
ENQA AGENCY REVIEW: POLISH ACCREDITATION COMMITTEE (PKA)

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EXECUTIVE SUMMARY

This report results from an external review assessing the compliance of the Polish Accreditation Committee, Polish: Polska Komisja Akredytacyjna (PKA) against the 2015 Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). As it is already the third review of PKA, it is important to recognize that in 2015 the ESG were updated potentially requiring agencies to adjust some of their processes. PKA is a member of the European Association for Quality Assurance in Higher Education (ENQA) and has been listed in the European Quality Assurance Register for Higher Education (EQAR) since 2009. PKA is the only recognized institution in Poland responsible for external Quality Assurance in the field of higher education (HE). PKA operates on a national level with some international activities as part of European Projects. This external review report is based on the review process that primarily used PKA's self-assessment report, a site visit of the ENQA appointed review panel to Warsaw, and published information available on PKA's website.

Comparable to the change of ESG in 2015, since the last review of PKA the legal regulations pertaining to Polish higher education were repeatedly adjusted. The dynamics of changes, particularly these in the scope of legal regulations, has resulted in the need for the Polish Accreditation Committee to adapt as well. After an introduction of institutional review mechanisms in 2011, these operations were again suspended in 2016 putting the focus of PKA on programme evaluations as well as opinion giving processes.

While PKA is funded from the state budget, the operational use of the funds remains within its self-governing responsibility. PKA does not charge any fees to institutions.

Based not only on the written documentation and the manifold evidence reviewed by the panel of experts, but equally considering the numerous stakeholder interviews and impressions while talking to PKA members and employees, it became obvious that PKA is a well-respected institution in the Polish HE system. In the past years, PKA has started to adjust its procedures in a way that perception of its activities moves away from being a control-oriented body, towards an institution that supports enhancement and focuses on the support of internal quality assurance procedures. With a clear focus on enhancing the national system and performance of programmes, PKA – much to the benefit of its operations – also increased to include international experiences. Connections with stakeholders are in place and adjustments that were implemented after 2015 start showing effects. The review also identified a number of recommendations, strongly targeting the different dimensions of the opinion giving process, like the criteria alignment with the requirements of ESG 2.1, but also the publication of reports for this activity.

In light of repeated and also current change of the legal context of its operations, PKA successfully manages to maintain good relations with the relevant stakeholders by implementing procedures sound with the Polish HE system.

The panel wish to make explicit that the Opinion Giving Process, one of PKA's two main activities, and its specificities, significantly prevented a more positive assessment of some standards. The panel was fully aware of the fact that important work was in progress to change the legal framework of PKA activities and the new rules could also improve the Opinion Giving Process. However, in line with ENQA rules and recommendations, the panel analysed and assessed the current context or framework and cannot make assessments based on expected future developments.

The panel found PKA's level of alignment with the ESG is the following:

- Fully compliant for the following ESGs – 3.1, 3.2, 3.3, and 3.7
- Substantially compliant in the following ESGs – 3.4, 3.5, 3.6, 2.2, 2.3, 2.5, and 2.7
- Partially compliant: 2.1, 2.4 and 2.6

The panel underlines that the main recommendations, particularly addressing the ESG 2.1, 2.4 and 2.6, refer strongly to the opinion giving process. The panel believes that the programme evaluation process of PKA is generally well adjusted. The panel hopes that its analyses and recommendations will support PKA in its continued efforts to enhance their procedures and thus the quality of the Polish HE system while at the same time raising the impact of its quality assurance activities.

INTRODUCTION

This report analyses the compliance of the Polish Accreditation Committee (Polska Komisja Akredytacyjna, PKA) with the 2015 *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in 5 months from April to August 2018. The review was commissioned in view of the agency's wish to reconfirm its membership of ENQA and its listing in EQAR.

BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015.

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

MAIN FINDINGS OF THE 2013 REVIEW

In its 2013 report, the panel concluded that the Polish Accreditation Committee is in compliance with the ENQA Membership provisions. The panel therefore recommended to the Board of ENQA that PKA should have its Full Membership in ENQA confirmed for a further period of five years. The same report was the basis for listing PKA in EQAR.

Already the 2013 report recognized the responsiveness of PKA towards developments in the HE system and emphasized that PKA had taken the lead in helping to create a climate in which the quality of education is a paramount concern in Poland. The detailed findings of the review, that followed the then relevant review methodology were as follows:

- **ESG 2.1 (Use of internal quality assurance procedures): substantial compliance**

PKA should strengthen the assessment of quality assurance policies and procedures (ESG 1.1) as part of its programme evaluation by including explicit references to both elements in the relevant (sub-) criteria.

- **ESG 2.2 (Development of external quality assurance processes): substantial compliance**

PKA should put in place a formal mechanism for consultations with its external stakeholders on, and impact assessment of, prospective changes in its processes, procedures and / or criteria which identifies stakeholders to be obligatorily targeted and methods to do so.

- **ESG 2.3 (Criteria for decisions): full compliance**

- **ESG 2.4 (Processes fit for purpose): substantial compliance**

PKA should review and revise its arrangements for the recruitment and training of experts so that academic experts are recruited through a fully transparent procedure, a mechanism is put in place to assess training needs of all categories of experts on a regular basis, and the training or briefing of international experts ensures that all of them are well prepared for their tasks in terms of familiarity with the national context and PKA's procedures. To increase

transparency, PKA may consider adopting a rule that a certain minimum proportion of new experts are recruited after the end of each evaluation cycle or PKA's term of office.

PKA should make early progress in securing the targeted increase of international experts, including non-Polish speaking, in its external quality assurance processes.

- **ESG 2.5 (Reporting): substantial compliance**

Pursuing its thoughts as part of the work already initiated, PKA should revise its evaluation report templates so that they include recommendations and suggestions on quality improvement and enhancement, in particular IQA systems, and a clear distinction is made between recommendations and suggestions.

- **ESG 2.6 (Follow-up procedures): full compliance**

- **ESG 2.7 (Periodic reviews): full compliance**

- **ESG 2.8 (System-wide analyses): substantial compliance**

In addition to publications already planned, PKA should produce a more fine-grained publication specifically devoted to internal quality assurance systems at Polish HEIs, preferably with a Code of Good Practice or guidelines on how current approaches could be improved.

- **ENQA membership criterion 4 / ESG 3.5 (Mission statement)**

PKA should revise its mission statement so that it clarifies that its external quality assurance processes have a double purpose of quality enhancement and accountability / compliance, and that its ex-post evaluation decisions lead to legal consequences for HEIs.

- **ENQA membership criterion 7 / ESG 3.8 (Accountability procedures)**

In line with its plans and preliminary arrangements, PKA should implement fully its internal quality management system and assess regularly its fitness for purpose and effectiveness.

PKA should introduce a formal mechanism for the periodic collection of feedback from a sample of experienced HEIs on its overall evaluation methodology (i.e. institutional and programme evaluation processes considered jointly as making up a whole), in addition to feedback now collected on individual evaluations.

Pursing its initial thoughts, PKA should make arrangements for maximising and exploiting more extensively the potential of its Advisory Board in terms of its input on the work and operations of the Agency, and for reviewing its effectiveness. Information about the activities of the Board should be easily available on the PKA website.

REVIEW PROCESS

The 2018 external review of PKA was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of PKA was appointed by ENQA and composed of the following members:

- **Jacques Lanarès (Chair)**, Vice Rector for Quality, HR and Development of Teaching University of Lausanne (Unil), Switzerland, (EUA nominee);
- **Ronny Heintze (Secretary)**, Commissioner for International Affairs, Agency for Quality Assurance through Accreditation of Study Programmes (AQAS), Germany (ENQA nominee);
- **Angeline Aubert-Lotarski**, Quality Coordinator at the Faculty of Engineering, University of Mons, Belgium, (ENQA nominee);

- **Inguna Zariņa**, Master Student at University of Latvia, Latvia (ESU nominee)

Agnė Grajauskienė coordinated the review on behalf of the ENQA Secretariat and was supported by Milja Homan, who participated as an observer. The panel is thankful to the important support delivered by Agnė Grajauskienė, which was a decisive factor in allowing than panel to process the review in a well-structured way.

The review followed the broadly accepted sequence of the agency producing a self-assessment report (SAR) that is then reviewed by a nominated panel of international experts who use a site visit to interview all relevant stakeholders during their visit. The interviews aim at clarifying and gathering additional evidence. Based on the SAR, the information gathered during the interviews as well as considering additionally presented information, the panel produces the final review report.

Self-assessment report

PKA started the self-evaluation process in the second half of 2017 with a team of seven people appointed by the President of PKA and composed of the Committee's Vice-President, members and experts, including representatives of students and employers, and the Bureau. The self-assessment focussed on the ESG 2015 as well as the EQAR policy paper *Use and Interpretation of the ESG* and was complemented by a SWOT analysis, which was prepared in consultation with the management and members of PKA. PKA also explained that the inclusion of a large number of people from different stakeholder perspectives in the self-assessment report consultation process was of special importance to the organization.

The SAR also contained an introduction to the polish higher education system and explanations on the different tasks of PKA. It followed the guidelines provided by ENQA, which was helpful for the panel as relevant information could be found easily. The panel found the SAR to be clear, open and honest providing a factual and self-reflective attitude. It also explained the impacts of numerous legal changes of the past years that impacted work and structures of PKA.

The final version of the SAR consisted of 82 pages and was accompanied by 16 appendixes that were available to download for the panel.

Site visit

The site visit took place at PKA premises in Warsaw on 22-25 May 2018. The first day served for an internal meeting of the panel to discuss and agree on issues that required further discussion and clarification during the interviews. During this preparation there was also a meeting with the agency's resource persons to clarify on broader questions helping the panel to understand the system PKA works in as well as relevant background information regarding changes in the polish HE system.

Starting on 23 May, there were 13 meetings with different stakeholders with relevance to the activities of PKA. These meetings included meetings with the:

- CEOs of PKA and PKA Bureau,
- Team responsible for drafting the SAR,
- Senior Management – Presidium and Chairman of the sections,
- Agency staff,
- Ministry of Higher Education as well as the Parliament,
- Members of different sections,
- Appeals Body and the Section for Ethics as well as Sections for Complaints and Motions,
- Heads of reviewed institutions,
- Quality Assurance officers of HEI,

- Representatives of the pool of reviewers,
- Students' experts,
- Other External Stakeholders (Rectors conference, employers organizations, Parliament of students).

A full list of meetings including the names of interviewees can be found in Annex 1 to this report.

It should be mentioned that the atmosphere of the interviews was constructive and that questions were raised and replied openly. The panel appreciates the openness of interviewees also to provide self-critical responses and present future oriented ideas that underline the potential of the organization towards further enhancement out of its own capacity. PKA supported the success of the site visit not only by an exemplary logistic, but also by creating a positive atmosphere.

Some members of the groups interviewed by the panel required translation from English to Polish and vice versa. Hence, in all interviews simultaneous translation was used. The panel was aware of this procedure in advance and the timelines were planned accordingly. The interpreters were independent and ENQA agreed to them before the site visit took place. The panel recognizes the important role of the interpreters for the efficient progress of the site visit.

HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

HIGHER EDUCATION SYSTEM

The LoHE from 2005 constitutes the legal basis for providing higher education programmes in Poland. Public higher education institutions and since 1990 private HEIs operate in Poland. Public HEIs are founded by the state, whereas natural or legal persons can establish non-public institutions.

Both groups include university- and non-university-type higher education institutions. Pursuant to the LoHE, a university-type HEI is an institution conducting research, whose at least one academic unit is authorised to confer the degree of doktor. University-type HEIs can offer first cycle tertiary education programmes leading to the award of licencjat (bachelor's) or inżynier (engineer) degree and second cycle or long cycle studia magisterskie (master's degree courses) leading to the award of the magister (master's) or an equivalent degree, as well as doctoral programmes. Non-university-type higher education institutions are HEIs, which offer first cycle, second cycle or uniform master's degree programmes, but which are not authorised to award the degree of doktor.

Changes initiated at the turn of the 1990s spurred the establishment of first non-public universities in Poland in 1991, and their number continued to grow until the academic year 2010/2011, when there were 328 non-public higher education institutions in Poland. From that point their number started to constantly decrease to 265 in 2017. The number of public HEIs remained constant in the past years at 134. Together with eight church-run HEIs the Polish HE system is set up of 408 institutions.

Poland has established a National Qualifications Framework of eight levels that sets standards for all degree programmes.

There are three cycles in the HE system of Poland, while a secondary education graduation certificate (świadectwo dojrzałości) is a precondition for entering first cycle or long cycle programmes. The first cycle leads to the degree of licencjat (bachelor's) degree or inżynier (engineering) degree after at least 180 ECTS credits. The second cycle requires a degree from the first cycle to enter the programme, lasts at least 90 ECTS credits and leads to a magister (master's) degree or a magister inżynier (master of science in engineering) degree. It is also possible to directly enter long cycle programmes, which lead to the same degrees as the second cycle. However, they comprise of 300 to 360 ECTS credits and do

not require a first cycle degree to enter. The third cycle marks the doctorate and comprises of 30-45 ECTS credits following a second or long cycle degree. Additionally, there are post-graduate programmes of at least two semesters and a minimum of 30 ECTS credits which may lead to various different degrees.

Besides the different degrees depending on the respective cycle, programmes offered by HEIs can be differentiated in two types, which are called profiles. There is a general profile as well as a practical profile. For the general profile it is required that more than one half of the degree programme (defined based on ECTS credits) includes activities aimed at ensuring that students gain in-depth knowledge corresponding with research. There is no need for any internship in these programmes. The practical profile aims at student's acquisition of practical skills and social competences, based on the assumption that more than one half of a degree programme (defined based on ECTS credits) includes practical activities that develop such skills and competencies, including skills acquired in workshops conducted by persons having professional experience gained outside of a higher education institution. An internship of at least three months is obligatory for these programmes.

In 2016/17 approximately 1/3 of the 5.843 programmes offered by Polish HEI belonged to the practical profile, while 2/3 could be assigned in the general profile. The past years – also due to legislative changes in 2014 – have seen a slow but steady shift towards more programmes with practical profiles.

The growth of the number of HEIs in the 1990s was accompanied by an increase in the number of students. The academic year 2005/2006 saw the largest number of students amounting to 1.953.800. Since then, due to the decline in the population aged 19-24, the number of students has consistently decreased, reaching 1.318.500 in the academic year 2016/2017 which marks a decrease of 30% compared to the peak. At the same time, there is a steady increase in the number of international (incoming) students, which was at 6.563 in 2000/01 and grew to 62.434 in 2016/17.

QUALITY ASSURANCE

The LoHE and relevant implementing acts constitute the basis for the operation of quality assurance activities in Poland, by incorporating two parallel and complementing dimensions; internal and external quality assurance.

Based on legal requirements HEIs themselves are obliged to ensure high quality education and to provide internal quality assurance systems. Certain requirements towards these systems are explicitly defined in the regulations, e.g. the consideration of the needs of the social and economic stakeholders, including the labour market. Also some elements of the system, such as student opinion questionnaires and periodical academic staff evaluations, are compulsory.

The LoHE also regulates the second dimension – external QA. This responsibility is assigned to the Polish Accreditation Committee. PKA is the sole body responsible for higher education, and PKAs opinions and resolutions enjoy legal validity. Undergoing assessment by PKA is obligatory and negative evaluation brings consequences stipulated by law. The MoHE defines regulations and general criteria for programme evaluation while the detailed criteria for programme evaluation are specified in the Statutes adopted by PKA itself. However, HEIs develop their own quality assurance systems, which allow a reflection of individual characteristics of a given HEI, its mission statement, education profile, students, staff, tradition and external conditions.

POLISH ACCREDITATION COMMITTEE

The Polish Accreditation Committee (PKA) was established under the name of the State Accreditation Committee on 1 January 2002. The Committee assumed all responsibilities of the State Accreditation Committee for Higher Vocational Education (Komisja Akredytacyjna Wyzszego Szkolnictwa Zawodowego (KAWSZ)) and some of the responsibilities of the General Council for Higher Education (Rada Główna Szkolnictwa Wyzszego (RGSW)) pertaining to giving opinions on applications for the establishment of new HEIs and their academic units, fields of study and occupational majors. However, PKA was given broader powers, and evaluations made by the Committee are far more binding for the minister responsible for higher education than it was the case with opinions given its predecessors.

Since its establishment PKA underwent numerous changes and adaptations to its tasks based on changes to the legal system. Recognizing the last review of PKA took place in 2013 the focus of the historical explanation will be on the relevant adjustments from thereon.

2011 – 2016:

Based on legislative changes in 2011 the name of PKA was changed from the State Accreditation Committee to the Polish Accreditation Committee. Two types of evaluation were introduced: programme and institutional reviews. During this phase PKA also covered third cycle and post-graduate programmes with quality assurance activities. The regulations on the ratings in programme evaluations (outstanding, positive, conditional and negative) were moved from the PKA Statutes to the LoHE while at the same time reconfirming PKAs right to define detailed criteria for the evaluations in its Statutes.

At the same time a number of structural changes were implemented, e.g. it was defined that the MoHE when appointing committee members should respect the requirement that all areas of study are represented and should ensure that at least 30% of the number of Committee members are women. Also the minimum and maximum number of committee members was increased and since from then on representatives of employers' organisations were appointed as Committee members, two of them sit on the Presidium of PKA.

An amendment of the LoHE in 2014 introduced changes in the organisational structure of the Polish Accreditation Committee by establishing a separate Appeals Body. Membership in the Appeals Body cannot be combined with membership in a section, and at least one Member of the appeals body should come from the respective study fields connected to the sections. Furthermore, the rules for appointing members of the Committee were modified by introducing a provision stating that during each term of office not more than 50% of the members of Committee are appointed from among persons acting as members of the Committee in the previous term of office.

At the same time the amended law led to the full publication of PKA resolutions concerning its programme and institutional evaluations together with their reasoning, as well as full reports of evaluation panels within fourteen days from the date of a resolution becoming final.

2016 – today

In 2016 the LoHE was amended three times introducing major changes affecting PKA. Resulting from a broad discussion in the academic community, which identified too much bureaucratisation of the provisions causing excessive load on HEIs resulting from formal requirements related to the process of creating internal quality assurance systems, PKA no longer conducts institutional evaluations (which were introduced with the change in 2011). As this type of evaluation also involved activities addressing the quality of post-graduate and third cycle programmes, currently these programmes are no longer covered by PKA activities. PKA outlines that the debate regarding institutional reviews and activities

connected with it is ongoing in the academic community and that also within the Committee there are strong opinions regarding this issue.

Another change affecting PKAs competences concerns the replacement of the use of the National Qualifications Framework for Higher Education and the introduction of the Polish Qualifications Framework covering the whole system of education, starting from primary school.

Based on the general regulations defined in the new LoHE in 2016 PKA developed – as mandated by the law - a catalogue of programme evaluation criteria in consultation with relevant stakeholders. Eight general and 16 detailed criteria demonstrating compliance with general evaluation criteria of programme evaluation laid down by the MoHE were defined. Consequently, PKA Statutes were adjusted to reflect the new requirements.

Even at the time of the site visit legal changes to the Higher Education System were underway probably also leading to adjustments of PKA work. For this purpose that panel believes that it is important to underline that only the current status was subject to the review and numerous changes and adjustments that were outlined to be on the horizon could not yet be part of the assessment as they lie in the non- evidenced future.

PKA'S ORGANISATION/STRUCTURE

As defined in the LoHE, the Minister for Higher Education appoints the members of the Polish Accreditation Committee. Prior to being appointed, candidates have to be nominated by one of the following bodies/institutions:

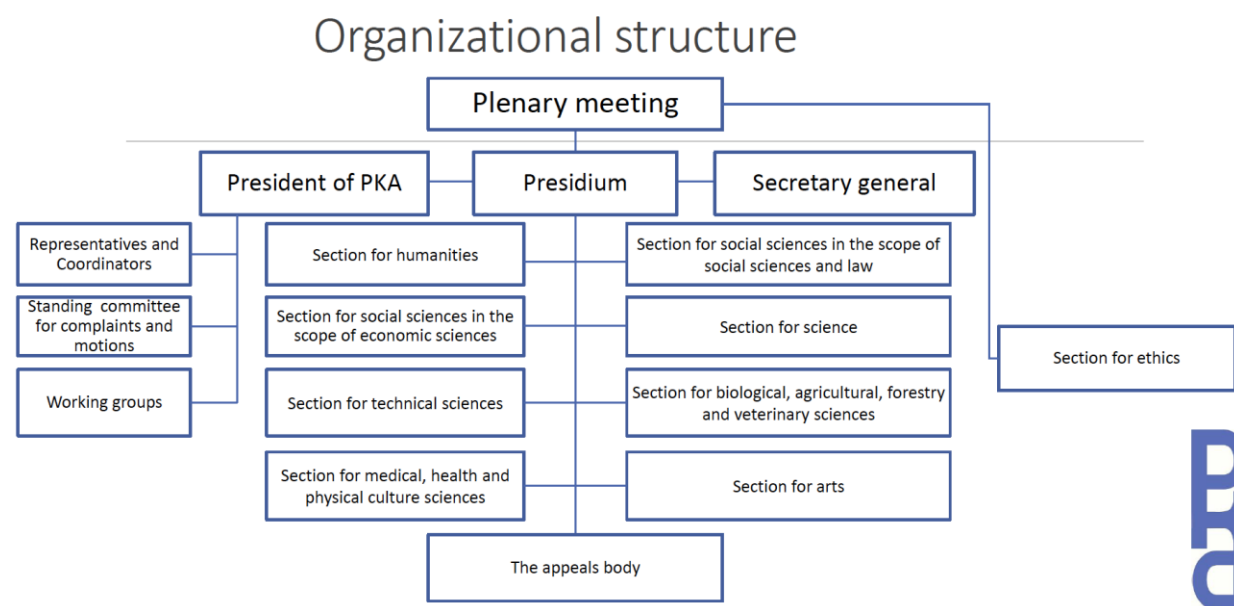
- General Council for Science and Higher Education,
- Conference of Rectors of Academic Schools in Poland,
- Conference of Rectors of Non-University Higher Education Institutions in Poland,
- Students' Parliament of the Republic of Poland,
- National Representation of Doctoral Students,
- HEI senates,
- Poland-wide academic associations,
- employers' organisations.

The Committee is composed of not less than 80 and not more than 90 members with a term-duration of four years. When appointing the committee for the next term, 50% of its members should be current committee members in order to reach continuity and avoid a loss of experience and consistency. Appointees have to be academic teachers holding at least the degree of doktor and having a higher education institution as their place of primary employment. However, this requirement does not apply to representatives of employers' organisations and the President of Students' Parliament of the Republic of Poland, who is a PKA member by virtue of law. Dismissal of a PKA member by the minister is only possible at the request of the Committee's Presidium.

The main organisational structure of the Committee comprises nine sections, including eight sections responsible for individual areas of science and the section for ethics.

The President of the Committee and its Secretary are appointed and removed from office by a decision of the minister for higher education. The PKA Presidium is composed of: the President, Secretary, President of the Students' Parliament of the Republic of Poland, two representatives of employers' organisations and the Chairs of the eight Sections. The Chair of the Appeals Body attends the meetings of the Presidium and has voting rights during such meetings when a resolution regarding an appeal is

decided. The specific functions and powers of individual bodies are set out in the Statutes of PKA. The organizational structure is shown in the following chart.



To support the work of the committee there is a Bureau providing administrative and financial services with currently 23 employees.

PKA'S FUNCTIONS, ACTIVITIES, PROCEDURES

The LoHE defines four areas of activity for PKA:

- evaluations of programmes, including the evaluation of initial teacher training programmes, as well as compliance with the requirements for the provision of degree programmes;
- opinions on the establishment of higher education institutions and granting them or their basic organisational units authorisations to provide degree programmes in specific fields of study, at specific levels and with specific degree profiles;
- opinions on re-granting of suspended authorisations to provide degree programmes in specific fields of study at specific levels and with specific degree profiles;
- opinions on the establishment of a higher education institution or a branch campus by the foreign higher education institutions.

The procedures for programme evaluation differ from the opinion giving process procedures. At the same time, there is no differentiation in methodologies for domestic procedures or for procedures in the foreign branches of Polish HEIs abroad.

Programme evaluation

Programme evaluation criteria include: the concept of education and its conformity with HEI's mission and strategy; study programme and possibility for achieving intended learning outcomes; effectiveness of internal education quality assurance system; teaching staff; cooperation with representatives of social and economic stakeholders in the education process; internationalisation of the education process; infrastructure used in the education process; care and support provided to students and support in the process of learning and achieving learning outcomes.

As in the programme evaluation process specific ratings are awarded to as part of the assessment. Ratings can be: outstanding, positive, conditional and negative. Programme evaluation criteria and the criteria and conditions for the award of assessments were adopted at a plenary session of the Polish Accreditation Committee and form an annex to the Statutes of the Committee.

If an outstanding rating is awarded, the next evaluation is conducted after 8 years, in cases of a positive rating the next evaluation takes place after 6 years, unless there are reasons to conduct them at an earlier date. Where a conditional rating is awarded, a resolution of the Presidium identifies shortcomings to be eliminated and sets a deadline for a follow-up evaluation. If the assessment of quality of programmes made by PKA is negative, the minister for higher education can revoke or suspend the authorisation to provide the programme.

Evaluations made by the Committee, result in specific consequences for HEIs or their academic units. Currently, in the state budget subsidies are allocated for programmes to which PKA awarded an outstanding rating.

The programme evaluation procedure followed by PKA includes:

- self-assessment;
- site visit by an evaluation panel including external stakeholders;
- decision – resolution of PKA’s Presidium;
- publication of a report and resolution of the Presidium including any comments, recommendations or other formal outcomes;
- follow-up procedure.

Opinion giving process

The scope of PKA’s opinions on granting an academic unit of a HEI or a HEI the authorisation to provide degree programmes is set out specifically in the LoHE and additional regulations by the MoHE, which also stipulates in detail the contents of an application for such authorisation. The opinions given by the Committee are not legally binding to the Minister.

Opinions are prepared by members of relevant Sections or experts appointed by the Secretary of the Committee in consultation with the Chair of the Section. The Chair of the Section or a member appointed by the Chair gives account of the matter at a meeting of the Section. The Section prepares opinions and resolutions and the Presidium considers the procedure based on the input provided by the section. Resolutions of the Presidium are forwarded to the Minister and higher education institutions or applicants following the decision.

PKA’S FUNDING

The operations of PKA are fully funded by the state budget. HEIs do not bear any financial costs of accreditation. Currently the annual budget of PKA is PLN 9,719,000.00, which constitutes ca. 0.0075% of all expenditures on higher education. Remuneration for PKA members and experts for participation in the external accreditation process forms the biggest part of PKA’s expenditure. The amount and principles for paying such remuneration are determined regulations defined by the MoHE.

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

ESG PART 3: QUALITY ASSURANCE AGENCIES

ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

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

2013 review recommendation

(ENQA membership criterion 4 / ESG 3.5):

PKA should revise its mission statement so that it clarifies that its external quality assurance processes have a double purpose of quality enhancement and accountability / compliance, and that its ex-post evaluation decisions lead to legal consequences for HEIs.

(ENQA membership criterion 7/ESG 3.8):

(...) Pursuing its initial thoughts, PKA should make arrangements for maximising and exploiting more extensively the potential of its Advisory Board in terms of its input on the work and operations of the Agency, and for reviewing its effectiveness. Information about the activities of the Board should be easily available on the PKA website.

Evidence

External Quality Assurance is the main activity of the Polish Accreditation Committee as stated in Article 48a of the Polish Law on Higher Education as well as in the Mission Statement of the Agency that is published on its website and explains that “The Polish Accreditation Committee is an independent institution dedicated to quality assurance and enhancement in higher education.” The Mission statement was adjusted in 2014 and in its current version mentions the double purpose of compliance as well as enhancement orientation.

As explained in the SAR, in the period from 2002 to 2017, on average, PKA processed 380 education quality evaluations per year indicating that regular external quality assurance is a key activity of the agency.

Two main activities for External Quality Assurance are explained in Article 49 of the act of 27 July 2005 Law on Higher Education: “The Polish Accreditation Committee carries out its mission by conducting obligatory programme evaluations and by giving opinions on applications for the authorization to provide degree programmes submitted by higher education institutions.” These tasks are also reflected in §4 of the PKA Statutes.

Regarding stakeholder involvement, the Mission Statement of PKA indicates “The Polish Accreditation Committee makes its duty comprehensive cooperation and dialogue with all stakeholders of the education process, including the academic community, candidates for studies, employers, state authorities and public administration.” The SAR as well as interviews with stakeholders confirmed this intention of the agency. Decisions regarding governance of the agency as well as regarding evaluations are made at the level of the Presidium that comprises representatives of HEI, students and employers’ organizations. The President of the Students’ Parliament of the Republic of Poland is a member of the Presidium by law (not by appointment by the Ministry).

Following the Statutes of PKA, in the programme evaluation process the panels comprise of a member of the PKA section who serves as a president of the panel, representatives of HEI/academics, students and employers’ representatives. The president of the panel coordinates the drafting of the report (including the rating) that is then agreed upon by the section, where no student is represented. PKA’s final decision is made at the level of the Presidium. It was explained during the interviews that in the past years the level of student involvement has increased. Their participation in the site visit was enhanced as well as a student coordinator position was established. An equal position is in place for the coordination of the employers.

In the case of the opinion giving process no student expert is assigned to the review panel that is coordinated by the section and a clear policy regarding the involvement of employers at the review stage could not be identified. The opinion is drafted at the level of the section and decided upon by the Presidium where students as well as employers are represented.

In the SAR (p.75) PKA also outlines other forms of work or exchange with stakeholders (e.g. the General Council for Science and Higher Education, Conference of Rectors, Central Commission for Degrees and Titles) and the content presented in the SAR is in line with the oral evidence presented to the panel during the interviews.

Following § 8 of the Statutes of PKA there is also an Advisory Board that includes international experts. Its members are listed publicly on the PKA website. As described in the SAR as well as confirmed in the interviews, the Advisory Board has not met in the current term of PKA and its members act more as individual advisors when requested by PKA. The Advisory Board is not mentioned in the organizational chart of PKA (page 23 of the SAR).

Looking at the level of review panels in the programme evaluation there is yet a limited number of international experts. Consistent reflection in the interviews during the site visit showed that language is a limiting factor to increase the number of international experts as all reviews happen in Polish language.

In 2016 PKA has defined a strategy for the period 2017-2020 that is based on an internal SWOT analysis. It defines five main strategic objectives that have been translated into operational objectives and actions. In addition, ownership and indicators of strategy implementation effectiveness are indicated.

Analysis

The revised Mission Statement of PKA in its current version clearly states the double purpose of quality enhancement and accountability/compliance and thus also reflects the recommendation given in the 2013 review. It is also important to recognize that during the interviews with the different stakeholder groups the notion of enhancement orientation was clearly reflected in the understanding of PKA’s work. Hence it can be concluded that not only a change in the Mission Statement was processed, but also stakeholders are aware of this double purpose of PKA work.

While the panel recognizes that the Mission Statement of PKA still doesn't clarify that its programme evaluation decisions lead to legal consequences for HEIs (recommendation in the 2013 review) it is clear that the programme evaluations are obligatory and all stakeholders have a clear idea about the consequences of the procedures. Hence the necessary transparency is well achieved. In this context the panel recognizes that in its Mission Statement PKA does not outline that its opinion giving process is addressed to the Ministry and part of the Ministry's decision process of authorizing the opening of a new programme. The programme evaluation process as well as the opinion giving process are both outlined next to each other as core activities of the agency.

Considering especially the evidence provided in the Law of Higher Education, combined with the Statutes of PKA including its appendixes the panel concludes that external quality assurance is the core activity of PKA and that these activities are processed on a regular basis. Their goals as well as objectives are defined and are reflected in the relevant documents.

Interviews with the stakeholders indicated that they trust the procedures of PKA and that they are also satisfied with their involvement in the governance of the organization. The involvement of students has increased over the last years while they are still not equal members of the system, particularly since they are not members of the sections. Based on interviews, PKA members were opposed to the idea of including students in the sections, no clear reason could be identified that would speak against student involvement at this point.

The appointment of a student- as well as an employer-coordinator has led to a facilitation of the stakeholder involvement in the proceedings of PKA as they are also valuable resource persons to support the members of the committee and its sections. Clearly these positions can be seen as an added value.

The opportunities offered by international experts in the Advisory Board are not really used as the role of the Board itself remains underdeveloped (it does not have a place in the organizational chart nor did it ever come together for a meeting in the current term of the Committee).

The numerous legislative changes of the past and present cause a key challenge for PKA. In this situation there is a critical need for being proactive in establishing priorities, determining a strategy to be implemented and systematically taking into account the monitoring of all actions. The panel does not have a clear view on how PKA will address new key challenges (i.e. new format for institutional evaluation, organizational changes for the Bureau, etc.).

The panel noted that some aspects of the opinion giving process (for instance involvement of students and stakeholders, publication of decision and reports) are not fully in compliance, but since these aspects are further mentioned when assessing part 2 of the ESG and will be considered in these chapters, to avoid duplication of critical elements, they are not taken into account in the judgment of this standard.

Panel commendations

PKA has appointed an employer's representative as coordinator for cooperation with employers and a student as a coordinator for cooperation with student experts. Interviews clearly showed the added value of these functions in terms of support to members and experts and of coordination with the Bureau and Presidium.

Panel suggestions for further improvement

- The potential of the Advisory Board should be better used and the international component in it should be strengthened as it allows an increase of expertise in the structures of PKA.
- PKA should consider including students as members of sections as well.

Panel conclusion: fully compliant

ESG 3.2 OFFICIAL STATUS

Standard:

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

Evidence

The status of the Polish Accreditation Committee is established in Article 48a of the Law on Higher Education, where it is explained that “the Committee is an independent institution dedicated to enhancing the quality of education”. Article 53(1) of the law confirms the independence of the Committee in formulating its criteria and procedures for external quality assurance.

The Committee commenced operations on 1 January 2002 in accordance with the act of 12 September 1990 on higher education. Its role and tasks have been expanded in the act of 27 July 2005 Law on Higher Education and its further amendments.

All HEIs offering first and second cycle study programmes must undergo evaluation carried out by PKA. A negative rating awarded by PKA as part of programme evaluation can result in suspending or revoking the authorisation to provide degree programmes (Article 11(b)(3) of the act). In case of being awarded an outstanding rating in the programme evaluation procedure, a higher education institution unit obtains additional funds from the state budget (Art. 94B(1)).

Article 7(1) of the act of 14 March 2003 - Law on Academic Degrees and Title and Degrees and Title in the Arts, requires cooperation between the Polish Accreditation Committee and Central Commission for Degrees and Titles in the scope of the opinion giving process.

The SAR explains that PKA is not a public administration body and the Code of Administrative Procedure does not govern its operations. Consequently, decisions taken by PKA cannot be appealed at any administrative court. According to the SAR, the operations of the Committee and their consistency with legal regulations are subject to regular audits by the Supreme Audit Office.

In its meeting with the Ministry of Education the panel learned that currently a major change in the legislation is part of the parliamentary discussion. A new Law on higher education is supposed to be voted upon shortly. In the meeting it was clearly expressed that the status of PKA will not be subject to any changes. Furthermore, PKA itself was involved in the hearing process as a stakeholder of the new law.

Analysis

The legislative basis for the operations of PKA was thoroughly examined by the panel. For this purpose, the Act of 27 July 2005 Law on Higher Education as well as the Act of 14 March 2003 - Law on Academic Degrees and Title and Degrees and Title in the Arts were reviewed.

Further questions, particularly with regard to the expected new law on higher education, were discussed in the meeting with the Ministry of Education.

Based on the content of the documents as well as the consistent statements during the interviews the panel concludes that the official status and legal basis of PKA is properly defined directly in the relevant laws. The Polish Ministry of Education recognizes PKA as the only institution in Poland responsible for external accreditation and quality assurance of higher education.

Panel conclusion: fully compliant

ESG 3.3 INDEPENDENCE

Standard:

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

Evidence

The principle of independence is officially stated in § 48a of the LoHE as well as in the Statutes of PKA. It recognizes both the operational independence as well as the organizational autonomy of the Committee. During the interview with MoHE the Minister himself confirmed that also the currently discussed new LoHE will not change the status of PKA and will continue to secure its independence and autonomy. In further interviews with CRASP as well as RCHEIP representatives it was also mentioned that the new law would not affect PKAs independence.

As defined in § 48 of the LoHE, all members of the Committee are appointed by the Minister, except for the President of the SPRP, who is a member of the Presidium of PKA by office. The Minister appoints the members based on nominations coming from different stakeholders of the HE system in Poland. When appointing committee members for a new term, the LoHE also regulates that 50% of all members must be chosen among acting members of the committee, taking into account the evaluation of their work by the Presidium of the Committee. During the interview with the Minister the panel learned that the number of nominations to become PKA members is very high leaving a real choice for appointments to the MoHE.

While the Ministry could not provide the panel with clear criteria and quantitative indicators regarding the selection and appointment of members, during interviews external stakeholders, and in particular HEI representatives as well as CRASP and RCHEIP members were confident that the procedure in place was not biased by a political agenda or third party influence.

A Committee member can only be dismissed at the request of the Presidium of PKA, which limits the possibility for external intervention. The President and Secretary General are appointed by the Minister from among members of PKA. §§ 7 and 9 of the Statutes of PKA give them a wide scope of authority over PKA's key procedures and members.

The annual schedule for programme evaluations is decided and adopted by the Presidium of the PKA while the MoHE can ask for additional ad hoc evaluations as defined in §48a of the LoHE. Since 2014, the MoHE determines, by way of a regulation, general criteria and the scope of evaluation, while leaving to the Committee the powers to determine detailed criteria and mode of evaluation. (§48 of the LoHE, SAR p.43)

PKA has the autonomy to define the Bureau's internal structure and tasks. Up to now, the Director of the PKA Bureau is appointed and dismissed by the PKA President, and staff reports to the Director.

The panel learned during the interviews with the Minister and the Presidium that, as a result of the new LoHE, it is considered to organize a competition to select and appoint a new Director who will be responsible for selecting and employing the Bureau's staff.

The SAR as well as the Statutes of PKA outline the procedure and criteria for selecting experts. Candidates are proposed by different bodies depending on their profile of expertise (Appendix 14 to the SAR). The formal appointment is made by President of PKA while Secretary General is in charge of appointing evaluation panels for programme evaluation. In order to avoid third party influence, HEIs do not know the panel members'/experts' names until the start of the site visit, with the exception of the chair of the panel. All members and experts sign a declaration of no conflict of interest (Code of Ethics; Appendix 10 to the SAR).

As defined in §18 (2) of the Statutes of PKA, the chair of an expert panel shall be a committee member or a former committee member of PKA.

Regarding the independence of formal outcomes, the panel learned that evaluation resolutions and ratings go through several stages of discussion before being adopted: within the panel, within a section, within the Presidium. During the discussions with the heads of sections, section members, as well as reviewers the decision-making procedure was described as collegial and contributing to the independence of the structures.

Interviews with HEI representatives as well as CRASP and RCHEIP members did not raise issues regarding the independence of formal outcomes. HEIs can raise any issue regarding potential conflicts of interest or appeal against decisions made and opinions given.

As described in the LoHE, PKA's resolutions regarding programme evaluation have legal consequences while PKA's opinions on planned programmes are not legally binding for the MoHE and the MoHE takes the final decision in these cases. Based on the discussion during the interviews PKA is informed about the decision of the ministry and the decision is recorded in a database, however there is no monitoring mechanism of the Minister's decisions in cases of the opinion giving process that would allow a comparison of PKA's opinion and the Ministers decision.

Analysis

The panel recognizes that regarding the appointment of its members, PKA's independence relies on a system of "checks and balances" to limit the influence of the Minister on the one hand and of other stakeholders on the other hand. As the Minister appoints based on nominations by the stakeholders, this checks and balance system seems to work well. Also, the panel recognizes that in no interview any concern of ministerial influence to everyday proceedings was raised. Reflecting on initial concerns by the panel, that the power of the MoHE would be very explicit in selecting preferred appointees, following the analysis of the documents combined with the information gained from the interviews the panel concludes that the system is sound, accepted by all stakeholders and does not threaten/jeopardise the independence of PKA. Recognizing the high number of nominations and the fact that the selection criteria of the Ministry are not fully transparent, in order to further diffuse any initial taste of bias, it might be wise for the Ministry to establish some selection criteria in order to increase transparency.

On the other end the procedure for the dismissal of PKA members, that gives the initial responsibility to the Presidium, does not enable the Minister to influence PKA during its term of office.

Evidently – also recognizing the changes made in 2014 - PKA autonomously defines its evaluation procedures and criteria and appoints its external experts serving as a clear indicator for operational independence. The clearly defined decision processes within PKA (panel – section – Presidium) limit

the possibility to promote possible particular interests and enable an independent decision making process.

In this context, the panel initially was concerned about the role of the president of review panels, as he/she is a member of PKA itself. In this case the same person is involved in making the assessment in the panel (in the role of its president), discussing the report in the section, and in cases when the panel is chaired by the president of the section also in the final decision of the Presidium. This set up creates a high level of dependence on the opinion of a single person who is involved in all steps of the procedure limiting checks and balances. The panel learned during the interviews that in cases where the president of the section acts as a president of the review panel, he/she abstains from voting in the Presidium in order to avoid conflicts of interest. Also the panel recognizes that this strong role of the individual person in the review process in practice has not yet created any conflict, and thus does not affect the judgement with regards to independence of the decision making process. However, the panel believes that this design of the procedure requires special attention when it comes to the requirements to the internal quality assurance system, where it has to be assured that there are appropriate checks and balances regarding this constellation. (see ESG 3.6)

The panel recognizes the central role of the President as well as the Secretary General of PKA. The task assigned to these positions in the Statutes is central for the operations of PKA and bring a large workload and responsibility. At the same time lots of power and knowledge is centred in them. The structure in place, as defined in the Statutes, enables the President and the Secretary General to exercise a substantial control over PKA's operations. Moreover, the panel could not identify any procedure related to the evaluation of their work by PKA's members.

Based on the analysis of the relevant documents and interviews, the panel does not question/doubt the present independence of PKA and its authorities from third party influence. Thanks to a high level of professionalism exercised by all parties, the system operates as independent.

Another dimension of independence however should be looked at as well. To a recognizable extent the system is currently depending on continuity and professionalism of two central positions within the organisation. While the panel is impressed and undoubtedly respects and acknowledges the high level of professionalism of all people interviewed, a side effect of this high level of power centralization might result in decisions that may not always reflect the diversity of stakeholder's expectations on the one hand and on the other hand it creates some fragility in the system in case one of the main actors mentioned above would not be available.

Panel suggestions for further improvement

When continuously developing the PKA structures, it should be considered to implement a checks and balances system related to the scope of authority and tasks of PKA's President and Secretary General. At the same time, it might be helpful to look at tasks, presently exclusively attributed to the President or Secretary General and assess which of them:

- could benefit from a collegial decision-making process (for instance evaluation panel appointment);
- could be assigned to the Bureau (for instance proof-reading the reports to insure their methodological consistency).

Panel conclusion: fully compliant

ESG 3.4 THEMATIC ANALYSIS

Standard:

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

Evidence

PKA outlines in its SAR that the main source relevant for the description and analysis of their findings is the annual report as well as the reports covering the terms of the Committee (SAR p.44). Annual reports, which are publicly available on the website, are published regularly. The data presented in them give grounds for drawing conclusions on the whole system. The reports contain general observations of PKA evaluation panels with reference to specific fields of study. These observations are based on the analyses of reports covering the whole reporting period. Reports address the most frequent reasons for reservations expressed by PKA and indicate the main reasons for awarding individual ratings. This approach allows the identification of the challenges for the improvement of the quality of education provided by HEIs.

During the interviews with different stakeholders, it was also explained to the panel that an important part of analysis takes place during the so called “Quality Forum”, an event bringing together HEIs and relevant stakeholders to discuss issues related to Quality Assurance and development of QA. PKA is actively involved in the arranging these fora.

In its SAR, PKA also outlines that activities linked to thematic analyses are mainly taken in the framework of international projects. PKA explains that there is no dedicated analytical unit within PKA, and that such operations are cost intensive. As examples, the EIQAS and IMPEA projects are mentioned, focussing on specific aspects that are of priority on the European level. Analysis happens in form of intellectual outputs of these projects. Beyond this, there are also expert Task Forces appointed by the President of PKA who are instructed on a case-by-case level and consist of PKA members and experts.

The SAR also explains that PKA publishes articles in Polish academic magazines for the general public in order to reflect on trends and areas requiring public or enhanced academic attention.

Analysis

The panel recognizes the important role annual reports play for the accountability of PKA as well as their contribution towards a thematic analysis. Clearly also the mentioned “Quality Forum” contributes to the further development of the HE system in a way that trends can be highlighted and PKA can actively contribute to a dialogue with the institutions in order to highlight good practice.

At the same time, the panel recognizes that the focus of the available annual reports as well as term reports of PKA is not primarily a thematic analysis but the explanation of the activities of PKA and a way of accountability towards the public. In this context also the thematic analysis as part of international projects can be seen as a progressive way to use the potential of such projects, however it cannot be overseen that international projects have their own priorities and do not necessarily meet the requirements that the current activities of PKA would pose. Projects on a European or international level always bring their own application requirements and as more proposals exist than are selected it is dangerous to rely on these projects in order to fulfil a vital requirement such as thematic reporting.

The panel clearly agrees with the conclusions of the discussions during the site visit that the activities of PKA in this field are particularly limited as no resources are assigned to this task. Furthermore, the panel believes that at this point a clear chance is lost to make use of the knowledge and experience that is already in place in the Bureau of the committee. Particularly analysing across procedures is a

task that Bureau staff could be much more involved as they bring not only the experience but also the distance to each individual procedure, as they are not involved in the substantial assessment.

Consequently, it can be concluded that PKA undertakes a number of activities in the field of thematic analysis resulting in a substantial reflection of their activities within the Polish HE system showing developments and areas of good practice. However, a meta analysis and full reflection on the improvement of quality assurance policies and processes in institutional, national and international contexts cannot be reached with the current approach. Currently thematic analysis is not part of the regular activity planning, so there is no pre-defined time or occasion when it should take place, hence also no resources are allocated to this activity.

Panel recommendations

PKA should strengthen their initiatives to develop a more structured approach towards thematic analysis leading to analysis meeting the requirements of the Polish HE system, independently from international projects as well as adding additional resources. Mobilizing resources from within the Bureau should be considered.

Panel conclusion: substantially compliant

ESG 3.5 RESOURCES

Standard:

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

Evidence

Financial resources

§ 53 of the LoHE defines that the operations of PKA are fully funded by the state budget. HEIs do not pay any fee for PKA services. Currently the annual budget of PKA amounts to PLN 9,719,000.00 of with the largest single position being spent for the remuneration for PKA members and experts for participation in the external accreditation procedures.

Human resources

The Committee is composed of not less than 80 and not more than 90 members that are appointed in accordance with § 48 of the LoHE by the Minister. During the current term of office, PKA has 90 members, including 36 members who acted as its members during the last term. Approximately 50% of the members hold the Degree of a Doctor, with the vast majority of them being habilitated.

In its SAR PKA explains that its members, including the President, Vice-President and Secretary, are not officially employed at the Committee, but may be fully or partially exempted from the obligation to teach classes at their HEIs to fulfil their PKA activities. The SAR mentions that apart from benefits this solution also results in negative consequences consisting in the fact that PKA members are not always fully focused on the implementation of PKA's statutory tasks, as they have to fulfil tasks at their home institutions at the same time.

As outlined in the SAR and also discussed during the meeting with the MoHE, the Bureau of PKA is a state-owned independent budgetary unit that provides administrative and financial services to the Committee. The Director of the Bureau, appointed and dismissed by the President of PKA, is responsible for HR policy and organising the work of the Bureau. Currently the Bureau employs 23

staff members. The employees of the Bureau perform the functions of secretaries of Committee sections. They are also responsible for international activities, accountancy as well as legal and organizational matters at the Committee. The SAR also recognizes that due to low remuneration rates and the freeze on wages in the public sector, Bureau staff does not obtain sufficient compensation for their qualifications resulting in a high staff turnover during the last years.

During the interview with the staff of the agency, the panel learned that due to the implementation of the new LoHE all staff contracts in the Bureau would be terminated. The president confirmed that staff would receive new contracts under the responsibility of the new director. As these are consequences of the new LoHE at this point there can be no individual guarantees.

The SAR also outlines the growing need to enhance analytical operations of PKA creating the requirement to increase the budget for these activities and looking for alternative sources of funding of some of its expenditure. The bulk of analytical and/or development activities is currently financed with external funds, such as European grants, e.g. as part of the Erasmus+ programme and restricted grants awarded by the European Commission and OECD.

Based on the numbers presented in the SAR, 1,300 external experts, including 49 internationals, support the work of PKA in their review activities. While these individuals are part of the reviewer database, the level of activity differs and the number of active reviewers is actually smaller.

Analysis

PKA committee members are not employees by the committee but instead receive compensation for their duties and activities based on a predefined scale. Not making them full employees of PKA ensures that they remain part of the academic community as they are only appointed for a fixed term. It was explained in the SAR and discussed with the head of sections as well as PKA members that this solution has benefits and downsides. The panel believes that there might be cases where the different tasks to be fulfilled have led to timely constraints and limitations for some Members that had to be solved from case to case. The principle of having the decision body not being fully employed by the Committee however has more benefits than downsides.

The panel recognizes the perception of the President of PKA that the Committee has appropriate human and financial resources allowing them to efficiently conduct their work. In general, the panel agrees to this perception, however the challenging situation of the Bureau should not be underestimated. During the interviews with the members of PKA, its Presidium as well as with the chairs of the sections it appears to the panel, that the contribution of the Bureau to the successful implementation of the work of PKA remains under-reflected. When looking at the organizational chart of PKA the Bureau is not even mentioned. The panel concludes that the importance of the work of the Bureau is underestimated and hence its potential is not fully implemented in the work of the organization. While there was concurring agreement between the different interviewees that after ending all contracts of the Bureau new contracts would be offered as the budget is still assigned, the panel believes that PKA should pay closer attention to the Bureau staff in terms of stability and competitive compensation. Additionally, in a context of a lack of resources for thematic analysis and a need to develop them, the Bureau could actively contribute creating value-adding activities.

Consequently, the panel believes that the resource situation with regards to the Bureau can be seen as partly adequate to fulfil the mission of PKA. Some activities cannot be addressed appropriately due to a lack of resources at this level. Even though the situation of resources is currently acceptable in the short/medium term, the Bureau's situation should be addressed.

Panel recommendations

PKA should take action to improve the situation of staff in its Bureau. Valuing – in terms of remuneration as well as job profiles – and capitalizing on its acquired expertise, should decrease staff turnover and increase PKA’s capacity to invest time and knowledge in thematic analysis and internal enhancement.

Panel conclusion: substantially compliant

ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

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

2013 review recommendation

ENQA membership criterion 7 / ESG 3.8 (Accountability procedures):

In line with its plans and preliminary arrangements, PKA should implement fully its internal quality management system and assess regularly its fitness for purpose and effectiveness. PKA should introduce a formal mechanism for the periodic collection of feedback from a sample of experienced HEIs on its overall evaluation methodology (i.e. institutional and programme evaluation processes considered jointly as making up a whole), in addition to feedback now collected on individual evaluations.

Evidence

PKAs commitment to IQA is mentioned in its Mission statement and the way it is translated into practice is outlined in the Quality Management System (QMS) described in Appendix 8 to the SAR. Beyond this, the enhancement of the System is particularly addressed in PKA’s Strategy 2017-2010 (Appendix 5 to the SAR).

The Quality Management System of PKA outlines that “The ultimate goal of the quality management system is to raise the effectiveness of activities undertaken in relation to the implementation of the mission statement, strategy and the quality policy of the Polish Accreditation Committee, their continuous improvement, as well as to ensure that the statutory tasks are implemented in a way guaranteeing the repetitiveness of quality characteristics.” (Appendix 8: IQA p. 3) Annex 2 of the IQA mentions the following processes:

- Quality assessment (programme evaluation)
- Opinion giving
- Resource management
- Maintenance and development of the quality management system
- Information policy.

Each process is described in a detailed way outlining how the PDCA cycle is implemented and how responsibilities are divided between the Committee and the Bureau.

Maintenance and development of the IQA is assessed by the so-called “Quality management system review” that is done at PKA’s President initiative. There are no formalized procedures assessing or ensuring effective internal feedback, as they rely on “opinions formulated by members, experts and employees”. Similarly, some management processes (such as decision making process; definition and implementation of the strategic plan; establishing partnerships, etc.) are not embedded in the IQA and, consequently, mainly rely on initiatives or work habits.

Beyond this and in line with its intent to be open to dialogue with internal stakeholders as explained in the SAR on page 53, PKA has put into place several procedures to evaluate and improve PKA's activities, regarding their compliance as well as their relevance to stakeholders (SAR page 52):

- Questionnaires to HEI after being reviewed (survey monitoring procedure)
- External consultation process was implemented in addition to regular meetings between the Presidium and HEI / HE bodies
- Quality window (that is yet used very little by HEI)
- Quality Forum with broad participation

Stakeholders such as CRASP, the RCHEIP, the MoHE or the National Council of Higher Education, as well as the Students Parliament have commended the work of PKA in form of letters that are annexed to the SAR. In their letters they also describe their involvement as stakeholders in the processes of PKA. These commendations were also confirmed during the stakeholder interviews during the site visit.

A general analysis of questionnaires that are received from HEI is presented in various meetings as well in the annual report of PKA. It is outlined in the SAR and was confirmed in the interviews with the heads of sections that a dedicated staff member is in charge of alerting the section for complaints and requests if a motive for dissatisfaction is expressed in one of the questionnaires.

As part of PKAs IQA and to ensure that all persons involved in its activities are competent and act professionally and ethically, the SAR explains that:

- PKA trains and assesses its staff (Bureau), members and experts.
- All members are assessed on their level of participation in PKA's activities (number of visits, attendance to meetings, etc.). Some sections add qualitative comments on the members' work but there are no explicit criteria (Additional document 21: Evaluation of PKA members).
- There is a Section for Ethics as well as a Code of Ethics, and all members and experts sign declarations of no conflict of interest
- The selection criteria for experts are publicly available.

During the interview with the Presidium, the experts learned that PKA does not involve any external actors (like subcontractors etc.) in its assessment activities and that in any case all activities would have to fulfil the standards of PKA.

Interviews during the site visit showed that the Secretary General plays an important role in the quality assurance for the consistency of evaluation reports. All draft reports are delivered to the Secretary General for review and comments. The commented version is then returned to the President of the review panel for further development. The panel president is free to implement the comments of the Secretary General. The review panel also reviewed an exemplary report with the comments of the Secretary General.

The interview with panel members and stakeholders as well as students showed that the experiences in review panels are generally positive and cooperation is seen to be respectful. At the same time, the panel heard that practice on how to come to the final review report differs between panels and also differs between the different sections. Reporting will be addressed with more detail under ESG 2.6.

Analysis

The panel positively recognizes that generally appropriate IQA processes are defined and in place. This not only reflects the high level of professionalism of the involved people but also aligns positively to

the recommendations of the last review. Additional progress has been achieved regarding external feedback mechanisms. The panel has no doubt that PKA is highly committed to ensure that all persons (staff, members and experts) are competent and act professionally and ethically.

The panel recognizes that the QMS main focus is on effectiveness of activities with regard to PKA's Statutes. In this context some mechanisms to ensure consistency, improvement and quality of results are not yet formalised. For instance: procedure and criteria for the assessment of panel-experts and PKA members; ensuring consistency of reports; internal feedback for improvement. The panel positively recognizes the crucial role of the Secretary General when it comes to the quality assurance of the panel reports. After reviewing a sample report including the comments, the panel commends the level of comments not only considering completeness but also addressing inconsistencies and contradictions. When formalizing this procedure, it might also be considered to utilize the experience and knowledge combined in the Bureau which also ensures consistency over time.

The panel is aware that in all of these areas PKA is already active and has practices in place and operational, which leaves the panel confident that PKA is acting in these matters but, as no procedure is established, actions depend on individual willingness and availability.

As outline in the assessment of ESG 3.3 Independence, the role of each member of the Committee is especially strong in both review processes – programme evaluation and opinion giving process. A PKA member acting as a President of a review panel, combines the review report, presents the report (and in cases of programme evaluation also the rating) in the section, and then discusses within the section about the rating. Recognizing this strong position of a single individual being involved in the process, it could be expected that the IQA system sets some clear regulations reassuring the role of other stakeholders. The review panel carefully analysed the defined processes and learned that the written procedures generally divide the tasks and steps between PKA and the Bureau. The descriptions of tasks of the Bureau are usually very detailed with clear definitions of timeframes and required signatures, while the whole process of the evaluation visit including the drafting of the report is defined in two lines without further specifications. Consequently, the variety of experiences of panel members in this matter can be explained and it can be stated that there is no mechanism in place to guarantee that all panel members are involved in the drafting of the report or informed about requirements to make adjustments. Recognizing the above-mentioned strong position of a PKA member when also being President of a review panel, clear safeguard mechanisms as part of the IQA could be expected.

The panel believes that comprehensiveness of the IQA should be developed in the areas of management procedures (decision-making process; definition and implementation of the strategic plan, etc.), role of the President of panel in programme evaluation and internal feedback.

It can be positively mentioned that indicators are used to monitor procedures with a focus on reporting and compliance. As a potential step for future developments, it should be recognized that the panel did not yet find examples of strategic use of indicators to monitor the implementation of the strategic plan or to monitor key aspects of procedure (for instance, on how the Appeals body is used by HEI). Considering the potential of the results of a monitoring of these aspects as a feedback mechanism towards the further development of a qualitative procedure could be reinforced.

Some clarification might also be helpful in the field of the procedures related to the complaints, requests and appeals. Documentation is available regulating each procedure, however, different options exist and the specificity of the procedure remained unclear. During the interviews the panel learned that that HEIs tend to write directly to the Heads of section or the President of PKA who then decides which way a request should take. The experts were unable to identify a clear procedure

outlining the separation between these different bodies nor procedures ensuring that each complaint is analysed and followed through. While this does not put into question the existence of complaints and appeal procedures (compare ESG 2.7) an appropriate reflection in the QMS should be reached.

Panel recommendations

- The panel believes that comprehensiveness of the IQA should be developed in the areas of management procedures (decision-making process; definition and implementation of the strategic plan, etc.), role of the President of panel in programme evaluation and internal feedback.
- PKA should update its internal Quality Assurance for the procedure for programme evaluation in a way that there is a checks and balance system for the strong role of the PKA member serving as president of the review panel.

Panel suggestions for further improvement

Existing informal procedures and criteria for the assessment of panel-experts and PKA members, ensuring consistency of reports, and internal feedback for improvement should be formalized.

Panel conclusion: substantially compliant

ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES

Standard:

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

Evidence

Article 1(4) of the Statutes of the Polish Accreditation Committee stipulates that in accordance with the operational arrangements for accreditation agencies working within the European Higher Education Area the activities of the Committee are subject to external review at least once every five years. The review conducted in 2018 is the third review of this type.

In a separate chapter of the SAR PKA also outlines how the recommendations received by the last ENQA review have been implemented and at what stage of implementation they are. Also, PKA explains in its SAR in which way they made systemic adjustments to their methodology considering the review against the updated version of the ESG.

Analysis

The panel confirms that PKA undergoes periodic external review as requested by the ESG. This can be demonstrated by the prominent placement of this requirement in § 1 of the Statutes of PKA and is seen by the panel as a clear commitment of PKA to the standards of ENQA and EQAR.

Panel conclusion: fully compliant

ESG PART 2: EXTERNAL QUALITY ASSURANCE

ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

2013 review recommendation

ESG 2.1 (Use of internal quality assurance procedures) PKA should strengthen the assessment of quality assurance policies and procedures (ESG 1.1) as part of its programme evaluation by including explicit references to both elements in the relevant (sub-) criteria.

Evidence

Since the last review in 2013, PKA has undergone several modifications of laws and regulations. One of the main changes is that PKA is no longer conducting institutional evaluations (quality assurance activities related to the operations of academic units of HEIs), as they were considered as too bureaucratic and excessively burdensome (SAR, Interview with PKA Presidium, Interview with HEI's). Therefore, PKA is currently focusing on two procedures: conducting obligatory programme evaluations and giving opinions on applications for the authorisation to provide degree programmes submitted by higher education institutions (Statute §4).

The criteria for programme evaluation are mentioned in the current Statutes of PKA, particularly in Annex 1&2 of these Statutes and in the LoHE (Article 48a/3). They cover 9 areas (study programmes, education and training standards, qualification of persons involved in teaching, cooperation with employers, effectiveness of the IQA system, learning outcome validation, internationalisation of the education process, infrastructure and student's support). The standards for programme evaluation are divided in two different categories that are used depending on the profile of the study programme under review: general academic profile or practical profile. The statutes defining these standards explicitly refer to the ESG (§4 /9).

The following table was presented by PKA to the panel and reviewed carefully. It shows the alignment of Part 1 of the ESG with the relevant criteria of PKA for programme evaluation:

General profile	Practical profile	ESG 2015
CRITERION 1. THE CONCEPT OF EDUCATION AND ITS RELEVANCE TO THE HEI'S MISSION STATEMENT AND STRATEGY		
1.1. The concept of education	1.1. The concept of education	ESG 1.1 Policy for quality assurance
1.2. Research into the field(s) of science/arts related to the degree programme	1.2. Development work in the areas of professional/economic activity typical for the field of study	ESG 1.1 Policy for quality assurance
1.3. Learning outcomes	1.3. Learning outcomes	ESG 1.2 Design and approval of programmes

CRITERION 2. STUDY PROGRAMME AND POSSIBILITY OF ACHIEVING INTENDED LEARNING OUTCOMES		
2.1. Study plan and programme of study - selection of programme contents and teaching methods	2.1. Study plan and programme of study - selection of programme contents and teaching methods	ESG 1.2 Design and approval of programmes ESG 1.3 Student-centred learning, teaching and assessment
2.2. Effective achievement of intended learning outcomes	2.2. Effective achievement of intended learning outcomes	ESG 1.3 Student-centred learning, teaching and assessment
2.3. Admission rules, credits, diplomas, learning outcomes recognition and validation	2.3. Admission rules, credits, diplomas, learning outcomes recognition and validation	ESG 1.4 Student admission, progression, recognition and certification
CRITERION 3. EFFECTIVENESS OF INTERNAL EDUCATION QUALITY ASSURANCE SYSTEM		
3.1. Design, validation, monitoring and periodic review of study programme	3.1. Design, validation, monitoring and periodic review of study programme	ESG 1.9 On-going monitoring and periodic review of programmes ESG 1.1 Policy for quality assurance ESG 1.2 Design and approval of programmes ESG 1.7 Information management ESG 1.10 Cyclical external quality assurance
3.2. Public access to information	3.2. Public access to information	ESG 1.8 Public Information
CRITERION 4. TEACHING STAFF		
4.1. The number, academic/ artistic achievements and competences of the teaching staff	4.1. The number, academic/artistic achievements, professional experience acquired outside the HEI and competences of the teaching staff	ESG 1.5 Teaching staff
4.2. Teachers conducting classes	4.2. Teachers conducting classes	ESG 1.5 Teaching staff ESG 1.3 Student-centred learning, teaching and assessment
4.3. Development and in-service training of the staff	4.3. Development and in-service training of the staff	ESG 1.5 Teaching staff ESG 1.7 Information management
CRITERION 5. COOPERATION WITH THE SOCIO-ECONOMIC ENVIRONMENT IN THE EDUCATION PROCESS		
		ESG 1.2 Design and approval of programmes ESG 1.9 On-going monitoring and periodic review of programmes
CRITERION 6. THE INTERNATIONALISATION OF THE EDUCATION AND TRAINING PROCESS		
		ESG 1.1. Policy for quality assurance ESG 1.2 Design and approval of programmes
CRITERION 7. FACILITIES USED IN THE EDUCATION PROCESS		
7.1. Teaching and scientific facilities	7.1. Teaching facilities used for initial practical training	ESG 1.6 Learning resources and student support
7.2. Library, information and educational resources	7.2. Library, information and educational resources	ESG 1.6 Learning resources and student support
7.3. Development and improvement of facilities	7.3. Development and improvement of facilities	ESG 1.6 Learning resources and student support ESG 1.7 Information management
CRITERION 8. PROVIDING CARE AND SUPPORT TO STUDENTS IN THE PROCESS OF THEIR LEARNING AND ACHIEVING LEARNING OUTCOMES		
8.1. The effectiveness of the care and support system addressed to students and motivating them to achieve learning outcomes	8.1. The effectiveness of the care and support system addressed to students and motivating them to achieve learning outcomes	ESG 1.6 Learning resources and student support

8.2. Development and improvement of the student support and motivation system	8.2. Development and improvement of the student support and motivation system	ESG 1.6 Learning resources and student support ESG 1.7 Information management ESG 1.8 Public Information
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In the case of the opinion giving process, PKA is not formally taking a decision on the institution but gives an opinion to the Ministry, which will take the decision. The criteria to be taken into account are defined in the Law.

PKA outlines in its SAR that the opinion giving process is not an ex-ante evaluation in the classic sense of the term, but that PKA is a participant in a decision-making process, through which the Minister of science and higher education goes, and which results in the issuance by the Minister of a decision to grant an academic unit of a HEI or a HEI the authorisation to provide degree programmes at a given level and with a given degree profile. During interviews with the Presidium as well as the members of PKA it was expressed that PKA does not have or take any ownership regarding the administrative process of the procedure and understands itself as part of a process that is owned by the MoHE. However, PKA explains that PKA has full independence in the design of this process. At the same time, it was also explained and documented in the SAR that this activity does not fully align with Part 1 of the ESG and some standards are not covered in this approach.

The SAR further explains that after a HEI obtains a favourable decision from the Ministry of Science and Higher Education and launches a degree programme, PKA conducts programme evaluation, usually upon the completion of the first cycle of education. Such programme evaluation also includes an assessment of the effectiveness of the internal education quality assurance system.

The following table was presented by PKA to the panel and reviewed carefully. It shows, from the point of view of PKA, the alignment of Part 1 of the ESG with their relevant criteria of PKA for opinion giving process:

General profile	Practical Profile	ESG 2015
1. OPINION ABOUT GENERAL CHARACTERISTICS OF THE DEGREE PROGRAMME		
		1.1 Quality Assurance Policy 1.2 Design and approval of programmes
2. OPINION ABOUT THE RATIONALE FOR ESTABLISHING THE DEGREE PROGRAMME IN A GIVEN FIELD OF STUDY, AT A GIVEN LEVEL OF EDUCATION AND WITH A PARTICULAR EDUCATION PROFILE		
		1.1 Quality Assurance Policy 1.2 Design and approval of programmes
		1.1 Quality Assurance Policy 1.2 Design and approval of programmes
4/3 OPINION ABOUT LEARNING OUTCOMES INTENDED FOR THE DEGREE PROGRAMME		
		1.2 Design and approval of programmes
5/4 OPINION ABOUT THE STUDY PROGRAMME AND STUDY PLAN OF THE DEGREE PROGRAMME		
		1.2 Design and approval of programmes 1.3 Student-centred learning, teaching and assessment
6/5 OPINION ABOUT THE METHODS OF VERIFYING AND ASSESSING LEARNING OUTCOMES ACHIEVED BY STUDENTS THROUGHOUT THE LEARNING PROCESS		
		1.3 Student-centred learning, teaching and assessment 1.4 Student admission, progression, recognition and certification

7/6 OPINION ABOUT THE DESCRIPTION OF COMPETENCES EXPECTED FROM CANDIDATES FOR THE DEGREE PROGRAMME		
		1.4 Student admission, progression, recognition and certification
8/7 OPINION ABOUT THE CONDITIONS FOR PROVIDING THE DEGREE PROGRAMME AND THE ORGANISATION AND IMPLEMENTATION OF THE TEACHING AND LEARNING PROCESS		
8.1 Opinion about the minimum staff resources		
		1.5 Teaching staff
8.3/7.3 Opinion about infrastructure that is at the disposal of the basic organisational unit of the HEI.		
		1.6 Learning resources and student support
8.4/7/4 Opinion about providing access to library and digital knowledge resources.		
		1.6 Learning resources and student support

Even though institutional evaluation is not anymore in the scope of PKA, the new law underlines the responsibility of HEIs for IQA (articles 8/3; 48a/3; 66/3a). The panel also learned from the letter of CRASP that PKA procedures clearly address the IQA in their evaluation procedures. Even more, some experts explained in the interviews during the site visit that and how they check how all criteria relate to the relevant IQA.

Analysis

The panel recognizes that since the last review explicit reference to ESG and the importance of internal quality mechanisms have been introduced in legal texts as well as in the Statutes of PKA. Even though the panel believes that the termination of the institutional evaluation weakens the impact of PKA on assuring these aspects in a global perspective, several requirements in the LoHE and the statute as well as feedback from HEIs made the panel rather confident that this dimension is indeed present in the activities and also represented in the standards.

The panel scrutinized the methodologies for PKA's quality assurance activities and confirms the direct link between internal (ESG Part 1) and external (ESG Part 2) quality assurance as far as the procedure of programme evaluation is concerned. The alignment table presented by PKA was carefully reviewed and the respective underlying documents were analysed. The panel particularly concludes that the empty boxes for Criteria 5 & 6 in the alignment table do not represent a lack of alignment; instead, it is important to recognize that in these standards of PKA no sub standards exist that could be added in the respective boxes.

The situation for the opinion giving process is different as full alignment is not the case and the PKA recognizes this difficulty. While ESG 1.1; 1.3 and 1.5 can be easily aligned with the Standards of PKA, the alignment of ESG 1.2 and 1.4 is already much weaker. However, the analysis identified that the ESG 1.7, 1.8 as well as 1.9 are not represented in the PKA methodology in the opinion giving process. This was also not disputed during the interviews and the panel recognizes the explanation of PKA that ownership would not be within the Commission but the MoHE.

The panel considers acceptable PKA's reasoning that if run, the programme will undergo an evaluation based on criteria in compliance with the requirements of the ESG. However, the opinion giving process is an activity of PKA (reflected in its Statutes) and despite the final decision being taken by the Ministry as such should be based on the same criteria, and the full set, to be compliant with the requirements of the ESG. Also, the panel does not fully agree with the argument of lack of ownership of this procedure. As the panel has learned during interviews, HEIs have the opportunity to appeal against an opinion of PKA following the PKA appeals procedure. The panel sees that as a clear indicator for

the fact that a certain ownership lies with the Committee as otherwise an appeal would not be placed within PKA but with the institution that holds ownership of the procedure.

As obviously this is not the case, the panel could not evaluate this standard as fully compliant.

Panel recommendations

The opinion giving procedure should be fully aligned with the standards of Part 1 of the ESG.

Panel conclusion: partially compliant

ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE

Standard:

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

2013 review recommendation

ESG 2.2 (Development of external quality assurance processes):

PKA should put in place a formal mechanism for consultations with its external stakeholders on, and impact assessment of, prospective changes in its processes, procedures and/or criteria which identifies stakeholders to be obligatorily targeted and methods to do so.

Evidence

According to its mission statement, PKA is “dedicated to quality assurance and enhancement in higher education” through “observance of higher education quality standards”, including European standards and “providing support for public and non-public higher education institutions in the process of enhancing the quality of education and building quality culture”. As an expected result of the work of PKA, it is described “to ensure graduates of Polish higher education institutions top position on the domestic and international labour market”.

As already mentioned in the assessment of Part 3 of the ESG, aims and purpose of PKA’s quality assurance activities, as well as evaluation criteria, are defined in the LoHE. The focus is on evaluation of programmes while these are divided into programmes with general academic and practical profiles. The criteria defined in the regulations are reflected in guidelines and report templates for institutions that PKA produced and the review panel carefully reviewed. For some specific areas of studies more detailed criteria are available (e.g. Pedagogy). The programme report template also requires the programme to outline a SWOT analysis to identify room for further developments. Several interviewees during the site visit mentioned consistently that the nature of reviews has evolved over the past years and nowadays – besides discussing the fulfilment of criteria – aims at supporting the development of programmes.

As described in the SAR, following adjustments to the legal system for HEI in Poland, in 2016 PKA procedures were adapted. It is described how PKA introduced modifications in the procedure to make the processes less bureaucratic (SAR p 59). The process took place under broad participation firstly of internal stakeholders of PKA. The resulting draft document was then put on the PKA website and external stakeholders were specifically requested to comment on the suggested paper. PKA staff has described the consequences of the changes in a reduction of documents required and in a simplified approach to site visits. Furthermore, HEI’s representatives have confirmed positive effects of these

modifications during the site visit and the different stakeholder groups have also confirmed their involvement in the consultation process.

The panel recognizes that it is the intention of PKA to increase interactions with stakeholders as reflected in the strategic plan 2017-2020 (objective 2.2). Also, the involvement of stakeholders by the institutions is now included in evaluation criteria for programme review (criteria 3.1 /4 Template report).

As described in the SAR, the criteria for the opinion giving process are part of the LoHE and PKA does not describe any bigger changes to the procedure lately.

The European Approach for Quality Assurance of Joint Programmes is not mentioned in the SAR. In interviews with the MoHE as well as PKA Presidium it was concurrently confirmed that the current legislation does not allow the application of the European Approach but that the currently debated LoHE that is expected to come into force shortly would implement all the required adjustment to enable the full use of the European Approach.

Analysis

With reference to the 2013 review, the panel welcomes the adjustments put in place and is convinced that the implemented approach towards stakeholder involvement is a progress that also increases the acceptance of the applied framework. The consulting process with stakeholders has been developed and structured; their input is taken into account when revising the methodologies. Moreover, the panel recognizes that different stakeholders confirmed that the bureaucracy of procedures has been reduced. This does not only leave more room for discussion of the particularities of the programme, it is also in line with the intention of PKA to design the procedures more towards enhancement and less towards control.

The panel positively confirms that the aims and purpose of PKA's quality assurance activities, as defined by the LoHE, are reflected in criteria and its processes. Examples can be seen in the collaboration with employers that is in line with the aim to assess the positioning of graduates on the job market or the integration of a SWOT analysis in the SAR for programme reviews to support further development in line with a developmental orientation. The panel recognizes this clear orientation towards development in the adjusted approach of PKA for the programme reviews. Recognizing that in most interviews the focus on the developmental dimension has been expressed quite explicitly, the panel also recognizes that in the same context the site visits were referred to as "inspection". The panel takes this as an indicator that the cultural change from compliance to development orientation still needs time to reach all areas of practice, as currently for some actors the compliance orientation is still perceived to be dominant.

The panel also positively recognizes that following the changes in the methodology modifications have been made to the templates and guidelines and the panel confirms that these are all in line with the evolution of the regulations. Furthermore, the panel has heard solid feedback from HEI as well as CRASP and RCHEIP that the methodologies implemented by PKA are fit for purpose.

Regarding the opinion giving process, it can be stated that it fulfils the purpose defined by the MoHE. However, considering ("dual") ownership, the non-existing involvement of stakeholders and the specifics of the procedure, the opinion giving process is not fully meeting the requirements. Several examples for the non-alignment with the ESG are explained in different sections of the report; to name only one example external stakeholders are not involved in the procedure at the assessment level as it is run by PKA committee members of the relevant sections. Furthermore it is generally a desk based exercise and institutions do not see the report they are subject to. Also the fact that there is a very

high number of successful appeals (see ESG 2.7 Complaints and Appeals) creates doubts in the panel, whether this procedure is at a high level of fitness for purpose.

Panel recommendations

The opinion giving process should be further developed in consultation with stakeholders, to increase its fitness for purpose.

Panel conclusion: substantially compliant

ESG 2.3 IMPLEMENTING PROCESSES

Standard:

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

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

Evidence

PKA outlines in its SAR that both procedures, the programme evaluation as well as the opinion giving process include a self-assessment report/application, supplemented with key figures on programmes. In the case of the opinion giving process, the required contents of the application are defined in the law as well as the scope of the opinion of PKA. The review panel also reviewed templates for these SARs / applications. In programme evaluations, there is a site visit that typically lasts for two days and involves independent external experts (see ESG 2.4 for details). The panel of experts also reviewed exemplary schedules of site visits.

In each procedure the final decision is the results of decisions at different levels: reviewers, section, Presidium. In case of accreditation with conditions, there is a defined follow up including another visit one year after (SAR p60 & 61). A template is provided which supports self-reflexion on measures taken but also on changes that occurred since the previous evaluation (SAR p 61). If minor irregularities are observed, the Decision of the Presidium includes deadlines and methodology for acceptance. In case of recommendations, not conditions, made only to improve good education, the follow-up is done during the next review. There are internal checking mechanisms to follow up the implementation of recommendations (meeting 10, QA staff). The opinion giving process is paper based (institutions application and documentation). There is no site visit unless necessary to get additional information as PKA explains that the nature of information required due to the scope of the activity generally can be achieved with a desk review.

The different steps of the procedures are defined and described in several documents of PKA that were reviewed by the panel: Statutes of PKA including the annexes, Resolutions of the Presidium, report templates, and Internal Quality Management System. The relevant documents are also publicly available on the website.

The panel also recognized that the evaluation reports and decisions on programmes are published on PKA's website. Concerning the opinion giving process the panel learned from the SAR as well as during the interviews that the decision of the PKA Presidium on authorisations is sent to the MoHE as well as to the applying institution. According to the SAR and concurrent explanations during the interviews,

the decision of the Presidium contains detailed justification, particularly in case of negative decisions. In case of a negative opinion – when the institution intends to appeal the decision of the PKA Presidium – the full/detailed opinion can also be made available to the institution.

Consistent use and application of the standards is also ensured as all draft reports are scrutinized by the Secretary General to ensure implementation of rules and coherence before they are discussed in the sections.

The panel also learned that PKA has done an effort in training and supporting panels throughout the evaluation process and in assuring consistency in conducting the procedures. A list of training for PKA members and experts in the years 2015-2017 showed trainings for different target groups and different formats.

Analysis

Regarding both relevant procedures, the panel finds the external quality assurance processes in general to be reliable and pre-defined. Information about both processes is presented transparently and known to the relevant stakeholders. By nature, complex procedures tend to produce a complex system of documentation and information. Hence the panel considers that gathering all information relevant to the processes in one document would contribute to increase usefulness and transparency.

The panel observes that all programme evaluations include a self-evaluation, an external evaluation, a panel report and a follow-up procedure as outlined above if required. Relevant documents including outcomes (evaluations reports and evaluation decisions) are posted on the PKA website. The panel found no evidence for inconsistencies in the application of the methodology.

For the opinion giving process there is also an application by the institutions, the desk-based assessment usually happens by reviewers who are members of PKA, their report is then discussed by the section which forms the baseline for the decision that is then made by the PKA Presidium. The decision is made available to the MoHE and the institutions, however it is not published. (see ESG 2.6) Students are only involved in the decision making process at its final stage in the Presidium of PKA. The panel found no indication for inconsistencies in the use of the predefined and reliable implementation. However, understanding that the institution only receives the decision of the PKA Presidium and not the full opinion that was formulated by the reviewers of the section, the panel found no predefined and transparent way how the opinion is then made available to the institution in cases it wants to appeal the decision. The explanations the panel received in the interviews with institutions and the Appeals committee could not produce a consistent picture of the procedures in these cases.

The fact that the Secretary General scrutinizes all reports on the one hand ensures consistency of reports but on the other hand this consistency relies on one extremely dedicated person. It might be wise to consider broadening the basis of this important mechanism by formalizing and diversifying the workload (see ESG 3.6).

Panel recommendations

PKA should increase the transparency of the process in the opinion giving procedure, particularly regarding the availability of documents for the applying institution.

Panel conclusion: substantially compliant

ESG 2.4 PEER-REVIEW EXPERTS

Standard:

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

For the programme evaluation procedure, the assessment is carried out by an evaluation panel composed of PKA members and external experts including a student as well as – under predefined circumstances – a representative of the labour market. The Secretary of PKA appoints evaluation panels, which are composed of up to seven members. The relevant criteria and mode of appointing experts are predefined in a separate document that served as Annex 13 to the SAR. The Secretary of PKA appoints evaluation panels, which are composed of from up to seven members (SAR p.61), student and employer representatives are appointed by relevant coordinator (SAR p.41). No external institution is authorised to affect the composition of PKA evaluation panels or the list of experts (SAR p.43). As described in the SAR (p.50) PKA members and experts sign a declaration of no conflict of interest to reassure independence and a Section for Ethics has been appointed together with the adoption of a Code of Ethics.

PKA has developed a list of experts that are selected and trained for external evaluations. As explained during the interviews, the database of experts holds 1.300 people, including 49 international experts. The student experts' pool has approximately 60 students who can be selected for review (currently each student has approximately 10 evaluations per year). Experts may be invited to participate also in other duties and tasks of agency. Experts undergo a selection procedure with several stages, including analyses of their CV, motivation letter, knowledge test and training. New selection procedures include face-to-face meetings with potential student-experts. In a second step their knowledge and soft skills are tested as well. Every new student-expert is accompanied with student mentor who is more experienced in evaluation process in the first evaluation visit. Students and employers have separate training sessions specifically developed and dedicated for their needs and role in review panels. All trainings and seminars for experts are organised by the Secretary General. As explained during the site visit, additionally to the regular training sessions, thematic seminars organised or co-organised by PKA are offered for experts.

Participation of international experts in evaluation procedures is limited due to the criteria for selection of experts. One of criteria is knowledge of Polish language as majority of documents are prepared and evaluation procedures usually are conducted in Polish language. During the interviews representatives from HEI's – to a certain extent - showed willingness to host evaluation process in English language, they noted that it might be especially beneficial for international study programmes. At the same time, PKA representatives explained that the amount for expert compensation is not sufficient to attract a larger number of high-level international experts for PKA reviews.

During the programme evaluations responsibilities are divided among review panel members according to their role in the panel. Consequently, as explained during the interviews, the level of involvement of experts in the different steps of the procedure including the preparation of the final report can differ between panels. Employers and students are required to assess and analyse one specific criterion independently (e.g. students assess "Support and motivation system of students"). The chair of the panel prepares the report. During the interviews the panel learned that there are cases where not all experts see and agree on the last version of panels' report as it lies within the responsibility of the chairman, who is at the same time a member or a former member of PKA. For evaluation of interdisciplinary programmes experts from both disciplines are selected in a review panel.

As outlined in the SAR and confirmed during interviews with PKA, for the opinion giving process the review is conducted by members of PKA coming from the relevant sections without additional input of external stakeholders like students or labour market representatives.

Currently each PKA evaluation panel includes academic staff representation. At the same time representatives of HEI indicated the necessity and expressed their wish that PKA should stronger take into account the respective profile of study programme (academic or professional), particularly when it comes to the professional profile. During interviews with PKA members the panel learned that also PKA is aware of the need to increase the involvement of academics with relevant experience for the professional profile of study programmes.

Analysis

The panel positively concludes that the composition of review panels for evaluations of study programmes generally complies with the ESG and does include representatives from the different stakeholder groups. Attention should be paid to the fact that the procedures are not solely carried out by external experts, as the chair of the review team is a PKA member his/herself. Additionally former PKA members can act as reviewers, too. The panel already expressed its view that this specific design of a review panel would require appropriate reflection in the IQA mechanisms in order to guarantee a fair and free assessment by all reviewers (ESG 3.6). The composition of panels for evaluations of study programmes with a professional profile sometimes creates challenges when experts do not have personal experience with these kinds of programmes. While the panel found during the interviews that to a certain extent there is awareness within PKA, the panel believes that in the future development special attention should be given to the involvement of academic experts with relevant professional and academic experience.

For the opinion giving process, the composition of review panels is not fully compliant with the ESG standard because no external stakeholders - students or labour market representatives - are involved in the review process. The panel does not ignore the stakeholder involvement in the decision making process through representation in the statutory bodies. However, the panel thinks that involvement of stakeholder should happen at the level of the assessment and not only in the statutory bodies to be in line with the ESG.

Clearly, it can be stated that the selection and training process of experts is very well developed, intense and contains important parts and aspects to assure experts' competence in evaluation process. While the panel agrees with PKA, that different stakeholder groups have different training needs, the fact that in none of the systematic training activities the stakeholders interact, they lose opportunity to share their perspectives and interpretation of standards. Joint elements of trainings could benefit both sides, as (ideally) during the review procedure experts will have to work together successfully.

While lots of attention is given to expert training and selection, the division of responsibilities and tasks among review panel members heavily depends on the chairman of the expert group. As the review panel was informed during the interviews that the level of involvement of the stakeholder's differs between the individual groups, the panel believes that PKA should stronger focus on this area in their IQA. In the current practice, students and employers are not necessarily included in the whole process of evaluation as equal members with the opportunity to comment on any aspect or criteria. Clearly, this makes the evaluation process less transparent. In this regard the panel respectfully recognizes that the information received during stakeholder interviews differs from the intended situation as described by PKA.

Regarding potential conflicts of interest, the panel believes that appropriate measures are in place. While it first seemed unusual that the members of the panel (despite the chair) are not announced to the institutions before the site visit happens, the panel particularly investigated in different interviews regarding any signs for concern due to this practice. Consequently, the panel concludes that this practice is sound for the academic environment PKA operates in and does not cause a cause for larger concern.

The panel agrees with PKA that the use of polish language in the evaluation procedures is a key limiting factor for a further internationalisation of the review process. For this reason, the panel can only encourage PKA to further work to increase the number of international experts in their pool while also further looking into options to facilitate reviews in English language.

Regarding the overall assessment of the standard the panel underlines that it is clear that the opinion giving process marks a regular activity of PKA which is also supported by the case numbers Hence assessing compliance with ESG 2.4 will have to reflect this.

Panel commendations

The PKA selection process and training for new experts is well developed and assures experts knowledge, skills and competence are sufficient for their work.

Panel recommendations

- PKA should develop a practice reassuring the equal involvement of stakeholders across the different procedures making sure all experts are involved in the relevant key steps of each procedure.
- External experts, particularly students should be used in the opinion giving process.

Panel suggestions for further improvement

- To improve evaluation of study programmes with professional profile PKA should increase the number of experts in their pool who have relevant experience and qualification.
- PKA should further work to increase the number of international experts in their pool while at the same time look into options to enable reviews in English language.
- PKA should organise joint trainings for experts from different stakeholder groups to facilitate peer learning between different representative groups and improve their further communication during the evaluation process.

Panel conclusion: partially compliant

ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

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

Evidence

As described by PKA, the law confirms PKA's right to stipulate in its Statutes detailed criteria for the evaluations and outcomes (SAR p.19). For the programme evaluation the Polish Accreditation Committee applies programme evaluation criteria adopted by its plenary session, which constitute an annex to its Statutes. (SAR p.69; Annex 1). The same source provides criteria and conditions for the award of assessments, which specify the rules for the award of the following ratings: outstanding, positive, conditional and negative. The conditions for the award of ratings are also publicly available and form an Annex to the statutes of PKA.

Programme evaluation criteria include: the concept of education and its conformity with HEI's mission and strategy; study programme and possibility for achieving intended learning outcomes; effectiveness of internal education quality assurance system; teaching staff; cooperation with representatives of social and economic stakeholders in the education process; internationalisation of the education process; infrastructure used in the education process; care and support provided to students and support in the process of learning and achieving learning outcomes" (SAR p.27, Annex 1).

The panel learned during the interviews on site that the MoHE defines criteria for the opinion giving procedures. PKA has developed templates to be used by reviewers in order to reach a consistent assessment. The templates form an Annex to a resolution by the PKA Presidium. The templates demonstrate that there are a number of issues assessed in the opinion giving process, e.g. learning outcomes, allocation of ECTS, and appropriateness of learning/teaching methods as well as assessment methods.

During the interviews with PKA members but as well with reviewers and stakeholders it was explained on multiple occasions that the approach in the programme evaluations has changed its focus from study programmes quality criteria to more holistic approach and that the new criteria are focused on evaluating broad aspects and not so much on controlling as it was before. PKA intends to change public and stakeholder perception of its role from being controlling to being more reflective external evaluation agency to support enhancement and development. While the overall agreement in the statements of PKA members were that criteria were improved based on the ESG2015, the reflection on specific aspects in the criteria that would now be more enhancement oriented received only few examples.

As described in the SAR (p.70) consistency in the decision is reached by multi-step decision-making process which includes:

- the evaluation panel or a reviewer proposing the rating,
- the proposed rating by the evaluation panel is analysed at a meeting of the Committee's Section for the study area,
- the decision is then taken by the PKA Presidium,
- the option of the appeal procedure.

Furthermore, consistency of decisions and in reports is supported by the Secretary General (with a help of few PKA members) who reviews all panels' reports to assure the correct use and interpretation of criteria as well as consistency of panels judgements in similar situations. After proofreading the Secretary General sends a report with her comments to a chair of review panel. As confirmed during the interviews this procedure is highly valued among Committee and experts.

The SAR also presented statistics on the use of the appeal procedure (p. 76 of the SAR). From 2014-2017 there were 90 appeals in programme evaluation procedures of which 40 were decided positively. The total number of programme evaluations in the same period were 1.181 (SAR p.28., table 10).

programme evaluations) In the opinion giving process during the same period there were 293 appeals, of which 160 ended positively. The total number of opinions given alone in 2016 and 2017 is 540 (SAR p.30., table 12. opinions)

For the programme evaluation procedure, where there is also a rating on the achievement of different standards the relevant criteria are clearly defined in Annex 3 to the Statutes of PKA and the conditions to obtain a global “outstanding” rating are explicit. However, the conditions to obtain an outstanding evaluation in the separate criteria are not fully developed and interviews with representative from HEI’s mentioned that this appreciation was not always predictable. The panel also learned from interviews with the Appeals committee that often appeals address the rating that was awarded.

Currently the MoHE is changing state level regulations. In various meetings it was explained that part of this change happens through active stakeholder involvement and consultation. From these meetings it arises that PKA has limited possibilities to influence new state regulations despite its’ competence, proficiency and previous experiences in the field. The panel learned during the interviews that the previously adopted institutional accreditation approach was not implemented successfully, there were many complains from different HEI’s and stakeholders which was the reason for moving back to programme evaluation.

Analysis

The panel positively recognizes that there is shared understanding regarding the use of the criteria and the intentions of the procedure. The new focus, as consistently explained in all relevant interviews, is much more towards enhancement than control. The panel believes that it is beneficial to share this overall understanding as it shapes decision-making processes and practice. However, when it came to the specific examples how criteria adjustments supported this intention the panel mainly received responses on adjustments on the application and operational level. Presented examples focussed on changes in the requested documents or new/less annexes that have to be presented as part of the programme evaluation procedure. On a more global level, since PKA’s work is also based on ESG, a common understanding of ESG 2015 between members as well as staff could be further developed. Analysis of materials and oral presented evidences does not yet fully confirm a comprehensive implementation of a new – more reflective evaluation approach. The panel learned from interviews with stakeholders and experts that there are still indications of control-based approach in the evaluation process. At the same time, the panel believes that PKA is in the process of finding the right balance between control and enhancement orientation fulfilling its role as defined in the LoHE.

The procedure of reading all review panel reports by Secretary General is impressive and seems to be good practice to ensure consistency of interpretation and judgements of standards among all Sections taking into account specifics of each Section. Nevertheless, it is important to address risks of mainly one person being responsible for overiewing all reports, interpretation of standards and evaluation of experts’ individual work. This puts lots of responsibility for a process on the shoulders of an individual. While clearly it is effective, activating Bureau resources in this context could increase efficiency.

Regarding the consistency of the decisions, the panel recognized with interest that there is a relatively high number of appeals in the opinion giving process. The fact that the majority of them succeed was explained by the fact that meanwhile the University already put improvements into practice, which can then lead to a more positive decision. The panel appreciates this enhancement-oriented approach, however this situation can also be an indicator for a need for greater transparency in the opinion giving process, particularly with regards to criteria for decisions. The panel recognizes the

limited flexibility of PKA in this procedure as regulations come from the MoHE, however, since PKAs decision can be appealed using the PKA appeal procedure, it indicates that there is responsibility on the side of PKA and this leads to the need for a greater transparency and consistency in the decision making process of the opinion giving process.

Another area that was discussed by the panel is the consistency of the ratings in programme evaluation. While the multiple levels of decision (panel, section, Presidium) could contribute to increasing the consistency of evaluation and ratings, the panel considers the fact that a majority of appeals concerns the granting of “outstanding” ratings as an indication that the evaluation of criteria could be further developed and clarified.

Panel is very well aware that due to its unique competency and experience PKA can provide valuable thematic analyses and additional information for improvements of external quality assurance procedures at state level, including new regulations with new criteria. PKA has numerous useful information, experience, power and trust from stakeholders to involve more in revision and improvements of quality assurance in higher education.

Panel recommendations

- The opinion giving procedure should be made more transparent and decision-making process should become more consistent in order to improve the procedure and decrease number of appeals.
- The criteria to grant respective ratings for the different standards in the programme evaluation procedures should be further developed and clarified.

Panel suggestions for further improvement

It is important that PKA takes an active role in analysing and discussing developments, processes, and implementation of new regulations that affect quality assurance of higher education.

Panel conclusion: substantially compliant

ESG 2.6 REPORTING

Standard:

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

2013 review recommendation

Pursuing its thoughts as part of the work already initiated, PKA should revise its evaluation report templates so that they include recommendations and suggestions on quality improvement and enhancement, in particular IQA systems, and a clear distinction is made between recommendations and suggestions.

This standard was flagged by EQAR “it should receive attention whether PKA, in consultation with the ministry, has considered to publish reports from ex-ante evaluations of authorised programmes and higher education institutions”.

Evidence

As described in the SAR, the amended law imposed an obligation on the Polish Accreditation Committee to publish on its website not only resolutions concerning its programme and institutional evaluations together with grounds for them, but also reports of evaluation panels within fourteen days from the date of a resolution becoming final” (SAR p.20). Additionally – in reflection of the recommendation of the review in 2013 – PKA introduced changes to the templates of the reports with a clear distinction between recommendations and suggestions on quality improvement and enhancement. In order to ensure adequate quality of site visit reports sent to HEI authorities, PKA has implemented a procedure for internal control of the reports: each report drawn by a chair of the evaluation panel is approved by the Secretary General. (p.79 of the SAR) Drafting the report lies within the responsibility of the chair of the review team. The panel reviewed both the templates as well as draft reports edited by the Secretary General. During the interviews with the heads of sections it was also explained that sections would also recognize good practice as part of their work so IQA could not only benefit from recommendations, but also recognition of good practice.

PKA explains in the SAR and presents on its website, that for the programme evaluation procedure the panel report and the resolution of the Presidium including any comments or recommendations are published. (SAR p.32). In order to address the results of IQA, PKA also reflects on changes that were made as a result of prior PKA reviews. (SAR p. 62)

Reports in the opinion giving process are not published. PKA explained during the interviews that ownership of this procedure does not lie with PKA but the MoHE, hence it is up to them to decide upon publication. During the interview with the MoHE, the panel recognized with interest that publishing the reports for the opinion giving process was part of the discussion when debating about the current change of the LoHE. As described during this interview, the MoHE intended to include the need to publish the reports, however it was explained that upon recommendation of PKA this change was not implemented to prevent to confuse HEI.

Regarding the same issue the panel learned during the interviews that HEI do not receive the report of the reviewers in the opinion giving process. However, once a HEI intends to appeal against the outcome it was described that they would have access. It could not be clarified how exactly this step of the procedure is processed and it would depend on the outcome whether HEI would receive the report or not.

As described in the SAR as well as confirmed by the HEIs during the interviews, in the programme evaluation HEIs have the opportunity to comment on potential factual errors in the reports before the PKA presidium takes a decision. Consequently, as HEIs do not receive the report in the opinion giving process, such an option does not exist for these procedures.

As explained above, the chair of the panel is responsible for drafting the programme evaluation assessment report. During the interviews with experts as well as students the panel learned that practice of this part of the procedure differs between panels resulting in different levels of expert involvement in the drafting process. In some cases it was even explained that students found the final outcome once it was published on the website but did not participate in the editing process after submitting their contributions to the report.

Analysis

For the programme evaluation procedure, publishing reports on the PKA website is an adequate way to inform relevant stakeholders, particularly HEIs, students, labour market, but as well the interested public. The templates developed by PKA are very helpful tools to reach consistency and completeness.

Design of the templates and the way they are used result in reports that also provide feedback regarding the IQA to the institutions. Of course, templates depend on the people who use them, so the practice of editing by the Secretary General is a very positive one to assure completeness as well as consistency in the assessment process. Potential weaknesses of the practice have already been mentioned above and only cover the strong centralization of this important process in one person.

The panel recognizes very positively the very transparent way of publishing the reports and resolutions in the programme evaluation procedure. By the way of presentation, it is very clear what is the resolution of the PKA's Presidium and what is the report coming from the panel of experts.

As not disputed by anybody, reports in the opinion giving process are not published by PKA. Following the discussion with stakeholders, PKA as well as the MoHE the panel cannot find strong reasoning for not publishing the reports. While it was explained that PKA would only fulfil a role in a procedure that would follow the rules of the MoHE, the panel learned with surprise that the suggestion to publish the reports was introduced in the debate on the new LoHE and it was upon PKAs recommendation that this change did not become part of the proposal. The panel does not conclude with PKAs position that this would confuse HEIs, instead this transparency would respect their role and responsibility in setting up new programmes. In this context, the panel also reflects on the fact that HEI's see the report if they intend to appeal the resolution of PKA that is based upon it. Publishing the report as well as the PKA resolution will lead to increased transparency and underline the sovereignty of each actor.

As already explained in the analysis of standard 2.4, the involvement of individual experts in the preparation of assessment reports in the programme evaluation procedures may differ between panels. Recognizing the need for appropriate involvement of each expert in this process, the panel can only reconfirm its recommendation to further develop the IQA mechanisms of PKA in a way that appropriate expert involvement in this process is guaranteed. The opinion giving process is less problematic in this aspect as it usually happens without further stakeholder involvement by members of the sections themselves.

Panel recommendations

- Expert reports and resolutions of the opinion giving process should be published.
- When drafting the assessment reports for the programme evaluation procedures by the chair of the panel, PKA should setup a mechanism reassuring appropriate involvement of all experts.

Panel conclusion: partially compliant

ESG 2.7 COMPLAINTS AND APPEALS

Standard:

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

Evidence

Since 2014, the organisational structure of the Polish Accreditation Committee has a separate Appeals Body. It is a fixed organisational structure of the Committee (SAR p.22) and membership in the Appeals Body cannot be combined with membership in a section operating in a given area of study. (SAR p.19). The Appeals Committee is composed of Committee members, and at least one "body member" represents each area of study (SAR p.73).

To connect the Appeals Committee with the decision making structure of PKA, the Chair of the Appeals Committee attends the meetings of the Presidium with a voting right when reconsidering a decision (SAR p.24). The Presidium, having heard the chair of the Appeals Body, makes the final decision. (SAR p.70).

A detailed procedure for examining an application for reconsideration of the matter was adopted in the framework of the quality assurance system and published on PKA website as well as explained in the PKA Statutes. In addition, each resolution of PKA offers instructions on how and when to submit an appeal. The Supreme Administrative Court of Poland stated that a resolution of PKA does not constitute a public administration act and as such cannot be governed by administrative jurisdiction and cannot be assessed by an Administrative Court. Therefore, resolutions adopted by the Committee are final and can be altered only by PKA. (SAR p.72).

In 2018 PKA appointed a Section for complaints and requests composed of: PKA President, the Secretary General, the Vice-President, the chair of the Section for Ethics, a representative for PKA internal quality assurance system, the coordinator of cooperation with employers, and the student coordinator. The Section examines remarks expressing dissatisfaction with the course of evaluation procedure or with the conduct of persons involved in it expressed in the questionnaires, as well as complaints and requests addressed to the Committee submitted by individuals and institutions otherwise. The Section adopts resolutions on its decisions in open voting by a simple majority of votes cast. If the Section finds that the standards set out in the Code of Ethics have been violated, the matter is referred to the Section for Ethics. (SAR p.72).

From 2014 to 2017 there were 90 appeals in the field of programme evaluation of which 39 were decided positively. (SAR p.74., table 19. Appeals) The total number of programme evaluations in the same period were 1.181 (SAR p.28., table 10. programme evaluations). From 2014 to 2017 there were 293 appeals regarding resolutions in the opinion giving process of which 133 resulted in positive opinion (SAR p.74., table 21.) The total number of opinions given alone in 2016 and 2017 is 540 (SAR p.30., table 12. opinions). Approximately 25% of all appeals address study programme evaluation while 75% refer to the opinion giving process.

During the interviews, the panel learned that every institution that underwent a review is asked to fill a questionnaire where they can express their complaints. Representatives from HEIs explained that issues mentioned in these questionnaires may be discussed in annual meeting, though the panel did not see written meta-analysis based on the results of these questionnaires.

The panel also learned when interviewing with PKA members and HEI representatives that it is possible to appeal also positive decisions of the Committee and that this tool is commonly used in order to improve the rating and increase prestige of the programme as outstanding study programmes are eligible to apply for extra funding from state. In the same interviews the panel was explained that when appealing in the opinion giving process, HEIs often present improvements and adjustments they made after considering the opinion. E.g., adjustments to the course order in a study programme or new academic staff are presented. The Appeals Committee then tends to a more positive opinion in order to support the development in the institutions.

The panel also recognizes the comments of the prior ENQA review of PKA where experts stated that "a large proportion of appeals are considered favourably".

Analysis

It is easily recognizable the PKA has used the past years intensively to continuously improve its appeals and complaints procedures. The introduction of an Appeals Committee in 2014 as well as a complaints section in 2018 – together with a section for ethics - present a remarkable portfolio of internal institutions safeguarding the quality of procedures in cases of (perceived) injustices or mistakes. The panel is convinced, particularly with the clearly defined appeals procedure when it comes to PKA resolutions, that effective measures are in place granting institutions the right to appeal an unjust decision. This is the case for both main activities of PKA under review.

In continuation of the remarks of the ENQA reviewers of 2013, the panel recognizes a relatively high percentage of appeals that are decided positively. While the reasoning – particularly when it comes to the opinion giving process – can explain the numbers, at the same time it raises the question how the facts that lead to a change of the decision can be implemented constructively into the procedure, to avoid the necessity of an appeal on the first hand. The panel believes that PKA could improve the way it uses the information available in the appeals and complaints procedures as a source for its IQA to remedy the sources for the high number of successful complaints.

Particularly when looking at the high number of appeals in the opinion giving process where one can argue that almost 25% of all decisions are appealed with a success rate of over 40%, it seems that the mechanism is not used to correct errors, mistakes or misjudgements. Instead, it is used creatively to present new facts that lead to a different decision. The panel believes that the procedure should be adjusted in a way that the number of appeals can be reduced without reducing the options of enhancement for HEIs.

While the situation in the programme evaluation procedure is less intense when it comes to the numbers, the success rates of appeals is also very high in this field. The panel learned that often the intention is to improve the rating. The panel is surprised about the high success rate in this area as it could imply that clearer guidelines for the award of ratings would be helpful to better justify them and not come to a different conclusion in the appeals procedure. This again underlines the recommendation to improve the inclusion of information from the appeals procedures in the IQA system.

Panel recommendations

- The implementation of the appeals procedure should be improved to avoid creative use of this system and decrease the number of appeals.
- PKA should implement a more systematic analysis of received feedback, recommendations, complaints and data from appeals procedures to facilitate IQA and improvements of procedures.

Panel conclusion: substantially compliant

CONCLUSION

SUMMARY OF COMMENDATIONS

ESG 3.1

PKA has appointed an employer's representative as coordinator for cooperation with employers and a student as a coordinator for cooperation with student experts. Interviews clearly showed the added value of these functions in terms of support to members and experts and of coordination with the Bureau and Presidium.

ESG 2.4

The PKA selection process and training for new experts is well developed and assures experts knowledge, skills and competence are sufficient for their work.

OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

The panel found PKA in full compliance with the ESG in four out of 14 standards reflecting the many years of experience of the organization and its orientation towards the implementation of the European perspective of QA in Poland. In seven out of 14 standards the panel found PKA to be substantially compliant with the ESG, while the three standards that were assessed only partially compliant, namely 2.1 Consideration of internal quality assurance, 2.4 Peer-Review experts and 2.6 Reporting all refer directly to the opinion giving process. The summary of the compliance assessment by the panel looks as follows:

- Fully compliant for the following ESGs – 3.1, 3.2, 3.3, and 3.7
- Substantially compliant in the following ESGs – 3.4, 3.5, 3.6, 2.2, 2.3, 2.5, and 2.7
- Partially compliant: 2.1, 2.4 and 2.6

ESG 3.1 - Fully compliant

ESG 3.2 – Fully compliant

ESG 3.3 – Fully compliant

ESG 3.4 – Substantially compliant

Panel recommendations:

PKA should strengthen their initiatives to develop a more structured approach towards thematic analysis leading to analysis meeting the requirements of the Polish HE system, independently from international projects as well as adding additional resources. Mobilizing resources from within the Bureau should be considered.

ESG 3.5 – Substantially compliant

Panel recommendations:

PKA should take action to improve the situation of staff in its Bureau. Valuing – in terms of remuneration as well as job profiles – and capitalizing on its acquired expertise, should decrease staff turnover and increase PKA's capacity to invest time and knowledge in thematic analysis and internal enhancement.

ESG 3.6 – Substantially compliant

Panel recommendations:

- The comprehensiveness of the IQA, should be developed in the areas of management procedures (decision-making process; definition and implementation of the strategic plan, etc.), role of the President of panel in programme evaluation and internal feedback.
- PKA should update its internal Quality Assurance for the procedure for programme evaluation in a way that there is a checks and balance system for the strong role of the PKA member serving as president of the review panel.

ESG 3.7 – Fully compliant

ESG 2.1 – Partially compliant

Panel recommendations:

The opinion giving procedure should be fully aligned with the requirements of Part 1 of the ESG.

ESG 2.2 – Substantially compliant

Panel recommendations:

The opinion giving process should be further developed in consultation with stakeholders, to increase its fitness for purpose.

ESG 2.3 – Substantially compliant

Panel recommendations:

PKA should increase the transparency of the process in the opinion giving procedure, particularly regarding the availability of documents for the applying institution.

ESG 2.4 – Partially compliant

Panel recommendations:

- PKA should develop a practice reassuring the equal involvement of stakeholders across the different procedures making sure all experts are involved in the relevant key steps of each procedure.
- External experts, particularly students should be used in the opinion giving process.

ESG 2.5 – Substantially compliant

Panel recommendation:

- The opinion giving procedure should be made more transparent and decision-making process should become more consistent in order to improve the procedure and decrease number of appeals.
- The criteria to grant respective ratings for the different standards in the programme evaluation procedures should be further developed and clarified.

ESG 2.6 – Partially compliant

Panel recommendations:

- Expert reports and resolutions of the opinion giving process should be published.

- When drafting the assessment reports for the programme evaluation procedures by the chair of the panel, PKA should setup a mechanism reassuring appropriate involvement of all experts.

ESG 2.7 – Substantially compliant

Panel recommendations:

- The implementation of the appeals procedure should be improved to avoid creative use of this system and decrease the number of appeals.
- PKA should implement a more systematic analysis of received feedback, recommendations, complaints and data from appeals procedures to facilitate IQA and improvements of procedures.

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

SUGGESTIONS FOR FURTHER DEVELOPMENT

The panel would like to make some general and more detailed suggestions, extending beyond strictly interpreted ESG and/or linking several ESG, which PKA may wish to consider when reflecting on its further development. These suggestions have already been signalled in the previous sections

ESG 3.1

The potential of the Advisory Board should be better used and the international component in it should be strengthened as it allows an increase of expertise in the structures of PKA.

PKA should consider including students as members of sections as well.

ESG 3.3

When continuously developing the PKA structures it should be considered to Implement a checks and balances system related to the scope of authority and tasks of PKA's president and secretary general. At the same time, it might be helpful to look at tasks, presently exclusively attributed to the President or Secretary General and assess which of them:

- could benefit from a collegial decision-making process (for instance evaluation panel appointment);
- could be assigned to the Bureau (for instance proof-reading the reports to insure their methodological consistency)

ESG 3.6

Existing informal procedures and criteria for the assessment of panel-experts and PKA members; ensuring consistency of reports, and internal feedback for improvement should be formalized.

ESG 2.4

To improve evaluation of study programmes with professional profile PKA should increase the number of experts in their pool who have relevant experience and qualification.

PKA should further work to increase the number of international experts in their pool while at the same time look into options to enable reviews in English language.

PKA should organise joint trainings for experts from different stakeholder groups to facilitate peer learning between different representative groups and improve their further communication during the evaluation process.

ESG 2.5

It is important that PKA takes an active role in analysing and discussing developments, processes, and implementation of new regulations that affect quality assurance of higher education.

ANNEXES

ANNEX 1: PROGRAMME OF THE SITE VISIT

22.05.2018		
16.00 – 19.30	Review panel's kick-off meeting and preparations for Day I A pre-visit meeting with the agency's resource persons to clarify elements related to the overall system and context	prof. dr hab. Łukasz Sułkowski, Vice President of PKA MSc Maciej Markowski, international cooperation officer
23.05.2018		
TIMING	TOPIC	PERSONS FOR INTERVIEW
8.30 – 9.00	Review panel private meeting	
9:00 - 10:15	Meeting with CEOs of PKA and PKA's Office	prof. dr hab. Krzysztof Diks, President of PKA prof. dr hab. Łukasz Sułkowski, Vice- President of PKA prof. dr hab. Maria Próchnicka, Secretary General of PKA MSc Barbara Wojciechowska, Director General of PKA's Office MSc Barbara Bryzek, Deputy Director General of PKA's Office MSc Izabela Kwiatkowska Sujka, Deputy Director General of PKA's Office
10.20-11.30	Meeting with the team responsible for preparation of the self-assessment report	prof. dr hab. Łukasz Sułkowski, Vice- President of PKA prof. dr hab. Janusz Uriasz, Chairmen of PKA's Section for Technical Sciences MSc Maciej Markowski, international advisor of PKA MSc Grzegorz Kołodziej, staff of PKA's Office Paweł Adamiec, PKA's students' expert, coordinator MSc Marcin Wojtkowiak, PKA's employers' expert, coordinator
11.30-11.45	Review panel's discussion	
11.45 - 13.00	Meeting with the representatives from Senior Management Team (PKA's Presidium - Chairmen of the Sections)	prof. dr hab. Janusz Uriasz, Chairman of PKA's Section for Technical Sciences prof. dr hab. Michał Kozakiewicz, Chairman of PKA's Section for Life Agricultural, Forestry and Veterinary Sciences prof. dr hab. Bożena Pączek, Chairman of PKA's Section for Medical, Health and Physical Culture Sciences prof. dr hab. Stanisław Wrzosek, Chairman of PKA's Section for Social Sciences prof. dr hab. Tadeusz Kufel, Chairman of PKA's Section for Economics prof. dr hab. Marek Kowalski, Employers' Organisation representative, Chairman of PKA's Section for Ethics prof. dr hab. Sławomir Kaczorowski, Chairman of the PKA's Section for Fine Arts
13.00 - 14.00	Lunch (panel only)	
14.00 - 15.10	Meeting with key staff of the agency/ staff in charge of evaluations	MSc Hanna Chrobak, Secretary of the Section for Economics MSc Jakub Kozieł, Secretary of the Section for Medical Sciences (..) MSc Artur Gawryszewski, Secretary of the Section for Social Sciences MSc Małgorzat Piechowicz, Secretary of the Section for Humanities MSc Agnieszka Socha Woźniak, Secretary of the Section for Life, Agriculture (...) MSc Edyta Lasota Bełzek, Secretary of the Section for Science

		MSc Jolanta Janas, Chief Accountant MSc Karolina Martyniak, international officer
15.10 – 15.30	Review panel's discussion - walk to the Ministry of Science and Higher Education	
15.30 - 16.45	Meeting with the ministry and parliament representatives (in the Ministry of Science and Higher Education)	dr Jarosław Gowin, Minister of Science and Higher Education MSc Piotr Muller, Vice-Minister of Science and Higher Education MSc Marcin Czaja, Director of the Department for Higher Education in the Ministry MSc Rafał Grupiński, Chairman of Parliamentary Committee for Education, Science and Youth (Sejm) Prof. dr hab. Kazimierz Wiatr, Chairman of Parliamentary Committee for Science, Education and Sports (Senat)
16.45 - 17.10	Review panel's discussion - walk to the PKA's office	
17.10 - 18.15	Meeting with members of PKA's Sections (usually in charge of chairing the evaluations panels)	prof. dr hab. Marek Lisiński, member of the Section for Economics dr Agnieszka Janiak-Jasińska, member of the Section for Humanities prof. dr hab. Bożena Muchacka, member of the Section for Social Sciences dr hab. Anna Bąkiewicz, member of the Section for Life, Agriculture (..) prof. dr hab. Teresa Kaszuba, member of the Section for Fine Arts prof. dr hab. Jerzy Garus, member of the Section for Technical Sciences
As necessary	Wrap-up meeting among panel members and preparations for Day II	
20.00	Dinner (panel only)	
24.05.2018		
8.30 – 9.00	Review panel private meeting at PKA's Office	
9.00-11.00	Meeting with Appeals' Body, Section for Ethics, and Section for Complaints and Motions	prof. dr hab. Wojciech Satuła, Chairman of Appeals' Body prof. dr hab. Tadeusz Boruta, member of Appeals' Body prof. dr hab. Mirosława Buchholtz, member of Appeals' Body prof. dr hab. Grzegorz Wójtowicz, member of Appeals' Body prof. dr hab. Marek Kowalski, Chairman of the Section for Ethics, member of the Section for Complaints and Motions MSc Grzegorz Kołodziej, member of the Section for Complaints and Motions MSc Marcin Wojtkowiak, member of the Section for Complaints and Motions
11.00 - 11.15	Review panel's private discussion	
11.15 – 12.30	Meeting with heads of some reviewed HEIs/ HEI representative	Warsaw University, Rector prof. dr hab. Marcin Pałys Jagiellonian University in Cracow, Vice-Rector prof. dr hab. Tomasz Grodzicki Technical University in Łódź, Vice-Rector prof. dr hab. Witold Pawłowski PWSZ (The State University of Applied Sciences) in Oświęcim, Rector prof. dr hab. Witold Stankowski WSB consortium of Non-public HEIs in Wrocław, Toruń, Gdańsk, Gdynia, Szczecin, Bydgoszcz, Chorzów, Opole, Poznań, Owner representatives, dr hab. Paweł Zygarłowski and MSc Arkadiusz Doczyk PWSZ (The State University of Applied Sciences) in Raciborz, Rector prof. dr hab. Ewa Stachura Kozmiński University in Warsaw, Vice-Rector prof. dr hab. Grzegorz Maurek

		Wyższa Szkoła Gospodarki Krajowej w Kutnie, Rector prof. dr hab. Sławomira Białobłocka
12.30 – 12.45	Review panel's private discussion	
12.45 – 14.00	Meeting with the Quality Assurance Officers of HEIs	Nicolaus Copernicus University in Toruń, dr hab. Agata Sudolska, Member of the University Council for Quality University of Life Sciences in Warsaw, dr Paweł Jankowski, Member of the Rector's Council for Quality Social Academy of Science (in Warsaw, Lodz, London, Kołobrzeg, etc.), dr Zdzisław Szymański, Rector's Proxy for Quality Assurance Maria Grzegorzewska University, dr Marlena Grzelak-Klus, Rector's Proxy for Quality Assurance AGH University of Sciences and Technology, dr hab. Jacek Tarasiuk, Rector's Proxy for Quality Assurance
14.20 – 15.20	Lunch	
15.30 – 16.15	Meeting with the representatives from reviewers' pool	prof. dr hab. Magdalena Osieńska, academics' expert prof. dr hab. Danuta Strahl, academics' expert prof. dr hab. Mansur Rahnema, academics' expert dr hab. Jacek Kropiwnicki, academics' expert dr hab. Artur Stefański, employers' expert MSc Waldemar Razik, employers' expert MSc Zbigniew Rudnicki, employers' expert professor Kamil Kardis, international expert MSc Wioletta Marszelewska, expert for assessment procedure
16.15 – 16.30	Review panel's private discussion	
16.30 – 17.15	Meeting with the students' experts	Michał Klimczyk, students' expert Paweł Miry, students' expert Przemysław Ogórek, students' expert Paulina Okrzymowska, students' expert Julia Sobolewska, students' expert Michał Dzieciuch, students' expert
17.15 – 17.30	Review panel's private discussion	
17.30 – 18.45	Meeting with the stakeholders representatives (Conferences of Rectors, General Council for Science and Higher Education, Parliament of Students, Employers Organization)	Conference of Rectors of Academic Schools in Poland, Chairman prof. dr hab. Jan Szmidt and Secretary General prof. dr hab. Andrzej Kraśniewski Conference of Rectors of Non-University Schools in Poland, Chairman prof. dr hab. Waldemar Tłokiński and Vice-Chairman dr Włodzimierz Banasik General Council for Science and Higher Education, member MSc Michał Goszczyński Polish Chamber of Crafts, representative and expert MSc Marta Jankowska Polish Chamber of Commerce, Vice-Chairman of the Committee dr hab. Waldemar Grądzki Students' Parliament of Republic of Poland, representative Jakub Grodecki
As necessary	Wrap-up meeting among panel members and preparations for Day III and provisional conclusions	
20.00	Dinner (panel only)	

25.05.2018		
9.00-10.00	Morning meeting among panel members to agree on final issues to clarify	
10.00 – 11.00	Meeting with CEOs to clarify any pending issues	prof. dr hab. Krzysztof Diks, President of PKA prof. dr hab. Łukasz Sułkowski, Vice- President of PKA prof. dr hab. Maria Próchnicka, Secretary General of PKA MSc Barbara Wojciechowska, Director General of PKA's Office MSc Barbara Bryzek, Deputy Director General of PKA's Office MSc Izabela Kwiatkowska Sujka, Deputy Director General of PKA's Office
11.00 – 12.30	Private meeting among panel members to agree on the main findings	
12.30 – 14.00	Lunch (panel only)	
14.00 – 14.20	Final de-briefing meeting with staff and Council/Board members of the agency to inform about preliminary findings	prof. dr hab. Krzysztof Diks, President of PKA prof. dr hab. Łukasz Sułkowski, Vice- President of PKA prof. dr hab. Maria Próchnicka, Secretary General of PKA MSc Barbara Wojciechowska, Director General of PKA's Office MSc Barbara Bryzek, Deputy Director General of PKA's Office MSc Izabela Kwiatkowska Sujka, Deputy Director General of PKA Office prof. dr hab. Marek Kowalski, Chairman of the Section for Ethics, member of the Section for Complaints and Motions prof. dr hab. Wojciech Satuła, Chairman of Appeals' Body prof. dr hab. Michał Kozakiewicz, member of PKA's Presidium prof. dr hab. Janusz Uriasz, member of PKA's Presidium MSc Maciej Markowski, Intenational advisor of PKA MSc Grzegorz Kołodziej, staff of PKA's Office MSc Karolina Martyniak, international officer Paweł Adamiec, PKA's students' expert, coordinator

ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

External review of the Polish Accreditation Committee (PKA) by the European Association for Quality Assurance in Higher Education (ENQA)

Annex I: TERMS OF REFERENCE

January 2018

1. Background and Context

PKA was established as the State Accreditation Committee on 1 January 2002 on the basis of the amended Higher Education Act of 1990 and currently operates on the basis of the 2005 Law on Higher Education, amended in 2011, and resulting Regulations of the Minister of Science and Higher Education. It is the only statutory body responsible for external quality assurance in all Polish HEIs which operate on the basis of Law on Higher Education. PKA is a quality assurance agency conducting systematic activities in order to enhance the quality of education. Evaluations conducted by PKA are obligatory and negative assessment of the Committee may cause suspension or withdrawal of authorisation to provide degree programme in a given field of study and at a given level of study on the basis of a decision of Minister responsible for higher education.

PKA's main functions include:

- conducting programme evaluations;
- giving opinions to the Minister of Science and Higher Education on (applications for):
 - the establishment of HEIs, including HEIs or branch campuses to be established by foreign HEIs;
 - the granting of authorisations to HEIs' units to provide first-, second- or long-cycle programmes with specific fields of study and profiles (in cases where a given unit is not authorised to award postdoctoral degrees or the field of study concerned covers an academic area and domains of science / fine arts which do not correspond to those where the unit is authorised to award postdoctoral degrees; for the extent of HEIs' curricular autonomy).

In other words, PKA conducts mandatory ex-post programme evaluations and gives opinions or acts in an advisory capacity to the Minister of Science and Higher Education as part of what may be called ex-ante programme evaluation / accreditation (though the term 'evaluation' or 'accreditation' is not used in law to refer to this process). Additionally, it gives opinions to the Minister on matters related to: the re-granting to HEIs' units of suspended authorisations to provide first-, second- or long-cycle programmes; the compliance of first, second- and long-cycle programmes with the conditions for the provision of programmes laid down in national legislation; and the quality of education at HEIs' units applying for an authorisation to award doctoral and postdoctoral degrees.

National legislation sets a general framework for PKA's activities, including ex-post evaluations and the assessment of applications concerning the establishment of HEIs and programmes as part of ex-ante evaluation. However, pursuant to Law on Higher Education, PKA is free to determine detailed criteria and procedures for evaluation / assessment and to appoint experts or reviewers.

PKA's term of office is four years. The Agency may include 80 to 90 members who may be only academic staff holding at least a doctoral degree and employed at an HEI as the place of primary employment, except that the President of the Students' Parliament of the Republic of Poland (SPRP,

a national student organisation) is a PKA member by virtue of law. Besides, under the law the representatives of employers' organizations are also appointed to the PKA bodies and sections.

PKA has been a full member of ENQA and has been registered in EQAR since 2009, a member of several multilateral networks, including CEENQA since 2002, of ECA and INQAAHE since 2005. It has also signed bilateral cooperation agreements with a number of accreditation agencies across Europe.

PKA has been a member of the European Association for Quality Assurance in Higher Education (ENQA) since 2009 and is applying for renewal of membership.

PKA has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2009 and is applying for renewal of EQAR registration.

2. Purpose and Scope of the Evaluation

This review, will evaluate the way in which and to what extent PKA fulfils the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of PKA should be reconfirmed/granted and to EQAR to support PKA application to the register.

The review panel is not expected, however, to make any judgements as regards granting membership.

2.1 Activities of PKA within the scope of the ESG

In order for PKA to apply for ENQA membership and for registration in EQAR, this review will analyse all activities of PKA that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is regardless of whether these activities are carried out within or outside the EHEA, and whether they are obligatory or voluntary.

The following activities of PKA have to be addressed in the external review:

- programme evaluations; (ex-post)
- opinions to the Minister of Science and Higher Education on (applications for): the establishment of HEIs, including HEIs or branch campuses to be established by foreign HEIs or/and the granting /re-granting of authorisations to HEIs' units to provide first-, second- or long-cycle programmes (ex-ante)

3. The Review Process

The process is designed in the light of the *Guidelines for ENQA Agency Reviews* and in line with the requirements of the *EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-assessment by PKA including the preparation of a self-assessment report;
- A site visit by the review panel to PKA;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow-up of the panel's and/or ENQA Board's recommendations by the agency, including a voluntary follow-up visit.

3.1 Nomination and appointment of the review team members

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

The panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA expectations are met throughout the process. The ENQA staff member will not be the Secretary of the review and will not participate in the discussions during the site visit interviews.

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

ENQA will provide PKA with the list of suggested experts with their respective curriculum vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards the PKA review.

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

PKA is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which PKA fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat who has 4 weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the ENQA Guidelines for External Review of Quality Assurance Agencies, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to reject the report and ask for a revised version within 4 weeks. In such cases, an additional fee of 1000 € will be charged to the agency.

- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

3.3 A Site Visit by the Review Panel

PKA will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel at least two months before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is 2,5 days. The approved schedule shall be given to PKA at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by PKA in arriving in Warsaw, Poland

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the granting or reconfirmation of ENQA membership.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings with regards to each ESG. A draft will be first submitted to the ENQA review coordinator who will check the report for consistency, clarity and language and it will be then submitted to PKA within 11 weeks of the site visit for comment on factual accuracy. If PKA chooses to provide a statement in reference to the draft report it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter the review panel will take into account the statement by PKA, finalise the document and submit it to ENQA.

The report is to be finalised within three months of the site visit and will not exceed 40 pages in length.

When preparing the report, the review panel should also bear in mind the *EQAR Policy on the Use and Interpretation of the ESG*, so as to ensure that the report will contain sufficient information for the Register Committee for application to EQAR.

PKA is also requested to provide a letter addressed to the ENQA Board outlining its motivation applying for membership and the ways in which PKA expects to contribute to the work and objectives of ENQA during its membership. This letter will be discussed along with the final evaluation report.

4. Follow-up Process and Publication of the Report

PKA will consider the expert panel's report and will publish it on its website once the ENQA Board has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. PKA commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting a follow-up report to the ENQA Board. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

The follow-up report will be complemented by a small-scale visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered as of particular importance or challenge by PKA. Its purpose is entirely developmental and has no impact on the judgement of membership and/or compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

5. Use of the report

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

The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether PKA has met the ESG and can be thus admitted/reconfirmed as a member of ENQA. The report will also be used for registration on EQAR, and is designed so as to serve these two purposes. However, the review report is to be considered final only after being approved by the ENQA Board. Once submitted to PKA and ENQA and until it is approved by the Board the report may not be used or relied upon by PKA, the panel and any third party and may not be disclosed without the prior written consent of ENQA. PKA may use the report at its discretion only after the Board has approved of the report. The approval of the report is independent of the decision on membership.

The Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

6. Budget

PKA shall pay the review related fees as specified in the agreement between the external review coordinator and the PKA.

It is understood, that the fee of the follow-up visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it.

In the event of a second site visit required by the ENQA Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, additional fees will be charged.

7. Indicative Schedule of the Review

Agreement on terms of reference	January 2018
Appointment of review panel members	January/February 2018
Self-assessment completed	By the end of February 2018
Pre-screening of SAR by ENQA coordinator	March 2018
Preparation of site visit schedule and indicative timetable	April 2018
Briefing of review panel members	May 2018
Review panel site visit	Late May/Early June 2018
Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	July 2018
Draft of evaluation report to PKA	August 2018
Statement of PKA to review panel if necessary	August 2018
Submission of final report to ENQA	By Mid-September 2018
Consideration of the report by ENQA Board and response of PKA	October 2018
Publication of report	October/November 2018

ANNEX 3: GLOSSARY

CRASP	Conference of Rectors of Academic Schools in Poland
ENQA	European Association for Quality Assurance in Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	higher education
HEI	higher education institution
LoHE	Law on Higher Education
MoHE	Ministry of Higher Education
PKA	Polish Accreditation Committee (<i>Polish: Polska Komisja Akredytacyjna</i>)
QA	quality assurance
RCHEIP	Conference of Rectors of Non-University Higher Education Institutions in Poland
SAR	self-assessment report

ANNEX 4: DOCUMENTS TO SUPPORT THE REVIEW

DOCUMENTS PROVIDED BY PKA

Before the site visit as Annex to the SAR

- The Statutes of PKA including evaluation criteria and conditions for awarding ratings
- Law on Higher Education
- Mission Statement
- The Statutes of PKA - matrix of changes since the last external review
- Strategy for the period 2017-2020
- Mapping of PKA's international activities
- Code of Ethics
- Quality Management System
- Templates for self-assessment report, site visit report, report on corrective measures
- Rules for conducting site visits
- List of training for PKA members and experts in the years 2015 - 2017
- Regulations of the Section for Ethics
- Rules and criteria for the selection of PKA experts
- PKA Follow-up Report
- Opinions of Stakeholders on PKA's SAR and its activity:
 - Ministry of Science and Higher Education
 - General Council for Science and Higher Education
 - Conference of Rectors of Academic Schools in Poland
 - Conference of Rectors of Non-University Higher Education Institutions in Poland
 - Students' Parliament of the Republic of Poland
 - National Chamber of Commerce
- Mapping detailed criteria against ESG standards, Part 1

Before the site visit at the request of the panel

- Agenda of a meeting of PKA plenary
- Agenda of a meeting of PKA Presidium
- Sample of minutes of the committees (section, Presidium, plenary)
- Reports or minutes that document the outcomes of described internal quality assurance
- Document explaining the composition & role of the mentioned advisory board
- List of members of PKA
- 4 sample expert teams from procedures (team composition)

During the site visit

- Statistic on the number of appeals and their outcome 2014-2017
- Exemplary schedules of a site visit
- sample for a report with the edits of the Secretary General

OTHER SOURCES USED BY THE REVIEW PANEL

- The website of the Ministry for Education in Poland
- The website of the Agency – PKA



THIS REPORT presents findings of the ENQA Agency Review of the Polish Accreditation Committee (PKA), undertaken in 2018.



2018 ENQA AGENCY REVIEW