

POLISH
ACCREDITATION
COMMITTEE



SELF-ASSESSMENT
REPORT

WARSAW, 2018

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1. Introduction

Article 1(4) of the Statutes of the Polish Accreditation Committee (*Polish: Polska Komisja Akredytacyjna (PKA)*) ([Appendix no. 1](#)) stipulates that the activities of the Committee are subject to external review at least once every five years in accordance with the operational arrangements for accreditation agencies working within the European Higher Education Area.

In 2008 and 2013, the Polish Accreditation Committee was subjected to external review by a panel of international experts. The strategic goal of the review was obtaining/renewing full membership in ENQA and registration in EQAR. The awarded positive rating resulted in making the Committee more credible to Polish HEIs as an external quality assurance agency, which applies procedures and methodology, which are comparable with those adopted by recognized accreditation agencies, and observes European standards. In response to comments included in the last report, and in 2014, the Polish Accreditation Committee adopted a Follow-up Action Plan, which provides for complying with the recommendations of the panel of external experts. As a result of the external review held in early 2009, PKA obtained and has maintained full membership in ENQA and has been registered in EQAR.

Just like in the previous years, the third external review of the activities of the Polish Accreditation Committee held in 2018 aims at confirming full membership in ENQA by specifying the degree to which PKA meets the European Standards and Guidelines for Quality Assurance in European Higher Education Area (ESG), as stipulated in Part 2 and 3 thereof, and equivalent EQAR standards, which will allow for renewing the registration in EQAR.

Over this time, legal regulations pertaining to Polish higher education have been repeatedly changed. The dynamics of changes, particularly these in the scope of legal regulations, has resulted in the need for the Polish Accreditation Committee to adapt to the new requirements. Having regard to the above, the self-assessment report presents the role PKA plays in the higher education system in Poland after the subsequent amendments of Polish Law on Higher Education. The new legal context, in which PKA currently operates has been accompanied by the emergence of new challenges for the operations of the institution. The Polish Accreditation Committee has made best efforts in order to assure that the new approach to the evaluation process, which at present involves only one path, i.e. programme evaluation, is understood by all the stakeholders.

The Polish Accreditation Committee believes that the external review contributes to greater effectiveness of its internal quality assurance system, because the external review allows to identify the weaknesses, which were not noticed by PKA and to indicate the directions for the development of the Committee, also in the context of the professionalisation of accreditation agencies operating in the European Higher Education Area.

2. Development of the Self-Assessment Report (SAR)

Organisational measures related to the external review were taken in parallel with the process of the Committee's self-assessment. In the second half of 2017, a seven-strong team 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's staff conducted self-assessment of the Polish Accreditation Committee. The goal of the self-assessment was to make a reliable and comprehensive analysis of the Committee's activities, primarily from the angle of the observance of the ESG 2015 and ENQA/EQAR membership criteria, and to identify the strengths and weaknesses of the Committee's operations, along with potential opportunities and threats, based on facts and supporting documents. Therefore, the self-assessment process has been complemented by a SWOT analysis, which was prepared in consultation with the management and members of PKA.

Moreover, it should be emphasised that PKA always treats the self-assessment process as an exercise in acquiring self-awareness concerning its organisational structure, objectives, strategies,

activities, and the implications of available solutions aimed at making informed choices when facing new challenges in the area of higher education and quality assurance. Due to the fact that self-assessment is inherently a subjective analysis, PKA strived at its objectivisation by confronting opposing points of view. For this purpose, representatives of various circles, including persons representing different bodies and sections operating within PKA and experts who cooperate with the Committee (students, employers) were included in the self-assessment process. The inclusion of a large number of people in the self-assessment report consultation process was of paramount importance to PKA. The draft self-assessment report was the subject of internal consultations within PKA (Presidium, Sections, the Appeals Body, the Ethics Team, PKA Bureau, experts) and external consultations (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, Conference of Rectors of Public Non-University Higher Education Institutions in Poland, the Polish Chamber of Commerce, Students' Parliament of the Republic of Poland). The final version of the self-assessment report was approved at the plenary session of the Committee held on 22 February 2018 and at the beginning of March 2018 submitted to the Secretariat responsible for the coordination of the ENQA external review process.

3. Higher education and QA in higher education in the context of the Agency's operations

3.1. Institutional Structure.¹

Act of 27 July 2005 Law on Higher Education constitutes the legal basis for providing higher education programmes in Poland. ([Appendix no. 2](#)). Public (state-run) higher education institutions and since 1990 non-public (private) HEIs operate in Poland. Public HEIs are founded by the state represented by a relevant state authority or public administration agency, whereas non-public schools can be established by natural or legal persons other than state and local authority entities.

Both groups include university- and non-university-type higher education institutions. Pursuant to the act, 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 by the political transformation 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. In the academic year 2011/2012, there were 328 non-public higher education institutions in Poland. From that point, you can observe a gradual drop in their number, as evidenced by the data pertaining to academic years 2011/2012 - 2016/2017 presented in Table 1 and 2 and in Figure 1. Starting in 1997, public non-university higher education institutions have also been founded, whose main task is to educate students by providing to them programmes and professional specialisations, which supplements specialist knowledge and develops occupational skills. They also offer occupational re-training programmes. In accordance with data contained in the Integrated System of Information on Science and Higher Education POL-on², the system of

¹ Developed on the basis of the report entitled Operations of PKA in 2016 (Polish: Działalność PKA w 2016 roku), chapter entitled The Structure of Higher Education.

² **The Integrated System of Information on Science and Higher Education POL-on** has been commissioned by the Ministry of Science and Higher Education in 2011 as a tool for formulating an effective policy in the field of science and higher education. POL-on collects data about all Polish academic units, to which public access is granted in accordance with the laws and regulations adopted by the Ministry of Science and Higher Education (higher education institutions' registers, information about degree programmes and training profiles, aggregated numerical data on students, academic staff, etc.). The system also collects information about laboratories and research equipment, library collections, investments made,

higher education in Poland, as February 2017, includes 407 higher education institutions, including 134 public HEIs, 265 non-public HEIs founded by natural or legal persons other than the state and local authority entities and 8 church-administered HEIs run by the Catholic Church, other churches and religious communities on the basis of regulations on the relationship between the state and the Catholic Church in the Republic of Poland and regulations on the relationship between the state and other churches and religious communities. In recent years, the number of public and church-run HEIs has remained unchanged and amounts to 134 and 8 accordingly. Data for the past three academic years is presented in Table 1.

Table 1. The number of public, non-public and church-run HEIs³ and their percentage share in the total number of higher education institutions in Poland

	Public HEIs	Non-public HEIs	Church-run HEIs	Σ
2014/2015	134	295	8	437
	30.66%	67.51%	1.83%	100%
2015/2016	134	281	8	422
	31.7%	66.5%	1.8%	100%
2016/2017	134	265	8	407 ⁴
	33%	65%	2%	100%

Source: GUS Reports: Higher Education Institutions and their Finances; The Integrated System of Information on Science and Higher Education POL-on. (February 2017)

Table 2. The number of non-public HEIs in subsequent academic years

	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017
Total	328	321	306	295	281	265

Source: GUS Reports: Higher Education Institutions and their Finances; The Integrated System of Information on Science and Higher Education POL-on (February 2017).

Non-university HEIs (36) form the largest group of public HEIs. They are followed by: universities and higher education institutions for the arts and by technical HEIs. Universities are higher education institutions whose academic units are authorised to confer the degree of doktor in at least ten disciplines, including in at least two fields of science from each of the following groups:

- humanities, law, economics and theology;
- mathematical sciences, physical sciences, earth sciences and technological sciences;
- biological, medical, chemical, pharmaceutical, agricultural or veterinary sciences.

The HEIs whose name has been supplemented by an adjective(-s) defining their profile were not included in the group of universities. These are the HEIs whose academic units have the authority to confer the degree of doktor in at least ten disciplines, including in at least four in the scope of fields of science included in their profiles. Depending on their profile, they have been included in the group of higher education institutions for the arts, economics, medical sciences, pedagogy or agricultural and natural sciences. The group of universities of technology includes academic units, which have the authority to confer the degree of doktor in at least ten disciplines, including in at least six fields of technological sciences. The distribution of public higher education institutions according to their type is presented in Table 3.

Table 3. Public higher education institutions by type

scientific projects, publications, patents and achievements of HEIs aimed at the promotion of science. You can also find there indicators used for the assessment of higher education institutions. Access to certain parts of the system is limited to public administration staff.

³ The classification adopted in the POL-on. system

⁴ Due to the fact that the Catholic University of Lublin is included in the POL-on classification both in the category of public HEIs and church-run HEIs, the presented number is lower than the total, which would result from the sum of individual HEI categories presented in the Table.

Type of HEI ⁵	The number of HEIs	Percentage share of a given type of HEI in the number of public HEIs
Non-university	36	26.87%
HEI for Arts	19	14.18%
University	19	14.18%
Technical University	18	13.43%
Medical University	10	7.46%
HEI for Agriculture/Natural Sciences	6	4.48%
Physical Education University	6	4.48%
HEI for Economics	5	3.73%
Pedagogical University	5	3.73%
Military HEI	5	3.73%
HEI for Maritime Studies	2	1.49%
Public services HEI	2	1.49%
Theological HEI	1	0.75%

Source: GUS Reports: Higher Education Institutions and their Finances; The Integrated System of Information on Science and Higher Education POL-on. (February 2017)

The dynamic growth of the number of HEIs has been 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, which has resulted in changes in the structure of higher education in Poland. As presented in the Table below, the number of students in the academic year 2016/2017 as compared to their number in the academic year 2005/06 is lower by more than 30% and amounts to 1.318.500. Table 4 illustrate the decline in the number of students in the academic years 2011/2012 - 2016/2017.

Table 4. The number of students in individual academic years

		2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017
Public HEIs	Full-time	876,744	886,420	860,230	851,189	838,651	799,924
	Part-time	369,120	331,057	291,085	259,019	236,548	227,894
Non-public	Full-time	88,519	83,715	79,525	78,313	80,301	67,030
	Part-time	429,677	375,735	319,037	280,865	249,633	223,605
Total		1,764,060	1,676,927	1,549,877	1,469,386	1,405,133	1,318,453

Source: GUS Reports: Higher Education Institutions and their Finances; The Integrated System of Information on Science and Higher Education POL-on. (February 2017)

The regulation of the Minister of Science and Higher Education of 7 December 2016 amending the regulation on the methods of allocating state budget subsidies to public and non-public higher education institutions (OJ of 2016, item 2016), and resulting from it changes in the method of calculating subsidies for HEIs caused by the introduction of the reference number of students per

⁵ The classification adopted in the POL-on system.

one academic teacher amounting to 13 is another factor, which can result in a further reduction in the number of students at public HEIs in subsequent years.

When analysing the trends resulting from the above changes, you should take into consideration a positive phenomenon, which is an increase in the number of students coming from abroad. Starting from the academic year 2000/2001, when the number of international students in Poland amounted to 5,202, you could observe a huge surge in their numbers reaching 62,434 in the winter semester of the academic year 2016/2017. Relevant data in this respect is presented in Table 5.

Table 5. The number of international students in individual academic years

Academic Year	Number of international students
2000/2001	6,563
2001/2002	7,380
2002/2003	7,608
2003/2004	8,106
2004/2005	8,829
2005/2006	10,092
2006/2007	11,752
2007/2008	13,695
2008/2009	15,862
2009/2010	17,000
2010/2011	21,474
2011/2012	24,253
2012/2013	29,172
2013/2014	35,983
2014/2015	46,101
2015/2016	57,119
2016/2017	62,434

Source: GUS Reports: Higher Education Institutions and their Finances; The Integrated System of Information on Science and Higher Education POL-on. (February 2017)

In accordance with the applicable provisions of the Law on Higher Education, higher education institutions can provide education as part of programmes with general or practical profiles. The characteristics of the two profiles and the main differences between them are presented in the table below.

Table 6. Description of practical and general profiles and main differences between them

Practical profile	General profile
DEFINITION	
degree profile - either practical or general profile (Article 2(1)(18e) of the Law on Higher Education).	
practical profile – a profile of a study programme that includes modules aimed 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 (Article 2(1)(18e) of the Law on Higher Education).	general profile – a profile of a study programme that includes modules corresponding with research carried out at a higher education institution, based on the assumption that more than one half of a degree programme defined based on ECTS credits includes activities aimed at ensuring that students gain in-depth knowledge (Article 2(1)(18eb) of the Law on Higher Education).
STUDY PROGRAMME	
A study programme of a degree programme with practical profile includes modules related with initial	A study programme of a degree programme with general profile includes modules related with

<p>practical training, to which ECTS credits are assigned in an amount exceeding 50% of the ECTS credits referred to in Section 1 (2), which serve the purpose of acquiring practical skills and social competences by the students (Article 4(4)(1) of the regulation of the Minister of Science and Higher Education of 26 September 2016 on the conditions for providing degree programmes).</p>	<p>research conducted in the area of science or arts related with a particular field of study, to which ECTS credits are assigned in an amount exceeding 50% of the ECTS credits referred to in Section 1 (2), which serve the purpose of acquiring by the students extended knowledge and skills in conducting research. (Article 4(4)(1) of the regulation of the Minister of Science and Higher Education of 26 September 2016 on the conditions for providing degree programmes).</p>
STUDENT PLACEMENTS	
<p>An academic unit of a higher education institution that provides a programme in a specific field and level of study with a practical profile is obliged to include in the study programme student placements lasting at least three months. Such a unit can organise alternate training in the form of traditional classes taught at the HEI and practical training with employers, allowing to achieve all learning outcomes intended for the degree programme for that field and level study and for that degree profile (Article 11(9) of the Law on Higher Education; Article 7(1)(2c) of the regulation of the Minister of Science and Higher Education of 26 September 2016 on the conditions for providing degree programmes).</p>	<p>A study programme of a field and level study and for a degree profile shall, among other things, specify: the number of hours, rules for and forms of student placements organised as part of degree programmes with practical profile, and in the case of degree programmes with general profile - if the study programme of such a degree programme provides for student placements - as well as the number of ECTS credits that students must earn as part of such placements (Article 4(1)(8) of the regulation of the Minister of Science and Higher Education of 26 September 2016 on the conditions for providing degree programmes).</p>
TEACHING COURSES	
<p>1. Courses related to initial practical training included in the study programme of degree programmes with practical profile shall be provided:</p> <ol style="list-style-type: none"> 1) in conditions adequate for a given scope of professional activities; 2) in a way that allows the performance of practical activities by students; 3) by persons, the majority of whom have professional experience acquired outside of the higher education institution, which corresponds to the scope of courses taught (Article 5(1) of the regulation of the Minister of Science and Higher Education of 26 September 2016 on the conditions for providing degree programmes). 	<p>2. Courses related to a specific science or artistic discipline are taught by academic staff members with research or artistic achievements in this discipline (Article 5(2) of the regulation of the Minister of Science and Higher Education of 26 September 2016 on the conditions for providing degree programmes).</p>
MINIMUM STAFF RESOURCES / CORE STAFF	
<p>Academic staff members may be included in the minimum staff resources for a particular degree programme with a practical profile, if they have academic or artistic achievements in the area of knowledge corresponding to the area of study indicated for this field of study, in the scope of one of the academic or artistic disciplines, to which the learning outcomes of this field of study refer, and which allow for the implementation of the study programme or possess professional experience gained outside the higher education institution relating to the skills specified in the statement of learning outcomes for this field of study. (Article 11(1)(2) of the regulation of the Minister of Science</p>	<p>Academic staff members may be included in the minimum staff resources for a particular degree programme with a general profile, if they have academic or artistic achievements in the area of knowledge corresponding to the area of study indicated for this field of study, in the scope of one of the academic or artistic disciplines, to which the learning outcomes of this field of study refer, (Article 11(1)(1) of the regulation of the Minister of Science and Higher Education of 26 September 2016 on the conditions for providing degree programmes).</p>

and Higher Education of 26 September 2016 on the conditions for providing degree programmes).

Source: Authors

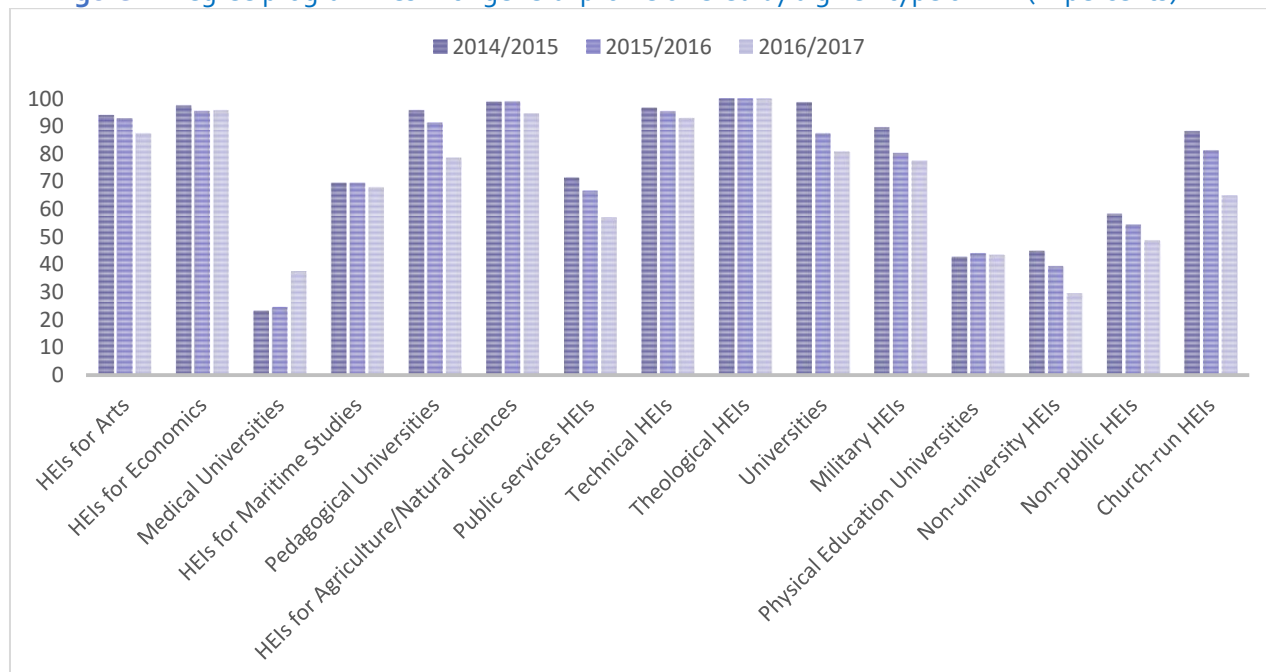
Table 7. Degree profiles

	Practical profile	General profile	Σ
2014/2015	1,225	3,574	4,799
	25.53%	74.47%	100%
2015/2016	1,447	3,715	5,162
	28.03%	71.97%	100%
2016/2017	2,012	3,831	5,843
	34.43%	65.57%	100%

Source: GUS Reports: Higher Education Institutions and their Finances; The Integrated System of Information on Science and Higher Education POL-on. (February 2017)

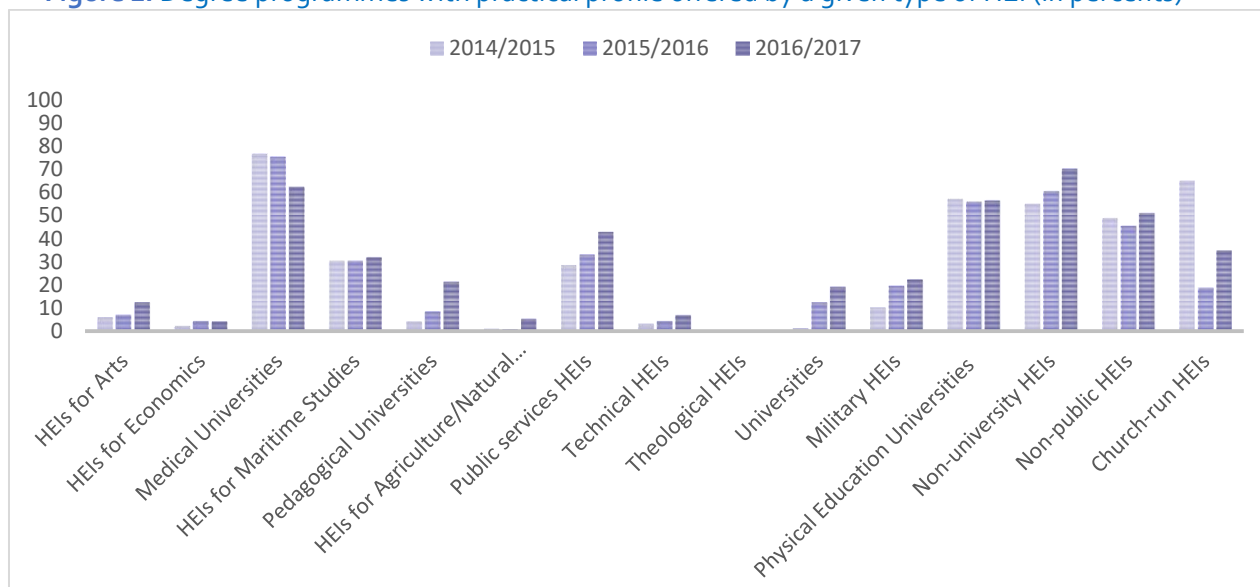
Since the introduction of changes resulting from the amendment of the Law on Higher Education of 2014, which stipulates that academic units, which are not authorised to confer the degree of doktor or do not have a positive rating of education quality resulting from an evaluation of a given degree programme by the Polish Accreditation Committee is obliged to provide degree programmes with practical profile, we can observe the decline in the number of so far prevailing general degree profiles. Detailed changes in this scope are presented in the form of a compilation of data in Table 7. On the basis of this data, you can note an important change in the ratio of general to practical profiles in the overall number of degree programmes, i.e. 74.47% to 25.53% in the academic year 2014/2015 and 65.57% to 34.43 in the academic year 2016/2017. Moreover, it should be emphasised that in the group of practical degree profiles, their number has grown by nearly 65% within three years, whereas the number of general degree profiles has increased only by about 7%. Over this time, among newly established degree programmes, the share of these with practical profile amounted to approx. 75% and those with general profiles amounted to approx. 25%. Figure 1 and 2 present data on individual degree profiles offered by different types of HEIs.

Figure 1. Degree programmes with general profile offered by a given type of HEI (in percents)



Source: The Integrated System of Information on Science and Higher Education POL-on. (February 2017)

Figure 2. Degree programmes with practical profile offered by a given type of HEI (in percents)

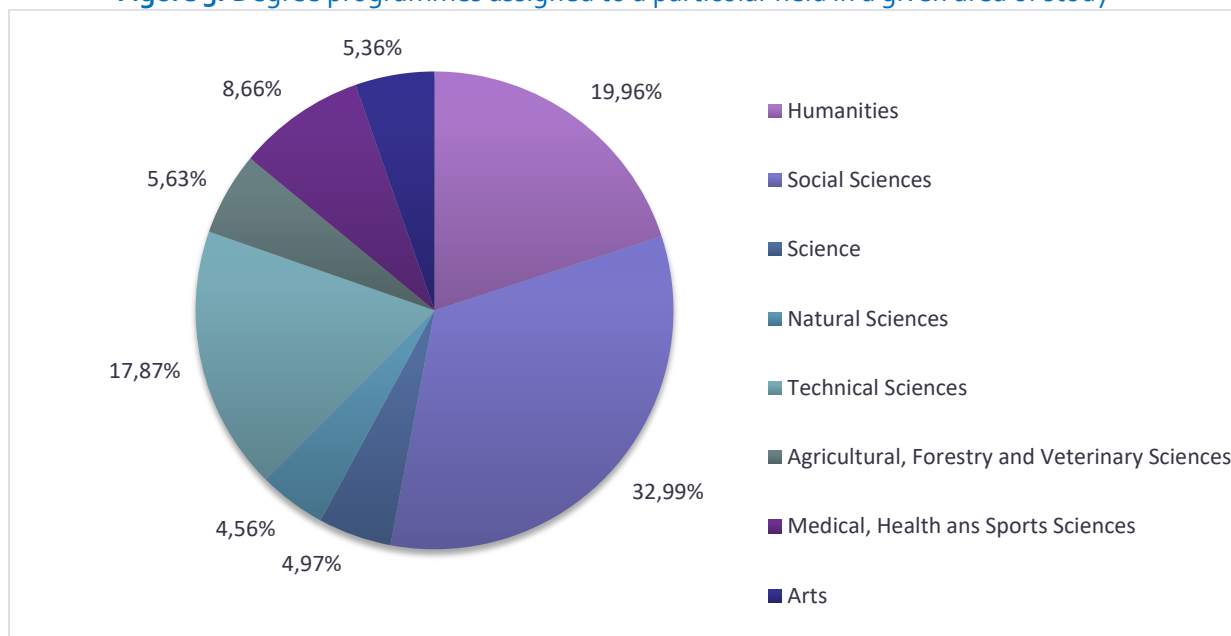


Source: The Integrated System of Information on Science and Higher Education POL-on. (February 2017)

The comparison of the changing ratios of degree profiles of individual programmes shows that from the entry into force of the amended law in 2014 to the academic year 2016/2017, the biggest change in the group of public HEIs was observed in the university category, where the proportion of general to practical profile shifted from 98.7% to 1.3% in the academic year 2014/2015 to 80.8% to 19.2 % in the academic year 2016/2017 (an increase in the share of degree programmes with practical profile by 17.9%). A significant growth in the percentage of programmes with practical profile was also observed in the category of pedagogical HEIs (17.1%), non-university HEIs (15.3%), public services HEIs (14.3%), military HEIs (12%) and HEIs for arts (6.6%), HEIs for agricultural and natural sciences (4.3%), technical HEIs (3.7%), HEIs for economics (1.7%) and HEIs for Maritime Studies (1.6%). Very important changes have also been observed in the group church-run HEIs, where the share of practical profile programmes increased by 23.2%, whereas in the group of non-public HEIs the growth amounted to 9.5%. Opposite to trend forecast, a slight decrease in the share of programmes with practical profile was observed at medical schools (14.3%) and physical education universities (0.6%). In the group of public theological HEIs, all degree programmes are invariably offered as programmes with general profile.

In accordance with binding regulations, an academic unit of a HEI can provide a degree programme if the Senate of the HEI has specified the name of the field of study consistent with the intended learning outcomes, level and mode of study, degree profile and has assigned the field of study to an area or areas of study and specified academic or artistic areas and disciplines, to which the learning outcomes of a particular field of study refer. When determining the thematic scope of the degree programme it designs, a HEI assigns it to a particular area or areas of study, choosing from among the following areas: the humanities, social sciences, science, natural sciences, technical sciences, agricultural, forestry and veterinary sciences, medical, health and physical education sciences, and to the area of arts. If a degree programme has been assigned to more than one area of study, the HEI has to indicate the percentage share of the number of ECTS credits assigned to each area in the number of ECTS credits required for being awarded a qualification corresponding to a given level of education. In addition, assigning a degree programme to several areas of study involves additional requirements for human resources needed for the implementation of the education process to be met by the HEI. Each area of study to which a field of study has been assigned, should be represented in the minimum staff resources by at least one academic staff member with achievements in the area of knowledge corresponding to the area of study.

Figure 3. Degree programmes assigned to a particular field in a given area of study



Source: The Integrated System of Information on Science and Higher Education POL-on. (February 2017)

The summary of the data shows that invariably the largest number of degree programmes is assigned to the area of social sciences, followed by the humanities, technical, medical and health sciences, physical education sciences, agricultural, forestry and veterinary sciences, arts, science and natural sciences. The analysis of applications for the establishment of degree programmes submitted to the Polish Accreditation Committee in 2016 shows that learning outcomes related mainly to the area of social sciences, followed by medical and health sciences, physical education sciences, technical sciences, the humanities, natural, agricultural, forestry and veterinary sciences, the arts and science. A strong growth in the number of opinions on granting HEIs or their academic units authorisation to provide degree programmes in the fields of study assigned to the area of medical and health sciences and the area of physical culture sciences, which were submitted by PKA to the minister competent for higher education in the academic year 2016/2017, indicates that the prevalence of applications concerning the area of social sciences will no longer be the case as a result of changes in preferences in the labour market.

3.2. Degree structure

Holding a secondary education graduation certificate (świadectwo dojrzałości) is a precondition for entering first cycle or long cycle programmes.

Table 8. Description of individual levels of education

Level of study	Definition	Length and number of ECTS	Qualifications
First Cycle Programmes	a mode of education, to which candidates holding secondary education graduation certificates are admitted and upon graduation from which first cycle qualifications are awarded	In order to obtain a first cycle higher education diploma students are obliged to accumulate at least 180 ECTS credits. First cycle programmes leading to the award of a degree of licencjat comprise a minimum of six semesters, and first cycle programmes leading to the award of a degree of inżynier	<ul style="list-style-type: none"> • licencjat (bachelor's) degree • inżynier (engineering) degree • a degree equivalent to licencjat or inżynier

		shall comprise a minimum of seven semesters.	
Second Cycle Programmes	a mode of education, to which candidates holding at least first cycle qualifications are admitted and upon graduation from which second cycle qualifications are awarded	In order to obtain a second cycle higher education diploma students are obliged to accumulate at least 90 ECTS credits. Second cycle programmes comprise from three to five semesters.	<ul style="list-style-type: none"> • magister (master's) degree • magister inżynier (master of science in engineering) degree • a degree equivalent to magister or magister inżynier degree (e.g. lekarz -- M.D.)
Long cycle programmes	a mode of education, to which candidates holding secondary education graduation certificates are admitted and upon graduation from which second cycle qualifications are awarded.	In order to obtain a long cycle higher education diploma students are obliged to accumulate at least 300 ECTS credits during a five-year programme and 360 ECTS credits during a six-year programme.	
Third Cycle Programmes	Doctoral programmes offered by an authorised academic unit of a HEI, a research institute of Polish Academy of Sciences, a research institute or an international institute operating in the Republic of Poland established based on distinct regulations, to which candidates holding second cycle qualifications are admitted and upon graduation from which third cycle qualifications are awarded.	ECTS 30-45	<ul style="list-style-type: none"> • The degree of doktor in a given academic area of study in a given academic discipline or doktor sztuki in a given artistic discipline.
Post-graduate Programmes	a mode of education, to which candidates holding at least first cycle qualifications are admitted offered by a HEI, a research institute of Polish Academy of Sciences, a research institute or a medical centre offering postgraduate programmes, upon graduation from which postgraduate qualifications are awarded.	A programme lasts at least 2 semesters and at least 30 ECTS credits are awarded.	<ul style="list-style-type: none"> • varied

Source: Authors

Studies can be offered in the form of full time and part-time programmes.⁶ Detailed rules for the establishment of HEIs, both public and non-public ones, and the fields of study have been stipulated in the act of 27 July 2005 Law on Higher Education. In accordance with Article 4(1) of the act, HEIs are autonomous in all areas of their activity pursuant to the rules laid down in the act.

⁶**Full-time programmes** – a mode of studies, where at least 50% of the programme is offered in the form of classes that require direct participation of academic teachers and students.

Part-time programmes – a mode of study other than full-time, as specified by the senate of a higher education institution.

3.3. National Qualifications Framework / Polish Qualifications Framework⁷

In accordance with the law on higher education, HEIs enjoy full autonomy in the scope of the development of study programmes. In the years 2011-2015, the regulation of the Minister of Science and Higher Education of 2 November 2011 on the National Qualifications Framework for Higher Education and the Regulation of the Minister of Science and Higher Education of 5 October 2011, as amended by the regulation of 3 October 2014 on the conditions for the provision of degree programmes in a specific field and at a specific level of study constituted the basis for the development of study programmes. The regulation on NQF stipulated learning outcomes for first- and second cycle programmes, both for general and practical profiles and for areas of study. HEIs have been authorised to attest qualifications in a form of a diploma in accordance with the adopted template.

The act of 22 December 2015 on the Integrated Qualifications System entered into force on 15 January 2016. The system forms a distinct part of the National Qualifications System, which includes standards for describing qualifications and assigning levels of Polish Qualifications Framework to them; rules for incorporating qualifications in the Integrated Qualifications System and recording them in the Integrated Qualifications Register; and the rules and standards for qualifications certification and quality assurance in the scope of qualifications awarding, as specified in the act. The Integrated Qualifications System covers a large part of Polish qualifications, which are incorporated into it by virtue of the act and can be added to it pursuant to decisions of competent ministers. Polish Qualifications Framework has 8 levels, and each one of them represents general requirements to be met in order to obtain qualification at a given level. Levels 6 to 8 relate directly to qualifications awarded in the higher education system, where:

- level 6 is assigned to full qualifications awarded upon the completion of first cycle studies;
- level 7 is assigned to full qualifications awarded upon the completion of second cycle studies;
- level 8 is assigned to full qualifications awarded upon the completion of third cycle studies;
- level 6 or 7 is assigned to partial qualifications awarded upon the completion of post-graduate programmes.

Since 2016, the regulation of the Minister of Science and Higher Education of 26 September 2016 on the second stage descriptors of Polish Qualifications Framework typical for qualifications awarded in higher education after the award of full qualification at level 4 - levels 6-8 issued on the basis of an authorisation included in the act on the Integrated Qualifications System and the regulation of the Minister of Science and Higher Education of 26 September 2016 on the conditions for providing degree programmes form the basis for the establishment of degree programmes. In the regulation on the second stage descriptors of Polish Qualifications Framework, learning outcomes for first- and second cycle programmes were determined (both in relation to general and practical profile), and for third cycle programmes, as well. It should be noted, however, that statements of intended learning outcomes relating to individual degree programmes developed by the HEIs on the basis of previous legislation can still apply.

Degrees and documents attesting qualifications to be acquired as part of first cycle, second cycle and long-cycle (magister) study programmes and as part of third cycle programmes have been stipulated in the Regulation of the Minister of Science and Higher Education of 10 February 2017 on degrees awarded to graduates, conditions for their award and indispensable elements of higher education graduation diplomas and post-graduate studies completion certificates and a specimen diploma supplement, and in the regulation of the Minister of Science and Higher Education of 10 February 2017 on education in doctoral programmes in HEIs and academic units.

⁷ **Polish Qualifications Framework** - a description of eight levels of qualifications identified in Poland and corresponding to relevant levels of European Qualifications Framework. Each level is defined by general learning outcomes descriptors for qualifications at various levels divided into the category of knowledge, skills and social competences. Initially in Polish documents and studies on the qualifications framework, the term national qualifications framework was used.

3.4. Higher Education Quality Assurance System in Poland

Provisions of the Act of 27 July 2005, Law on Higher Education and relevant implementing acts constitute the basis for the operation of quality assurance system, which incorporates two parallel and complementing each other dimensions; internal and external quality assurance.

In accordance with the regulation of the Minister of Science and Higher Education of 12 July 2007 on education standards, HEIs have been obliged to ensure high quality education and to introduce internal quality assurance systems. After the amendment of the act in 2011, the obligation to have internal quality assurance systems in place has been stipulated in the regulation of 5 October 2011 on the conditions for the provision of degree programmes in a specific field and at a specific level of study, which states that *“an academic unit may provide first cycle programmes and second cycle programmes, if it has implemented an internal quality assurance system, including actions aimed at the improvement of the teaching programme in the field of study provided.”* This provision has been included in the regulation of the Minister of Science and Higher Education of 3 October 2014 on the conditions for the provision of degree programmes in a specific field and at a specific level of study. However, in accordance with the regulation of 26 September 2016 on the conditions for providing degree programmes, which is currently binding, *“an academic unit of a HEI can provide first cycle, second cycle or long-cycle degree programmes, if it takes - as part of an internal quality assurance system - systematic measures aimed at the assessment and improvement of the study programme, especially in the context of the needs of the social and economic stakeholders, including the labour market”*. Some of the elements of the system, such as student opinion questionnaires and periodical academic staff evaluations, have been defined in the Law on Higher Education as indispensable preconditions. Moreover, individual elements of the system have been identified in the detailed criteria for programme evaluation of the Polish Accreditation Committee, which stipulate that academic units under evaluation should have efficient internal education quality assurance systems in place. It should be noted that in accordance with the binding legislation, the minister for higher education defines by way of a regulation general criteria for programme evaluation, and detailed criteria for programme evaluation are specified in the Statutes adopted by the Committee. However, HEIs develop their own quality assurance systems, which provide for individual characteristics of a given HEI, its mission statement, education profile, students, staff, tradition and external conditions.

In the Law on Higher Education, the Polish Accreditation Committee was entrusted with external quality evaluations. The Committee was appointed as the sole body responsible for higher education, whose opinions and resolutions enjoy legal validity. Observing standards and guidelines for quality assurance in education in European Higher Education Area, and caring for the consistency of the national quality assurance system, PKA consistently strives at ensuring that quality assurance procedures also provide for the evaluation of the efficiency of internal quality assurance systems. Apart from PKA, peer committees also operate in the system of higher education in Poland. Competencies of each of them are limited to a given group of HEIs (e.g. technical universities, schools of economics, etc.), which when applying for accreditation specify the field of study and persons who are to do that. Subjecting to the evaluation of a peer committee is voluntary and negative assessment, which translates into the refusal to award a quality certificate, has no consequences. However, undergoing assessment by PKA is obligatory and negative evaluation brings consequences stipulated by law.

4. History, profile and activities of the Agency

4.1. Outline of History

The Polish Accreditation Committee (PKA) was established under the name of the State Accreditation Committee on 1 January 2002 pursuant to Article 38(1) of the Law on Higher Education of 12 September 1990 (OJ No. 65, item 385) amended on 20 July 2001. The Polish Accreditation Committee is an independent institution dedicated to quality assurance and

enhancing the quality of education. All Committee activities are governed by the principles of fairness, impartiality and transparency. The participation of women and men in PKA's works is balanced. Upon its establishment, PKA covered with its scope all public and non-public HEIs, both these founded based on the act of 26 June 1997 on non-university higher education institutions and those operating pursuant to the act of 12 September 1990 law on higher education. 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, yet unlike KAWSZ and RGSW, 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 by KAWSZ and RGSW. If one is to attempt making a historical analysis of the operations of PKA, you can divide its activities into four stages, which result mainly from subsequent amendments of legal regulations governing higher education sector in Poland. Thanks to expanding PKA's competencies so that it meets the requirements of evolving system of higher education and quality assurance in Poland, the subsequent amendments of law have strengthened the position of PKA in the system of higher education. Also the organisational structure of PKA was subject to change with subsequent stages of its development, however, the integrity of its objectives was preserved and expressed in its Mission Statement ([Appendix no. 3](#)).

Table 9. Outline of history of the Polish Accreditation Committee

Stage	PKA' term of office	Legal basis	Tasks
Stage 1 2002-2005	1. 2002-2004 2. 2005-2007	Act of 12 September 1990 Law on Higher Education	The minister responsible for higher education appointed the Polish Accreditation Committee for a three-year term of office, i.e. the years 2002-2004, from among candidates presented by HEIs, General Council for Higher Education, scientific, professional and artistic associations, as well as employers' organisations. Tasks: <ol style="list-style-type: none"> 1. evaluating the quality of education in a given field of study, 2. presenting opinions and motions in matters including: <ol style="list-style-type: none"> 1) the establishment of higher education institutions; 2) granting to HEIs authorisations to provide programmes in specific fields of study and at specific levels of study; 3) the establishment by a HEI of an academic unit, including a branch campus; 4) assigning professional majors offered by non-university higher education institutions to relevant fields of study; 5) giving permission for the establishment and offering fields of study different from these stipulated in the regulations.
Stage 2 2005-2011	3. 2008- 2011	Act of 27 July 2005 Law on Higher Education	Tasks: <ol style="list-style-type: none"> 1. evaluating the quality of education in a given field of study, 2. presenting opinions and motions in matters including:

			<ol style="list-style-type: none"> 1) the establishment of higher education institutions; 2) authorisation for a higher education institution to provide degree programmes <ol style="list-style-type: none"> a) in a given field and at a given level of study, b) in the form of a macro field of study, c) in the form of interdisciplinary programmes, 3) extending the permits for the operation of non-public HEIs; 4) granting the existing or newly established branch campuses of a HEI the authorisation to provide education, if the application pertains to a unit/HEI authorised to provide second cycle degree programmes or long cycle programmes; 5) the establishment of a HEI in the Republic of Poland by a foreign HEI.
Stage 3 2011-2016	4. 2012-2015	<p>Act of 18 March 2011 amending the Law on Higher Education, amending the Law on Academic Degrees and Title and Degrees and Title in the Arts, and amending certain other laws.</p> <p>and</p> <p>Act of 11 July 2014 amending the act - Law on higher education and certain other acts, which introduced, among other things, significant changes in the procedure for the examination of requests for the reconsideration of the matter by the Committee.</p>	<p>Tasks</p> <ol style="list-style-type: none"> 1. programme evaluation, including the evaluation of initial teacher training programmes; 2. institutional evaluation, including the quality evaluation of third cycle programmes and non-degree postgraduate programmes; 3. giving opinions in matters pertaining to: <ol style="list-style-type: none"> 1) the compliance with the requirements for the provision of programmes as laid down in the legislation; 2) the re-granting of suspended authorisations to provide programmes in specific fields of study and at specific levels of study; 3) the establishment of higher education institutions; 4) the granting of authorisations to academic units of higher education institutions to provide programmes in specific fields of study and at specific levels of study where the field of study concerned covers an academic area and domains of science or fine arts which do not correspond to authorisations to confer post-doctoral degree (doktor habilitowany) held by a given unit; 5) the establishment of a higher education institution or a branch campus in the territory of the Republic of Poland by a foreign higher education institution; 6) the quality of education provided by the unit applying for the authorization to grant the doktor and doktor habilitowany degrees.
Stage 4 2016-until now	5. 2016-2019	Act of 23 June 2016 amending the act - Law on higher education and	<p>Tasks</p> <ol style="list-style-type: none"> 1. programme evaluation, including the evaluation of initial teacher training programmes;

		certain other acts	<p>2. giving opinions in matters pertaining to:</p> <ol style="list-style-type: none"> 1) the compliance with the requirements for the provision of programmes as laid down in the legislation; 2) the re-granting of suspended authorisations to provide programmes in specific fields of study and at specific levels of study; 3) the establishment of higher education institutions; 4) the granting of authorisations to academic units of higher education institutions to provide programmes in specific fields of study and at specific levels of study where the field of study concerned covers an academic area and domains of science or fine arts which do not correspond to authorisations to confer post-doctoral degree (doktor habilitowany) held by a given unit; 5) the establishment of a higher education institution or a branch campus in the territory of the Republic of Poland by a foreign higher education institution; 6) the quality of education provided by the unit applying for the authorization to grant the doktor and doktor habilitowany degrees.
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Source: Authors

At the first stage of PKA's operations, legal and operational bases were formed, which due to the large number of tasks, were urgently needed. The Committee adopted its Statutes during a plenary meeting on 11 January 2002, i.e. only a few days after the award of the appointment by the minister. Next, indispensable internal regulations were adopted. PKA, being a successor of RGSW and KAWSZ was forced to immediately start giving opinions on applications and undertake quality assurance activities.

The second stage was very important for the operations of the Committee due to the changes introduced to the system of higher education, including quality assurance, as introduced by the Act of 27 July 2005 Law on Higher Education. The Committee's term of office was extended by one year, and its members were joined by a section for military sciences and President of Students' Parliament of the Republic of Poland, who also became a Presidium member by virtue of law. Due to the fact that the act on non-university higher education institutions and military schools was repealed and a uniform system of higher education governed by a single act was formed, the powers of the Committee also covered military and police schools and degree programmes offered by them. At the time when ENQA published its Standards and Guidelines for Quality Assurance in Education in European Higher Education Area (ESG 2005), PKA commenced the adaptation process, which over the next years was verified by Stocktaking Reports aimed at the review of the implementation of the principles of the Bologna Process in individual countries. The conclusions of the report were positive for PKA.

The third stage of the Committee's operations commenced with the amendment of the Law on Higher Education adopted on 18 March 2011. The first modification was changing its name from the State Accreditation Committee to the Polish Accreditation Committee. The amended law stipulated in more detail the organisation and role of PKA and emphasised its operational independence. A rule has been introduced that when appointing members of the Committee, the minister competent for

higher education 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. The minimum and maximum number of Committee members has been increased. Due to the fact that representatives of employers' organisations have been appointed as Committee members, two of them sit on the Presidium of PKA. Moreover, the composition and method of appointing individual sections have changed. From 2012, the sections are formed by the President and correspond to individual areas of study. Two types of evaluation have been introduced; programme and institutional one. PKA has also covered third cycle and post-graduate programmes with quality assurance activities. The provision naming the ratings; outstanding, positive, conditional and negative, has been introduced to the law. So far, this provision had only been included in PKA's Statutes. The law has stipulated that PKA's opinion on the quality of education run by the HEI's unit is obligatory in the authorization process of awarding degrees and titles. Moreover, the law confirmed PKA's right to stipulate in its Statutes detailed criteria for the evaluations. Due to the introduction of National Qualifications Framework, the scope of opinions presented by PKA has been expanded, along with the impact the Committee has on education at the stages preceding the achievement of learning outcomes.

The amendment of the act in 2014 introduced changes in the organisational structure of the Polish Accreditation Committee by distinguishing a separate Appeals Body. Membership in the Appeals Body cannot be combined with membership in a section operating in a given area of study, and at least one of its members represents each of such areas. Moreover, 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, taking into account the evaluation of their work by the Presidium of the Committee. Another modification directly concerned the functioning of the Committee and consisted in granting the minister competent for higher education powers to determine, by way of a regulation, basic criteria and the scope of programme and institutional evaluation, and not only the conditions for such evaluations as it was to date. A provision has been added stipulating that the Statutes of the Committee will come into force, if the minister responsible for higher education does not submit reservations concerning its legal compliance within thirty days of the receipt of the Statutes. It should be emphasised that the law confirmed PKA's right to stipulate in its Statutes detailed criteria for the evaluations. The amendment of the act resulted in the need for the minister responsible for higher education to issue or amend many implementing acts, including these concerning the conditions for programme and institutional evaluations and conditions for the provision of degree programmes in a specific field and at a specific level of study.

Moreover, a possibility for HEIs to validate qualifications obtained outside of the system of higher education has been introduced. It was assumed that the senates of individual HEIs would define the procedures for the validation of learning outcomes, including the rules, mode and method of the appointment and operation of committees responsible for verifying such outcomes, whereas the Polish Accreditation Committee was entrusted with quality assurance of the operations of such a system. It was also stated that only academic units of higher education institutions, which were awarded by the Polish Accreditation Committee at least a positive rating of their programmes in a relevant field and level of study and degree profile - and if no assessment was conducted for such a field of study – an academic unit of a higher education institution, which is authorised to confer a degree of doktor in the area of study and discipline, to which a given field of study is assigned can validate learning outcomes. The amended law complemented the reform of higher education launched in 2011 in terms of the integration of HEIs with their socio-economic environments, and presented different requirements concerning education as part of practical and general profile by, among other things, committing HEIs to increase the number of hours of student placements offered as part of practical degree profiles, i.e. it promoted closer cooperation with persons with practical experience. Moreover, provisions have been added stipulating that academic units, which are not authorised to confer the degree of doktor or do not have a positive rating of education quality resulting from an evaluation of a given degree programme by the Polish Accreditation

Committee are obliged to provide degree programmes with practical profile. Equally important were the amendments of provisions on revoking and suspending the authorisation to provide degree programmes granted to public and non-public HEIs and on the liquidation of non-public HEIs, e.g. as a consequence of their evading the evaluation by the Polish Accreditation Committee. Moreover, provisions were introduced, which allow to restrict the enrolment for studies provided in negligent way or the ones not respecting the rights of students. It was enacted that information about HEIs against which proceedings were initiated in order to revoke or suspend their authorisations to provide degree programmes or to revoke the permission to establish a non-public HEI or to liquidate it or information about HEIs, which were awarded a negative rating by Polish Accreditation Committee would be included on a warning list published by the minister responsible for higher education on the ministry's website and in the POL-on system. 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. In addition, in order to meet the requirements imposed in the European Higher Education Area concerning the independent character and reliability of theses written by students, an obligation has been imposed on higher education institutions to check the theses using plagiarism detection systems and to enter them to the repository of written theses immediately after the final exams. In accordance with the amended law, the repository is included in the Information System on Higher Education, which forms a part of the Integrated Information System on Science and Higher Education POL-on run by the Minister of Science and Higher Education. The system was also used for the needs of amended procedure for monitoring the careers of graduates, which no longer is the responsibility of the HEIs. A Poland-wide monitoring system managed by the minister responsible for higher education in cooperation with the the Social Insurance Institution (ZUS) was introduced instead. Each year, the Ministry transfers data on graduates from the Integrated Information System on Science and Higher Education POL-on to the Social Insurance Institution, where it is aggregated with data determining the status history of a graduate in the labour market. Next, the Ministry analyses so obtained data by creating a database of information about the employability of graduates of individual HEIs and degree programmes. This change was introduced because of the need to obtain objective and comparable data on careers of graduates and provide it to the public, government and candidates for studies. However, the solution does not prevent HEIs from making their own analyses of graduate careers in order to prepare offers of degree programmes possibly best tailored to the growing requirements of the labour market and the needs of employers, and to improve the quality of the education provided to students.

When analysing **the fourth stage** of the Committee's operations, it should be stressed that in 2016 the Law on Higher Education was amended three times, including by the act of 23 June 2016 amending the act - Law on higher education and certain other acts (OJ of 2016, Item 1311), which introduced major changes affecting the Committee. In connection with Article 1(13)(b) of the Law, The Polish Accreditation Committee no longer conducts quality assurance activities related to the operations of academic units of HEIs (institutional evaluation). This change resulted 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, often without sufficient focus on the actual quality of education.

In the opinion of academic community, the concept of institutional evaluation should be redefined in cooperation with all stakeholders and its introduction should be preceded by a well prepared pilot procedure. Institutional evaluations were conducted by the Committee from 2011, and their suspension was an important topic of internal discussions held by the sections operating in the scope of individual areas of study and individual expert groups at the Committee. During internal discussions some Committee members and experts said that external quality assessment aimed at the verification of effectiveness and comprehensiveness of mechanisms operating within HEIs focusing on current and ongoing monitoring of the quality of education and research, and that it

should be continued and should remain within the remit of the Committee. Moreover, some of them raised concerns that the suspension of institutional evaluation could result in abandoning the improvement of internal education quality assurance systems and giving up by the HEIs/academic units the effective, though often labour-intensive processes focusing on education quality, which were being significantly developed over the past years. Institutional evaluation also involved external assurance of the quality of education provided as part of post-graduate and third cycle programmes. In the opinion of some of PKA members and experts, evaluation of these programmes should be provided for in the legislation. At the same time, it should be emphasised that the views of the Committee's members and the experts on the form and extent of institutional evaluation significantly vary and the discussion on the topic is continued at present, i.e. at the time when advanced works on a new law on higher education are conducted. It should be noted that the latest draft of the Law on Higher Education as for the date of the report, dated 22 January 2018, introduces a concept of comprehensive evaluation, which would include measures aimed at quality assurance at the level of HEIs, and, in particular, at ensuring its effectiveness throughout the institutions, in all disciplines, in which education is provided.

Another change important from the point of view of PKA's competences concerns abandoning 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. The above legislative changes and the commencement of the process of removing excess red tape from the provisions governing the operation of the system of higher education have significantly changed the provisions contained in the regulation laying down general criteria for programme evaluation. In 2016, in accordance with its powers set out in Article 53(1) of the Law on Higher Education, the Committee developed a catalogue of programme evaluation criteria and held broad consultation on the topic. Eight general and 16 detailed criteria demonstrating compliance with general evaluation criteria of programme evaluation laid down by the Minister of Science and Higher Education in a relevant regulation were identified.

At the same time it should be noted that from the time of the previous external review, the Polish Accreditation Committee amended its Statutes twice. The first amendment was adopted in 2015 and the second one year later. [Appendix no. 4](#) presents major changes as compared to the current Statutes and a map illustrating the types and paths of evaluations carried out by the Committee at individual dates, for which PKA developed relevant criteria.

4.2. Mission and Strategy.

The Polish Accreditation Committee carries out its mission by conducting obligatory programme evaluations and by giving opinions on applications for the authorisation to provide degree programmes submitted by higher education institutions. PKA considers itself a partner in the education quality assurance process in Polish system of higher education. The overriding value guiding the work of the Committee is common good, because the quality and effectiveness of education significantly contribute to the development of intellectual capital and civil society. The Polish Accreditation Committee feels accountable for the decisions it makes, as they impact on the development of higher education. PKA enhances its credibility thanks to objective evaluations and opinions, professional activities, observing the principle of openness and transparency of the procedures, presenting clear arguments, and respecting ethical principles and academic tradition. PKA is a platform for cooperation and dialogue for all stakeholders interested in acting on behalf of ensuring top quality higher education. The Committee undertakes cooperation initiatives in this area, also in an international arena. It actively cooperates with other accreditation agencies and international organisations on the implementation of the Bologna Process and the development of European Higher Education Area.

The Committee has adopted a Strategy ([Appendix no. 5](#)), which will be implemented until 2020, and which stipulates operational goals and tasks allowing for the achievement of strategic goals in the areas presented below:

- Strategic Area 1 - PKA as an upholder of higher education quality standards
 - performing its basic tasks in the scope of programme evaluation;
 - developing competences of PKA members and experts;
 - modernising the organisation of work of evaluation panels;
 - improving the efficiency and transparency of accreditation procedures.
- Strategic Area 2 - PKA as a partner in fostering quality culture
 - developing analytical activity;
 - intensifying dialogue with external and internal stakeholders;
 - disseminating good practices in education quality assurance;
 - raising the level of accreditation procedures internationalisation;
 - developing new forms of education quality external assurance procedures.
- Strategic Area 3 - PKA as an active and globally recognised accreditation agency
 - developing active membership in international organisations promoting higher education quality and intensifying bilateral and multilateral cooperation;
 - intensifying publishing activity and measures aimed at the promotion of PKA operations in an international arena;
 - acquiring funds for projects aimed at the development and improvement of PKA operations;
 - maintaining formal status of PKA in an international arena.

The development of the Polish Accreditation Committee's Strategy was preceded by an internal, in-depth strategic analysis based on the SWOT methodology. It takes into account the examination of its internal organisational structure and external stakeholders. SWOT analysis of the Polish Accreditation Committee was made using the following documents:

- Mission Statement of the Polish Accreditation Committee;
- Strategy of the Polish Accreditation Committee for the years 2012-2015;
- Declaration of Quality Policy,
- Report of the Polish Accreditation Committee on its operations during the 4th term of office, including the report on Strategy implementation in the years 2012-2015;
- PKA's Self-Evaluation Report of 2013;
- The results of the survey carried out in the framework of the EIQAS project devoted to external quality assurance, see: EIQAS Country Report, Poland, 2015.

Reflection and discussion on strategic matrix fields held by PKA management and its internal stakeholders also formed a part of the SWOT analysis.

It should be emphasised that the Polish Accreditation Committee monitors the implementation of its strategy and develops in-depth analyses relating to the evaluation of the attainment of specific strategic objectives (see Report of the Polish Accreditation Committee on its operations in the years 2012-2015).

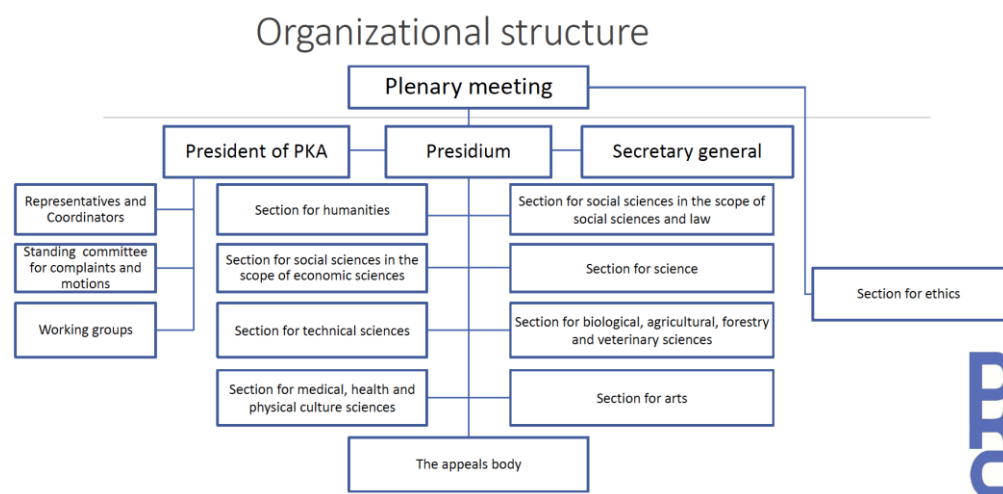
4.3. Organisational structure of PKA

The Law on Higher Education, regulation of the Minister of Science and Higher Education on general criteria for programme evaluation, PKA Statutes, procedures, criteria and guidelines constitute a consistent set of complementary regulations, which enable PKA to efficiently, on time, and in a reliable, objective and transparent manner perform the tasks, which have been defined in the Law on Higher Education.

The Mission Statement ([Appendix no. 3](#)), which describes the role the Committee plays in the system of higher education, is the main programme document of the Polish Accreditation Committee. Act of 27 July 2005 Law on Higher Education constitutes legal basis for the establishment and operation of PKA. The act stipulates the body that appoints the Committee and method of appointing it, the number of its members, duration of the term of office, the Committee's bodies and their basic competencies, organisational structure, tasks, method for adopting resolutions and principles for applicants' appeals against them, as well as administrative and

financial support provided to the Committee. General criteria for programme evaluation are set out in a regulation of the Minister of Science and Education. The scope of PKA's opinions on granting 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 is set out in Article 11(4)(1) and 11(5) of the Law on Higher Education and in Clause 15 of the regulation of the Minister of Science and Higher Education of 26 September 2016 on the conditions for providing degree programmes, which also stipulates in detail the contents of an application for such authorisation. In accordance with its powers, PKA has stipulated the procedures binding when making evaluations and giving opinions on requests presented by the minister, as well as detailed evaluation criteria and instructions, guidelines for conducting site visits and preparing self-assessment reports by HEIs, and templates of opinions and site visit reports. In accordance with article 48 of the Law on Higher Education, members of the Polish Accreditation Committee are appointed by the minister responsible for higher education from among candidates presented by the 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 and employers' organisations. The Committee is composed of not less than 80 and not more than 90 members, and the minister competent for higher education appoints members of the Committee representing not more than 50% of all its members from among the persons acting as members of the Committee in the previous term of office, taking into account the evaluation of their work by the Presidium of the Committee. Academic teachers holding at least the degree of doktor and having a higher education institution as their place of primary employment can be appointed Committee members. 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 the virtue of law. A member of the Committee can be dismissed by the minister responsible for higher education at the request of the Committee's Presidium. the President of the Committee can announce the expiry of the mandate of a Committee member, which can take effect as a result of sending in a resignation or failure to participate in the works of the Committee over a period longer than six months.

Figure 4. PKA's organizational chart



In the years 2002-2005, the Committee could have up to 70 members, in 2005 up to 80, and from 2011 up to 90. During the 5th term of office, PKA has 90 members, including 36 members who acted as its members during the fourth term. Invariably, the vast majority of Committee members hold the title of professor. As at the commencement of the fifth term of office this group forms 47.8% of Committee members. Among PKA members are also holders of the degree of doktor habilitowany

(43.3%) and holders of the degree of doktor (8.9%)⁸. When appointing the members of the Committee, the minister took into account the requirement that they represent all areas of study. The organisational structure of the Committee comprises nine sections, including eight sections responsible for individual areas of science (referred to as 'Sections'):

- 1) Humanities;
- 2) Social Sciences in the scope of Economic Sciences;
- 3) Social sciences in the scope of Social Sciences and Law;
- 4) Science;
- 5) Biological, Agricultural, Forestry and Veterinary Sciences;
- 6) Technical Sciences,
- 7) Medical, Health and Physical Culture Sciences,
- 8) Arts.

and the Appeals Body.

The Sections formulate opinions and proposals on matters included in the scope of operations of the Committee and their reports form the basis for decisions taken by the Presidium. In their work, section members are assisted by a group of almost 1300 experts appointed by the President of the Committee in accordance with the procedure for the mode and criteria for the appointment of experts. The Committee works in plenary sessions and through its bodies. In accordance with the Law on Higher Education, the Polish Accreditation Committee has the following bodies:

- one-man bodies: the President of the Committee and Secretary of the Committee;
- a collegial body: the Presidium of the Committee.

The President of the Committee and its Secretary are appointed and removed from office by the minister competent for higher education. The Presidium is composed of: the President, Secretary, President of the Students' Parliament of the Republic of Poland, two representatives of employers' organisations and eight Chairs of Sections. The Chair of the Appeals Body attends the meetings of the Presidium, during which resolutions are adopted on requests for reconsideration of a matter, and has a voting right during such meetings. The powers of individual bodies are set out in the Statutes of PKA.

Moreover, the organisational structure of the Committee includes the Section for Ethics, to which Committee members and experts are accountable for violating the standards of conduct laid down in the Code of Ethics ([Appendix no. 7](#)), and a Section for Examining Complaints and Requests composed of: PKA President, Secretary, Vice-President, and Chair of the Section for Ethics, as well as Representative for PKA quality assurance system, Coordinator of cooperation with employers and Coordinator of cooperation with experts on student matters. The last three members are appointed by the President of the Committee.

The organisational structure of PKA is complemented by three sections established in accordance with Article 7(3)(12) of the Statutes of the Polish Accreditation Committee: The Section for employers, the Section for quality-oriented models of education provided as part of programmes in pedagogy and programmes including pedagogical specialisation, and Section for internationalisation of PKA's accreditation procedures (*described in more detail in section 8*). The Section for employers consists of members representing sections operating in the scope of individual areas of study and experts with practical experience appointed by employers' organisations (18 persons). The main tasks of the Section include making and submitting proposals, recommendations, position papers, expressing opinions on cooperation with employers as part of carrying out the Mission and Strategy of PKA, serving as and advisory and consultative body for other PKA bodies and taking various initiatives related to the development and strengthening of cooperation with institutions representing employers.

The Section for quality-oriented models of education provided as part of programmes in pedagogy and programmes including pedagogical specialisation aims at defining the method of carrying out the evaluation of programmes including pedagogical specialisation, adapting education and training

⁸ Source: Study entitled *Działalność PKA w 2016 r.*

standards for programmes in pedagogy and programmes including pedagogical specialisation to current requirements of employers and developing recommendations aimed at improving the quality of student placements.

The Bureau of the Polish Accreditation Committee provides administrative and financial services to the Committee. From 1 January 2006, the Bureau is an independent state budget unit. Organisational structure and detailed scope of activities of the Bureau are laid down in its organisational regulations. At present, 23 employees work at the Bureau of the Polish Accreditation Committee. In 2017, state budget funds allocated to the Committee for the performance of its statutory tasks amounted to PLN 9,719,000.00, which amounted to ca. 0.0075 % of the state budget funds allocated to higher education in the budget law. The allocated funding was mainly used for:

- following the programme evaluation procedure;
- following the procedure for giving opinions on applications;
- implementing tasks related with international cooperation of the Committee;
- making lump sum payments to the President, Deputy President and Secretary, and paying remuneration to Committee members for attending the sessions of the Committee;
- maintaining material resources of the Bureau and the Committee.

HEIs do not bear financial costs related to quality assurance procedures followed by the Polish Accreditation Committee and giving opinions to the applications. All costs related with external quality assurance, such as: business travel, accommodation and remuneration costs for experts are covered with the funds at the disposal of the Committee's Bureau.

5. Higher education quality assurance activities of the Agency

5.1. Tasks

In accordance with Article 49(1) of the Law on Higher Education, the Committee submits to the minister competent for higher education:

- 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;
- results of programme evaluation, including the evaluation of initial teacher training programmes, as well as compliance with the requirements for the provision of degree programmes;
- 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 a foreign higher education institution.

In accordance with Article 1(13b) of the act of 23 June 2016 amending the act - Law on higher education and certain other acts (OJ of 2016, Item 1311), the Polish Accreditation Committee no longer conducts quality assurance activities related to the operations of academic units of HEIs. The Committee conducted institutional evaluations since 2011 and they included the assessment of:

- the operation and improvement of education quality assurance systems applied by the units, including their structure and impact on education quality;
- the compliance of unit's operations with the HEI's mission statement and strategy for development, in particular in the scope of assuring high quality education and research, taking into account the results of a comprehensive evaluation of the quality of research activities or research and development activities of the unit;
- the consistency of the development of teaching and scientific facilities with the development strategy of the unit;

- cooperation with representatives of social and economic stakeholders, including cooperation with academic and scientific institutions as part of the implementation of the development strategy of the unit;
- the efficiency of human resources policy pursued by the unit, including the development of teaching and research staff;
- the support system for students and doctoral students, including financial aid and support in the development of research, artistic and sports activity and adapting infrastructure to the needs of people with disabilities;
- the quality of post-graduate programmes, including the achievement of intended learning outcomes and methods for the verification of achieved learning outcomes;
- the quality of education provided as part of doctoral studies, including research conducted by doctoral students, the achievement of intended learning outcomes and methods for the verification of achieved learning outcomes.

In accordance with the regulation of the Minister of Science and Higher Education of 26 September 2016, general criteria for programme evaluation include the ones pertaining to:

1. study programme:
 - education concept implementation,
 - the statement of intended learning outcomes including the characteristics of learning outcomes for qualifications at level 6 and 7 of Polish Qualifications Framework, as stipulated in the act of 22 December 2015 on the Integrated Qualifications System (OJ of 2016, item 64 and 1010) and the regulations issued based on Article 7(3) of the act;
 - study programme implementation, with taking into consideration the specificity of education profile and level,
 - effectiveness of achieving intended learning outcomes;
2. education and training standards - adapting study programme to requirements laid down in education and training standards for the fields of study stipulated in regulations issued based on Article 9b and 9c of the act of 27 July 2005 - Law on Higher Education;
3. qualifications of academic teachers and other persons teaching classes to students - the adequacy of the selection of staff for the study programme;
4. cooperation with representatives of social and economic stakeholders in the education process - the participation of employers' representatives in the development of study programmes and implementation of the education process;
5. effectiveness of the internal education quality assurance system - measures taken to improve the quality of education, and to improve the study programme, as well as the use of results of graduates career monitoring and labour market needs analyses;
6. learning outcomes validation - study conditions for students admitted as a result of learning outcomes validation;
7. internationalisation of the education process:
 - international cooperation,
 - preparation for learning in foreign languages;
8. infrastructure used for the achievement of learning outcomes - adapting the teaching and research infrastructure to educational needs and objectives;
9. supporting students in the learning process - the method of providing students with research and teaching support and quality-oriented activities, which motivate students to achieve learning outcomes.

When conducting programme evaluation, the Polish Accreditation Committee takes into consideration accreditations and certificates obtained as a result of reviews carried out by international and national agencies evaluating selected areas of education and by accreditation agencies registered in the European Quality Assurance Register or by agencies with whom it has concluded agreements on the recognition of accreditation decisions.

Besides in the case of conducting programme evaluation procedures in the foreign branches of Polish HEIs abroad or giving opinions on applications for establishment of such branches abroad, the procedure and criteria are identical to that carried out with reference to national providers because the provisions of the Law on Higher Education remain still in force.

In 2016, in accordance with its powers set out in Article 53(1) of the Law on Higher Education, the Committee developed a catalogue of programme evaluation criteria and held broad consultation on the topic. Eight general and 16 detailed criteria demonstrating compliance with general evaluation criteria of programme evaluation laid down by the Minister of Science and Higher Education in a relevant regulation were identified.

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. Moreover, criteria and conditions for the award of assessments, which specify the rules for the award of the following ratings: outstanding, positive, conditional and negative, have been developed. 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. Moreover, a draft self-assessment report, which was approved after holding broad consultation with stakeholders, and templates of site visit reports and opinions were developed.

In accordance with the Statutes, another evaluation is conducted after 8 years, if an outstanding rating was previously awarded, or after 6 years if a positive rating was previously awarded, 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 the Polish Accreditation Committee is negative, the minister competent for higher education, in particular taking into consideration the type and scope of infringements, can revoke or suspend the authorisation to provide degree programmes in a given field and level of study and with a given degree profile, held by any academic unit of a higher education institution.

Evaluations made by the Committee, both in the past and today, result in specific consequences for HEIs or their academic units. At present, in the state budget subsidies are allocated for the promotion of quality-oriented measures, which are assigned for co-financing of academic units of HEIs providing degree programmes to which the Polish Accreditation Committee awarded outstanding rating as part of programme evaluation. The quality of education provided as part of degree programmes by an academic unit affects the possibility of obtaining the authorisation to award academic degrees and title. In accordance with the act of 14 March 2003 - Law on Academic Degrees and Title and Degrees and Title in the Arts (OJ 2017, item 1789) and the regulation of the Minister of Science and Higher Education of 8 August 2011 on the method of filing applications for granting the authorisation to award the degree of doktor and doktor habilitowany, such an application should be accompanied by an opinion by the Polish Accreditation Committee on the quality of education or a rating by another agency, which evaluates the quality of education and is registered with European Quality Assurance Register (EQAR) or an agency operating in another country, whose reviews are recognised by the Polish Accreditation Committee. This power emphasises the role PKA plays in academic circles and confirms that no decision affecting the quality of the system of higher education can be taken without the participation of PKA. Moreover, the minister, when making the decision about increasing the number of full time students at public HEIs, takes into consideration education quality evaluations made by PKA.

The site visit reports drawn by PKA constitute a compendium of knowledge on the standing of HEIs in the community; their role and position in the education market; their concepts of education and their implementation; internal quality assurance systems applied; academic teachers and students

of the evaluated field of study; research activity; international cooperation; teaching and research facilities; and student matters. This information is useful to the minister who takes the decision.

External quality assurance activities conducted by the Committee help HEIs identify their strong and weak points and develop improvement and remedial action plans, which are of benefit to them. During following evaluation, the Committee surveys how, to what extent and with what result HEI authorities have used the acquired knowledge in day-to-day quality management. The dates for subsequent evaluations are dependant on the degree to which the requirements stipulated in PKA standards are met. In the case of a conditional rating, a follow-up evaluation is usually made after one year. In the case of a follow-up evaluation made after a conditional rating, a separate procedure is followed. It provides for informing the HEI about the need to demonstrate corrective measures taken to remove shortcomings found in the course of the preceding evaluation procedure. Moreover, in the case of some positive ratings, the Committee gives recommendations, where it specifies the deadline for their implementation and requests documenting such implementation.

The scope of PKA's opinions on granting 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 is set out in Article 11(4)(1) and 11(4)(2) of the Law on Higher Education and in Article 15 of the regulation of the Minister of Science and Higher Education of 26 September 2016 on the conditions for providing degree programmes, which also stipulates in detail the contents of an application for such authorisation. The opinions given by the Committee are not legally binding, however the subsequent ministers have by and large made decisions in accordance with the position of the Committee. Only in the case of a few applications, where the HEIs submitted additional documentation, information and explanations already after the completion of the opinion-giving procedure by PKA and prior to taking the decision by the Minister, who in accordance with the rules of administrative proceedings had carefully examined additional information, the minister made decisions differing from PKA's opinions. It should be added that in such cases, the Committee - at the request of the Minister - makes quality evaluation of such documentation and presents its position to the Minister.

The Polish Accreditation Committee - being an opinion-making body - takes an active part in legislative works of the government, for whom it prepares opinions on draft bills and regulations. The Committee considers the participation in the development and improvement of legal regulations governing the higher education system as its obligation and pays due diligence and attention to the performance of these tasks. In the period 2012-2016, the Polish Accreditation Committee presented 123 opinions on draft bills.

5.2. Figures illustrating PKA operations

In the period 2002-2017, PKA made 6084 programme evaluations, (on average 380 evaluations per year) and awarded 184 outstanding ratings, 5047 positive ratings, 657 conditional ratings and 196 negative ones (forming respectively ca. 3%, 83%, 11% and 3%). Table 10 and also Figure 5 present detailed data in this scope. Moreover, in the period 2011-2017, PKA made 255 institutional evaluations and awarded 23 outstanding ratings, 223 positive ratings, 8 conditional ratings and 1 negative rating (forming respectively ca. 9%, 87%, 3% and 1%). Table 11 present detailed data in this scope. As far as opinions on applications are concerned, in the period 2002-2017, PKA issued 6984 opinions, including 3964 positive ones, 2870 negative ones and 150 opinions, which were defined as opinions without a positive assessment. Table 12 present relevant data in this respect.

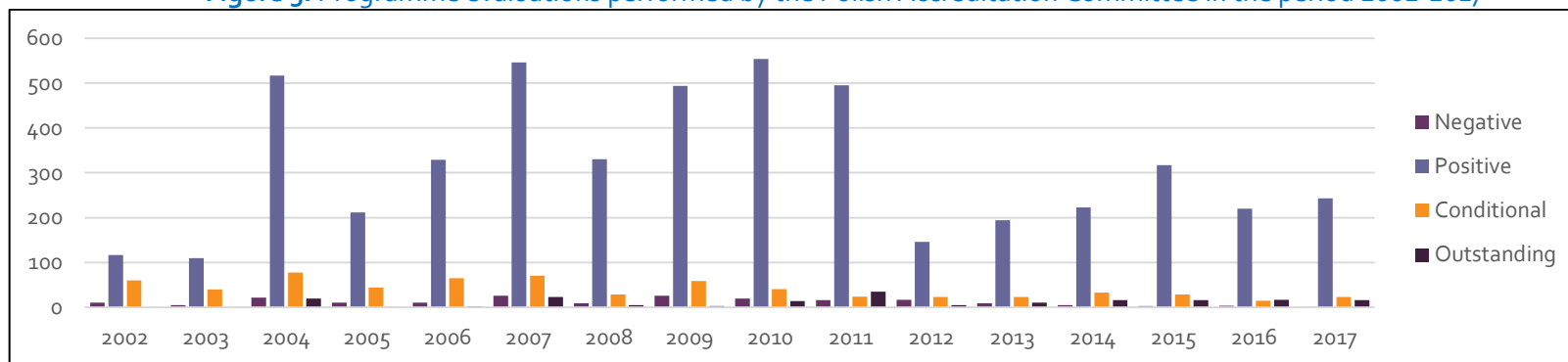
Table 10. Programme evaluations performed by the Polish Accreditation Committee in the period 2002-2017

Year		2002		2003		2004		2005		2006		2007		2008		2009	
The number of ratings awarded as part of programme evaluation, including:	P	188	134	155	112	637	472	268	232	407	256	666	441	373	220	582	358
	N		54		43		165		36		151		225		156		224
outstanding, including:	P	-	-	-	-	20	19	1	0	2	2	23	23	5	5	3	3
	N		-		-		1		1		-		-		-		
positive, including:	P	117	85	110	87	517	393	212	187	329	227	546	380	330	200	494	340
	N		32		23		124		25		102		166		130		154
conditional, including:	P	60	43	40	24	78	50	44	38	65	27	71	30	29	11	59	12
	N		17		16		28		6		38		41		18		47
negative, including:	P	11	6	5	1	22	10	11	7	11	-	26	8	9	4	26	3
	N		5		4		12		4		11		18		5		23
Abandonment/suspension in total, including:	P	There were no cases of abandonment/suspension				4	3	6	4	11	9	16	7	31	6	43	16
	N						1		2		2		9		25		27
Year		2010		2011		2012		2013		2014		2015		2016		2017	
The number of ratings awarded as part of programme evaluation, including:	P	629	438	570	400	191	96	237	122	277	158	365	192	256	164	283	207
	N		191		170		95		115		119		173		92		76
outstanding, including:	P	14	13	35	34	5	3	11	10	16	15	16	13	17	14	16	16
	N		1		1		2		1		1		3		3		-
positive, including:	P	554	407	495	347	146	84	194	106	223	130	317	172	220	142	243	179
	N		147		148		62		88		93		145		78		64
conditional, including:	P	41	16	24	13	23	7	23	6	33	13	29	7	15	8	23	12
	N		25		11		16		17		20		22		7		11
negative, including:	P	20	2	16	6	17	2	9	-	5	-	3	-	4	-	1	-
	N		18		10		15		9		5		3		3		4
Abandonment/suspension in total, including:	P	43	17	46	15	65	10	61	6	83	14	88	17	52	14	30	15
	N		26		31		55		56		69		71		38		15

P - public HEIs; N - Non-public HEIs

Source: Authors (December 2017)

Figure 5. Programme evaluations performed by the Polish Accreditation Committee in the period 2002-2017



Source: Authors (December 2017)

Table 11. Institutional evaluations performed by the Polish Accreditation Committee in the period 2011-2017

		Institutional evaluations															
Type of evaluation	Total	Public HEIs								Non-public HEIs							
		Total	Resolutions on ratings adopted in the year							Total	Resolutions on ratings adopted in the year						
			2011	2012	2013	2014	2015	2016	2017		2011	2012	2013	2014	2015	2016	2017
Outstanding ratings	23	22	1	3	8	1	6	1	2	1	0	0	0	0	1	0	0
Positive ratings	223	209	0	42	72	40	36	19	0	14	0	0	6	1	6	1	0
Conditional ratings	8	8	0	1	3	4	0	0	0	0	0	0	0	0	0	0	0
Negative ratings	1	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0
Total	255	239	1	46	83	45	42	20	2	16	0	0	6	1	7	2	0
Abandonment/suspension	7	6	0	2	0	0	3	1	0	1	0	0	1	0	0	0	0

Source: Authors (December 2017)

Table 12. Opinions on applications given by the Polish Accreditation Committee

The type of application	1st term of office			2nd term of office				3rd term of office				4th term of office				2016			2017				Total
	Positive	Negative	Total	Positive	Without a positive assessment	Negative	Total	Positive	Without a positive assessment	Negative	Total	Positive	Without a positive assessment	Negative	Total	Positive	Negative	Total	Positive	Without a positive assessment	Negative	Total	
Applications for the authorisation to provide education in newly established HEIs	123	306	429	21		43	64	39		52	91	2		7	9	2		2	1		5	6	601
Applications for the authorisation to provide education as part of first cycle programmes	417	498	915	453		390	843	564		404	968	410		210	620	77	60	137	65		47	112	3595
Applications for the authorisation to provide education as part of second- and long cycle programmes	67	83	150	65		56	121	164	1	145	310	213		109	322	57	20	77	42		42	84	1064
Applications for granting existing or newly established branch campuses of a HEI the authorisation to provide education	58	76	134	56		39	95	117	4	57	178	111		44	155	30	15	45	18		20	38	645
Applications for assigning specialisations	332	35	367	17		1	18																385
Applications for extending the permit for the functioning of a HEI				63	57	4	124	154	80	17	251												375
Applications for re-granting suspended authorisations to provide programmes in specific fields of study				7		10	17	22	1	19	42	9	2	11	22	2	1	3	1			1	85
Applications for pronouncing the compliance with the requirements for the provision of programmes																1		1	4			4	5
Applications for the establishment by a Polish HEI of an academic unit abroad								5		8	13												13
Opinions on the quality of education provided by units applying for the authorisation to award degrees												80			80	13		13	12			12	105
Other applications	35	19	54	17		8	25	6	4	5	15	9		3	12	2		2	1	1	1	3	111
TOTAL:	1032	1017	2049	699	57	551	1307	1071	90	707	1868	834	2	384	1220	184	96	280	144	1	115	260	6984

Source: Authors (December 2017)

6. Processes and relevant methodologies

6.1. Procedures

PKA performs its statutory tasks in accordance with adopted procedures, which have been included in the internal quality management system concerning the quality of PKA's work ([Appendix no. 8](#)). The procedures, evaluation criteria and specimen documents are published on PKA's website and external stakeholders are informed about them.

6.2. Programme evaluation procedure

The programme evaluation procedure followed by PKA includes:

- self-assessment;
- site visit by an evaluation panel composed of:
 - experts - academic teachers;
 - expert – students' representative;
 - expert on evaluation process;
 - employers' representative (in the case of programmes with practical profile and general profile, if a study programme provides for student placements);
 - international expert - depending on the capabilities and evaluation type;
- 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.

Characteristic features of the evaluation procedure conducted by PKA include no- costs (any and all accreditation costs are covered from PKA's budget), obligatory nature (HEIs are obliged to submit to the accreditation procedure), universality (all public and non-public HEIs are subject to the accreditation process), cyclical nature and uniformity of the procedures applied to all evaluated units offering degree programmes subject to evaluation.

The Committee conducts evaluation on its own initiative, upon a HEI's request, and, in the cases stipulated in the law, also upon a request of the minister competent for higher education.

Higher education institutions submit their self-assessment reports (in accordance with a template and guidelines as adopted in a resolution of PKA – (see: [Appendix no. 9](#)) to the Committee within six weeks of the date of the receipt of an evaluation notice. A site visit should be conducted not later than within eight weeks of the date of receipt of the self-evaluation report. A site visit should be undertaken in accordance with the rules for conducting site visits laid down by the Presidium of PKA and published on its website ([Appendix no. 10](#)). Failure on the part of a higher education institution to submit its self-assessment report, and at a later stage, feedback on the report from the evaluation panel will not prevent further steps taken as part of the evaluation process. The Director of the Committee's Bureau notifies the higher education institution concerned of the date of a site visit and provides an outline agenda for the visit to the institution not later than two weeks before the starting date of the visit. The chair of an evaluation panel is a member of the Committee or in justified cases an expert who is a former Committee member. An evaluation panel composed of two to seven members is appointed by the Secretary of the Committee in consultation with the Chair of the Section concerned. The Secretary may increase the number of evaluation panel members in duly justified cases. Following the analysis of a self-assessment report and after a site visit, the evaluation panel prepares a report within a period of six weeks. Each expert is obliged to present an interim report, and the Chair of the panel draws a final report on their basis. The report of the evaluation panel is sent immediately to the higher education institution, which may provide feedback within three weeks of its receipt. Minutes of the Section's meeting including an opinion and a draft resolution on the rating, together with its grounds, are presented at a meeting of the Presidium by the Chair of the Section or by a person appointed by the Chair not later than within six weeks of the date of the receipt of the feedback from the higher education institution concerned. The

Committee presents all the ratings, along with justification and conclusions, immediately upon their adoption. A party dissatisfied with a resolution adopted by the Presidium can submit a request for reconsideration of the matter within 30 days of the date of the delivery of the resolution. The Committee publishes on its website rating and resolutions, along with justifications and site visit reports.

In the case of programme evaluations held in Polish HEI branches abroad the above mentioned procedure is followed accordingly.

6.3. Opinion-giving procedure

The Committee presents to the minister responsible for higher education opinions and proposals concerning:

- the establishment of a higher education institution and the authorisation for a higher education institution to provide degree programmes in a given field and at a given level of study;
- re-granting of suspended authorisations to provide programmes in specific fields of study and at specific levels of study;
- the establishment of a higher education institution or a branch campus by a foreign higher education institution.

An academic unit of a given HEI, which is not authorised to award the degree of doktor habilitowany in an area of study and discipline, to which a given degree programme is assigned, which:

- 1) has the right to confer a degree of doktor in the area of study and discipline to which a given field of study is assigned, may obtain the right to provide, in line with statement of learning outcomes defined by the senate of a higher education institution:
 - a) degree programmes with practical profile in such a field of study and at a specific level of study,
 - b) degree programmes with a general profile in such a field of study and at a specific level of study;
- 2) does not have the right to confer a degree of doktor in the area of study and discipline to which a given field of study is assigned, may obtain the right to provide, in line with statement of learning outcomes defined by the senate of a higher education institution:
 - a) degree programmes with practical profile in a given field and at level of study,
 - b) degree programmes with general profile in a given field and at level of study, if:
 - first or second cycle programmes in such a field of study received at least a positive rating of the quality of education from the Polish Accreditation Committee,
 - it employs full-time at least eight academic staff members holding the academic title of profesor or the degree of doktor habilitowany or have been awarded a degree equivalent to the degree of doktor habilitowany on the strength of Article 21a of the Act of 14 March 2003 - Law on Academic Degrees and Title and Degrees and Title in the Arts, for whom the higher education institution is the place of primary employment, and representing the field of science or arts related to a given field of study
 - conducts research in the discipline related to the field of study.

At the request of a rector and by way of a decision, the minister competent for higher education, having consulted the opinion of a minister supervising the HEI and of the Polish Accreditation Committee in the scope of the conditions to be met by academic units in order to offer programmes in a specific field and at a specific level of study, grants authorisation to provide degree programmes to academic units of higher education institutions as described above. The opinion of the Committee is also required if an academic unit, which is not authorised to award the degree of doktor habilitowany, wants to establish a field of study, to which education and training standards apply.

Reviews are prepared by members of relevant Sections or experts appointed by the Secretary of the Committee in consultation with the Chair of the Section. If a study programme is assigned to more

than one area of study, the Section whose powers relate to learning outcomes with the largest percentage of ECTS credits in the total number of ECTS credits coordinates the opinion-giving process. Other Sections participate in the opinion-giving process, if the percentage of ECTS credits allocated to learning outcomes relating to the area of study falling under the remit of a given Section exceeds 30%. 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 not later than within four weeks of the date of the receipt of a review or a report on a site visit, if a site visit is indispensable for comprehensive assessment of the application. The Presidium considers individual matters not later than within four weeks of the date on which the Section concerned prepared an opinion and a draft resolution. Resolutions of the Presidium are forwarded to the Minister and higher education institutions or applicants not later than within two weeks of the date of their adoption. In the case of higher education institutions supervised by ministers other than the minister competent for higher education, a resolution is also forwarded to the competent minister. In duly justified cases, the Secretary can extend the above time limits. It should be remembered, however, that in accordance with the law, the Committee issues opinions on applications within three months from receiving them at maximum. A party dissatisfied with a resolution adopted by the Presidium can submit a request for reconsideration of the matter. It should be noted here that application for the establishment by a Polish HEI of an academic unit abroad follow the same procedure as mentioned above.

7. Agency's internal quality assurance system

In the plenary session held on 11 December 2014, PKA adopted its Quality Policy with the following wording:

The Polish Accreditation Committee giving full consideration to common good and specifically accountability towards stakeholders demonstrates particular care for maintaining high standards of activities related to quality assurance in the European Higher Education Area.

The Committee adopts pro-quality approach in all activities it undertakes. Furthermore, the Committee sets quality goals as it recognises constant improvement of relevant factors that form parts of applied Quality Management System as its obligation.

The overarching goals of the Committee stipulated in the Quality Policy are as follows:

- 1. effective and efficient realisation of tasks laid down in the Law on Higher Education, as well as mission and strategic goals of PKA.*
- 2. efficient allocation of resources allowing for highest possible level of realisation of processes.*
- 3. constant development of human resources through systematic improvement of competences of members of PKA, experts and other persons contributing to the Committee.*
- 4. promotion of ethical and pro-quality behaviours, professionalism and objectivity in undertaken activities.*
- 5. establishment and further development of frameworks of debate with academic circles and its environment.*
- 6. assurance of transparency of both PKA's activities and their results through complex information policy.*

These goals are attained through the following activities:

- 1. implementation of process approach to quality management in the Committee.*
- 2. correct planning and monitoring of tasks.*
- 3. application of procedures and initiation of new proposals improving quality of undertaken activities.*
- 4. enabling members of PKA, external experts and other persons contributing to PKA's activities to develop their competences.*
- 5. identification of qualitative and quantitative changes related to the Quality Management System.*

6. *performing cyclical review of the Quality Management System.*
7. *ensuring proper transfer of information to internal and external stakeholders.*

The current activities of the Polish Accreditation Committee are governed by the Quality Policy as far as the goals and tasks are concerned.

The Quality Policy and quality objectives are related with the mission statement and strategy of the Committee and form the basis for the implementation of activities in the field of quality assurance at the Polish Accreditation Committee. The Polish Accreditation Committee adopts the Mission Statement, Strategy and Quality Policy at a plenary session and informs its internal and external stakeholders about them.

The Quality Management System of PKA was introduced on the basis of the decision of the President of the Polish Accreditation Committee of 24 April 2013, which was amended in 2015 and 2018 because of the amendments of the Law on Higher Education and implications resulting from its operation.

The model of the quality management system operates in the PDCA cycle related to the planning, implementation, supervision and continuing improvement of identified processes. The system identifies processes, which in overwhelming majority relate to current operations of PKA and actions it takes under its powers resulting from the Law on Higher Education and the Statutes of PKA. The responsibility for monitoring the implementation of individual processes is correlated with the organisational structure of PKA and powers provided for in the Statutes of PKA and organisational regulations of the Bureau.

Table 13. Main and support processes

MAIN PROCESSES			SUPPORT PROCESSES	
Performing evaluations	Giving opinions on applications	Information policy	HR Management	Operation and development of the quality a management system
The process is oriented at ensuring timely and reliable performance of all programme evaluations	The process is oriented at ensuring timely and reliable performance of the second statutory task of the Committee, i.e. giving opinions on applications	The process involves all tasks related to providing internal and external stakeholders with current and comprehensive information about actions taken by the Polish Accreditation Committee, including quality measures.	The process has been limited to ensuring human resources competent from the point of view of tasks the Committee is entrusted with, including tasks directly related with human resources.	The process refers to ensuring the effectiveness and efficiency of the system by ensuring proper supervision over documents, monitoring the effectiveness of actions taken in the framework of individual processes, including monitoring feedback from internal and external stakeholders.

Source: Authors

In order to ensure correct performance of PKA tasks, the President has established detailed procedures, which determine modus operandi of the Committee's bodies, Sections and Bureau, as well as the rules for documenting such activities, which allows for monitoring and evaluation of individual stages of the opinion-giving and evaluation processes. In addition, template documents with instructions for PKA members and experts participating in the evaluation process have been developed (Available at: www.pka.edu.pl). At present, the list of procedures followed by the Committee forms an annex to Decision no. 3 of the President of the Polish Accreditation Committee of 10 December 2015 on the quality management system of the Polish Accreditation Committee ([Appendix no. 8](#)).

The Polish Accreditation Committee monitors and measures the effectiveness of the procedures on an ongoing basis. In the measurements it uses: questionnaires addressed to HEIs, cyclical external reviews of the operations of the Polish Accreditation Committee performed by domestic and international institutions and self-assessment of the Polish Accreditation Committee related to them, as well as opinions on the issues of quality and the effectiveness of adopted solutions presented by PKA members, experts and the staff of the Bureau. The results of the analyses performed are transferred to relevant bodies of the Committee and published, and the resulting conclusions form the basis for improvement measures.

Moreover, the Presidium of PKA and the Management of PKA Bureau monitor on an ongoing basis current operations of PKA in the scope of the performance of its statutory tasks, having regard to the monitoring and evaluation of the performance of tasks by the Presidium of PKA; monitoring and evaluation of the timeliness of tasks performed by the PKA's Secretary; monitoring and evaluation of the contents of PKA's database, from which source documents posted on PKA website are taken (resolution, reports); cyclical evaluation of the performance by PKA members (2015, 2017) and experts (students, employers), etc. The results from the latest monitoring period confirm the timeliness of the performance of the majority of the Committee's activities. The cases, in which the deadlines referred to in the Statutes of PKA were missed mainly concerned the drawing of site visit reports. Most often, the delays resulted from numerous obligations of PKA members and experts associated with their teaching and research obligations at the HEIs, which employ them or from random incidents. Caring for timeliness of the Committee's work, appropriate disciplinary measures were imposed on evaluation panels and individual members and experts, to mention: reprimand from the Secretary of the Committee, reprimand from the President of the Committee, transferring the case to the Ethics Committee.

Therefore, it should be noted that measures aimed at the improvement of PKA's work are taken on an ongoing basis and subsequent examinations as described above confirm the degree of their implementation. Internal evaluation forms an integral element of the Deming cycle adopted by PKA in relation to the implemented processes. Individual cases of deviations from the procedures are systematically solved by the Committee's bodies and chairs of sections within their powers and statutory authorisations. Moreover, all changes of the criteria, report templates and methodology applied by the Committee are preceded by consultations with external stakeholders who also analyse the causal connection of the proposed changes and comment on the proposed improvement measures. The consultation system has been integrated with the quality management system and is reflected in the procedure for drawing up internal rules of the Committee, which requires that draft documents are submitted for internal and external consultation. It should be emphasised that the Committee not only adapts to, but also participates in any regulatory changes and presents suggestions resulting from its experiences and observations on the development of higher education, which are reflected in the comments and positions of the Presidium of PKA.

The Committee members are also subject to systematic assessment. The Chairs of Sections (2015, 2017) carry out cyclical assessments and the Secretary of the Committee, who supervises the work organisation and is the first recipient of the results, is responsible for an ongoing evaluation. When specific needs are identified, the Secretary of the Committee initiates the procedures relating to the development of expert skills used in the performance of tasks of the Polish Accreditation Committee. In addition, the group of student experts and employers' representatives is subject to an intensive programme of evaluation and development of expert skills (*see, ESG 2.4. Peer review experts*).

In its work, PKA is committed to the principles of professionalism, impartiality and transparency. Having the above in mind, a multi-stage mechanism, which does not cause the conflict of interests between the members and experts of PKA, and which allows for the observance of the above rules in day-to-day work of the Committee, has been purposefully implemented (*for more information, see: ESG Standard 3.6 Internal quality assurance and professional conduct*).

At the same time, PKA leadership makes efforts to modify the Committee's information policy in reaction to the needs expressed by the stakeholders. Online communication is used for broad

consultation with stakeholders on essential works on the criteria and recording of the evaluation process.

In 2014 and 2016, as a result of amendments of the Law on Higher Education, the Committee members focused their efforts on developing criteria for programme evaluation, the amendment of PKA Statutes and adapting other internal documents to amended regulations. The proposals for changes in the scope of the criteria for programme evaluation and the amendment of the Statutes prepared by the working teams of PKA were published on PKA website and stakeholders were invited to discussion on them.

8. Agency's international activities

PKA sets ambitious strategic objectives in the scope of international cooperation and recognises the need for accreditation agencies to conduct joint quality assurance activities, as pointed out by the European Commission and participants in the Bologna Process. It also sees the benefits resulting from such cooperation associated with the possibility for developing innovative tools and review methods ensuring transparency of the process and for providing reliable and comparable information on the quality of higher education in Europe and across the world. From the beginning of its operations, the Committee expressed special interest in and commitment to full membership in international organisations affiliating accreditation agencies, such as CEENQA (Central and Eastern European Network of Quality Assurance Agencies in Higher Education), INQAAHE (International Network of Quality Assurance Agencies in Higher Education), ECA (European Consortium for Accreditation), ENQA (European Association for Quality Assurance in Higher Education), and CHEA IQG (Council for Higher Education and Accreditation International Quality Group). It is worth noting that from its second term of office, i.e. from 2012, representatives PKA have sat on boards, working groups and councils of the above mentioned organisations. As a result, the Committee has contributed to the development of international solutions. The long-standing and multilateral international activities of PKA have contributed to its position in an international arena and confirmed its status of a reliable European accreditation agency, as reflected in multilateral and bilateral agreements signed by the Committee.

In a plenary session held in November 2016, the Polish Accreditation Committee adopted new principles for the Strategy of the Polish Accreditation Committee in the scope of internationalisation, which struck a compromise between a new vision of PKA leadership with regard to international cooperation and the achievements of the Polish Accreditation Committee. The principles also responded to the changing expectations of external stakeholders.

Table 14. Strategic objectives in the scope of internationalisation

Strategic Area 3 - PKA as an active and globally recognised accreditation agency Strategic objectives in this area are oriented mainly at maintaining international position of PKA and using the opportunities resulting from international cooperation in the development of internal procedures.	
Strategic Objective 3.1. – further development of active membership in international organisations promoting quality assurance in HE and intensifying bilateral and multilateral cooperation.	Tasks aimed at achieving this objective include maintaining and improving PKA's position in global and European organisations of accreditation agencies; INQAAHE, ENQA, EQAR, ECA, CEENQA, etc. The achievement of this objective requires commitment to statutory activity and projects carried out by the above organisations and active participation in events and initiatives taken by them.
Strategic Objective 3.2. - intensifying publishing activity and measures aimed at the promotion of PKA operations in an international arena;	Tasks aimed at achieving this objective are closely linked to strategic objective 2.1, yet they assume the publication of results using the means addressed to international recipients, such as conferences and articles in journals devoted to the sector. Activities under this objective should be taken in close cooperation with international partners in order to increase their

	coverage, impact and prestige.
Strategic Objective 3.3. - acquiring funds for projects aimed at the development and improvement of PKA operations;	Tasks under this objective are closely correlated with other strategic objectives of PKA; objective 2.1, 2.4, 2.5 and 3.2, in particular. Acquiring funds for development activities based on international cooperation will allow to finance those tasks with external funds, and to enhance PKA's standing in an international arena, coupled with ensuring synergy between the cooperating accreditation agencies.
Strategic Objective 3.4. - maintaining formal status of PKA in an international arena.	Tasks under this objective are associated with maintaining the existing status of PKA as an organisation with international presence, thanks to its membership in EQAR, ENQA and recognition by the US Department of Education. The achievement of this objective requires a thorough and systematic review of PKA's operations from the angle of adopting recommendations of the above organisations and preparations for subsequent external reviews.
Strategic Objective 2.4. - raising the level of accreditation procedures internationalisation;	This objective stands for the adoption of recommendations presented by a team of ENQA international experts in 2008 and 2013. The internationalisation of accreditation procedures calls for the introduction of an adequate system for the recruitment and training of international experts and for conducting the procedures in English. The achievement of this objective call for the development of a system of incentives for HEIs and adequate preparation of Polish and international experts to work in international teams.

Source: Authors

Active membership in all major organisations affiliating accreditation agencies operating in the field of quality assurance in HE and PKA's multilateral, bilateral and project cooperation prove the Committee's focus on these objectives. As part of activities aimed at the internationalisation of PKA's operations, its members and experts work on panels evaluating the quality of education provided by HEIs abroad; in Lithuania, Romania, Armenia, Macedonia, Russia and Estonia in particular.

PKA operations are also subject to Stocktaking Reports, which analyse the adherence to the communiques from the ministers of the signatory countries of the Bologna Declaration. The Stocktaking Report is prepared in biennial cycles prior to the conferences of ministers for higher education from the signatory countries of the Bologna Declaration. From the beginning of its operations, PKA has prepared five reports on reform implementation; one before the ministerial conference in Bergen in 2005; in London in 2007; in Leuven in 2009; in Bucharest in 2012, and in Yerevan in 2015. Reports have been prepared on the basis of the Stocktaking Report drawn up separately for each country (<http://www.ehea.info/article-details.aspx?ArticleId=86>).

In 2016, PKA established the Section for internationalisation of its accreditation procedures composed of representatives of PKA Sections for individual areas of study, Vice-President of PKA and PKA experts on international matters. The Section has developed guidelines for internationalisation, on the basis of which the team for internationalisation of higher education at Polish Ministry of Science and Higher Education has drawn up the report entitled "The internationalisation of Polish system of higher education" (Polish: "Umiejdzynarodowienie polskiego systemu szkolnictwa wyzszego"). The Report has contributed to the introduction of measures promoting internationalisation taken in 2017, such as: developing the concept of comprehensive evaluation by PKA; a call announced by the Ministry of Science and Higher Education for international accreditations, and calls related to internationalisation using the funding from the EU and the Ministry.

In conclusion, it is worth emphasising that the examples quoted above are only some of the activities of the Polish Accreditation Committee. At present, representatives of PKA are members of several working groups, which are developing new innovative international initiatives. The Committee not only monitors aspects relevant for the European Higher Education Area, but above all initiates several international activities, which is reflected by, among other things, international projects launched by the Committee. In order to meet the expectations of HEIs and face the challenges of the European Higher Education Area (i.e. QA of cross-border HE, digital learning, recognition of non-formal education, joint programmes, internationalisation, innovation, enterp, etc.) representatives of the Committee participate in the works of multinational working groups developing innovative international initiatives in the field of quality assurance in higher education. The detailed mapping of PKA's international activities has been shown in [Appendix no. 6](#).

9. Compliance with European Standards and guidelines (Part 3)

9.1 ESG Standard 3.1 Activities, policy and processes for quality assurance

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.

Evidence proving that the standard has been met:

- The Mission Statement of PKA has been published on the Committee's website. It indicates the objectives of external quality assurance process and the Committee's obligation to cooperate with stakeholders;
- PKA declares in its Mission Statement that its quality assurance tasks form its main area of activity;
- The Mission Statement of PKA has been included in its strategy;
- The method of implementing the Mission Statement of PKA is documented in annual reports on its operations;
- External quality assurance activity is a statutory task of the Committee (Article 48a of the Law on Higher Education);
- PKA has declared that external quality assurance activity is the main tool for implementing its mission;
- In the period 2002-2017, on average, PKA made 380 education quality evaluations per year.

In accordance with Article 49 of the act of 27 July 2005 Law on Higher Education, the main tasks of the Committee are performing programme evaluations and giving opinions on applications. This task was reflected in the Mission Statement of PKA adopted by a plenary session, in accordance with which "*The Polish Accreditation Committee carries out its mission by conducting obligatory programme evaluations and by giving opinions on applications for the authorisation to provide degree programmes submitted by higher education institutions*". With reference to the amendment of the tasks of the Committee, PKA revised its Mission Statement in October 2016. The document adopted in a plenary session of PKA has been published on the Committee's website.

The Mission Statement stipulates that the primary objective of the operations of the Polish Accreditation Committee is supporting Polish HEIs in the process of enhancing the quality of education by conducting obligatory programme evaluations of quality of education and by giving opinions on applications for the authorisation to provide degree programmes. The Committee makes cooperation and dialogue with all stakeholders of the education process its duty and emphasises the impact of its operations in the public.

Carrying out its mission, PKA considers itself a partner in the quality assurance process in Polish system of higher education. The overriding principle observed by the Committee in its works is the objectivity, professionalism and transparency of quality evaluations and opinions issued, which form an indispensable element of supporting Polish HEIs in securing their position in domestic system of higher education. PKA is a platform for cooperation and dialogue for all stakeholders interested in acting on behalf of ensuring top quality of HE. The Committee takes initiative related to such cooperation both at home and in an international arena. In its work, PKA focuses on striking the right balance between the ancillary role it plays for HEIs by providing them with support in building education quality culture and performing its function of an upholder of education quality who cares for the observance of quality standards adopted as part of PKA rating system.

The declarations contained in the Mission Statement of PKA crystallised in its Strategy, which defines five main areas. The strategic objectives have been translated into operational objectives and actions. In addition, ownership and indicators of Strategy implementation effectiveness have been indicated. The Mission Statement and Strategy have been published on the Committee's

website. Moreover, PKA publishes annual reports on its operations. They are available in print and in electronic version.

Performing its tasks, the Polish Accreditation Committee each year designates degree programmes, which will undergo programme evaluation in a given academic year and publishes a relevant list on its website. In the period 2002-2017, the Committee made 6084 evaluations, i.e. on average 380 per year. As part of its powers, PKA evaluates both new fields of study, and as part of complementary activities, regularly performs reaccreditation of the programmes whose evaluation validity period has expired (one year in the case of conditional rating, six years in the case of positive rating, and eight years in case of outstanding rating).

See the next section for detailed information about the use of mechanisms in external quality assurance processes referred to in Part 2 of ESG.

PKA attaches special importance to building relationship with its partners, both at HEIs and ministries, and with representatives of socio-economic stakeholders, as it contributes to the achievement of fundamental strategic objectives of the Committee's operations. The representatives of external stakeholders, students and employers are members of the Polish Accreditation Committee and members of PKA Presidium, Sections (employers) and evaluation panels (a student, employers). The Committee's organisational structure also includes coordinators for cooperation with employer experts and students. The coordinators are responsible for the recruitment, training, and induction of experts and for regular assessment of their performance. In addition, in accordance with the procedure for giving opinions on internal acts of the Committee, any amendments are subject to broad consultation with internal and external stakeholders.

Related documents:

- Act of 27 July 2005 Law on Higher Education - [Appendix no. 2](#);
- Strategy of PKA - [Appendix no. 5](#);
- The Statutes of PKA including annexes - [Appendix no. 1](#);

9.2 ESG Standard 3.2 Official status

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

Evidence proving that the standard has been met:

- The Polish Accreditation Committee is the only in Poland institution responsible for external accreditation and quality assurance of education established on the strength of legal regulations. The status of PKA is described in the Law on Higher Education;
- The Law on Higher Education explicitly states that PKA is an independent body;
- The Supreme Audit Office undertakes regular audits of the Committee's operations and verifies their consistency with binding legal regulations.

The Polish Accreditation Committee is an institution established on the strength of legal regulations, and its status is stipulated in Article 48a of the act. 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. From the beginning of its operations, on the strength of the Law on Higher Education, the Committee conducts programme evaluations of all fields of study offered in Poland. From 01.10.2011 until 2017 PKA also conducted institutional evaluations. The Committee also gives opinions on draft legislation concerning higher education. PKA is the only in Poland institution operating in the scope of quality assurance in higher education based on the law whose resolutions have specific effects for all HEIs operating in Poland. All HEIs running first and second cycle study programmes as well as long cycle (master's degree) programmes must undergo evaluation carried out by PKA. Opinion of PKA on re-granting the suspended authorisation is taken into consideration by the Minister, and a negative rating awarded by PKA as part of programme evaluation can result in suspending or revoking the authorisation to provide degree programmes (pursuant to Article

11(b)(3) of the act). In the case of being awarded an outstanding rating, a higher education institution unit obtains additional funds from the state budget (pursuant to art. 94B(1), and decisions of PKA bring legal effect. The Committee presents to the minister competent for higher education, who is responsible for state policy in the field, the results of programme evaluation conducted in a given field of study, including a teacher training programme, and opinions on the establishment of a HEI, awarding to a HEI the authorisation to provide education, including the authorisation to a foreign higher education institution to establish a higher education institution or a branch campus in Poland.

In accordance with Article 48a of the Law on Higher Education, "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 legal framework also regulates the relations of PKA with other higher education stakeholders. Decisions of PKA are communicated directly to the Minister of Science and Higher Education and other ministers responsible for the supervision over individual types of HEIs; i.e. the Minister of Culture and National Heritage, the Minister of Health, the Minister of National Defence, the Minister of the Interior, and Minister of Maritime Affairs and Inland Shipping. The Minister of Science and Higher Education appoints the members of the Polish Accreditation Committee from among candidates presented by, among others, HEIs, employers' organisations, the General Council for Science and Higher Education, Students' Parliament of the Republic of Poland, conferences of rectors, etc.

Moreover, Article 7(1) of the act of 14 March 2003 - Law on Academic Degrees and Title and Degrees and Title in the Arts (OJ No. 65, item 595, as amended provides for cooperation between the Polish Accreditation Committee and Central Commission for Degrees and Titles in the scope of giving opinions on applications for the authorisation to confer degrees submitted by academic units of HEIs.

In the light of judgements of the Supreme Administrative Court, PKA is not a public administration body and its operations are not governed by the Code of Administrative Procedure. This is why decisions taken by PKA cannot be appealed against to an administrative court. The operations of the Committee and their consistency with legal regulations generally binding in Poland are subject to regular audits by the Supreme Audit Office.

Related documents:

- Act of 27 July 2005 Law on Higher Education - [Appendix no. 2](#);
- Act of 14 March 2003 - Law on Academic Degrees and Title and Degrees and Title in the Arts

9.3 ESG Standard 3.3 Independence

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

Evidence proving that the standard has been met:

- Operational independence and organisational autonomy of the Polish Accreditation Committee have been guaranteed in the act of 27 July 2005 Law on Higher Education;
- Organisational arrangements and operational procedures of the Committee, specific powers of its bodies, detailed criteria and procedure for programme evaluation, and the method for the appointment of reviewers are laid down in the Statutes adopted by the Committee in a plenary session;
- Candidates for Committee members are presented by various stakeholders of PKA, and a Committee member can be dismissed only at the request of the Presidium of the Committee;
- External experts are appointed by autonomous decisions of the President of PKA, which are not affected by state authorities, HEIs or other stakeholders;

- The Bureau of the Polish Accreditation Committee, a state-owned independent budgetary unit, provides administrative and financial services to the Committee; The President of the Committee appoints the Director of the Bureau;
- Decision-making process is independent - PKA adopts independent resolutions and no external institution can impact the decision making process.

Organizational independence

Independence of the Committee on the strength of the binding law was ensured in Article 48a of the Law on Higher Education stipulating that "*the Committee is an independent institution dedicated to enhancing the quality of education*". At the same time, pursuant to Article 53, the Committee has retained the right to develop on its own detailed evaluation criteria.

Operational Independence

The Committee enjoys autonomy in shaping its operational solutions. On the strength of powers granted in the Law on Higher Education, organisational arrangements and operational procedures, specific powers of the Committee's bodies, detailed evaluation criteria and procedures, and the method of appointing reviewers are regulated in the Statutes adopted in a plenary session of PKA. Moreover, all the rules concerning the structure and tasks performed by the Bureau, including employment and remuneration policy lie within the powers of PKA, and the precise remit of the Bureau and its organisational structure are specified in its organisational regulations provided by the President of the Committee (Article 53 of the Law on Higher Education). An important change as compared to the previous period is the introduction in 2014 to the act of the authorisation for the minister competent for higher education to determine, 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. As a result of this change, PKA, when determining detailed criteria for programme evaluation, was obliged to take into account general criteria laid down by the Minister of Science and Higher Education. Moreover, a provision has been added stipulating that the Statutes of the Committee will come into force, if the minister competent for higher education does not submit reservations concerning its legal compliance within thirty days of the receipt of the Statutes.

PKA also maintains its independence in the scope of appointing experts. PKA members are appointed by the minister responsible for higher education from among candidates presented by the General Council for Science and Higher Education (Rada Główna Nauki i Szkolnictwa Wyższego), Conference of Rectors of Academic Schools in Poland (Konferencja Rektorów Akademickich Szkół Polskich), Conference of Rectors of Non-University Higher Education Institutions in Poland (Konferencja Rektorów Zawodowych Szkół Polskich), Students' Parliament of the Republic of Poland (Parlament Studentów Rzeczypospolitej Polskiej), National Representation of Doctoral Students (Krajowa Reprezentacja Doktorantów), HEI senates, nation-wide academic associations and employers' organisations. A Committee member can be dismissed only at the request of the Presidium of PKA, which limits the possibility for intervening in the internal staffing policy of PKA and affecting its governance rules. The President of PKA appoints PKA experts, and the Secretary of PKA appoints members of evaluation panels. No external institution is authorised to affect the composition of PKA evaluation panels or the list of experts.

PKA on its own selects degree programmes to be evaluated in a given academic year. The Minister of Science and Higher Education may request that PKA conducts an evaluation outside of the adopted annual schedule. Besides, on the request of a HEI interested in evaluation, the Committee may include the HEI in the schedule in a given academic year.

Moreover, the Law on Higher Education grants powers to PKA to independently decide about the scope and form of cooperation with other accreditation institutions operating in Poland and abroad.

Independence of formal outcomes

The resolutions of the Committee are final and no external institution is authorised to alter them or affect their contents at any stage of their drafting. The units offering degree programmes under evaluation may present additional information/documentation in response to a site visit report and as part of the appeal process. In the case of a negative rating, the minister competent for higher

education is obliged to revoke or suspend the authorisation to provide education in the evaluated field of study and at the level of education. The experience shows that the subsequent ministers for higher education have made decisions in this scope that were consistent with the resolutions of the Presidium of PKA.

The decision making process, which is divided into stages, (the evaluation panel, the Section and the Presidium) as provided for in the Statutes of the Polish Accreditation Committee excludes the possibility of an interference by a third party or their influence on the contents of a resolution. The Polish Accreditation Committee makes all the decisions collegially and in an independent manner. As observed by the review team in 2008 and confirmed in 2014: *"The two-stage decision-making procedure combined with collective decision making prevents any third party from influencing quality ratings that PKA gives as a result of its ex-post evaluations and opinions given as part of the ex-ante evaluation"*.

Related documents:

- Act of 27 July 2005 Law on Higher Education - [Appendix no. 2](#);
- The Statutes of PKA including annexes - [Appendix no. 1](#);

9.4 ESG Standard 3.4 Thematic analysis

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

Evidence proving that the standard has been met:

- PKA publishes annual reports summarising its operations in a given calendar year and presenting an in-depth analysis of its results;
- PKA reports are published for each year and for each term of office and illustrate major events and trends, as well as good practices and weaknesses;
- As part of its project-based activity, PKA makes thematic analyses and prepares studies, which are relevant for the agency and the entire system of higher education;
- Representatives of PKA publish articles in Poland-wide journals and conduct research (e.g. on quality culture, strategic management at HEIs), and share their achievements in plenary sessions, with relevant Parliamentary committees and organisations operating in the field of higher education.

Each year, the Polish Accreditation Committee makes qualitative and quantitative analyses of its operations. The results of such analyses are published in annual reports (www.pka.edu.pl) or in reports on a given term of office, which are also sent to HEIs and external stakeholders. Annual publications are usually approx. 200 page long and data presented in them give grounds for drawing conclusions on the whole population on the basis of studies on samples of the population (i.e. data comes from evaluations completed in a given reporting year or term of office or from applications to which opinions were given). The presented studies are used to identify the frequency of occurrence of a given phenomenon and to determine the level of interdependence, which exists between individual data. Factual analyses contained in the reports and pertaining to the operations of individual sections include, among other things: general observations of PKA evaluation panels with reference to specific fields of study formulated based on the analyses of reports covering the whole reporting period; the most frequent reasons for reservations expressed by PKA; assessment of changes and development trends; assessment of the impact of PKA operations on the development of quality culture.

Often annual reports feature statements saying that the number of conditional ratings decreased as compared to the previous period, because HEIs implemented a recovery plan, which is a tangible expression of the impact of the Polish Accreditation Committee on improving the quality of education at HEIs. In addition, the reports indicate the main reasons for awarding individual ratings, which allow for the identification of the challenges for the improvement of the quality of education provided by HEIs and areas that require corrective action (see: The operations of the Polish

Accreditation Committee in the period 2012-2015, fourth term of office, pp. 43-46), and thus to identify areas requiring support on the part of the units concerned and PKA itself. Publications for a given year feature data on the previous calendar year. Analyses with a wider scope (including these allowing for the observance of trends) are published at the end of a term of office of PKA and cover three (in the past) or four (at present) years of PKA's operations. The conclusions resulting from annual analyses serve to improve quality assurance methods used by PKA and are source of information for external stakeholders.

On top of that, the Committee takes a number of steps to examine/diagnose issues, which are of significance for the quality assurance system and higher education. Thus, it enhances its impact on selected aspects of HEIs' operations (i.e. to mention the development of internal quality assurance systems, internationalisation, innovativeness of higher education, cooperation with socio-economic stakeholders, providing education with practical profile, quality-oriented models of education provided as part of programmes in pedagogy and programmes including pedagogical specialisation). Due to the fact that no dedicated analytical unit operates at PKA, and having in mind cost-intensiveness of such operations, activity linked to thematic analyses are mainly taken in the framework of international projects (to mention EIQAS, IMPEA, etc.) or by expert task forces appointed by the President of PKA, such as the Section for quality-oriented models of education provided as part of programmes in pedagogy and programmes including pedagogical specialisation. In the period 2014-2017, EIQAS ('Enhancing Internal Quality Assurance Systems') project was carried out. The project focused on the improvement of internal education quality assurance systems operating at HEIs and ESG 2015 Part 1.

In the framework of the project, a quantitative and qualitative study on the development of internal education quality assurance systems at HEIs was conducted. One of the analysed aspects was determining the degree of internal quality assurance systems maturity and the Committee's impact on their development, and identifying further areas of support. All intellectual outputs of the project were posted on the website (www.eiqas.com), the most important include:

- *Country Report Poland*, I. Kwiatkowska & M. W. Socha, Warsaw, 2015
- *Cross-country report Bulgaria, Poland, Portugal, Slovenia*, I. Kwiatkowska, M. Fonseca, K. Subic, T. Shopov, Warsaw, 2015
- *Reference framework for comparative analysis of assessment methodologies of IQA*, J. Sirok, M. Markowski, I. Kwiatkowska, M. Fonseca, T. Shopov, Ljubljana, 2015
- *Comparative analysis of assessment methodologies of IQA*, J. Sirok, M. Markowski, I. Kwiatkowska, M. Fonseca, T. Shopov, Ljubljana, 2015
- *Students' Guide to ESG*, A. Gaber, A. Praznik, I. Jesih, J. Strbac, B. Petrov, R. Jakimova, V. Dimitrova, V. Petkova, A. Ganchev, A. Mrozowska, E. Profaska, G. Kołodziej, T. Kocoł, L. Nowak, A. Mordido, H. Soares, J. Ferreira, M. Sampaio, S. Vileila, E. Bohinc, Ljubljana, 2016
- *Guide to IQA*, I. Kwiatkowska, M. W. Socha, M. Fonseca, M. Markowski, T. Shopov, V. Perovsek, A. Kraśniewski, S. Vileila, J. Borges, A. Mrozowska, G. Kołodziej, Warsaw, 2016
- *Final methodology for identification of good practice in IQA. Descriptions of examples of good practice*, M. Penelova, T. Shopov, M. Markowski, M.W. Socha, M. Fonseca, V. Perovsek, I. Santos, K. Subic, Sofia, 2015

In addition, in 2015, in parallel to the EIQAS project and in line with the recommendations of the review team who analysed the operations of PKA in 2014, the Committee published the first in a series book entitled *Selected good practices in education quality assurance at Higher Education Institutions in Poland* (Polish: *Wybrane Dobre praktyki zarządzania jakością kształcenia w polskich szkołach wyższych*). The book edited by prof. dr hab. Łukasz Sułkowski features 10 good practices selected together with HEIs. The publication of the book was preceded by numerous meetings of quality expert groups, during which the criteria for the identification of good practices were identified for the needs of PKA.

Since 2017, another IMPEA project (Facilitating Implementation of European Approach to Quality Assurance of Joint Programmes) has been carried out. The objectives of the project focus on one of

the dimensions of higher education, internationalisation, i.e. joint programmes. Both HEIs and accreditation agencies identify challenges in the area of the provision and accreditation of joint programmes. For many years, PKA has advocated the introduction of legal regulations promoting the provision of this type of studies in Poland, as well as the accreditation of such programme and recognition of accreditation decisions. The present draft bill allows for making relevant analyses and presenting satisfactory solutions at the national level. Any outputs of the project will be posted on a dedicated website (www.impea.online).

PKA also responds to numerous remarks and worrying signals coming from the academia, employers and experts concerning the challenges of education quality assurance and seeks to address these issues in the diagnoses/analyses it makes. An example of such measures is making analysis related to the process and methods of external quality assurance of study programmes with teaching specialisation offered as part of non-teaching fields of study, including student placements at schools. PKA Employers Section has presented an initiative consisting in the appointment of a team of experts who would develop relevant standards for their implementation. The selection of experts and interdisciplinary areas they represented contributed to making possibly the most comprehensive diagnosis of above issues. The team presented the main issues and challenges to be tackled. Three main goals relating to the steps to be taken in the area of accreditation process, education and training standards and student placements were set. With reference to the issues identified by the experts, which the above mentioned circles considered as the most contentious ones, already at an early stage of work the experts recognised the need to run broad consultation with the academia, students, graduates and employers. The team presented the diagnosis and its position at two conferences devoted to teacher education held in Kraków (14 May 2017 and 16-17 November 2017 - Quality Forum). The positions adopted by the members of PKA team have been presented to the representatives of the Ministry of National Education and to the joint teams appointed by the Ministry to develop new standards for teacher education and to identify the criteria, which units offering teacher training should meet.

As part of this area of activity, the Polish Accreditation Committee publishes articles in Polish academic magazines for general public (e.g. *Forum Akademickie*, *Gazeta Prawna*, *Rzeczpospolita*), in academic journals (Peter Lang International, Entrepreneurship and Management, PWN), propagates research conducted by individual PKA members (grants of the National Science Centre) on the basis of the output of the Committee (i.e. Quality culture, strategic management) and PKA leadership attend meetings of the Sejm and Senate committees for education.

PKA is aware of the growing wealth of information it avails of and, as far as possible, strives to make analyses responding to the current demand of the institution and its stakeholders. The establishment of a dedicated analytical unit within the organisational structure of PKA would allow for the professionalisation of its activities in this area. The draft bill meets the expectations of the Committee in this scope.

9.5 ESG Standard 3.5 Resources

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

Evidence proving that the standard has been met:

- PKA has a membership ranging from 80 to 90 members appointed by the minister competent for higher education in accordance with the provisions of the Law on Higher Education. PKA members work within eight sections and the Appeals Body, which perform statutory tasks of PKA;
- PKA is supported by almost 1300 experts. PKA experts are appointed on the strength of a decision of the President of PKA based on the needs identified by authorised stakeholders;
- PKA members and experts undergo intensive internal training in order to ensure effective implementation of external quality assurance processes;

- PKA avails of sufficient financial resources allowing for the implementation of its statutory tasks, including annual work schedules developed by the Presidium. Planning and monitoring of expenditures are conducted in accordance with the rules stipulated in the public finance law.
- PKA Bureau employees, who provide administrative services to PKA, are hired based on employment contracts;
- The infrastructure is adequate for the implementation of current tasks of PKA, and the list of IT tools used in day-to-day work is consistently expanded.

Human Resources

In accordance with article 48 of the Law on Higher Education, members of the Polish Accreditation Committee are appointed by the minister competent for higher education from among candidates presented by the 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 and employers' organisations. The Committee is composed of not less than 80 and not more than 90 members, and the minister competent for higher education appoints members of the Committee representing not more than 50% of all its members from among the persons acting as members of the Committee in the previous term of office, taking into account the evaluation of their work by the Presidium of the Committee. Academic teachers holding at least the degree of doktor and having a higher education institution as their place of primary employment and employers' representatives, to whom the above requirement does not apply, can be appointed Committee members. By virtue of law, the President of the Students' Parliament of the Republic of Poland is also a Committee member. During the 5th term of office, PKA has 90 members, including 36 members who acted as its members during the fourth term. Invariably, the vast majority of Committee members hold the title of professor. As at the commencement of the fifth term of office this group forms 47.8% of Committee members. Among PKA members are also holders of the degree of doktor habilitowany (43.3%) and holders of the degree of doktor (8.9%). The largest number of changes (i.e. 4.4%) in the Committee's membership was observed in the third quarter of 2016, when its members who were elected members of authorities of their respective HEIs had to give up their PKA membership.

A large group of experts (approximately 1,300), including 49 international experts, participates in the work of PKA. As part of human resources development measures, PKA members and experts undergo training. In the period 2015 - 2017, approx. 50 such training events were organised ([Appendix no. 11](#)).

Table 15. PKA's Experts

Expert	Year		
	2015 (31.12)	2016 (31.12)	2017 (20.11)
from among academic teachers (quality)	1069	1080	1035
from among students	39	43	46
quality expert	21	21	-
from among employers	85	129	129
for evaluation process (on legal and organisational bases for HEIs' operations; on internal education quality assurance system)	24	24	23 experts on internal education quality assurance systems/ 27 experts for evaluation process
Total	1298	1357	1309

Source: Authors

PKA members, including the President, Vice-President and Secretary, are not officially employed at the Committee, yet they may be fully or partially exempted from the obligation to teach classes at

their HEIs. Apart from benefits, such a solution results in negative consequences consisting in the fact that PKA members are not fully focused on the implementation of PKA's statutory tasks.

Bureau of the Polish Accreditation Committee, a state-owned independent budgetary unit, 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. At present the Bureau employs 23 staff members displaying broad competences. The employees of the Bureau perform the functions of secretaries of Committee sections and some of them act as experts in the accreditation process. They are also responsible for international activities, accountancy and legal and organizational matters at the Committee. However, due to low remuneration rates and the freeze on wages in the public sector, they do not obtain sufficient compensation for their qualifications. As a result, a big rotation of staff has been observed for the past few years.

Material and IT resources

In order to perform its statutory tasks, the Committee rents office space of 900m². It is sufficient, with adequate organisation, to provide enough space for the work of the Presidium, sections working within areas of study and PKA Bureau. For bigger meetings, rooms are rented and paid for with internal funds of PKA Bureau. For the needs of optimising the effectiveness of its internal processes and procedures, PKA has developed dedicated IT infrastructure and applications (to mention databases of evaluations and applications, repository of documents used by PKA members and experts, correspondence file, intranet). In addition, in 2017, works started on the introduction of a report generator at PKA, which in the future will allow evaluation panel members develop in parallel final site visit reports. PKA also has access to the Integrated Information System on Science and Higher Education POL-on.

Financial Resources

In accordance with Article 53 of the Law on Higher Education, the operations of PKA are fully funded by the state budget. HEIs do not bear any financial costs of state accreditation. At present, annual budget of PKA amounts to 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 bulk of PKA's expenditure. The amount and principles for paying such remuneration are determined by way of a regulation of the Minister of Science and Higher Education. At present, it is based on the regulation of the Minister of Science and Higher Education of 15 December 2014 on the remuneration for members of the General Council of Science and Higher Education, members of the Polish Accreditation Committee, reviewers and experts appointed by the Council and the Committee, members of the Council's disciplinary committee, members of the disciplinary committee appointed by the minister competent for higher education, disciplinary ombudsmen appointed by the minister competent for higher education, and the Ombudsman for Graduate Affairs (OJ 2014, item 1965), which stipulates that the remuneration for each day of work during site visits at HEIs amounts to PLN 970.20. The vast majority of visits lasts two days, therefore each member of evaluation panels is paid PLN 1940.40 for each visit.

Table 16. The budget structure / Expenditure schedule for 2018

Expenditure schedule for 2018

For the Bureau of the Polish Accreditation Committee under part 38 "Higher Education"
Section 803 "Higher Education" Chapter 80395 "Other activity"

Item no.	Specification	Paragraph	Plan (PLN)
1.		3	4
1.	Current expenditure		9,690,000
	including:		
	Current expenditure of the unit	4000	2,498,000
	Payroll	4010	1,059,000
	Supplementary payroll	4040	84,000
	Social security contributions	4110	293,000

	Labour Fund contributions	4120	41,000
	Outsources work costs	4170	5,526,000
	Purchase of renovation services	4270	4,000
	Domestic business trips	4410	20,000
	International business trips	4420	70,000
	Various fees and contributions	4430	6,000
	Contribution to the Unit's Social Benefits Fund	4440	29,000
	Fees paid to international organisations	4540	50,0000
	Training of staff who are not members of the civil service	4700	10,000
2.	Capital expenditure		101,000
	Including		
	Expenditure for the investment by state budget units	6060	101,000
	Total expenditure		9,791,000

Source: Authors

Based on the experiences of more than 16 years of the Committee's operations, it can be said that human and financial resources have allowed for efficient organisation of works related to the objectives and tasks of PKA. In particular, all the operational objectives have been met, including these related with scheduled site visits and giving opinions on applications, and PKA budget has been balanced.

The growing need to enhance analytical operations of PKA calls for increasing the budget and looking for alternative sources of funding of some of its expenditure. The bulk of analytical and/or development activities is financed with external funds, as PKA applies for external funds, such as European grants, e.g. as part of the Erasmus+ programme and restricted grants awarded by the European Commission and OECD. In the period 2014-2018, PKA benefited from such funds when coordinating EIQAS and IMPEA projects funded as part of Erasmus+ with a total value exceeding EUR 680,000 and when acting as a partner organisation, to which the costs of work of individual experts who contributed to intellectual outputs of such projects were reimbursed (i.e. CEQUINT, HEInnovate, EQUATIC, The University of Future, etc.). It is also necessary to employ more staff at the Bureau and secure funds allowing for the employment of employees displaying adequate competences.

9.6 ESG Standard 3.6 Internal quality assurance and professional conduct

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

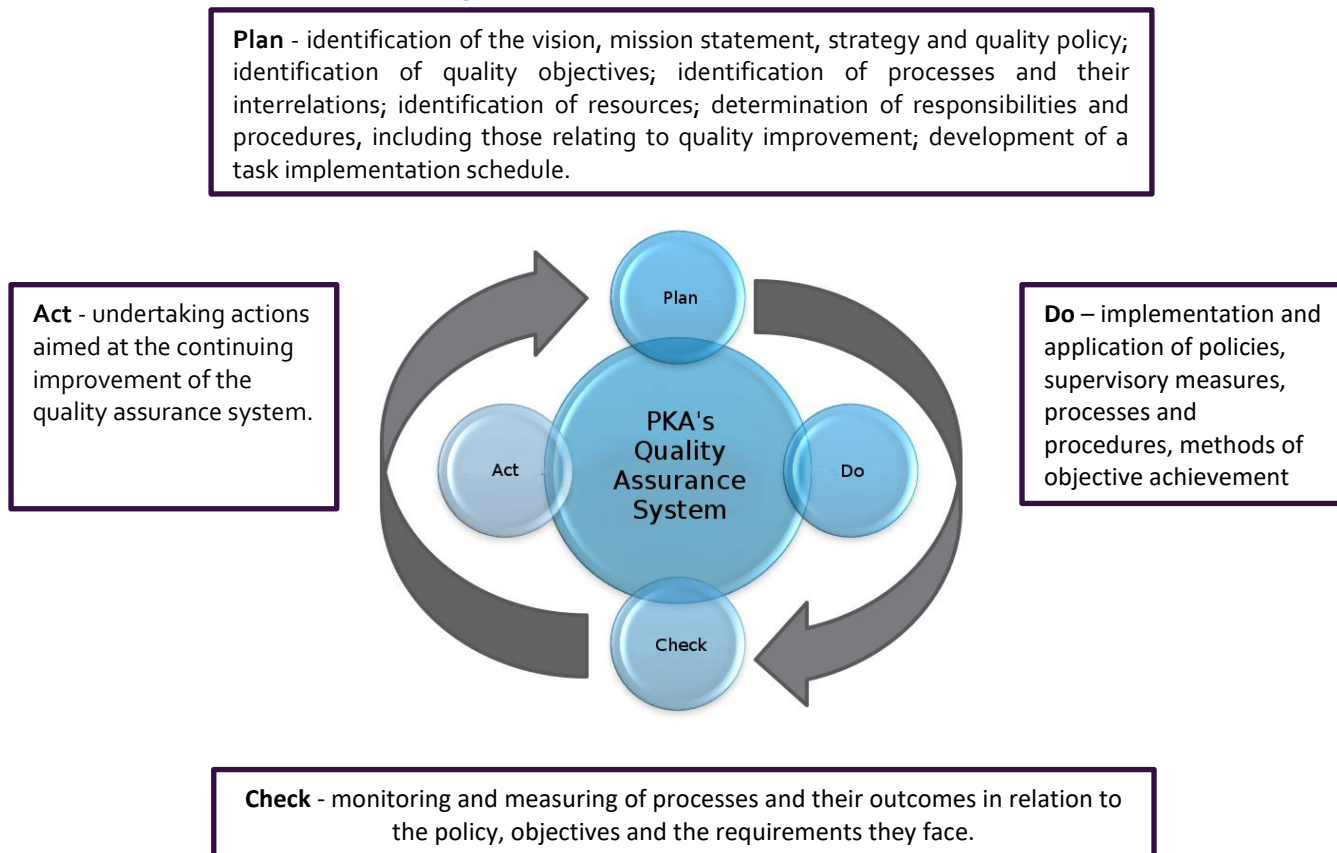
Evidence proving that the standard has been met:

- Feeling accountable for its operations, PKA has adopted its Quality Policy and quality objectives, which are related with the Mission and Strategy of the Committee and form the basis for the implementation of its activities in the field of quality assurance. The Polish Accreditation Committee adopts the Mission Statement, Strategy and Quality Policy in a plenary session and informs its internal and external stakeholders about them via its website.
- The Polish Accreditation Committee has implemented a comprehensive internal quality management system concerning its work, which is consistently adapted to changing legal regulations;
- A mechanism to prevent conflicts of interest has been implemented at the Polish Accreditation Committee. It covers the procedures for selection, monitoring and evaluation of work of Committee members and experts;
- In accordance with the Statues, professionalism, impartiality and transparency are the overriding principles for the operations of the Polish Accreditation Committee. For this purpose, the Section for Ethics has been appointed and the Code of Ethics has been adopted. In addition, PKA members and experts sign a declaration of no conflict of interest;
- PKA has adopted criteria for the selection of experts, which have been made public. Notices of vacancies and lists of experts are fully transparent to external stakeholders;

- PKA has a formal mechanism in place, which allows for reflection, collecting, analysing and using information from external and internal stakeholders in order to improve its processes;
- Both the results of PKA's work and the results of analyses related with the monitoring of the quality of its works are presented to external and internal stakeholders during regular meetings, published in annual reports and on its website;
- Moreover, representatives of external stakeholders have been appointed to the Presidium of the Polish Accreditation Committee, evaluation panels, and as a result have direct influence on the operations of PKA;
- The operations of the Committee are subject to cyclical, mandatory inspections and external reviews conducted by international organisations and the domestic control bodies;
- PKA neither subcontracts nor outsources any elements of the evaluation and accreditation processes;
- The processes, procedures, guidelines and criteria identified by the Committee form the basis for external quality assurance and decision-making processes. In accordance with the suggestion of the team, which staged the review of PKA's operations in 2014, the Committee ensured the objectivity of the appeal process and appointed an independent Appeals Body.

The Polish Accreditation Committee has introduced a comprehensive internal quality management system, which involves all the processes and procedures in the scope of its powers and responsibilities. The identification of key processes allowing for the implementation of tasks entrusted to the Polish Accreditation Committee in relation with the requirements formulated in the Law on Higher Education and implementing regulations formed the basis for the development of the internal quality assurance system. The model of the quality assurance system at the Polish Accreditation Committee operates in the PDCA cycle related to the planning, implementation, supervision and continuing improvement of identified processes.

Figure 6. PKA's Quality Assurance System



Source: Authors

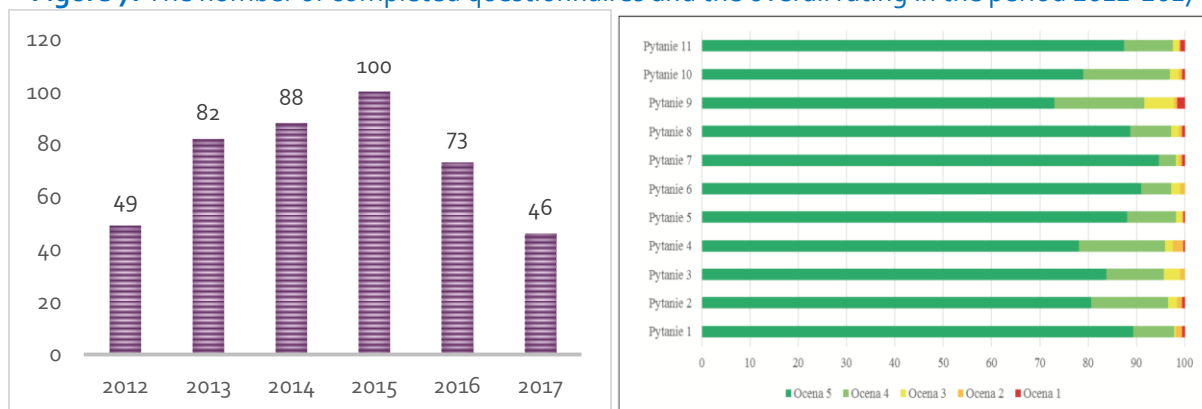
The ultimate goal of the quality management system is to raise the effectiveness of activities undertaken in relation to the implementation of the Mission Statement and Strategy of the Polish Accreditation Committee, their continuous improvement, as well as to ensure that the statutory tasks are implemented in a way that guarantees the repetitiveness of quality characteristics. Moreover, the objectives of the system include ensuring professionalism and objectivity in the scope of projects implemented, providing resources guaranteeing high standards in project implementation and improving communication channels and cooperation with Committee stakeholders. In relation with the implementation of the system requirements, processes, which are the most important for the work of the Polish Accreditation Committee have been identified, i.e. objectives, procedures and the scope of responsibilities at individual stages of implementation have been described for each process. These processes are monitored and supervised in accordance with the requirements stipulated in generally binding and internal regulations of the Polish Accreditation Committee, with taking into consideration indispensable facilities and qualifications of human resources. Having regard to the dynamics of change in legal regulations, PKA systematically updates its quality assurance system and introduces procedures improved in line with comments formulated by internal and external stakeholders.

Professionalism, impartiality and transparency are the overriding principles for the operations of the Polish Accreditation Committee. Having the above in mind, a multi-stage mechanism, which does not cause the conflict of interests between the members and experts of PKA, and which allows for the observance of the above rules in day-to-day work of the Committee, has been purposefully implemented. The initial stage is implemented in accordance with the procedure for the selection of experts, which allows for the appointment of professionals meeting the criteria of the Polish Accreditation Committee in terms of qualifications, competences and predispositions for working as Committee experts. The procedure for the selection of candidates is fully transparent, as notices of expert vacancies are posted on the website of PKA, the same holds true for the lists of selected experts. HEIs and all stakeholders know the names of all experts and are free make reservations at an early stage of quality assurance process. Experts are appointed by a decision of the President of the Polish Accreditation Committee and are obliged to take on a commitment not to take actions, which could collide with the performance of entrusted tasks. Moreover, in accordance with the provisions of the Statutes, in performance of their tasks, experts are obliged to abide by the Code of Ethics, which stipulates the rules for ethical conduct of PKA members and experts and the scope of liability for their infringements. For the infringement of rules of conduct stipulated in the Code of Ethics, Committee members and experts are accountable to the Section for Ethics appointed from among Committee members in the first plenary session of a given term of office. Detailed organisation and mode of work of the Section for Ethics are stipulated in the regulations adopted by the Section. The Secretary of the Committee is responsible for ongoing monitoring of the implementation of the mechanism. In accordance with the procedures, the Secretary is also responsible for the appointment of members of evaluation panels and persons who analyse questionnaires sent by HEIs on an ongoing basis. The Polish Accreditation Committee monitors and measures the effectiveness of all processes in relation to the implemented policy, objectives and requirements set for the processes relating to quantity (among other things determined in the schedules) and to quality (among other things in the national legislation and internal regulations). In the measurements, external and internal feedback mechanism and an ongoing control by PKA bodies in accordance with the powers granted in the Status are applied.

External feedback mechanism

- Based on the questionnaires filled out by the HEIs upon the completed evaluation process (introduced in 2011), the overall rating of the Polish Accreditation Committee in the years 2012-2015 was very good; the arithmetic mean calculated on the basis of the answers to closed questions amounted to 4.75 on a 1-5 scale. However, in the years 2016-2017, a very low response rate was observed. Each quarter, PKA publishes on its website a summary of completed questionnaires, and once a year it presents an annual summary.

Figure 7. The number of completed questionnaires and the overall rating in the period 2012-2017



Rating 5 Rating 4 Rating 3 Rating 2 Rating 1

Source: Authors, based on the report "Działalność PKA 2012-2015" and quarterly analyses of completed questionnaires in the period 2016-2017.

The respondents were asked the following closed questions: 1) *Did the PKA Bureau send you a notice of the planned site visit well in advance so that you could prepare for it well?* 2) *Do you believe that members of the evaluation panel became well acquainted with the self-assessment report prior to the visit?* 3) *Did the scope of the visit allow for efficient and reliable evaluation of education quality?* 4) *Did the duration of the site visit allow for efficient and reliable evaluation of education quality?* 5) *Did the evaluation panel present their expectations in a comprehensible manner?* 6) *Did the evaluation panel present their expectations in a manner consistent with applicable law?* 7) *Did the attitudes and conduct of evaluation panel members during the site visit reflect their respect of ethical standards?* 8) *Was the summary of the evaluation panel's work presented during the meeting with the authorities of the HEI supported by matter-of-fact and objective argumentation?* 9) *Did the site visit prove helpful in solving current issues concerning the degree programme/unit subject to evaluation?* 10) *Did the site visit prove helpful in channelling possible changes?* 11) *How do you assess the quality of the evaluation panel's work?*

- "Quality Window" - a tool for communication with stakeholders, which is available on the website dedicated to internal quality management system of the Polish Accreditation Committee and which provides an unhindered communication channel. However in the past, stakeholders extremely rarely benefited from this opportunity, and if any questions appeared, they mainly related to the questions of criteria interpretation.
- External consultation mechanism has been established under a separate procedure and is used for the collection of opinions put forward by external stakeholders, including the opinions presented by the Conferences of the Rectors, Minister of Science and Higher Education, General Council for Science and Higher Education, Students' Parliament of the Republic of Poland, representatives of external stakeholders sitting on the Presidium and evaluation panels. The Committee also provides opportunities for consultation via its website, where individuals and HEIs can present their opinions. Recently, two major consultation processes were held in 2014 and 2016. They related to the amendments of legal regulations and the need for PKA to adapt to new reality. The consultation is not only about presenting opinions on internal acts adopted by PKA, but also about the reflection on the quality assurance system and operation of the higher education system.
- PKA Quality Forum - is a platform for annual meetings of stakeholders and discussion on the most significant issues for higher education and quality assurance system. PKA invites external stakeholders to discussion and opens up to dialogue. PKA sends an open invitation to the Quality Forum by posting it on its general website and a dedicated service at <http://www.forumjakosci.edu.pl>. HEIs operating in relevant areas are invited to co-organise the Forum. In the period 2012-2017, Quality Forums focused on the following topics: "New challenges to providing education and its quality assurance", 5-6 November 2012; "Challenges to quality assurance in higher education", 26-27 March 2015; "Degree programmes with practical profile - the first years' experience" 9-10 June 2015; "Programme assumptions and

providing education as part of degree programmes with practical profile", 16-17 November 2016; "New quality in teacher education", 16-17 November 2017.

- Regular external reviews of PKA's operations are undertaken by domestic (the Supreme Audit Office) and international institutions (ENQA). From 2004, PKA has been subject to several inspections by domestic inspection authorities. Inspection reports have shown that the Committee performs its tasks in accordance with binding regulations and called for enhancing or modification of procedures in place. Inspection reports have been posted on the websites of inspection bodies and were presented at meetings of parliamentary committees.

Internal feedback mechanism

- opinions on quality issues or needs expressed by PKA members, experts and employees of the Bureau during regular meetings with the management of PKA and its Bureau -- PKA is open to dialogue with its internal stakeholders, because the quality of its work is the overriding value for PKA members and experts;
- the results of the ongoing and cyclical assessment of the performance of PKA members and experts -- the Secretary of PKA makes such an assessment on an ongoing basis and based on the results of their work, whereas cyclical evaluation is carried out at the request of the President or Presidium of PKA, in the case of PKA members (2015, 2017), or on the initiative of coordinators of expert groups, in the framework of the programmes for evaluation and development of expert skills (annually - students, employers);
- reviews of the quality management system - are carried out on regular basis in order to introduce updates related to amendments of legal regulations or improvements of procedures in place;
- cyclical self-assessment of PKA operations -- is an internal mechanism for self-reflection, which helps to identify weaknesses and challenges for the development of PKA. In addition, corrective action programmes developed in line with recommendations of external panels bring short- or long-term improvement measures taken by PKA.

Being aware of the importance of modern forms of communication and having in mind the need to support the improvement processes by means of dialogue with stakeholders, the Polish Accreditation Committee has launched a website at www.pka.edu.pl and a quality assurance system information panel accessible to the public at www.pka.jakosc.edu.pl, where current analyses are published. Online communication is used for broad consultation with stakeholders on essential works on the criteria and on the recording of the accreditation process.

Related documents:

- Statutes of PKA - [Appendix no. 1](#);
- The Code of Ethics of PKA - [Appendix no. 7](#);
- Quality Management System - [Appendix no. 8](#);
- Regulations of the Section for Ethics - [Appendix no. 12](#);
- Regular reports of the Polish Accreditation Committee on its operations available at www.pka.edu.pl

9.7 ESG Standard 3.7 Cyclical external review of agencies

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

Evidence proving that the standard has been met:

- The Statutes of PKA provide for compulsory external review of its operation held once every 5 years.

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.

Related documents:

- Statutes of PKA - [Appendix no. 1](#);

10. Compliance with European Standards and guidelines (Part 2)

10.1 ESG Standard 2.1 Consideration of internal quality assurance

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

Evidence proving that the standard has been met:

- Individual standards of Part 1 of ESG for quality assurance in the European Higher Education Area are reflected in programme and evaluation criteria adopted by PKA.

In accordance with the 2016 regulation of the Minister of Science and Higher Education on the conditions for providing degree programmes, *"an academic unit of a HEI can provide first cycle, second cycle or long-cycle degree programmes, if it takes - as part of an internal quality assurance system - systematic measures aimed at the assessment and improvement of the study programme, especially in the context of the needs of the social and economic stakeholders, including the labour market"*. In accordance with the binding law, PKA conducts quality evaluations of individual fields of study (Article 48a (3) of the Law on Higher Education) and submits to the minister competent for higher education 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 (Article 49 (1)(1) of the Law). Article 48a (3) specifies general criteria, which PKA should take into consideration when conducting evaluations of individual fields of study (programme evaluation). These criteria include the effectiveness of internal education quality assurance system (Article 48a (3)(5), which was reflected in the evaluation criteria adopted by the plenary session of PKA. Article 48 (3) sets the framework for external quality assurance activities. PKA is responsible for conducting evaluation and awarding ratings in accordance with the scale specified in the Law. Table 17 presents the mapping of programme evaluation criteria against standards specified in ESG 2015, Part 1.

Table 17. Mapping programme evaluation criteria against standards of ESG, Part 1

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

Source: Authors

In the case of giving opinions on applications, PKA does not take decisions on the establishment of higher education institutions and on 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; Upon a request of a rector and having consulted the Polish Accreditation Committee, the Minister of Science and Higher Education takes the decision concerning learning outcomes specified by the HEI's senate and the fulfilment of the conditions set forth in the regulations issued under Article 9 (3)(1)(2) and under Article 9b, in the case of degree programmes in medicine, dentistry, pharmacy, nursing, midwifery, medical analysis/ laboratory medicine, veterinary

medicine, and architecture; and Article 9b, in the case of training of students preparing for the profession of a teacher, and in some cases having consulted a competent minister having supervision over a HEI, as referred to in Article 33(2), i.e. the Minister of National Defence – in the case of military higher education institutions; minister competent for internal affairs – in the case of public services higher education institutions; minister competent for culture and national heritage – in the case of higher education institutions for the arts; minister competent for health – in the case of higher education institutions for medical studies; minister competent for maritime economy – in the case of higher education institutions for maritime studies. (Article 11 (4)(1) and (2) of the Law on Higher Education).

It is worth highlighting that only academic units of HEIs, which are not authorised to award the degree of doktor habilitowany in an area of study and discipline, to which a given degree programme is assigned, must apply for the authorisation to provide degree programmes in specific fields of study, at specific levels and with specific degree profile. Academic units holding such authorisation can provide degree programmes with general and practical profiles in the fields of study and at the levels of study determined by a resolution of the senate, which correspond to the areas of study and disciplines in which such a unit is authorised to award the degree of doktor habilitowan (Article 11 (1)(3) of the Law on Higher Education).

The analysis of binding regulations shows that PKA does not conduct ex-ante evaluation in the classic sense of the term, but 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.

In this process, PKA serves as an opinion-giving body, and the scope of its opinions is set out in Article 11 (4)(1) and 11 (4)(2) of the Law on Higher Education and in Article 15 of the regulation of the Minister of Science and Higher Education of 26 September 2016 on the conditions for providing degree programmes, which also stipulates in detail the contents of an application for such an authorisation. Although the contents of the applications specified in the above-mentioned regulations do not require separate description on internal quality assurance system, the HEIs while describing programmes and their conditions include presentations of quality assurance mechanisms.

Therefore, when drawing up an opinion on an application, the Polish Accreditation Committee builds on material evidence, the contents of which are determined by the minister of science and higher education in the above-mentioned regulation.

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. In the case of programmes in medicine, programme evaluation of a newly established field of study is conducted at the end of the first year of education. It is worth noting that programme evaluation of any field of study may be conducted at any time, at the request of the minister of science and higher education.

Therefore, Table 18, which illustrates reference criteria used by PKA when drawing up opinions on applications for launching a new field of study, shows that the criteria PKA uses neither have direct references to nor fully relate to the following standards of Part 1: the ESG Standard 1.7 Information Management; ESG Standard 1.8 Public information; ESG Standard 1.9 On-going monitoring and periodic review of programmes; ESG Standard 1.10 Cyclical external quality assurance. These standards are closely linked to internal quality assurance.

Table 18. Mapping of the criteria used in drawing up opinions on applications against ESG, Part 1

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

Source: Author

10.2 ESG Standard 2.2 Designing methodologies fit for purpose

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

Evidence proving that the standard has been met:

- The general objectives for external quality assurance processes are defined in the Law on Higher Education and implementing acts, and specified in more detail in the Mission Statement and internal regulations of PKA, which are made public;
- Stakeholders are involved in the process of creating and improving external quality assurance system and provide opinions on legal acts.

The external quality assurance system in Poland is based on two pillars; the generally binding law and internal regulations adopted by the Polish Accreditation Committee. At a general level, the objectives of processes related to quality assurance are specified in the act of 27 July 2005 Law on Higher Education and implementing acts. These legal regulations are published in publicly accessible official journals of law. The detailed provisions on the programme evaluation conducted by the Polish Accreditation Committee have been regulated in the Statutes of PKA and resolutions of its Presidium, which stipulate templates for self-assessment and site visit reports and specimen reviews of applications. Such documents are posted on PKA website. Moreover, general quality assurance objectives have been translated into the Mission Statement of PKA and specific objectives have been stipulated in its Strategy. The Mission Statement has been recently amended after the external review in 2014, while another amendment in 2016 resulted from PKA's abandonment of conducting institutional evaluation.

Stakeholders are involved in the process of shaping and improving external quality assurance system, both at the stage of drafting legal regulations (stakeholder consultation process) and drafting of PKA's internal regulations (procedure for giving opinions on internal regulations). Therefore, it can be said that general objectives expressed in the law and PKA regulations are the result of a compromise and long-standing experience related to external quality assurance in Polish higher education system. The will to continue support provided to HEIs in their pursuit for possibly the highest quality standards matching world-class solutions is the indicator of change.

From time to time PKA adapts its work to legislative requirements by modifying its Statutes, as well as the criteria and procedures. The criteria and approaches to the evaluation process were recently redefined in 2016, which was the subsequent year of legal changes introduced in the higher education system. These changes primarily focused on making the operations of higher education institutions less bureaucratic and on limiting the burden of accreditation procedures. These changes also affected the Polish Accreditation Committee, which had to adapt its internal regulations to the new legislation. The Statutes of the Polish Accreditation Committee were amended, and new Annexes to it set the detailed criteria for programme evaluation for the two degree profiles. To carry out this task, the Presidium of PKA appointed a Section for Criteria composed of the chairs of all (i.e. eight) PKA's sections for areas of study, a member of the Appeals Body, President of Students' Parliament of the Republic of Poland, representative of doctoral students and an employee of PKA Bureau. Such a composition of the Section for Criteria represents all internal stakeholders of PKA. In order to develop a list of criteria, which will meet the expectations of both the Committee and HEIs, as well as other stakeholders, draft criteria for the new programme evaluation with the breakdown into general and practical degree profile were subject to a broad external stakeholder consultation process. The draft criteria were published on the Committee's website in order to ensure that all interested parties can participate in the discussion on the planned solutions. Moreover, the Committee asked the following bodies to present comments on the draft criteria: the Conference of Rectors of Academic Schools in Poland, General Council for Science and Higher Education, Students' Parliament of the Republic of Poland, National Representat, Ombudsman for Graduate Affairs, Conference of Rectors of Non-University Higher Education Institutions in Poland,

Conference of Rectors of Medical Higher Education Institutions, Conference of Rectors of Higher Education Institutions for Physical Education, Conference of Rectors of Technical Universities, Conference of Rectors of Public Non-University Higher Education Institutions, Conference of Rectors of Military Higher Education Institutions, Conference of Rectors of Higher Education Institutions for Arts, Conference of Rectors of Higher Education Institutions for Economics, Conference of Rectors of Higher Education Institutions for Agriculture and Natural Sciences, Polish Accreditation Council for Nursing and Obstetrics Schools. When developing the final version of the criteria, the Committee took into account many of the presented comments, although they were rather of organisational nature, as there were no comments indicating that the criteria did not meet the expectations of HEIs or that they omitted important areas of quality assurance. The criteria were also discussed in detail at meetings of all Sections and bodies of the Committee. The criteria form an Annex to the Statutes, as the Minister of Science and Higher Education did not raise any objections to their legality.

The adoption of the new criteria for programme evaluation resulted in the need to develop new templates for self-assessment reports and site visit reports, as well as of opinions on granting the authorisation to provide degree programmes, because also in the course of giving opinions on applications for the establishment of new fields of study the compliance with those criteria is verified. On the basis of comments and opinions expressed by PKA members and experts, and HEIs' responses to survey questionnaires, relevant amendments were introduced to the new templates for documents over a period of a few months.

Related documents:

- Law on Higher Education - [Appendix no. 2](#);
- Statutes of PKA - [Appendix no. 1](#);
- Procedure for giving opinions on internal regulations of PKA /quality management system - [Appendix no. 8](#).

10.3 ESG Standard 2.3 Implementing processes

External quality assurance processes should be reliable, useful, predefined, 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 proving that the standard has been met:

- The evaluation process includes self-evaluation, site visit, site visit report, and follow-up procedure;
- The self-assessment report and site visit report, the internal structure of which indicates a list of major issues, reflect the criteria applied by the Committee;
- The self-assessment report and site visit report contain references to previous recommendations and corrective action taken;
- PKA applies a follow-up procedure in order to verify if a given HEI has complied with the recommendations of PKA;
- Having undergone the evaluation procedure, academic units are obliged to submit reports on corrective measures taken or improvements made within deadlines stipulated in the resolutions of the PKA Presidium;
- PKA publishes site visit reports and resolutions on its website.

PKA performs its statutory tasks in accordance with adopted procedures, which are specified in the Statutes and included in PKA's internal quality assurance system. The procedures, detailed evaluation criteria and specimen documents are published on PKA's website and external stakeholders are informed about them.

(Ex post) Programme evaluations

In accordance with the Statutes, PKA's evaluation process includes: drawing up of a self-evaluation report by the HEI, site visit conducted in accordance with the rules laid down by the Presidium, drawing up of a report by the evaluation panel in accordance with template developed by the Presidium, sending the report to the HEI, sending the reply to the report by the HEI, presenting by the Section a proposal for the rating together with justification, and adoption by the Presidium of a resolution on programme evaluation. The evaluation procedure is carried out by the evaluation panel composed of PKA members and experts. The Secretary of PKA appoints evaluation panels, which are composed of from up to seven members. Academic units providing education in the field of study undergoing evaluation in a given year submit their self-evaluation reports to the Committee within six weeks of the date of receipt of evaluation notice. The template for self-evaluation report, and in particular the report prepared by HEIs because of the follow-up evaluation, calls for self-reflection not only on corrective measures taken, but also on all changes that have occurred since the previous evaluation. The programme evaluations staged by the Polish Accreditation Committee take into consideration the changes introduced as a result of previous evaluations. Sections of the reports devoted to this issue are included in the procedures on programme evaluations made after six and eight years and follow-up evaluations related with the awarded conditional rating in the previous procedure. As a general rule, follow-up evaluations are conducted after one year. In the case of positive ratings, if recommendations are designed only to improve a good education process, their adoption is examined in the course of the subsequent programme evaluation. But if they involve even minor irregularities, the resolutions of the Presidium include recommendations along with the deadline and method for their adoption. Usually the HEIs are obliged to present corrective measures taken together with relevant documentation, which are assessed by a competent Section and by the Presidium.

A site visit is undertaken in accordance with the rules for conducting site visits laid down by the Presidium of PKA and published on its website ([Appendix no. 10](#)). A site visit usually lasts not less than two days and, among other things, includes a meeting with the authorities of the HEI and the unit providing the field of study under evaluation; class inspections; inspection of teaching facilities, including the buildings of the HEI and other buildings used in the teaching process in a given field of study; meetings with academic teachers teaching classes in the field of study under evaluation, meetings with students, representatives of socio-economic stakeholders etc. After conducting the site visit, the Panel draws a report within six weeks at maximum. In the case of evaluations made at the request of the minister competent for higher education, the Panel presents the report immediately. More information about reporting is presented in the section ESG Standard 2.6 Reporting. In order to ensure adequate quality of site visit reports sent to HEI authorities, PKA has implemented a procedure for internal control of this type of documents; each report drawn by a chair of an evaluation panel must be approved by the PKA Secretary. The cohesion of the document is analysed (along with the adoption of recommendations presented by PKA during previous evaluations) and the consistency of the scope of the evaluation with the requirements included in the templates posted online are verified. The report of the evaluation panel is sent to the higher education institution, which may provide feedback to it. Then, after receiving HEIs feedback, the evaluation issue is considered by the PKA's Section. In a meeting of the Presidium, the Chair of the Section or a person appointed by the Chair presents the minutes of the Section's meeting featuring an opinion and a draft resolution on the rating, together with its justification. The Committee presents all the ratings, along with justification and conclusions, immediately upon their adoption. A party dissatisfied with a resolution adopted by the Presidium can submit a request for reconsideration of the matter within 30 days of the date of the delivery of the resolution (ESG Standard). The Committee posts on its website ratings and resolutions along with justifications. In order to provide to stakeholders access to the results of the Committee's work, PKA posts on its website the results of education quality evaluations, resolutions of PKA Presidium, reports of evaluation panels, and analytical reports for a given year and a term of office.

(Ex-ante) Programme accreditation/evaluation

The Polish Accreditation Committee follows the opinion-giving procedure in relation to applications submitted by academic units of HEIs, which are not authorised to establish and provide degree programmes on their own. At the request of a rector and by way of a decision, the minister competent for higher education, having consulted the opinion of a minister supervising the HEI and of the Polish Accreditation Committee in the scope of the conditions to be met by academic units in order to offer programmes in a specific field and at a specific level of study, grants authorisation to provide degree programmes. The opinion of the Committee is also required if an academic unit, which is not authorised to award the degree of doktor habilitowany, wants to establish a field of study, to which education and training standards apply. The law also stipulates the procedure to be followed in the event of an application for granting authorisation to provide a degree programme, as well as the (opinion-giving) role of PKA, whereas the above-mentioned regulation defines the scope of the opinion, and specific contents of the application. In accordance with the scope of the opinion defined in the law and specific contents of the application specified in the regulation, PKA has prepared templates for opinions on applications (separately for academic and practical profiles) and posted them on its website.

Reviews are prepared by members of relevant Sections or experts appointed by the Secretary 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 not later than within four weeks of the date of the receipt of a review or a report on a site visit, if a site visit is indispensable for comprehensive assessment of the application. Resolutions of the Presidium are forwarded to the Minister and higher education institutions or applicants not later than within two weeks of the date of their adoption. In the case of higher education institutions supervised by ministers other than the minister competent for higher education, a resolution is also forwarded to the competent minister. The importance of PKA's 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 should also be stressed. Negative opinions on the application for the establishment of a new field of study does not prevent the HEI from the possibility to make corrections and file the documents again, and detailed justification included in the resolution of the Presidium of PKA precisely indicates elements that need to be improved. With subsequent applications, the Committee notices better adjustment to quality standards set by PKA and closer observance of legal regulations, which contributes to improving the quality of education.

Each HEI concerned can appeal against a resolution adopted by the PKA Presidium (*for more information, see: ESG Standard 2.7 Complaints and appeals*).

Related documents:

- Law on Higher Education - [Appendix no. 2](#);
- Statutes of PKA - [Appendix no. 1](#);
- Template for self-evaluation report – [Appendix no. 9](#);
- Template for site visit report - [Appendix no. 9](#);
- Template for report on corrective measures adopted by the HEI, which has received a conditional rating - [Appendix no. 9](#);
- Template for follow-up site-visit report - [Appendix no. 9](#);
- Template for review of an application – [Appendix no. 9](#);

10.4 ESG Standard 2.4 Peer-review experts

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

Evidence proving that the standard has been met:

- The Polish Accreditation Committee operates, monitors and updates a procedure and criteria for the selection of individual groups of experts (last update introduced in 2017);
- The expert recruitment procedure is open and transparent, and lists of experts are available on the website of the Polish Accreditation Committee <http://www.pka.edu.pl/eksperci-polskiej-komisji-akredytacyjnej/>;
- The Polish Accreditation Committee has developed a model of dividing tasks between members of evaluation panels;
- The Polish Accreditation Committee monitors the training needs of its members and experts while organising regular evaluation and training meetings intended for: evaluation process experts, employer cooperation experts, student experts and experts being academic teachers;
- An initial meeting for participating experts (briefing) is held before each site visit;
- National experts and - wherever possible - those from abroad take part in the work of the Polish Accreditation Committee;
- Student representatives are involved in each programme evaluation site visit and the President of the Student Parliament of the Republic of Poland participates in the work of the Polish Accreditation Committee;
- Employers' representatives take part in each programme evaluation site visit concerning programmes with a practical profile and those with a general profile where the relevant study programme includes student placements;
- Student representative and employers' representatives are involved in decision making process by their presence in PKA's Presidium (student, employers) and Sections (employers);
- The Polish Accreditation Committee has developed an operating model where the Secretary of the Polish Accreditation Committee analyses all evaluation panel reports prior to sending them to the higher education institution concerned;
- The President of the Polish Accreditation Committee has appointed a coordinator for cooperation with employers and a coordinator for cooperation with student experts who provide the relevant groups of experts with substantive support and monitor the Committee's assistance from the perspective of its adequacy to relevant tasks;
- The Committee has developed and adopted a Code of Ethics preventing conflict of interest to ensure that Committee members and experts are fully independent.

Taking into consideration the relevance of the competences of experts participating in evaluations to the achievement of planned outcomes, the Polish Accreditation Committee operates, monitors and updates a procedure and criteria for the selection of individual groups of experts:

1. academic teachers;
2. students;
3. international experts;
4. employers;
5. evaluation process experts.

The evaluation of expert potential is carried out on an ongoing basis by the Secretary of the Committee who - as specified in the Statutes - is responsible for the organisation of the Committee's work and for initiating formal recruitment procedures, should staffing needs be identified. Committee expert recruitment is open and all relevant information is posted on the Committee's website or sent directly to potential institutions and candidates (Student Parliament of the Republic of Poland, employer associations, HR departments, etc.). Candidates for experts identified during the process are proposed by the Committee's sections operating within areas of study, the relevant body of the Student Parliament of the Republic of Poland, Vice-President of the Committee responsible for international cooperation, employers or those representing their associations as well as by the Director of the Bureau of the Polish Accreditation Committee. Candidates are assessed during an appropriately profiled qualification process and are approved by the President of the Committee. Moreover, candidates for student experts and evaluation process experts must pass an examination. Expert lists are monitored, modified and completed on an ongoing basis (eg. 11

appropriate changes were made in 2017 and currently the expert list contains about 1300 names). The Secretary of the Committee must approve the composition of each evaluation panel proposed by chairs of sections operating within areas of study and by the chair of the Appeals Body. There is an analogical mechanism operating in the field of appointing reviewers of applications submitted to the Committee, including applications for reconsideration of the matter.

The Polish Accreditation Committee organises or co-organises regular evaluation and training meetings for individual groups of experts. The Committee recognises that its organisational professionalism requires continuous improvement in the field of the expertise of all expert groups of the Committee which, among other things, can be ensured by training programmes. In 2012-2017, the Polish Accreditation Committee regularly trained its members and all its expert groups (about 100 training sessions). The topics of those sessions targeted selected expert groups. The content-related scope of those sessions complied with Polish legal regulations and above all - with the task-specific needs of the Polish Accreditation Committee, as well as with the latest methods of education quality assurance. The necessity of training intensification was due not only to the fact that quite a number of 4th and 5th term members started working for the Committee for the first time, but also to significant changes to the Law on Higher Education introduced within this period, and - above all to the need to constantly improve experts' competences. Moreover, members and experts of the Polish Accreditation Committee participate in thematic seminars organised or co-organised by the Committee. [Appendix no. 11](#) contains a table presenting a detailed list of forms of continuing professional development completed by the Committee's members and experts in 2015-2017. Moreover, there are briefings for evaluation panel members organised on the eve of site visits in order to: share observations relating to self-evaluation reports; agree a list of matters to be discussed or explained with the participation of HEI authorities and those of the basic academic unit providing the programme under evaluation, with particular emphasis put on observations and recommendations formulated during the previous evaluation of the quality of education provided as part of this programme, final determination of tasks to be performed by individual panel members during site visits, detailed schedules of site visits including meetings with academic teachers teaching classes as part of the programme under evaluation, as well as with students and representatives of the social and economic environment.

In accordance with the Committee's working standards, representatives of all expert groups who have been assigned individual competency-based tasks take part in site visits. The Committee's model of dividing tasks among evaluation panel members takes account of: proposed responsibilities for the evaluation of specific criteria; rules determining the division of responsibilities in the scope of factual investigation and ratings given to the fulfilment of individual programme evaluation criteria, as well as rules governing the preparation of site visit reports, interim reports and annexes; a description of an evaluation process expert's responsibilities. There is a mechanism in place whereby the Secretary of a Section operating within an area of study - after consultation with the Chair of this Section - prepares a note containing the proposed composition of the evaluation panel as well as the determination of timing and tasks to be performed by individual members.

The note is submitted to the Secretary of the PKA who - having evaluated the proposal and declared that there is no conflict of interests - appoints an evaluation panel. Should there be any reservations as to the proposed composition of the evaluation panel, the Committee's Secretary and the Chair of the Section put forward other candidate/candidates. Therefore, any composition of an evaluation panel proposed by chairs of sections must be approved by the Secretary of the Polish Accreditation Committee. There is an analogical mechanism operating in the field of appointing reviewers of applications submitted to the Committee.

All evaluation panel members are under the obligation to participate in the whole site visit, in accordance with its timing and schedule. Taking account of the Committee's rules of dividing responsibilities, chairs of evaluation panels divide responsibilities among evaluation panel members in the scope of factual investigation and ratings given to the fulfilment of individual programme evaluation criteria, as well as in the scope of preparing final and interim reports and annexes. Chairs of panels and experts are under the obligation to perform a thorough and expert-level factual

investigation based on general and detailed guidance relating to the preparation of programme evaluation reports, and on separate guidance for the programme evaluation of programmes with a general and practical profile. Regardless of the finally agreed division of responsibilities relating to the evaluation of the extent to which specific criteria have been fulfilled, each evaluation panel member can formulate opinions, observations and recommendations. They can also indicate good practices relating to individual criteria and relay them to the Chair. There is a panel meeting organised by chairs at the end of each site visit, where - following a discussion about the degree of fulfilment of individual criteria - participants agree their evaluations and formulate them. Evaluation process experts prepare discussion protocols including conclusions that have been drawn. The protocols are submitted to the Chairs of panels.

Programme evaluation site visits involve the participation of:

- experts - academic teachers;
- an expert – student representative;
- expert on evaluation process;
- employers' representative (in the case of programmes with practical profile and general profile, if a study programme provides for student placements);
- an international expert - depending on the type of evaluation and whenever possible.

During their work, experts rely on the guidance that relates to the preparation of site visit reports. This guidance consists of a number of internal publications used by the Committee's members and experts as a kind of manual helping with the preparation of reports. It is also training material. Guidance for the preparation of site visit reports is also relied on by the Secretary of the Polish Accreditation Committee in the process of verifying the quality and completeness of site visit reports.

The Polish Accreditation Committee seeks to involve international experts in the evaluation process as often as possible. However, as the internalisation of Polish HEIs is not very high despite a growing number of international students, programmes provided in English are rare and HEIs are reluctant to translate education-related documentation into foreign languages. Therefore, the Polish Accreditation Committee is compelled to use the services of the few international experts who speak Polish. At the same time, this is an area that the Committee considers its weakness regardless of a remedial programme already adopted. The Presidium of the Polish Accreditation Committee has made a commitment to increasing the involvement of international experts in all Committee-led evaluation procedures to 30%. However, as the Committee decided to withdraw from institutional evaluations in 2016, this target level is currently extremely difficult to achieve. International experts participated in each institutional procedure, and the scope of evaluation and remuneration were regarded satisfactory by persons involved in this task. The necessity to find people being not only outstanding specialists in education quality assurance, but also versed in the specificity of the legal system of Polish higher education and the conditions in which programmes are provided is one of the reasons why it is so difficult to involve international experts in programme evaluations.

The programme evaluation process operated by the Polish Accreditation Committee involves students and employers as full members of evaluation panels. This group is involved in the evaluation process at each of its stages. Students and employers participate in the whole site visit in accordance with its timing and schedule. They are present at all meetings significant for the preparation of interim reports in accordance with the division of tasks. The participation of student experts in site visits (two days) as an element of the programme evaluation process was introduced in 2017 (as opposed to students' one-day participation in previous programme evaluations). The Committee introduced this change wishing to provide evaluation panels with conditions supporting effective and partner cooperation within evaluation panels. Moreover, as a result of the monitoring and evaluation of student experts' work, it became obvious that in certain situations one-day participation in the site visit made it more difficult for a student expert to evaluate student affairs in accordance with the Committee's standards. When working within their evaluation panels, student experts try to pay particular attention to outstanding, ingenious and beneficial solutions which -

when successfully implemented - serve students' academic, professional and social development. The participation of all members of evaluation panels in all meetings as well as the final once enrich their competences and experience. Ensuring student experts' adequate and constant level of knowledge and skills is a particularly big challenge faced by the Committee. This is mainly due to quite a high and incessant student turnover within this expert group. Therefore, both the training programme and support offered in the form of training sessions and regular evaluations must ensure maximum effectiveness in relation to the implementation of these objectives. To meet the challenge, they have to be correlated with experts' needs. That is why a pilot programme supporting the development of Commission experts' competences was developed and implemented in 2013. The main principle of the programme consists in a comprehensive approach based on the current identification of experts' needs which offers flexibility necessary to successfully meet their development needs. The main objective of the programme focusses on raising the competences of student experts. A detailed identification of each expert's strengths and weaknesses is one of the stages of the implementation of this objective. In this way not only it is possible to identify needs relating to professional development, but also to jointly determine individual developmental objectives whose implementation will improve the quality of tasks performed while working for the Polish Accreditation Committee. Another important element of the programme involves getting experts' opinions on the available tools and forms of support offered to them as part of cooperation with the Polish Accreditation Committee, with particular emphasis on initial training. Experts' opinions on the adequacy of training contents and methods to their knowledge, skills and competences at the moment of starting their involvement with the Committee, together with their responsibilities resulting from working as a Committee expert, facilitate the formulation of recommendations aimed at the adaptation of the current methods of expert competence development and at the creation of new ones. The following methods of collecting information are used as part of the programme: expert's self-assessment questionnaire; evaluation of site visit reports submitted by individual experts; in-depth interviews with experts. The programme of supporting the development of Committee's experts' competences has been run from May/June to November/December every year since 2013 when the pilot programme was implemented. Increasing the duration of training provided to candidates for student experts from 2 to 3 days is an example of programme outcomes. In response to the needs that were reported by experts, this additional day focusses on interpersonal training aimed at the improvement of communication skills, obtaining information, public speaking and self-presentation, which is particularly important in the context of participation in meetings with various stakeholders involved in the education process. Moreover, as a result of the opinions obtained, the lecture method is now less frequently applied giving way to workshop-based group work. Currently, candidates for Committee student experts participate in a standardised training process consisting of the following stages: 1) a three-day training workshop focussing on evaluation criteria, site visit rules and report preparation principles including interpersonal training aimed at improving communication skills, obtaining information, public speaking and self-presentation. This training workshop also includes the examination and improvement of skills relating to analysis of legal regulations, synthesis of information obtained, formulation of conclusions and text edition. 2) participation in one site visit in the capacity of observer and the preparation of a site visit report which is assessed and verified by the student expert observed and by the Committee's Coordinator for Cooperation with Students. 3) the coordinator's analysis and evaluation of at least 3 reports covering subsequent site visits involving the communication of comments on the contents of the reports, ways of formulating evaluations and their reasons and interpretation.

Just like students, all candidates for Committee experts representing employers go through a standardised training system involving the following stages: 1) a two-day training workshop focussing on a detailed presentation of evaluation criteria, principles of site visits and rules governing the preparation of reports. 2) participation in at least one site visit in the capacity of an observer and the preparation of a site visit report, which is assessed and verified by the Committee's Coordinator for Cooperation with Employers. 3) the coordinator's analysis and evaluation of at least

2 reports covering subsequent site visits involving the communication of comments on the contents of the reports, ways of formulating evaluations and their reasons and interpretation. The expert candidate training programme is based on the several-year experience of the coordinator and employer experts with the most extensive experience. Recruitment shows that the level of knowledge and skills among candidates for Committee experts is quite similar, hence a standardised training process. The validity and appropriateness of this solution was later confirmed during evaluation studies. Since 2015, evaluation meetings have also been used for the purpose of preparing programmes and training material. They serve as a basis for the improvement of the programme and for the extension of the scope of new candidates' training. Apart from the participation in such meetings, experts fill in an online evaluation questionnaire where they present observations and conclusions in relation to site visits and improvement issues. Reports covering evaluation meetings and surveys constitute annexes to annual reports prepared by the coordinator. During its meetings, the Committee's Section for Employers examines and discusses evaluation outcomes.

Also, as shown in the document, evaluation process/internal quality assurance experts regularly participate in training intended only for the above groups of experts and in meetings, seminars and training organised for experts who are academic teachers.

Training needs are met on a day-to-day basis, both on the initiative of the management of the Committee and its bodies and on reporting a need by chairs of sections operating within an area of study and in response to the scope of that need, most of the time linked to frequent changes to legal regulations serving as the base for the activities of the Committee.

In the opinion-giving procedure reviews are prepared by members of relevant Sections or experts appointed from among group of experts - academic teachers by the Secretary 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 (see: ESG 2.3) . Since the following decision making process is held within the PKA's Sections and then Presidium the presence of employers' representatives and student representative in the above mentioned procedure is secured (see: 6.3 Opinion-giving procedure, p. 33).

The Polish Accreditation Committee has introduced a multi-stage mechanism for preventing conflict of interest between members and experts: 1) careful and transparent candidate selection; 2) making a statement confirming the absence of conflict of interest resulting from the performance of tasks; 3) verification of each evaluation panel composition by the Secretary of the Polish Accreditation Committee; 4) accountability to the Section for Ethics (*more ESG Standard 3.6 Internal quality assurance and professional conduct*).

Related documents:

- Criteria and mode of appointing experts of the Polish Accreditation Committee - [Appendix no. 13](#);
- Rules for conducting site visits as part of programme evaluation - [Appendix no. 10](#);
- The Code of Ethics of PKA - [Appendix no. 7](#);
- Final report on the implementation of the programme "Support for the development of competences of PKA experts" (available on site).

10.5 ESG Standard 2.5 Criteria for outcomes

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 proving that the standard has been met:

- In accordance with the statutory powers, the Polish Accreditation Committee has determined detailed criteria, rules for conducting site visits, and templates for reports, which are posted on its website;

- In accordance with the rule of transparency, PKA has developed and made public all the procedures related to its performance of statutory tasks, and specimen documents indispensable for their implementation;
- A decision-making process involving several stages ensures consistent and uniform application of the criteria by all sections of the Polish Accreditation Committee;
- In the decision-making process, PKA takes into consideration the replies of the HEIs to site visit reports and in justified cases modifies its opinion as presented in the evaluation report;
- A system of intensive training for members and experts of PKA allows for ensuring consistent interpretation of the criteria by all PKA panels;
- Resolutions of PKA are formulated based on well substantiated documents.

(Ex post) Programme evaluation criteria

Article 48a of the Law on Higher Education stipulates the scope of programme evaluation, in accordance with which PKA evaluates the quality of education provided as part of individual fields of study with taking into consideration: concept of education; learning outcomes; study programmes; standards of education and training; qualifications of academic teachers and other persons teaching classes to students; cooperation with representatives of social and economic stakeholders in the education process; effectiveness of internal education quality assurance system; functioning of the procedures for the validation of learning outcomes; internationalisation of the education process; accreditation and certificates of domestic and international institutions; infrastructure used to achieve learning outcomes; support provided to students in the learning process. In accordance with the law, the minister competent for higher education determines by way of a regulation general criteria for programme evaluation, whereas the Committee has retained the right to develop detailed evaluation criteria and modes of conducting programme evaluation and methods for appointing experts.

When performing its statutory tasks, the Polish Accreditation Committee applies programme evaluation criteria adopted by its plenary session, which constitute an annex to its Statutes. The last amendment of the criteria was caused by an amendment of the Law on Higher Education, which aim was making the operations of higher education institutions less bureaucratic. These changes also affected the Polish Accreditation Committee, which had to adapt its internal regulations to the new legislation. The criteria for programme evaluation, rules for conducting site visits, templates for reports and detailed procedures concerning the implementation of the Committee's tasks have been published on its website at www.pka.edu.pl, and all the stakeholders have been informed about them. All the PKA evaluation panels, members and experts preparing the reviews of the applications are obliged to observe them. The system includes eight criteria. The provisions of the act of 27 of July 2005, Law on Higher Education along with implementing acts, objectives expressed in the Mission Statement of PKA and ESG 2015 served as a starting point for the development of the detailed criteria. The new detailed criteria for programme evaluation for both degree profiles include:

1. Concept of education and its conformity with HEI's mission and strategy;
2. Study programme and possibility for achieving intended learning outcomes;
3. Effectiveness of internal education quality assurance system;
4. Staff providing the education process;
5. Cooperation with representatives of social and economic stakeholders in the education process.
6. Internationalisation of the education process;
7. Infrastructure used in the education process;
8. Care and support provided to students in the process of learning and attaining learning outcomes and new conditions for awarding ratings.

(Ex ante) Programme accreditation/evaluation criteria

The analysis of binding regulations shows that PKA does not conduct *ex-ante* evaluation in the classic sense of the term, but 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.

In this process, PKA serves as an opinion-giving body, and the scope of its opinions is set out in Article 11 (4)(1) and 11 (4)(2) of the Law on Higher Education and in Article 15 of the regulation of the Minister of Science and Higher Education of 26 September 2016 on the conditions for providing degree programmes, which also stipulates in detail the contents of an application for such an authorisation.

The criteria used in the process of giving opinions on applications for the authorisation to provide degree programmes at a given level and with a given degree profile are made public, as they are regulated by universally applicable law. The law stipulates the procedure to be followed in the case of an application for granting authorisation to provide a degree programme, as well as the (opinion-giving) role of PKA, whereas the above-mentioned regulation defines the scope of the opinion, and specific contents of the application. In accordance with the scope of the opinion defined in the law and specific contents of the application specified in the regulation, PKA has prepared templates for opinions on applications (separately for academic and practical profiles) and posted them on its website.

Moreover, in cooperation with the Ministry of Science and Higher Education, PKA has developed a template for applications for the authorisation to provide degree programmes at a given level and with a given degree profile (posted on the Ministry's and PKA's website). It should be noted, however, that this template does not need to be applied on a mandatory basis, as the Law on Higher Education does not authorise the minister to prepare such a template. The minister is only authorised to determine by way of a regulation the scope of information to be included in the application for granting an academic unit the authorisation to provide degree programmes in a specific field and level of study and with a specific degree profile, which are submitted in electronic form to the minister competent for higher education.

Consistent criteria application

A multi-step decision-making process, which prevents derogations and free interpretation is conducive for consistent application of the criteria. The decision-making process involves four stages:

1. **the evaluation panel or a reviewer propose the rating**, which takes into consideration the contents of the self-assessment report, the site visit, the site visit report, reply of the HEI to the site visit report, and in the case of an application -- assessment of documents submitted by the HEI and a site visit report, if a visit has been staged.

The site visit report takes into account the the division of tasks between individual members of the evaluation panel, in accordance with their respective competencies. For the needs of experts, general and detailed instructions on the drawing up of programme evaluation reports have been developed, separately for the evaluation of fields of study with general and practical profile. The panel members are required to assess whether individual criteria have been met. After each site visit, experts agree their position on each standard, and the reply of the HEI to the site visit report may result in amending the assessment of a given criterion and, as a result, in presenting a different rating of education quality. In such cases, the chair of an evaluation panel contacts all the experts who agree the final standing. If the ratings proposed by individual experts differ, the chair of the evaluation panel makes the final decision;

2. **the rating proposed by the evaluation panel is analysed at a meeting of the Committee's Section for the study area**. The Section, having discussed each partial standard and criterion, makes a decision on the proposed rating by voting, and the rating is later presented to the PKA Presidium. The chair of the evaluation panel presents details of the site visit report and the reply from HEI's authorities to comments presented in the report. Such a reply usually includes information of key importance for adopting a given position. The rating is agreed by voting and treated as the proposal of the Section for the study area. It is later presented by the Chair of the Section at a meeting of the PKA Presidium as a recommended rating.

3. **the decision taken by the PKA Presidium** is preceded by a discussion on the recommendation of the Chair of the Section for study area, which includes detailed description of the conditions of meeting each individual education quality standard/criterion. The Presidium of the Polish Accreditation Committee makes autonomous decisions by way of voting (there are situations where the result of voting is different from the recommendation of the Section) on each proposed rating, starting from outstanding to negative one (each case is voted on individually). The resolutions are adopted in open voting by a simple majority of votes cast.
4. **the appeal procedure** provides for giving independent opinions on HEIs' applications for the reconsideration of the matter and the reassessment of the accuracy of the decisions made. The Presidium, having heard the chair of the Appeals Body, makes the final decision in a given matter.

Moreover, several practical solutions applied are conducive for the consistent application of the criteria, these include:

- a member or a former member of PKA is the chair of each evaluation panel. The chair is also responsible for drawing up the final version of the site visit report. Moreover, in order to ensure the consistency with the applied standards and criteria, prior to being sent to the HEI under evaluation, the site visit report is reviewed by the Secretary of the Committee, and judgements made there are analysed and compared with the evidence. The cohesion of the document is analysed (along with the adoption of recommendations presented by PKA during previous evaluations) and the consistency of the scope of the evaluation with the requirements included in the templates posted online are verified.
- all PKA members and experts undergo initial and continuing training, during which they become acquainted with the amended legal regulations, procedures, standards and evaluation criteria;
- regular meetings of groups of experts are held to ensure that they improve qualifications;
- a large majority of experts has worked for PKA for many years. Many of the experts are former members of PKA.

The fact that the President and Secretary of PKA attend the meetings of KRASP, KRZASP, General Council for Higher Education and other sector events is conducive for propagating and uniform interpreting of the criteria applied by PKA.

Related documents:

- Law on Higher Education - [Appendix no. 2](#);
- Statutes of PKA - [Appendix no. 1](#).

10.6 ESG Standard 2.6 Reporting

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.

Evidence proving that the standard has been met:

- Upon the completion of the evaluation process, reports on programme evaluations and resolutions of PKA are posted on PKA's website and in the Public Information Bulletin (Polish: BIP). Such a publication is a statutory requirement;
- The site visit report has a coherent structure and is standardised for all types of evaluation (general and practical degree profiles). It is also compatible with the self-assessment report;
- Templates for site visit reports and opinions are posted on PKA's website;
- Before PKA adopts a final resolution, it sends the report to the HEI with a request for providing a reply to comments contained in it (factual accuracy check);

- PKA requests feedback from the higher education institutions under evaluation concerning the whole evaluation process, which takes form of survey questionnaires. One of the aspects of the survey is assessing the usefulness of site visit reports.

PKA has modified templates for site visit reports in order to ensure their publication in any number of copies. The reports consist of two parts: open and secret one. The latter is intended for the HEI only and contains sensitive information covered by personal data protection. This means that PKA has introduced the rule of publishing the site visit reports. This rule has been confirmed in Article 53a (1) of the Law on Higher Education.

When designing the structure of the documents, the PKA Presidium followed the rule that they should reflect the adopted criteria. In order to facilitate the searching for key opinions presented by experts, a synthetic report is placed at the end of each section of the report along with the assessment of the degree of meeting a given criterion indicating strengths and weaknesses. Changes introduced to enhance diagnostic function of the programme evaluation reports and to support HEIs in creating a culture of education quality include the introduction of a possibility for the presentation of good practices in the report. Such an approach should contribute to the exchange of experiences and promotion of quality solutions, both in education quality management and learning process enhancement. Furthermore, the principle of producing synthetic and coherent justification for the rating; making recommendations on individual quality evaluation criteria; and presenting a coherent description of the actual facts, which confirm that the criteria have been met has been introduced. This should form a clear and unambiguous message for the HEIs about measures aimed at education quality enhancement. Maintaining symmetry between the structure of the self-assessment report and site visit report makes the evaluation of education quality more transparent and comprehensible. Templates for self-assessment reports, site visit reports, opinions for CK, opinions on the applications for the authorisation to provide degree programmes in specific fields of study are posted at - <http://www.pka.edu.pl> (Tab: templates and procedures).

At present, the reports are structured as follows:

1. Information about the visit and its course;
 - 1.1. The compositions of the PKA evaluation panel;
 - 1.2. Information about the evaluation process;
2. Basic information about the study programme of the field of study under evaluation;
3. Assessment of the degree of satisfying the programme evaluation criteria;
4. Detailed description of the degree of satisfying the programme evaluation criteria;
 - Criteria 1-8 (separately for each criterion);
 - Analysis of actual facts and the assessment of the degree of satisfying the criterion;
 - Justification, taking into account the strengths and weaknesses;
 - Good practices;
 - Recommendations;
5. Assessment of the unit's acting on the recommendations presented in the last PKA's evaluation with reference to the results of the current evaluation;
6. Annex
 - Legal basis of the evaluation of education quality;
 - Detailed schedule of the site visit and the division of tasks between individual members of the evaluation panel;
 - Assessment of selected mid-term papers and of final theses;
 - List of teachers who can be included in the minimum staff resources for the field of study;
 - List of teachers who cannot be included in the minimum staff resources;
 - List of modules, for which staffing of classes is improper;
 - Information on inspected classes and their evaluation.

The contents of the report are well structured. In order to ensure the transparency of the evaluations, each section of the report has a title and features a commentary describing the expectations towards the evaluation panel. In each section, there is a summary of meeting the detailed criteria and the assessment of the degree of meeting a given criterion. There is a section in

the report, where the HEI under evaluation can present its explanations to the contents of the report by the evaluation panel, opinions on the evaluation panel, and a table illustrating the changes in evaluations of individual criteria introduced based on them. Before PKA takes the decision, the report of the evaluation panel is sent to the HEI accompanied by a request that the HEI provides a reply to comments contained in it. The HEI's reply is handed over to the chair of the evaluation panel who presents it for examination by the panel.

The Polish Accreditation Committee requests feedback on the evaluation process from each higher education institution under evaluation. The feedback takes form of a survey questionnaire to be filled out online. The survey process is distinct from the evaluation process; the request for feedback is presented along with the site visit report, and the HEI can fill out the questionnaire at any time, also after the completion of the evaluation process. The questionnaire also includes a question on the usefulness of the site visit report for the identification of problems and for improving quality in the areas under evaluation.

Neither opinions on applications for the authorisation to provide degree programmes at a given level and with a given degree profile nor resolutions of PKA on the opinions are posted on PKA's website. This results from the legal analysis of PKA's role in the decision making process as presented above (see: ESG Standard 2.5 and 2.3), where the Minister of Science and Higher Education is the owner of the process and related documentation, as it is the minister who is the addressee of the application and who requests an opinion from PKA. It is also the minister who is the consumer of the opinion in the decision making process. Therefore - it is the role of the minister, who takes the decision and administers the documentation, to decide whether to make PKA's opinions public or not. However, draft bill (Constitution for Science, Act 2.0).meets the expectations of both institutions in this scope .

PKA also takes measures aimed at investigating the needs of HEIs with reference to the site visit report. It also invites the HEIs to participate in consultation on the templates for self-assessment and site visit reports. The consultations are open and held via PKA's website.

Related documents:

- Law on Higher Education (Article 53a (1)) - [Appendix no. 2](#);
- Templates for site visit and self-assessment reports - [Appendix no. 9](#);
- Specimen survey questionnaire.

10.7 ESG Standard 2.7 Complaints and appeals

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

Evidence proving that the standard has been met:

- An independent Appeals Body established under the Law on Higher Education operates within the organisational structure of PKA;
- The appeal process has been defined in the Statutes of PKA and in the quality assurance system published on PKA website;
- Each resolution of PKA features instruction on how and when submit an application for reconsideration of the matter;
- PKA has complemented the survey monitoring procedure with the element of examining complaints and requests for consideration, which is published on PKA website;
- The Section for complaints and requests has been formed.

Due to the statutory tasks of the Committee and far-reaching consequences of its decisions, the appeal procedure plays a very important role in the operations of the Polish Accreditation Committee. A HEI dissatisfied with a resolution adopted by the Presidium can submit a request for reconsideration of the matter.

The inclusion of the Appeals Body in the organisational structure of PKA is one of the most important changes concerning the operation of PKA resulting from the amendment of the law. In response to previous recommendations, the Polish Accreditation Committee has taken steps aimed at regulating its appeals system and establishing an independent appeals body. In accordance with Article 50 of the amended act, in 2014 changes were introduced in the organisational structure of the Polish Accreditation Committee by distinguishing a separate Appeals Body. The Appeals Body is composed of Committee members, and at least one Body member represents one area of study. Membership in the Appeals Body cannot be combined with membership in a Section operating in a relevant area of study, thus the members of the Appeals Body do not participate in the preparation of an initial rating or opinion concerning education quality. Such an approach guarantees that two instances are involved in the appeals process. The Chair of the Appeals Body attends the meetings of PKA Presidium and enjoys a voting right in matters, on which the Section presented its opinions. The Presidium of PKA adopts a resolution in open voting by a simple majority of votes in the presence of at least 50% of its members. In accordance with the appeals procedure, a resolution on a programme evaluation and on an application submitted to the Committee can be the subject of an appeal. Reservations can apply to procedural, legal and factual aspects of evaluation and should only regard the problems and their scope that were the subject to evaluation and constituted the basis for adopted resolutions. The Presidium decides to modify a rating only in the case where the presented arguments pertain to each charge and remove any doubts that constituted the basis for the original resolution and at the same time are within the admissible limits allowing for the supplementing of information and documentation. 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. In addition, each resolution of PKA features instruction on how and when submit an application for reconsideration of the matter. The Supreme Administrative Court 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. The Polish Accreditation Committee feels accountable for the decisions it makes, as they impact on the development of higher education, and strives at enhancing the quality of its work. This is why in 2018 it modified the procedure for monitoring surveys submitted by HEIs. The scope of the procedure was extended by a procedure relating to the examination of remarks, complaints and requests submitted to the Committee using a method different than the opinion survey process. In accordance with the procedure, PKA appointed the Section for complaints and requests composed of: PKA President, Secretary, Vice-President, Chair of the Section for Ethics, Representative for PKA internal quality assurance system, Coordinator of cooperation with employers and Coordinator of cooperation with experts on student matters. 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. Tables 19, 20 and 21 and Figures 8, 9 and 10 present the breakdown of appeals submitted to PKA in the period 2014-2017.

Related documents:

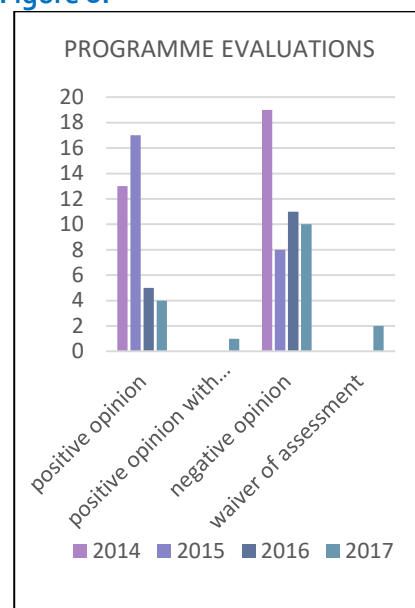
- Law on Higher Education (Article 50) - [Appendix no. 2](#);
- Statutes of PKA - [Appendix no. 1](#);
- Quality Management System - [Appendix no. 8](#);
- The Code of Ethics [Appendix no. 7](#);

Table 19. Appeals - programme evaluation

Year	Total	Including those resulting in			
		positive opinion	positive opinion with recommendations	negative opinion	waiver of assessment
2014	32	13		19	
2015	25	17		8	
2016	16	5		11	
2017	17	4	1	10	2
Total	90	39	1	48	2
%	100%	43.33%	1.11%	53.33%	2.22%

Source: Authors (December 2017)

Figure 8.



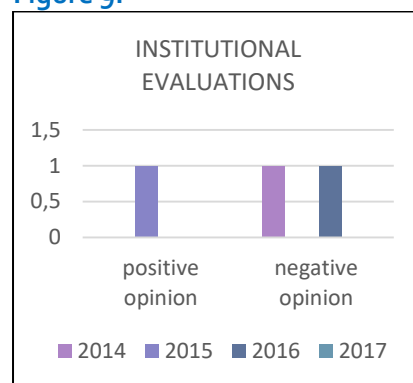
Source: Authors (December 2017)

Table 20. Appeals - institutional evaluation

Year	Total	Including those resulting in	
		positive opinion	negative opinion
2014	1		1
2015	1	1	
2016	1		1
2017			
Total	3	1	2
%	100.00%	33.33%	66.67%

Source: Authors (December 2017)

Figure 9.



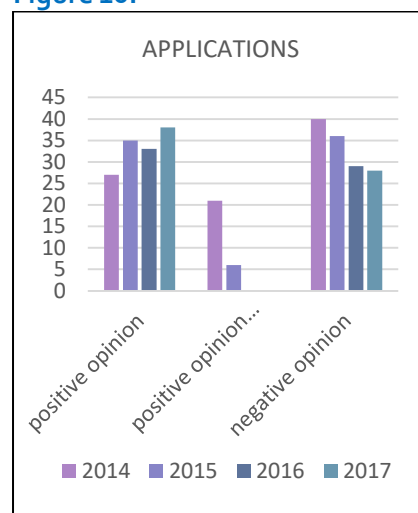
Source: Authors (December 2017)

Table 21. Appeals – applications

Year	Total	Including those resulting in		
		positive opinion	positive opinion with recommendations	negative opinion
2014	88	27	21	40
2015	77	35	6	36
2016	62	33		29
2017	66	38		28
Total	293	133	27	133
%	100%	45.39%	9.22%	45.39%

Source: Authors (December 2017)

Figure 10.



Source: Authors (December 2017)

11. Information and opinions of stakeholders

The Polish Accreditation Committee considers it its duty to develop comprehensive cooperation and dialogue with all stakeholders of the education process, and by undertaking activities aimed at ensuring and improving education quality it will continue its participation in the creation and improvement of legal regulations in the scope relating to higher education. Cooperation between the Polish Accreditation Committee and the Ministry of Science and Higher Education is of particular importance, especially because the Law on Higher Education authorises the Minister to formulate general criteria for programme evaluations. Moreover, within the Polish external quality assurance system it is the Minister who makes decisions on granting authorisation to provide or suspend education.

Cooperation character with external stakeholders is presented below in Table 24. Moreover, opinions of major stakeholder on PKA's SAR as well as its operation in the Polish higher education systems are presented separately in [Appendix no. 15](#). The general opinion on the functioning of PKA is highly satisfactory and PKA is perceived as an important partner in shaping the Polish higher education and quality assurance system.

Table 22. Cooperation with external stakeholders

Minister of Science and Higher Education	day-to-day cooperation related with the performance of statutory tasks by PKA and giving opinions on legal acts by the Committee. Moreover, the management of the Committee holds regular meetings with the ministry managerial staff devoted to matters of importance to proper functioning of the higher education sector, including key solutions concerning the amendments of the law on higher education.
General Council for Science and Higher Education	the management of PKA attends plenary sessions of the Council, during which the position of the Committee on matters of key importance to the system of higher education are presented.
Central Commission for Degrees and Titles	current matters related with the expanded statutory powers of PKA
Conferences of Rectors, KRASP and KRzASP in particular	members of PKA Presidium attend the Conferences' meetings and other regular meetings and seminars
Students' Parliament of the Republic of Poland	day-to-day cooperation, the President of the Students' Parliament of the Republic of Poland is also a PKA Presidium member, and student experts are involved in the work of evaluation panels.
Employers' Organisations	day-to-day cooperation in relation with the standing representation of employers' organisations in PKA (as members of the Presidium and evaluation teams)
Higher Education Institutions	direct contacts of evaluation panels with HEIs, participating in, organising training, seminars, conferences devoted to education quality assurance.

Source: Authors

12. Recommendations and main findings from previous review(s) and agency's resulting follow-up (for second and subsequent reviews only).

In response to comments included in the last external review report, and in 2014, the Polish Accreditation Committee adopted a Follow-up Action Plan, which provides for complying with the recommendations of the panel of external experts. The Follow-up Action Plan as at February 2018 is presented in [Appendix no. 14](#).

Recommendation: 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.

Following the amendment to the Law on Higher Education (LoHE) PKA adopted new Statute with evaluation criteria on the 23rd of February 2015. The changes in the programme evaluation criteria were made accordingly and the explicit references to QA policies and procedures were included - see Appendix 1-3 Statute of the Polish Accreditation Committee. However, it should be noted that since the last external review Statute has been changed two times. The profound change in criteria set took place in 2016 following the amendment to the LoHE and withdrawal from institutional evaluation process.

Recommendation: 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.

PKA introduced to its QM system internal procedure on designing regulations where the direct mechanism for consultations with external stakeholder were included. The last wide consultancy process took place in 2014/2015 and in 2016 and its outcomes were brought by PKA on board while developing new evaluation criteria, templates of the reports etc.

Recommendation: 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.

According to the amendment to the experts' recruitment procedure queries for experts from academic staff and requirements are publicly announced and sent directly to interested institutions or individuals. PKA needs with regards to new experts are verified and refilled on on-going basis, however, at the beginning of each terms of office the pool of experts is reviewed once again. As on the 1st of January 2016 PKA has commenced its new terms of office and at the moment the pool of PKA's experts is being verified.

With regard to different groups of experts it has been developed the range of tools (e.g. questionnaires, evaluation interviews, self-assessment of competences etc.) enabling to conduct the process of research and assessment of training needs and expectations. The training programme is always tailored to different experts' groups expectations and needs and finally delivered by qualified trainers. Since the quality policy of PKA aims at the continuous development of experts/staff competences the above-mentioned procedure is in constant use.

According to the resolution adopted by PKA's Presidium all institutional evaluations and at least 30% of all programme procedures should be attended by foreign experts. Since March 2014 PKA has been organizing cyclical trainings for international experts and has been expanding its list of experts on a regular basis. It should be noted that withdrawal from institutional evaluation caused some difficulties in meeting the expected level of international experts engagement.

The internationalization of PKA external quality assurance processes is in the core of its interest. The Task Force responsible for the delivery of this process has been appointed and is responsible for the delivery of the process. Besides in 2014-2017 PKA coordinated IQAS project that was also directed at the capacity building of partners' agencies with special regard to experts training and future exchange among QA agencies. Two trainings for international experts (students, QA experts) were organized in Ljubljana and Lisbon; for further information see project website : www.eiqas.com.

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.

Following the amendment to the LoHE, 2014 and PKA's Statute the changes of reports' templates were made accordingly. There is 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 this type of documents; each report drawn by a chair of an evaluation panel must be approved by the Secretary General. The consistency of the document is analysed (also the compliance with the recommendations presented by PKA during previous evaluations is analysed) and the consistency of the scope of the evaluation with the requirements included in the templates posted online is verified.

Recommendation: 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.

The final outcome of EIQAS project was development of the Guide to IQA (publication specifically devoted to IQA with the examples of good practices) - for further information see project website: www.eiqas.com. Besides in 2015 PKA published its first booklet on good practices in quality management of education that was widely distributed among HEIs. The publication is also available on PKA website www.pka.edu.pl.

Recommendation: 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.

The PKA mission was revised immediately after coming into force the amendment to the LoHE, 2014. The recent revision was consulted with PKA's Advisory Council in order to reflect the double purpose of quality assurance processes carried out by PKA – see for further information Appendix 2 Mission Statement of the Polish Accreditation Committee or PKA website <http://www.pka.edu.pl/en/mission-statement/>

Recommendation: 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. 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.

The QM system was implemented in April 2013 and then modernized in 2015 and 2018 after some changes in LoHE. All processes and procedures aimed at identifying the areas that need correction

or improvement are constantly being monitored. The effectiveness of the systems was assessed as satisfactory with regard to identified processes and their performance.

The mechanism for collection of feedback from experienced HEIs is constantly used by Conferences of Rectors and other HE bodies while addressing the most pressing issues for quality assurance in HE. Besides the PKA mechanism for consultation with stakeholders is always enriched with the reflection on the current PKA's position.

Since the beginning of 2018 PKA has been reconsidering a new formula of efficient stakeholders involvement in agency's daily work. Taking into account the agency's development phase and its striving towards professionalization of its activities in dynamically changed legal framework some new solution is required. However, it should be noted that the Advisory Body was mainly exploited in consultation process of newly developed criteria. It should be admitted here that it was individual approach to the process rather than a collegiate ones since other communication channels were still open with PKA's stakeholders causing "overlapping effect". At the same time some of Advisory Board members were cooperating with PKA on on-going basis being directly involved in Committee's routine activities as well as in international projects (e.g. EIQAS, etc.). From PKA's perspective individual experts' engagement in PKA's activities brought greater added-value to the agency than collegiate ones.

13. SWOT analysis

Strengths

Area 1. Education quality assurance and enhancement and supporting HEIs in building quality culture	
1.1. Education accreditation and quality assessment;	<ul style="list-style-type: none"> • PKA's official status in Polish higher education system as a national quality assurance agency, whose decisions have legal effect; • PKA's operational independence and autonomy in determining detailed criteria, methods and procedures for accreditation and in making education quality evaluations; • approbation of the current model of accreditation and education quality evaluation in the framework of international accreditation (ENQA, EQAR, US Department of Education) and under agreements on recognition of accreditation decisions.
1.2. Providing assistance to HEIs in building quality culture.	<ul style="list-style-type: none"> • cyclical nature of programme evaluations and connecting outstanding ratings awarded as part of programme evaluation with a system of HEI funding; • PKA has considerable experience and has accumulated knowledge about the system of higher education in Poland, which allows it to support universities in the process of building quality culture; • Annual Quality Forum events organised by PKA enjoy excellent reputation and serve as a platform for discussions about issues of relevance for quality assurance.
Area 2. Internal resources and processes	
2.1. Human and financial resources	<ul style="list-style-type: none"> • PKA has influence on shaping its expert pool, which allows for the performance of statutory tasks;
2.2. Internal processes	<ul style="list-style-type: none"> • key processes of PKA's operations have been identified and transparent procedures concerning the performance of tasks have been adopted and published; • operational efficiency and continuity despite changing requirements of external environment; • establishment of a transparent two-instance decision making structure at PKA, including a separate Appeal Body.

Area 3. Relations with stakeholders	
3.1. Academic community and socio-economic stakeholders	<ul style="list-style-type: none"> ensuring the participation of representatives of the of the Students' Parliament of the Republic of Poland and employers in the organisational structure of PKA and in evaluation panels; official cooperation with socio-economic stakeholders (e.g. Quality Fora, KRASP, RGNiSW) has been established and prospective areas of cooperation have been identified.
3.2. International cooperation	<ul style="list-style-type: none"> established position of PKA in an international arena resulting from its active membership in international organisations affiliating quality assurance agencies (ENQA, CEENQA, INQAAHE etc.), registration in EQAR, implementation of bilateral and multilateral international agreements, and participation in numerous transnational projects.
3.3. PKA's image	<ul style="list-style-type: none"> PKA enjoys fine reputation in the area of higher education.

Weaknesses

Area 1. Education quality assurance and enhancement and supporting HEIs in building quality culture	
1.1. Education accreditation and quality assessment;	<ul style="list-style-type: none"> limited prospects for quick responding to changes in external requirements, because the Minister needs to present an opinion about the Statutes of PKA.
1.2. Providing assistance to HEIs in building education quality culture.	<ul style="list-style-type: none"> limited opportunities for supporting HEIs in building quality culture outside of statutory operations of PKA; limited capability for making analyses of PKA's efficiency in building quality culture at HEIs and of the system of self-reflection about the impact of external quality assurance on quality culture, due to operational activity burden; Committee's expertise is not applied in the process of introducing changes to higher education system.
Area 2. Internal resources and processes	
2.1. Human and financial resources	<ul style="list-style-type: none"> lack of capabilities for PKA expert training using modern Internet technology (such as webinars); limited financial resources available to PKA Bureau, which prevents PKA from hiring and keeping employees with high qualifications and from optimising the scope of responsibilities in individual positions; lack of financial resources for the development of analytical capabilities of PKA with regard to the measurement of the effectiveness of its operations.
2.2. Internal processes	<ul style="list-style-type: none"> no methods and tools allowing to measure the effectiveness and efficiency of the PKA's operations in higher education system; lack of an integrated IT system for the management of the evaluation process (and monitoring of operations from the beginning till the end, along with report generator); the accreditation process, relations with stakeholders; and information policy; moderate level of internationalisation of evaluation procedures carried out by PKA.
Area 3. Relations with stakeholders	
3.1. Academic community and socio-economic stakeholders	<ul style="list-style-type: none"> poor recognisability of PKA outside the academic community; difficulty with overcoming barriers created by representative bodies in higher education, which treat PKA as a control authority.
3.2. International cooperation	<ul style="list-style-type: none"> a limited correlation between accreditation activity taken at home and abroad.
3.3. PKA's image	<ul style="list-style-type: none"> lack of comprehensive studies on internal and external stakeholders' perception of PKA. There is no satisfaction level measurement in the

case of internal stakeholders. In the case of external stakeholders, only a survey is administered after a site visit, which is a measurement of service quality. Quality Forum is used as a platform for reflection on current challenges for quality assurance system and a consultation mechanism in the case of changes in methodology.

Opportunities

Area 1. Education quality assurance and enhancement and supporting HEIs in building quality culture	
1.1. Education accreditation and quality assessment;	<ul style="list-style-type: none"> • HEIs start to use the assessments awarded as part of programme evaluations as an element of building their competitive advantage; • connecting outstanding evaluations with financial support for higher education institutions; • developing permanent forms of cooperation with PKA stakeholders in order to build an optimal external quality assurance system;
1.2. Providing assistance to HEIs in building education quality culture.	<ul style="list-style-type: none"> • developing multifaceted cooperation with HEIs in order to increase their capabilities related to quality culture building and to boost synergy between external and internal quality assurance processes;
Area 2. Internal resources and processes	
2.1. Human and financial resources	<ul style="list-style-type: none"> • professionalisation of PKA and PKA's Bureau staff thanks to the introduction of relevant legislation and international standards in the scope of human resources development (e.g.: NQA staff capacity building or HRD); • acquiring from alternative sources funds to finance the operations of PKA (e.g.: European funds, funds from the World Bank), and to support and develop its analytical activities; • increasing the participation of foreign experts in the works of PKA.
2.2. Internal processes	<ul style="list-style-type: none"> • Computerisation and streamlining of PKA procedures; • creating organisational conditions allowing for the internationalisation of PKA external assurance procedures.
Area 3. Relations with stakeholders	
3.1. Academic community and socio-economic stakeholders	<ul style="list-style-type: none"> • development of system-wide cooperation between HEIs and business.
3.2. International cooperation	<ul style="list-style-type: none"> • development by the Ministry of Science and Higher Education of a strategy for higher education internationalisation, which will also include quality assurance processes; • increasing PKA's participation in international projects, which will allow it to bridge its analytical and financial gap and to respond to challenges of the European Higher Education Area.
3.3. PKA's image	<ul style="list-style-type: none"> • introduction of a central system for monitoring the satisfaction level of PKA stakeholders, which is based on quantitative and qualitative studies and observation of discursive processes; • opening up all channels of communication with external stakeholders.

Threats

Area 1. Education quality assurance and enhancement and supporting HEIs in building quality culture	
1.1. Education accreditation and quality assessment;	<ul style="list-style-type: none"> • frequent amendments of legislation governing external quality assurance.
1.2. Providing assistance to HEIs in building quality culture.	<ul style="list-style-type: none"> • formal requirements for quality evaluation imposed by legal regulations make it difficult for PKA to convince stakeholders that it is an accreditation agency supporting the process of quality culture building and not a control body. • underuse by other external stakeholders of PKA's experience in education quality assurance.

Area 2. Internal resources and processes	
2.1. Human and financial resources	<ul style="list-style-type: none"> lowering the quality of PKA's work due to presenting by HEIs candidates for PKA experts who lack experience in work on quality assurance; not using external sources of financing (European funds) as regards the possibility of undertaking analytical activity by PKA and the introduction of innovative solutions; limited funds allocated for operations of PKA, which among other things, result from the fact that the role PKA Bureau plays in supporting PKA in fulfilling its mission is underappreciated.
2.2. Internal processes	<ul style="list-style-type: none"> frequent modifications of PKA's internal procedures resulting from amendments of generally binding legislation undermine the stability of its internal quality management system.
Area 3. Relations with stakeholders	
3.1. Academic community and socio-economic stakeholders	<ul style="list-style-type: none"> lack of approval on part of some academic circles for the accreditation model and evaluations carried out by PKA; attempts made by academic community to develop a replacement education quality assurance system and the rejection of the model implemented by PKA resulting from applicable laws.
3.2. International cooperation	<ul style="list-style-type: none"> the appearance of a significant number of international sector accreditations, many of which are not compatible with the ESG 2015.
3.3. PKA's image	<ul style="list-style-type: none"> lack of reliable knowledge about the rules/legal regulations governing higher education, PKA, the Bologna Process, bodies responsible for making assessments and giving opinions, which impact on legal regulations, including those affecting PKA.

14. Current challenges and areas for future development

Key challenges result from the SWOT analysis and envisaged changes of legislation on higher education contained in the Constitution for Science - Act 2.0. These include:

- development of and pilot procedures concerning new institutional evaluation solutions, with particular regard to its international character;
- development of and pilot procedures concerning quality assurance of new modes of study: dual programmes, joint programmes, programmes promoting entrepreneurship, etc.;
- development of and pilot procedures for validation of learning outcomes gained outside higher education;
- development of analytical and research activity of PKA and using the results of analyses and studies to improve education quality at Polish HEIs;
- professionalisation of the accreditation process thanks to the introduction of a function of evaluation panel secretary, in order to guarantee the standardisation of the accreditation activities and site visit reports;
- further computerisation of accreditation procedures to guarantee full electronic documentation workflow and timeliness of work;
- adaptation of PKA to new conditions arising from the adoption of new law (Constitution for Science, Act 2.0).
- development of incentives for HEIs to seek international quality assurance (institutional evaluation);
- developing a clearer differentiation between evaluation criteria for the accreditation of degree programmes with general and practical profile and connecting them with regulations promoting innovation;
- making cyclical comparative studies of accreditation schemes together with research centres in order to develop and disseminate good practice and benchmarks.

Glossary of Terms

- BIP** (Polish: Biuletyn Informacji Publicznej) - Public Information Bulletin;
- EQAR** – European Quality Assurance Register for Higher Education;
- ENQA** – European Association for Quality Assurance in Higher Education;
- ESG** – European Standards and Guidelines;
- KAWSZ** (Polish: Komisja Akredytacyjna Wyższego Szkolnictwa Zawodowego) - Accreditation Committee for Non-University Higher Education Institutions;
- KRASP** (Polish: Konferencja Rektorów Akademickich Szkół Polskich) - Conference of Rectors of Academic Schools in Poland;
- NQF** - National Qualifications Framework;
- KRZaSP** (Polish: Konferencja Rektorów Zawodowych Szkół Polskich) - Conference of Rectors of Non-University Higher Education Institutions in Poland;
- MNiSW** (Polish: Ministerstwo Nauki i Szkolnictwa Wyższego) - Ministry of Science and Higher Education;
- NIK** (Polish: Najwyższa Izba Kontroli) - The Supreme Audit Office;
- PDCA** – Plan – Do – Check – Act;
- PKA** (Polish: Polska Komisja Akredytacyjna) - the Polish Accreditation Committee;
- POL-on** (Polish: Zintegrowany System Informacji o Nauce i Szkolnictwie Wyższym) - The Integrated System of Information on Science and Higher Education;
- PQF**- Polish Qualifications Framework;
- PSRP** (Polish: Parlament Studentów Rzeczypospolitej Polskiej) - Students’ Parliament of the Republic of Poland;
- RGNiSW** – (Polish: Rada Główna Nauki i Szkolnictwa Wyższego, formerly Rada Główna Szkolnictwa Wyższego (RGSW) - The General Council of Science and Higher Education.