appreciates the strong evidence of the student-centred approach to learning in the curriculum (e.g., flipped classroom). The programme offers substantial opportunities for students to demonstrate their understanding and attainment of course objectives, e.g., module 9 featuring a practical integration exercise.

On the basis of the interviews, the panel is satisfied with the integration of the concept of "reflective practitioner" referring to the wider application of the concept within the FMS, to create critical, self-learning students. The panel observed that appropriate measures are in place for students with functional impediments.

With respect to experiential learning, the panel notes that the programme management should think about how to engage with the employer. For experiential learning to be a success, it is important to liaise with the organisations that will be involved in what is taught in the classroom in order to obtain the necessary permissions, if needed, to use and share sensitive information in cases that will be shared, and to ensure that students will learn on the job. The panel gathered from the interviews that the programme will take care of this in the first two years for modules involving the defence organisation, to assure the commitment of the MoD. The institutional management of CIIMT has the intention to make agreements

NVAO | Netherlands Defence Academy - Compliance and Integrity in International Military Trade Academic Master's Programme | 18 December 2018 |

about commitment with other involved organisations, but there is no permission yet to do so. The BoE formulates the intention to design an instrument for assessing the quality of experiential learning.

The panel points out that the part-time structure of the curriculum is one of the programme's strengths. The focus on professionals already working in the field can support the interdisciplinarity of the programme, because the student target group is expected to stem from a heterogeneous background. E.g., civilian students may hail from diverse organisational backgrounds and research domains, while military students will each have followed a different career path. Besides, the management of the CIIMT programme intends to provide interdisciplinarity within the teaching staff to reflect the broad outlook of the programme.

#### Conclusion

The programme meets standard 4.

# 4.5 Standard 5: Intake

The curriculum ties in with the qualifications of the incoming students.

#### Outline of findings

The NLDA FMS will contact potential MoD military and civilian CIIMT master's students via the NLDA website, articles and announcements in defence magazines, brochures, e-mail, and information sessions. As for contacting international NATO+ military and civilian students, and students from relevant industries, communication channels are provided by the MoD. In the information dossier and in the prospectus, the entry requirements are clearly articulated. In the prospectus, potential students can find a description of who can apply for CIIMT (for the description of possible applicants, see appendix 5).

Because of the heterogeneity of the students as mentioned above, the educational management is taking care to re-acquaint students with an array of research methods applicable to the CIIMT domain. From 2020 on, there will be deficiency courses available online to support incoming students, to a maximum of 30 ECTS credits. These courses comprise: Defence Accounting and Information Systems (5 credits); Information Management (5 credits); Defence Management Accounting (5 credits); Defence Economics and Performance Management (5 credits); Strategic Defence Sourcing (5 credits) and/or Systems, Networks and Safety (5 credits).

### Considerations

The panel strongly believes that, to a large extent, the curriculum ties in with the qualifications of the incoming students. The panel nevertheless points out that a gap may exist between the expectations that the programme raises with respect to the added value of the student research and the expertise of students transferring immediately upon completing a bachelor's programme. It does, however, understand that the bachelor's graduates command work experience in the MoD, as this is part of their programme.

It becomes clear to the panel that in the first two years, the programme will only be open to graduates from relevant FMS bachelor's programmes. From 2020 onward, deficiency courses will be available which allows students from a different background than the military disciplines and comparable civilian disciplines, such as business studies, management or economics, to embark on the programme. The panel advises that, in response, the programme will also need to focus additional attention on research methods.

The expected heterogeneity of the incoming students is believed to support the interdisciplinarity of the programme. Apart from the plan to invite guest lecturers, it is not entirely clear to the panel how the educational management is going to compensate for the potential lack of heterogeneity before and after 2020. This remains a point for consideration. Nevertheless, the panel is convinced that the programme as it is proposed, is suitable for the expected intake.

Conclusion The programme meets standard 5.

# 4.6 Standard 6: Staff

The staff team is qualified for the realisation of the curriculum in terms of content and educational expertise. The team size is sufficient.

#### Outline of findings

The panel confirms that the policy on educational quality management of the FMS guarantees a base level by creating a teaching staff that possesses sufficient academic and educational qualities and enthusiasm for the degree programme and the underlying didactic concept. The CIIMT teaching staff are active researchers, as demonstrated by their PhDs and publications in their scientific fields. They are able to connect their research activities with the content of the modules to create an interesting learning environment for the students.

The teaching staff are BKO certified [BKO = basic teaching qualification for university staff] or working towards such certification. In addition, the teaching staff are to comply with English language demands by achieving a C1 proficiency grade before 2019. The teaching staff consists of core programme members and the Programme Board. The core programme members will coordinate their own courses. The Programme Board will coordinate the evaluation of individual courses and of the programme as a whole. In addition, guest lecturers will contribute to the teaching in the programme; they will be supervised by the core programme members. Given the expected student numbers and the size of the programme, the panel regards the total amount of 4 FTEs dedicated to CIIMT as adequate.

## Considerations

The panel believes that the educational, teaching and academic quality of the staff is sufficient. The panel is positive about the choice the programme has made to expand the team with lecturers on relevant themes to increase its interdisciplinarity. The panel suggests the further expansion of the expertise of the staff regarding the practical field of export

control as the programme develops. The panel notes that the educational management has not yet considered if and how the additional lecturers will be qualified. The panel is positive about the amount of 4 FTEs that has been allocated to the programme.

### Conclusion

The programme meets standard 6.

# 4.7 Standard 7: Facilities

The accommodation and material facilities (infrastructure) are sufficient for the realisation of the curriculum.

#### Outline of findings

CIIMT can build on the existing infrastructure of the FMS, which is adequate for facilitating the new programme. This infrastructure seems adequate for facilitating the CIIMT programme.

In terms of IT facilities, all Dutch MoD personnel are to use the MULAN network, in accordance with security standards. This network does not allow unrestricted access to the Internet. To allow FMS staff and students unrestricted access to the Internet, a wireless campus is available on all NLDA premises. A prerequisite is that students, and staff alike, bring their own device. Systems supporting the educational environment, such as the electronic learning environment (Moodle) as well as the NLDA library and associated databases can be accessed directly via the Internet. Both faculty staff and students can consult their schedules in Paralax, available through the Internet. Students have access to Osiris to view their grades and study progress. Both Paralax and Osiris are hosted on the Internet.

All courses use Moodle as the electronic learning environment. FMS faculty staff create and maintain their courses and students can access course related information. A forum function in Moodle allows online discussions. Written assignments are uploaded in Moodle to be checked for plagiarism by means of the Ephorus module.

FMS staff mainly use the premises at the Royal Military Academy (the Castle) in Breda. Ample space is available to host the courses. The classrooms available in the faculty building can be used as an overflow location.

The NLDA library specialises in military scientific literature. Apart from a physical collection (approx. 190,000 volumes), an increasing part of the collection is offered in digital formats. FMS staff and students have access to over 25,000 e-journals in databases such as ProQuest Central, ScienceDirect, Wiley, Sage, T&F, Psycharticles, and IEEE. Additionally, over 225,000 e-books are available through Ebrary and Springerlink. The complete collection can be searched by a discovery meta-search, and the digital collection can be accessed through the Internet. A link resolver provides a direct link to the full text of specific queries in Google Scholar. As well as a collection of literature, the NLDA library serves as a place of study and exchange of knowledge. The library has study places with and without PCs, group accommodation, and accommodation for individual study. The library staff

NVAO | Netherlands Defence Academy - Compliance and Integrity in International Military Trade Academic Master's Programme | 18 December 2018 |

provide tailored assistance to students in their quest for sources for education and research purposes. The NLDA library is considered the most relevant in the Netherlands in the domain of military studies. Regular acquisition efforts are made to keep the collection relevant and up to date.

# Considerations

The panel appreciated the tour at the Royal Military Academy (the Castle) in Breda very much. The Castle ambiance is special in itself; the accommodation and material facilities are up-to-date and sufficient to support the curriculum.

#### Conclusion

The programme meets standard 7.

# 4.8 Standard 8: Tutoring

The tutoring and provision of information to students are conducive to study progress and tie in with the needs of students

#### Outline of findings

Information on the programme and relevant policies (e.g., admission policy, prospectus, teaching and examination regulations) will be available throughout the year. Study guidance includes the provision of a mentor for every student. Once enrolled at FMS, students can make use of study guidance, counselling and mentorships, which aims to help them to study on time and successfully complete the programme. A study culture is promoted by strengthening the academic ambitions of students and, simultaneously, stimulating them to use academic insights to draw on and deepen the already existing practical knowledge base and vice versa.

This process starts at the annual welcome days before the start of the programme, during which information is provided to help create the necessary mindset for successful and timely completion of the programme. At this point, students and teaching staff get acquainted with one another, and with the philosophy and set-up of the programme, the underpinning research, as well as the needs of the professional field. Students communicate their own learning goals and how they intend to achieve these, something they will reflect on regularly as the programme proceeds.

During welcoming days, all relevant information about the programme and facilities will be distributed. The goals and tasks of mentorship will be clarified to the students. They will be encouraged not to hesitate to ask for meetings with their mentor and to contact their mentor for any subject that may affect their study progress.

Members of teaching staff act as student mentors and can be approached to provide information about the programme. They are available for study guidance, counselling and study advice to all students within their mentorship. Moreover, mentors can be approached in case of problems, such as: finding a balance between study time, work and private life; pending deployments; illness or any other hardship that impacts study progress or the

NVAO | Netherlands Defence Academy - Compliance and Integrity in International Military Trade Academic Master's Programme | 18 December 2018 |

wellbeing of a student. For students who risk falling behind schedule, study guidance and counselling focus on returning them to the schedule. In addition to consulting their mentors, in this respect, all students will be monitored by the BoE. For additional support, students may be referred to educational specialists or the NLDA Language Centre. Finally, there is a student ombudsman, which holds an independent position, who is impartial and handles complaints with strict confidentiality.

### Considerations

The study guidance and mentoring system is appropriate and ties in with the needs of the students. The programme intends to support students closely and give them timely support when they experience difficulties. The information provision is adequate and addresses all relevant issues.

The panel points out that the programme will have to develop a policy and set up guidelines for specific tutoring on experiential learning, especially when dealing with employers other than the MoD. This is also important, though, for students from within the MoD.

### Conclusion

The programme meets standard 8.

#### 4.9 Standard 9: Quality assurance

The programme has an explicit and widely supported quality assurance system in place. It promotes the quality culture and has a focus on development.

#### Outline of findings

The panel found that the quality assurance of all FMS degree programmes is outlined by the Faculty Board (FB) in the *Education and Quality Manual (EQM)*. The EQM focuses on both quality control and improvement, and addresses tasks and responsibilities of the Programme Board, BoE and teaching staff.

The programme dossier stipulates that for all FMS degree programmes, NVAO recommendations will serve as the basis for managing and further enhancing the quality of CIIMT on all aspects of the programme. This also extends to the manner in which the programme relates to the needs of the MoD, professional field, module and supra-module objectives, the level of graduates in general, and the development of its research base.

The quality control has a well described focus on module and supra-module levels. At the module level, evaluations focus on applied teaching methods, didactic skills, teaching materials, tests/assessments, learning effects, and course results (pass rate & objectives). Every module will be evaluated once every three years by the Education Section based on an evaluation scheme provided by the Programme Board. Quality control at *supra-module level* focuses on reaching (final) attainment levels and coherence between modules, both regarding the programme as a whole (e.g., feasibility of the programme; experiences with the schedule, including time allowed for preparation, contact and experiential learning weeks etc.; increasing demands for independent learning and students' responsibility for their own learning; relevance of the programme to students and the working field, etc.) as well as with regard to the stages that can be distinguished in CIIMT's curriculum design.

They always close the PDCA (plan, do, check, act) circle for each evaluation element of the programme. CIIMT therefore intends to conduct module evaluations, student and teacher satisfaction surveys, and alumni surveys. The tasks and roles of the parties involved in quality control are described.

# Considerations

The panel is convinced that the programme has a clear quality assurance structure, with clear tasks assigned to the different bodies that play a part in quality assurance. The panel is convinced that the programme has an explicit quality assurance system in place.

#### Conclusion

The programme meets standard 9.

# 4.10 Standard 10: Student assessment

The programme has an adequate student assessment system in place.

## Outline of findings

The programme has defined examination policies. These are in line with the policies used by the NLDA FMS and described in the Education Quality Manual (EQM). The programmespecific rules and regulations are set down in the Teaching and Examination Regulations (TER). With regard to the thesis, the programme defines principles in its thesis guide. These include the explanation of assessment criteria, the importance of the initial research proposal (IRP) of the thesis as a moment at which guidance is essential to steer students in the right direction, and last but not least to assist students in reflecting on their personal development and learning objectives.

For the CIIMT programme, the behaviour of its teachers is considered to have a significant impact on the study behaviour of students. By extending assignments at regular intervals and offering feedback, students will be stimulated to study during the whole period, instead of postponing this desired behaviour until preparing for exams. For each module, a course guide provides information as to the required hours of self-study, literature, themes discussed during the contact week as well as the testing formats and assignments. In developing the CIIMT programme, attention has been paid to adult students' learning styles to enhance students' experience of the programme. By providing regular formative feedback, students understand how they can improve as the programme progresses. The collection of student feedback at different junctures during the programme may be used to consult teaching staff to make timely adaptations to (the organisation of) modules to foster student commitment.

The independence of the BoE is institutionally guaranteed, as it reports to the Executive Board of the Foundation for Scientific Education and Research NLDA (SWOON) rather than the Programme Board. The BoE has an external member. It sees evaluating courses and thesis results as its most important task; therefore, 5 or 6 meetings per year are organised to make a plan, review the dossiers of the different modules, and discuss the findings with the Programme Board.

NVAO | Netherlands Defence Academy - Compliance and Integrity in International Military Trade Academic Master's Programme | 18 December 2018 |

The panel reviewed samples of assessments for modules 1 and 5 as part of its inquiry.

#### Considerations

The panel is satisfied with the transparency of the assessment system. The programme management formulates a strong idea of what constitutes valid, reliable and transparent tests. The variation in assessment methods is in place, which appears appropriate for the different modules. The sample of assessments seems suitable for the level and orientation of the programme. The panel is positive about the expertise of the envisaged BoE and their intended approach for guaranteeing the quality of the assessments.

*Conclusion* The programme meets standard 10.

# 4.11 Qualification and field of study (CROHO)

The panel recommends the conferral of the degree of "Master of Science" to graduates of the Compliance and Integrity in International Military Trade programme. The panel supports the programme's preference for the CROHO field of study of "Economics".

# 4.12 Conclusion

The panel is convinced that, in general, the CIIMT programme is a credible attempt to fill in a certain and specific need for increasing knowledge on the regulation of the international market in military equipment and dual-use goods and services. The panel is very confident about the quality of the staff and the institutional quality. The panel finds that the FMS is the right institution to offer this programme. Based on the information dossier and the discussions with the supporting staff, the panel agreed on a positive recommendation regarding the accreditation of the CIIMT programme. The panel was positive on all standards of the assessment framework but does point out the need for some critical reflection on the chosen intended learning outcomes, the content of the programme, and its alignment with the expectations of students and the work field. Because the domain covered by this master's programme is developing fast, the programme itself is expected to be a work in progress. Thus, the panel recommends the installation of an Advisory Board that in its constitution reflects the heterogeneity, interdisciplinarity, and international perspective of the programme, and includes possible stakeholders who will benefit from the programme.

All in all, the panel assesses the quality of the programme as positive.

### 4.13 Recommendations

Without taking away from the positive assessment, the panel has the following recommendations for improvement of the programme:

- to establish a better connection within the programme between the perspective of export control and compliance and the procurement perspective;
- to improve the alignment of the learning outcomes with the content of the curriculum and the expectations of prospective students and the work field, e.g., by replacing the

emphasis on "export control" and "trade" in learning outcomes 1 and 2 with a broader term such as "regulation of international transfers of military equipment and dual-use items", or "regulation of the export and procurement of military equipment";

- to set up an Advisory Board for the development of the programme that reflects the heterogeneity and the international character of the CIIMT stakeholders;
- to augment the attention to procurement and supply chain knowledge in the first four modules of the programme;
- to include doctrinal legal research as part of the research methods to be taught.

# **5** Overview of the assessments

Standard	Assessment
Intended Learning outcomes	Meets the standard
Standard 1: The intended learning outcomes tie in with the level and orientation of the programme; they are geared to the expectations of the professional field, the	
discipline, and international requirements.	
<b>Curriculum: orientation</b> Standard 2: The curriculum enables the students to master appropriate (professional or academic) research and professional skills.	Meets the standard
<b>Curriculum: content</b> Standard 3: The content of the curriculum enables students to achieve the intended learning outcomes.	Meets the standard
Curriculum: learning environment	Meets the standard
Standard 4: The structure of the curriculum encourages study and enables students to achieve the intended learning outcomes.	
Intake	Meets the standard
Standard 5: The curriculum ties in with the qualifications of the incoming students.	
Staff	Meets the standard
Standard 6: The staff team is qualified for the realisation of the curriculum in terms of content and educational expertise. The team size is sufficient.	
Facilities	Meets the standard
Standard 7: The accommodation and material facilities (infrastructure) are sufficient for the realisation of the curriculum.	
Tutoring	Meets the standard
Standard 8: The tutoring of and provision of information to students are conducive to study progress and tie in with the needs of students.	
Quality assurance	Meets the standard
Standard 9: The programme has an explicit and widely supported quality assurance	

system in place. It promotes the quality culture and has a focus on development.	
Student assessment	Meets the standard
Standard 10: The programme has an adequate student assessment system in place.	
Achieved learning outcomes	n/a
Standard 11: The programme demonstrates that the intended learning outcomes are achieved.	
Conclusion	Positive

# Annex 1: Composition of the panel

In compliance with the General Data Protection Regulation (GDPR), the details of the CVs of the panel members are not included in the report; the report only states their current position and/or status. Further information on the panel members can be obtained from NVAO.

Chair: Prof. Dr Leen Paape, Professor of Corporate Governance and Chairman of the Nyenrode Corporate Governance Institute.

Member: Prof. Dr Jan Leysen, Professor and Head of the Department of Economics, Management and Leadership, Royal Military Academy, Brussels.

Member: Dr Paul Holtom, Senior researcher at the Small Arms Survey, Geneva.

Member: Dr Niels van Willigen, Associate Professor of international relations at the Department of Political Science of Leiden University. He is also Senior Analyst in the Peace & Security Section of the Global Governance Institute.

Student member: Diana van Wanrooij, LLM, Student, International and European Law master's programme, Tilburg University (track: International Law and Human rights).

All the panel members have signed a statement of independence and confidentiality.

The panel was assisted by Thomas de Bruijn and Tinka Thede – both NVAO policy advisors – as process coordinators and by Katrien Goossens as secretary.

# Annex 2: Schedule of the site visit

The panel visited the Netherlands Defence Academy on 26 October 2018 as part of the external assessment procedure regarding the Compliance and Integrity in International Military Trade master's programme.

In compliance with the General Data Protection Regulation (GDPR), the names and positions of the persons interviewed by the panel are not stated in the report. Further information on this can be obtained from the NVAO.

08:30 – 09:00	Reception and preparatory panel meeting (confidential)
09:00 – 09:30	Representatives of the institutional management
09:30 – 10:30	Meeting with the programme board
10:45 – 11:15	Representatives from the professional field
11.15 – 11.45	Meeting with the board of examiners
11:45 – 12:30	Panel meeting (confidential)
12:40 – 13:10	Tour of the facilities by students
13:20 – 14:20	Representatives from the teaching staff
14:20 – 14:50	Second meeting with the programme board
14:50 – 16:30	Panel meeting (confidential)
16:30	Presentation of initial findings

# **Annex 3: Documents reviewed**

Programme documents presented by the institution

- Information dossier: Compliance and Integrity in Military Trade (CIIMT) master's programme
  - Appendices to the information dossier:
    - Prospectus on the Compliance and Integrity in Military Trade (CIIMT) master's programme, 2018-2020
    - Thesis Guide for the Compliance and Integrity in Military Trade (CIIMT) master's programme, 2018-2020
    - Teaching and examination regulations (TER) for the Compliance and Integrity in Military Trade (CIIMT) master's programme, 2018-2020
    - Education Quality Manual (EQM), 2016
  - Documents made available during the site visit
    - Course dossier per module
    - Information Dossier for the CIIMT master's programme; March 2018
    - o Prospectus on the CIIMT master's programme, 2018-2020; June 2018 (attached)
    - Teaching and Examinations Regulations for the CIIMT master's programme 2018-2020; (adapted in October 2018)
    - o Thesis Guide for the CIIMT master's programme; March 2018
    - Education Quality Manual, Faculty of Military Sciences, Netherlands Defence Academy; May 2016
    - Programme folder for the initial accreditation of the CIIMT master's programme, 2018
    - Draft leaflet on the CIIMT master's programme for recruiting students (+ examples of leaflets on other degree programmes of the Faculty of Military Sciences, Netherlands Defence Academy)
    - Education and Research report on the Faculty of Military Sciences 2016
    - Education and Research report on the Faculty of Military Sciences 2017
    - Policy on Research at the Faculty of Military Sciences of the Netherlands Defence Academy; January 2016
    - Netherlands Annual Review of Military Studies (NL ARMS) 2015: The Dilemma of Leaving: Political and Military Exit Strategies
    - Netherlands Annual Review of Military Studies (NL ARMS) 2016: Organizing for Safety and Security in Military Organisations
    - Netherlands Annual Review of Military Studies (NL ARMS) 2017: Winning Without Killing: The Strategic and Operational Utility of Non-Kinetic Capabilities in Crises
    - Netherlands Annual Review of Military Studies (NL ARMS) 2018: Coastal Border Control: From Data and Tasks to Deployment and Law Enforcement
    - Samples of assessments in modules 1 and 5.

# Annex 4: Curriculum of the Compliance and Integrity in International Military Trade master's programme

Module	ECTS credits	Title	Discipline	Leids Level
1	5	Internal trade in defence markets	Defence economics	400
2	5	The regulatory environment: legal and business perspective	Law, defence economics, organisation theory	400
3	5	Framework and regulations in international military trade	Law, ethics, defence economics	500
4	5	Managing compliance and integrity in military organisations	Ethics, system theory, organisation theory, defence economics	500
5	5	Designing internal compliance systems	Information systems, internal control	500
6	5	Monitoring and auditing internal compliance systems	Information systems, internal control, auditing	500
7	5	Research methods for export controls	Research methods (quantitative, qualitative)	500
8	5	Managing relationships in non- compliance contexts	Organisation theory, ethics, change management, management control	500
9	5	Integration Projects relating to aspects of ICP in business environments	All previous modules	600
10	15	Master's thesis (including individual research proposal)	All previous modules	600
Total	60			

# Annex 5: Description of possible Applicants to the CIIMT programme

- Applicants possess a relevant bachelor's degree at level 6 (or higher), according to the European Qualification Framework (EQF) or equivalent (e.g., Ontario Qualification Framework level 11) in the domain of: Military Management Studies; Military Systems and Technology, Military Business & Technology variant as provided by the Faculty Military Sciences at NLDA or a comparable degree earned at (NATO/EU) partner academies;
- Applicants possess a degree at the same level as mentioned under 1) in Economics, International Law and/or Common Law, Behavioural Sciences and/or Management and Organisational Studies. Applicants holding a degree in a comparable domain may also be admissible. Depending on their dossier and the advice from the Admissions Panel, the Executive Board will decide on their admissibility;
- 3. Applicants demonstrate relevant experience on the job. At least 2 to 3 years of experience in export control of international trade in military and dual-use goods and services;

The information dossier sets out what is regarded as relevant experience: 1) the demand (governmental) side; 2) the supply (defence-related industry) side, or 3) national and international regulatory agencies and/or research centres.

- 4. Applicants have a sufficient command of the English language. This is demonstrated by a certificate, not older than 5 years at the start of the programme, issued by either the Common European Framework Reference (CEFR), level B2; Cambridge First English (CFE); International English Language Testing System (IELTS) Academic, score 5.0; Test of English as a Foreign Language (TOEFL) Internet-based, 88 points. In all other cases, the Admissions panel will request additional proof of the level of English language command.
- 5. Additionally, Dutch MoD students require permission from their commanding officer/service command or director.

# Annex 6: List of abbreviations

ba	bachelor
BoE	Board of Examiners
CIIMT	Compliance and Integrity in Military Trade
ECTS	European Credit Transfer System
EQM	Education and Quality Manual
FB	Faculty Board
FMS	Faculty of Military Science
ICP	Internal Compliance programme
ma	master
MoD	Ministry of Defence
NLDA	Netherlands Defence Academy
NVAO	Accreditation Organisation of the Netherlands and Flanders
PB	Programme Board

This panel report was commissioned by NVAO in the purview of the initial accreditation of the Compliance and Integrity in International Military Trade master's programme to be provided by the Netherlands Defence Academy.

Accreditation Organisation of the Netherlands and Flanders (NVAO) Parkstraat 28

P.O Box 85498 | 2508 CD The Hague

- T 31 70 312 23 00
- E info@nvao.net
- W www.nvao.net

Dossier number 006590