

ENQA TARGETED REVIEW

# POLISH ACCREDITATION COMMITTEE (PKA)

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**enqa.**

European Association for  
Quality Assurance in Higher Education

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## EXECUTIVE SUMMARY

This report analyses the compliance of Polish Accreditation Committee (Polish: Polska Komisja Akredytacyjna) (PKA) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in the period November 2022 through May 2023 and should be read together with the external review report of the agency's last full review against the ESG. The agency was reviewed against the ESG following the methodology described in the Guidelines for ENQA Targeted Reviews.

With this review PKA is applying for renewal of its membership in the European Association for Quality Assurance in Higher Education (ENQA) and renewal of its registration on the European Quality Assurance Register for Higher Education (EQAR).

The Polish Accreditation Committee is an independent institution, acting to ensure and enhance the quality of education. The primary objectives of the Committee are to ensure compliance with quality standards in higher education, reflecting the European and global best practices, and to support public and non-public universities in the process of enhancing the quality of education and developing quality culture. These measures are aimed to ensure a high position of Polish higher education graduates on the national and international labour market and to increase the competitiveness of Polish higher education institutions as European institutions. PKA is carrying out the following activities within the scope of the ESG:

- Initial (ex-ante) programme evaluation (opinion- giving process)
- Programme evaluation (ex-post)

The review focuses on standards with a partial compliance conclusion in the Register Committee's last renewal decision based on the 2018 review;

ESG. 2.4 Peer-review experts,

ESG. 2.6 Reporting,

ESG. 3.5 Resources.

The review also considers standards affected by other types of substantive changes. These are;

ESG 2.3 Implementing processes – i.e. addition of specific elements related to on-line and distance learning to PKA's methodology (As requested by EQAR's Register Committee in their Extraordinary Revision of Registration of PKA from 2022-07-12 (Ref. R34/C68)) and the distinguishing between the two categories of positive programme accreditation decisions as requested by EQAR's Register Committee in their Substantive Change Report decision from 2022-11-25 (Ref. R37/C86)

ESG. 2.7 Complaints and appeals, (As requested by EQAR's Register Committee in their Substantive Change Report decision from 2022-11-25 (Ref. R37/C86))

ESG. 3.3 Independence, (As requested by EQAR's Register Committee in their Extraordinary Revision of Registration of PKA from 2022-07-12 (Ref. R34/C68) and as requested by EQAR's Register Committee in their Substantive Change Report decision from 2022-11-25 (Ref. R37/C86))

ESG. 3.6 Internal quality assurance and professional conduct (As requested by EQAR's Register Committee in their Substantive Change Report decision from 2022-11-25 (Ref. R37/C86))

The review also considers the following standards:

ESG 2.1 Consideration of internal quality assurance (Applicable to all agencies undergoing a targeted review),

### ESG 3.4 Thematic analysis (Agency’s self-selected enhancement area)

The review panel was also asked to consider other matters regarding ESG compliance that come up during the targeted review and that may affect the agency’s compliance with the ESG (if any). During the review process the review panel did not find any evidence of activities that were not assessed during the last full review against the ESG and were not included in the Terms of Reference for this review. The review panel also did not learn of any other substantial changes to the quality assurance activities carried out by PKA, except the changes already reported to EQAR and included in the Terms of Reference.

The summary of PKA’s compliance with the ESG Part 2 and Part 3, based on this review, is demonstrated in the table below:

#### Summary of agency’s compliance with the ESG (Parts 2 and 3)

<b>ESG</b>	<b>Compliance according to the targeted review<sup>1</sup></b>	<b>Compliance transferred from the last full review<sup>2</sup></b>
2.1	Compliance	
2.2		Compliance → Compliance
2.3	Partial compliance	
2.4	Compliance	
2.5		Compliance → Compliance
2.6	Compliance	
2.7	Compliance	
3.1		Compliance → Compliance
3.2		Compliance → Compliance
3.3	Partial compliance	
3.4		Compliance → Compliance
3.5	Compliance	
3.6	Compliance	

<sup>1</sup> Compliance refers to the focus areas that were evaluated in depth and are part of the Terms of Reference, i.e., standards that were only partially compliant with the ESG during the last full review, ESG Part 2 for newly introduced or changed QA activities of the agency, ESG 2.1 for all QA activities and any standard affected by substantive changes since the last full review. If any of the standards of Part 2 of the ESG are covered due to the newly introduced or changed QA activities, a remark “for new or changed QA activities only” is added in brackets to the compliance assessment.

<sup>2</sup> Compliance refers to the last EQAR Register Committee decision for renewal of inclusion on the Register, or in case when an agency is not renewing its registration in EQAR, compliance refers to the last ENQA Agency Review report and should its judgement differ from that of the panel, the judgement of the ENQA Board, as stipulated in the membership decision letter by the ENQA Board. Compliance refers to the QA activities of the agency that were reviewed during the previous full review.

3.7		Compliance (by virtue of applying) → Compliance
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Based on PKA's compliance with the ESG standards presented above and based on the review panel's analysis provided in this report, the review panel considers that PKA is overall in compliance with the ESG.

# INTRODUCTION

This report analyses the compliance of Polish Accreditation Committee (Polish: Polska Komisja Akredytacyjna) (PKA) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted in the period November 2022 through May 2023 and should be read together with the external review report of the agency's last full review against the ESG.

## BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

### BACKGROUND OF THE REVIEW

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

Registration on EQAR is the official instrument established by the European Higher Education Area (EHEA) for demonstrating an agency's ESG compliance. An external review is a prerequisite for registration.

Following PKA's submission of a substantive change report to EQAR in 2022 which informed of the PKA President's dismissal before the end of his term by the Minister, thereby impacting ESG 3.3, the Register Committee, in their Extraordinary Revision of Registration of PKA<sup>3</sup> from 2022-07-12 reduced PKA's registration period until 31 May 2023, so that PKA is able to launch a new external review instantly and submit the report before expiry of registration.

As PKA has undergone three successful reviews against the ESG Parts 2 and 3, it is eligible and has opted for a targeted review. The purpose of a targeted review is to ensure the agency's compliance with the ESG by covering standards that were found partially compliant during the agency's last renewal of registration in EQAR and on standards that could have been affected by substantive changes<sup>4</sup> during the past five years while at the same time further strengthening the enhancement part of the review.

This review therefore addresses the standards PKA was found to be partially compliant with during the review in 2017, the substantive changes made between 2018 and 2022 and the enhancement area selected by PKA.

### SCOPE OF THE REVIEW

This review will evaluate the extent to which PKA continues to fulfil the requirements of the ESG. The targeted review aims to place more focus on those parts that require attention and provide sufficient information to support PKA's application to EQAR. The review will be further used as part of the agency's renewal of membership in ENQA.

PKA is carrying out the following activities within the scope of the ESG:

- Initial (ex-ante) programme evaluation (opinion- giving process)
- Programme evaluation (ex-post)

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<sup>3</sup> [https://backend.deqar.eu/reports/EQAR/C68\\_PKA\\_SubstantiveChangeReport\\_decision\\_v2\\_0.pdf](https://backend.deqar.eu/reports/EQAR/C68_PKA_SubstantiveChangeReport_decision_v2_0.pdf)

<sup>4</sup> e.g. organisational changes, the launch of new external QA activities.

The activity 'complex evaluation procedure', is not yet carried out, but the activity was addressed in the self-evaluation report and external review report on the basis of available processes and documentation (mentioned under standard 2.3).

The review focuses on standards with a partial compliance conclusion in the Register Committee's last renewal decision based on the 2018 review;

ESG. 2.4 Peer-review experts,

ESG. 2.6 Reporting,

ESG. 3.5 Resources.

The review also considers standards affected by other types of substantive changes. These are;

ESG 2.3 Implementing processes – i.e. addition of specific elements related to on-line and distance learning to PKA's methodology as requested by EQAR's Register Committee in their Extraordinary Revision of Registration of PKA from 2022-07-12 (Ref. R34/C68) and the distinguishing between the two categories of positive programme accreditation decisions as requested by EQAR's Register Committee in their Substantive Change Report decision from 2022-11-25 (Ref. R37/C86)

ESG. 2.7 Complaints and appeals as requested by EQAR's Register Committee in their Substantive Change Report decision from 2022-11-25 (Ref. R37/C86))

ESG. 3.3 Independence as requested by EQAR's Register Committee in their Extraordinary Revision of Registration of PKA from 2022-07-12 (Ref. R34/C68) and as requested by EQAR's Register Committee in their Substantive Change Report decision from 2022-11-25 (Ref. R37/C86)

ESG. 3.6 Internal quality assurance and professional conduct as requested by EQAR's Register Committee in their Substantive Change Report decision from 2022-11-25 (Ref. R37/C86)

The review also considers the following standards:

ESG 2.1 Consideration of internal quality assurance (Applicable to all agencies undergoing a targeted review)

ESG 3.4 Thematic analysis (Agency's self-selected enhancement area)

The review panel was also asked to consider other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any).

These issues were investigated by the review panel as far as possible, providing an analysis and conclusion on the ESG standard(s) concerned.

## MAIN FINDINGS OF THE 2018 REVIEW

PKA was last assessed against the ESG in 2018. The 2018 panel found PKA in full compliance with the ESG in four out of 14 standards reflecting the many years of experience of the organisation and its orientation towards the implementation of the European perspective of quality assurance (QA) in Poland.

According to the EQAR Register Committee's decision on 2019-06-26, PKA was found to be in the following state of compliance with the ESG Parts 2 and 3:

ESG 2.1 Consideration of internal quality assurance - Compliance

ESG 2.2 Designing methodologies fit for purpose - Compliance



ESG 2.3 Implementing processes - Compliance  
 ESG 2.4 Peer-review experts - Partial Compliance  
 ESG 2.5 Criteria for outcomes - Compliance  
 ESG 2.6 Reporting - Partial Compliance  
 ESG 2.7 Complaints and appeals - Compliance  
 ESG 3.1 Activities, policy and processes for quality assurance – Compliance  
 ESG 3.2 Official status – Compliance  
 ESG 3.3 Independence – Compliance  
 ESG 3.4 Thematic analysis - Compliance  
 ESG 3.5 Resources - Partial Compliance  
 ESG 3.6 Internal quality assurance and professional conduct - Compliance  
 ESG 3.7 Cyclical external review of agencies – Compliance

The 2018 panel noted that in light of repeated and also current change of the legal context of its operations, PKA successfully manages to maintain good relations with the relevant stakeholders by implementing procedures sound with the Polish HE system. The panel wishes to make explicit that the Opinion Giving Process, one of PKA's two main activities, and its specificities, significantly prevented a more positive assessment of some standards. The panel was fully aware of the fact that important work was in progress to change the legal framework of PKA activities and the new rules could also improve the Opinion Giving Process. However, in line with ENQA's rules and recommendations, the panel analysed and assessed the current context or framework and cannot make assessments based on expected future developments.

The panel therefore acknowledges, in this report, the status of the ESG standards that were found to be in compliance with the ESG during the last full review.

## REVIEW PROCESS

The 2023 external targeted review of Polish Accreditation Committee was conducted in line with the process described in the *Guidelines for ENQA Targeted Reviews*, the EQAR Procedures for Applications, and in accordance with the timeline set out in the Terms of Reference. The panel for the targeted review of Polish Accreditation Committee (PKA) was appointed by ENQA and composed of the following members:

- **Almantas Šerpatauskas**, (Chair) Director, Center for Quality Assessment in Higher Education (SKVC), Lithuania - Quality Assurance Professional (ENQA nominee).
- **Andy Gibbs**, (Secretary) Independent Consultant, UK, - Quality Assurance Professional (EUA nominee).
- **Erdal Emel**, Prof. Dr. in Industrial Engineering Department, Faculty of Engineering Uludağ University, Bursa, Turkey - Panel member, academic (EUA nominee).
- **Pegi Pavletić**, Ph.D. Candidate in Pharmaceutical, Nutraceutical and food sciences, University of Camerino, Italy - Panel member, student (ESU nominee, member of the European Students' Union Quality Assurance Student Experts Pool).

**Ms Milja Homan** (Project and Reviews Officer, ENQA), acted as the review coordinator.

A panel briefing, which consisted of a coordinator's briefing on the review process and panel members' roles and responsibilities, as well as panel discussion on points from the self-assessment report (SAR) and further documents to be requested from the agency/division of the preparatory

tasks/preparation of the mapping grid/programme of the site visit/other issues, took place on 31st January 2023. This meeting commenced with a briefing on the scope of the review with EQAR representatives. A second online panel meeting was held on 15th February 2023 followed by a meeting with the PKA resource persons.

The draft review report was completed on 5th May 2023 and sent to PKA for the factual check on 7th May 2023. The final review report was submitted to the ENQA's Agency Reviews Committee on 24th May 2023.

The review panel confirms that the arrangements by ENQA provided for a smooth and well-coordinated review process. All the findings and conclusions included in this report are the joint opinion of the review panel and have been agreed on during the report drafting process.

### **Self-assessment report**

PKA's preparation of the SAR commenced on November 17th, 2022, by a team consisting of internal and external stakeholder representatives. The SAR was completed on December 12th 2022 and an open consultation process involving internal and external stakeholders was held immediately following approval by PKA Presidium on December 15th 2022 until December 20th 2022. A number of comments were received and considered by an executive team of the Presidium who made any necessary amendments before forwarding the revised version to ENQA. ENQA requested some additional information, and the SAR was received by the panel on January 9th, 2023.

The panel found the SAR informative and reflective of the pace of change in Polish Higher Education.

### **Site visit**

The site visit took place between February 27th – March 2nd 2023 at the premises of PKA, Żurawia 32/34 st., Warsaw. One meeting was held at the Ministry of Higher Education premises, Hoża 20, Warsaw.

The panel selected groups that would be able to comment on the standards and issues under review. These were:

PKA Bureau Managing Director,  
The Presidium including President of Student Parliament,  
PKA section secretaries-coordinators of programme evaluation and opinion-giving procedures,  
PKA Advisory Council,  
Chairs and members from Section for Appeals, Complaints and Ethics,  
Minister of Education and Science,  
Heads of some reviewed HEIs/ HEI representatives,  
Quality Assurance Officers of HEIs,  
Representatives from the reviewers' pool,  
Representatives of the Student Parliament,  
Stakeholders, such as employers, local community and alumni.

For the detailed schedule of meetings, please see Annex I.

Exceptionally, and with the agreement of PKA, the review coordinator participated online. This had no adverse impact on the process. The organisation of the technical arrangements by PKA is much appreciated.

Simultaneous translation was available and used throughout the site visit at the PKA premises, with some participants occasionally choosing to speak English. Consecutive translation was utilised during the meeting with the Minister of Education and Science.

It was decided not to conduct a separate interview with the working group responsible for producing the SAR, as the members of this group would fully overlap with the participants required for other sessions.

The review panel appreciates the openness of all interviewees invited by PKA and the quality of all discussions. The review panel felt welcome and was able to execute the site visit in a manner appropriate for a targeted and enhancement-oriented review.

## CHANGES WITHIN THE AGENCY

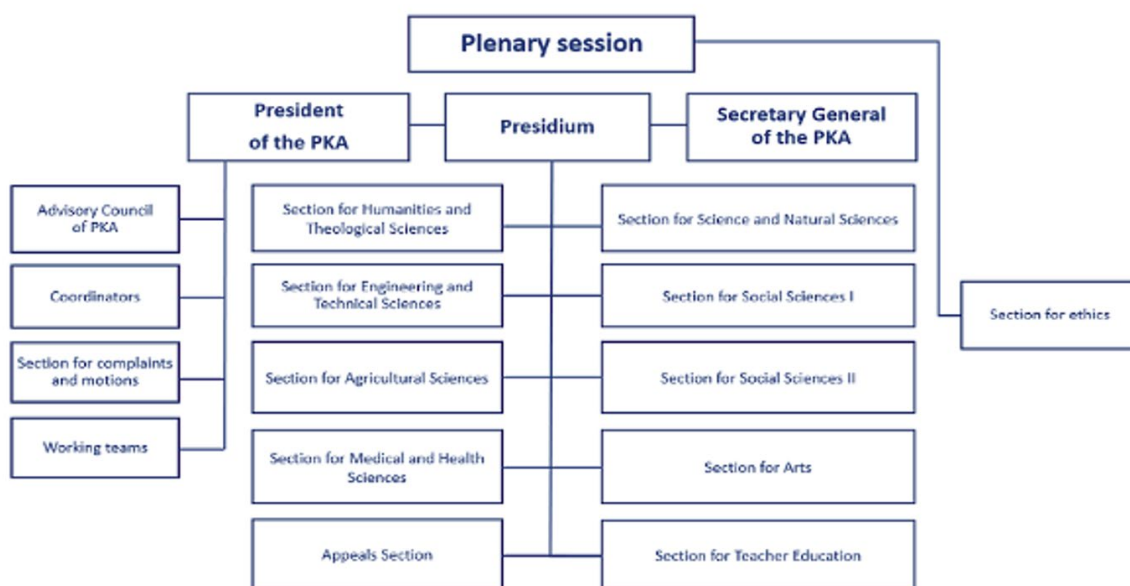
### HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM

The entry into force of the Law of July 20, 2018 - Law on Higher Education and Science - marks the start of the fifth stage of the Polish Accreditation Committee. These changes were indicated in the Substantive change report submitted to EQAR with the application for registration renewal in 2019, as well as in the Follow-up report submitted to ENQA in 2020. It needs to be noted, that unlike previous amendments to the legal system, introduction of the Law on Higher Education and Science created a completely new set of rules and regulations.

Their main aim was to facilitate greater European and global competitiveness of Polish higher education institutions (HEIs). Enhancement of quality of education and scientific outcomes have been the overarching principle of the new Law (called Law 2.0). Therefore, the new legal framework introduces greater institutional autonomy in its organisational aspect. Higher education institutions received greater flexibility in reshaping their own internal structures, processes and policies.

### PKA'S ORGANISATION/STRUCTURE

PKA organisation and structure is shown in the organogram below, taken from the SAR.



The Minister for Higher Education and Science appoints the members of the Polish Accreditation Committee based on nominations from national scientific and higher education bodies. PKA has 100 members. This is an increase of ten members since the previous report and was noted in RC34/C68. When appointing the members of the Committee, the Minister considers the requirement that they represent all fields of science.

The organisational structure of PKA is now complemented by an Advisory Council (noted in RC37/C86) established in accordance with Article 8 of the Statute of the PKA. The functioning of the advisory council is elaborated under standard 3.6 Internal Quality Assurance and Professional Conduct.

In 2022 PKA introduced changes in the Statute that consist the creation of a new body in the Committee in the form of the Quality Council of PKA's activity, whose main task will be to carry out activities related to improving the quality of PKA's work, including the implementation of a new task, which is the periodic evaluation of the work of members of the Committee and its experts. The detailed mode of operation of the Council will be specified in the regulations adopted by the Presidium of the PKA. Till the date of the site visit, the Quality Council has not been appointed and regulations have not been adopted by the Presidium.

A working team has been established with a focus on thematic analysis and is elaborated in standard 3.4 below.

In 2021/2022 PKA modified the procedure for monitoring surveys, complaints and motions submitted by HEIs. The change consists in isolating the complaint procedure and detailing the current complaint procedure in terms of deadlines, its stages and responsibilities. In accordance with the PKA's Statute, PKA's President appointed the Section for Complaints and Motions (SAR, p. 52).

Following the ENQA review panel recommendation, at the beginning of 2020 the President of PKA appointed the Team responsible for maintaining a database of interpretations of the Polish Accreditation Committee. The task of the Team is to develop positions on the interpretation of legal provisions (generally applicable and internal), which constitute the basis for the work of PKA, and in particular regulate the conduct of program evaluations and opinion-giving process (SAR, p. 53).

## PKA'S FUNDING

There is no change to funding arrangements since the 2018 review. The operations of PKA are fully funded by the state budget. HEIs do not bear any financial costs of accreditation. Currently the annual budget of PKA constitutes ca. 0.0075% of all expenditures on higher education. Remuneration for PKA members and experts for participation in the external accreditation process forms the biggest part of PKA's expenditure. The amount and principles for paying such remuneration are determined by regulations defined by the Ministry of Education and Science.

## PKA'S FUNCTIONS, ACTIVITIES, PROCEDURES

The introduction of the new Law on Higher Education and Science resulted in important internal changes in the PKA activities. First of all, plenary sessions of the Polish Accreditation Committee on 13 December 2018 approved the new Statute. It introduced significant changes regarding the criteria for programme evaluation and introduction of the separate criteria for the opinion-giving procedure.

The introduction of the new Law on Higher Education and Science has significantly reshaped the national policy context of PKA's operations. First of all, PKA's tasks have been significantly extended. PKA has been assigned with new tasks which aim to stimulate the quality enhancement in Polish higher education through new types of activities. These are:

- analytical activities
- training activities
- dissemination of good practices.

PKA no longer issues an opinion on the reinstatement of a suspended authorization to conduct studies in a specific field, level and profile of education, nor does it prepare an opinion for the Central Commission for Degrees and Titles.

The introduction of the new Law on Higher Education and Science required an update to regulations on studies and quality of education. The most important of these are focussed on criteria for program evaluation and on characteristics of second-level learning outcomes for qualifications at levels 6-8 of the Polish Qualifications Framework, and a set of regulations on standards of education preparing for regulated professions.

In 2018, in line with the Law on Higher Education and Science, PKA developed a catalogue of programme evaluation criteria and held broad consultation on the topic. Ten general criteria were identified together with general evaluation criteria of programme evaluation.

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

PKA has introduced in the Statute separate criteria for reviewing requests for granting permission to provide a degree programme. Furthermore, up to five quality education standards have been formulated for each of the criteria. In accordance with the Statutes, another evaluation is conducted after six years if a positive rating was previously awarded, unless there are reasons to conduct them at an earlier date. Evaluations made by the Committee, both in the past and today, result in specific consequences for HEIs or their academic units. At present, according to article 248: Should the Polish Accreditation Committee give a negative evaluation of the quality of education in a field of study, a higher education institution referred to in Art. 53 sections 7 to 9 shall cease the conduct of degree programmes in that field of study at the end of the semester in which the resolution becomes final. If there are less than three months of the semester remaining, a higher education institution shall cease the conduct of studies in that field of study at the end of the following semester. Moreover, the Minister may withdraw the permission to establish studies in a specific field of study, level and profile if PKA issued a negative assessment of the quality of education. (Article 56 (1)).

In addition, Minister shall, by way of an administrative decision, refuse to renew the entry in the register to the non-public HEIs if PKA has issued a negative assessment of the quality of education in at least half of the fields of study offered by the higher education institution (Article 41(4)).

The scope of PKA's opinions on granting a HEI the authorisation to provide degree programmes at a given level and with a given degree profile is set out in Article 53(3-7) a of the Law on Higher Education and Science and Clause 9 of the regulation of the Minister of Education and Science and 27 September 2018 on the study. The opinions given by the Committee are not legally binding for the Minister.

Finally, a new procedural change has been introduced regarding the experts' panel composition. A student experts' section for reviewing requests has been appointed by the President of PKA from among student experts of the Committee. The Secretary-General appoints the review panel and one of the reviewers must be a member of the student experts' section for reviewing requests.

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

## ESG PART 3: QUALITY ASSURANCE AGENCIES

### ESG 3.3 INDEPENDENCE

Standard:

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

**2018 ENQA review recommendation:** None

#### **2022 EQAR Register Committee decision on Substantive Change Report (2022-07-12)**

- The Register Committee noted that a new President of PKA was appointed before the end of the previous President's regular term.
- The Register Committee concluded that the dismissal casts serious doubts on whether PKA remains able to “act autonomously” and to assume “full responsibility for [its] operations”, as required by ESG standard 3.3.
- The Register Committee was unable to make a final conclusion as to whether PKA actually complies with standard 3.3 without a new external review of the agency.
- The Register Committee thus reduced PKA's registration period until 31 May 2023, so that PKA is able to launch a new external review instantly and submit the report before expiry of registration.

#### **2022 EQAR Register Committee decision on Substantive Change Report (2022-11-25) (Dealt with under ESG 3.6)**

- The Register Committee noted the reactivation of the Advisory Council. The Committee understood that this body has been established and operational and it will be performing consultative and advisory functions in order to support PKA's development.
- The Register Committee considered the reported change on the newly established body, the Quality Council, and expressed concern with the current proposal of an open-ended regulation that would affect the operability and independence of the Quality Council. The Committee could not make a final judgement on whether PKA continues to comply given the lack of clarity concerning the functioning of the new body.
- Considering the upcoming targeted review of PKA, the Register Committee therefore asks the panel to address: how the newly established Quality Council would affect the internal checks and balances within the agency, especially within the different bodies in the agency.

## Evidence

The panel reviewed the Extraordinary Revision of Registration of the Polish Accreditation Committee (PKA) ([Ref. R34/C68](#)), summarised in this report for context. The Register Committee noted that a new President of PKA was appointed before the end of the previous President's regular term. PKA provided no information how the previous President's term ended and why the President changed. The Register Committee sought clarification from PKA. PKA explained that the "change in the position of PKA was carried out" on the basis of and in accordance with the Law on Higher Education and Science, giving the Minister of Education the competence to appoint and dismiss the PKA President.

The Register Committee inferred that the Minister dismissed the previous PKA President, but PKA provided no reasons for the Minister's decision. The Committee thus invited the Minister to clarify the reasons for dismissing the previous PKA President. In his letter of 19/01/2022, the Minister confirmed that he dismissed the previous PKA President. The Minister reiterated that the law entitled him to dismiss the PKA President and noted that the Minister was "guided by his care to ensure that PKA performs tasks related to improving the quality of education in the field of higher education". The Minister did not provide any specific reasons why it was necessary to dismiss the previous President. As the Minister provided no reason for the dismissal whatsoever, the Register Committee was unable to establish any reasons or circumstances of overriding importance that would have justified the dismissal of the previous President.

The Register Committee concluded that the dismissal therefore casts serious doubts on whether PKA remains able to "act autonomously" and to assume "full responsibility for [its] operations", as required by ESG standard 3.3. was unable to make a final conclusion as to whether PKA actually complies with standard 3.3 without a new external review of the agency.

It was clear to the panel that finding the reasons for the previous President's dismissal was not the primary aim of the review, but more investigating the Minister's discretionary power, which, even if not exercised in the future, could influence the independence of the President and consequently the agency. The panel was also clear that, to demonstrate compliance with the standard, new evidence in the form of a policy, protocol, procedure or similar, specifying reasons/rationale for the dismissal of the President before the end of term and regulating the Minister's discretionary power would need to be presented.

Arrangements for nomination, appointment and dismissal of members of the agency's governing bodies were considered by the panel. Reviewing the statute and in meetings with the HE Minister, Senior Managers and PKA Members it was confirmed that the members of PKA are appointed by the Minister of Education and Science from nominations by various stakeholders (Polish HEIs, the General Council for Science and Higher Education, the Conference of Rectors of Academic Schools in Poland, the Conference of Rectors of Public Professional Universities, the Conference of Rectors of Vocational Schools in Poland, the Presidium of the Polish Accreditation Committee, the Students' Parliament of the Republic of Poland, nationwide scientific associations and employers' organisations). By the virtue of law, the President of the Students Parliament is also a member of PKA. Nominations are subsequently appointed by the Minister.

With regards to dismissal there are conditions in the Law on Higher Education and Science determining when a member can be dismissed from PKA. The panel considered the conditions for termination or dismissal of PKA members and PKA Bureau staff. PKA members are not employees of PKA. They are appointed by the President and can only be dismissed on *expiry of a member's mandate*. Those in the PKA Bureau are employees and can only be dismissed in line with the labour laws. The President has a unique position in that he is the only individual associated with PKA who can be summarily dismissed from the position of President without reason, although there is no



evidence of a precedent of previous dismissals. Notwithstanding dismissal from the position of President, the individual would remain a member of the PKA.

In addition to examination of the SAR, the panel spoke with Senior Managers of PKA and the PKA Bureau as well as the Minister for Education and Science . The panel also noted that apart from the Minister, no PKA member nor PKA Bureau employee could elaborate on the circumstances of the previous President's dismissal. Furthermore, the SAR made no comment on the issue.

The panel found no evidence of a policy, protocol, procedure or similar, specifying reasons/rationale for the dismissal of the President before term and regulating the Minister's discretionary power. On the contrary, the Minister confirmed his discretionary power and also indicated that he would take similar action in the future if the occasion arises. In the meeting with the Minister, the panel was informed orally about one of the reasons for dismissal. The Minister assured the panel that he is ready to discuss this issue with PKA to find the solution.

### **Analysis**

In light of the dismissal of the previous PKA President, the panel wished to investigate fully the provisions guaranteeing of PKA's independence in official documentation, in particular with regard to how the agency's governing bodies and officers are nominated and appointed, and what are the rules and conditions for dismissing its members. The panel were briefed by representatives from EQAR on the scope of the review, including concerns regarding the dismissal of the PKA President prior to the site visit. The arguments and representations that had been made by PKA and detailed in Extraordinary Revision of Registration of the Polish Accreditation Committee (PKA) (ref [Ref. R34/C68](#)) were reviewed and discussed by the panel who then deliberated on the evidence that would be required to reassure the panel that PKA was compliant with ESG 3.3.

The standard had been fully reviewed by the Register Committee prior to the review visit. The only new evidence that was presented during the review visit was the confirmation by the Minister of his discretionary power and his willingness to apply it.

The panel were cognisant of a previous decision of the EQAR Register Committee which set a precedent and considered that the dismissal of the leadership of an agency might be "*appropriate and justifiable if it was both reasonable and absolutely necessary to protect other overriding values or principles, e.g. the integrity of the agency*" (decision of 1/3/2018 on KAA). In turn, the Register Committee established that it infringes on an agency's independence if an external dismisses the agency's leadership without that being based on such overriding reasons or circumstances. During the meeting with the Minister for Science and Education, a reason for the dismissal of the previous President was mentioned. The panel did not have sufficient information nor evidence to conclude that this post hoc explanation was appropriate, justifiable, reasonable and necessary.

The panel was aware of EQAR's interpretation of the standard that "*independence is at risk when one single actor or stakeholder has a "controlling stake" in the agency, e.g. by the ability to decide on a majority of members in a governing body.*" The panel listened to assertions from PKA that there were sufficient checks and balances in the system to ensure that independence was maintained. The panel reviewed the agency's organisational and operational independence as well as the independence of its formal outcomes.

The panel noted that the statutes and regulations in place were unchanged from 2018, when the previous review panel concluded that, "Based on the analysis of the relevant documents and interviews, the panel does not question/doubt the present independence of PKA and its authorities from third party influence. Thanks to a high level of professionalism exercised by all parties, the system operates as independent." Furthermore, the previous panel had noted that The President of

the Committee is appointed and removed from office by a decision of the Minister for Higher Education (p.11)

The panel tested PKA's independence of formal outcomes and how the agency prevents undue influence of institutions or stakeholders on the findings, analysis, conclusions and recommendations. The resolution on accreditation is adopted by the Presidium of the Polish Accreditation Committee. Opinions are provided to the Ministry after consideration in the Section of Study Field and Presidium. The final decision is taken by the Minister. There are few cases when the Minister takes another decision based on additional information, but PKA opinion remains unchanged in the published outcomes. A clear and transparent distinction is therefore ensured for decisions that are taken by other bodies on the basis of the agency's outcomes.

During the site visit the panel were told that planning of evaluation procedures is conducted by the PKA. The Minister can request that an additional evaluation is conducted in cases of misconduct. No such cases have been reported. There are procedures and policy to ensure that conflicts of interests do not occur. The Presidium of the Polish Accreditation Committee adopts resolutions on the basis of opinions of the Section. No evidence was found that the decisions can be influenced by other parties.

The panel considered that, as far as could be ascertained, PKA maintains independence of its organisational and operational activities as well as independence of its outcomes. Organisational arrangements and operational procedures of PKA, criteria and procedure for evaluation, appointment of experts are laid down in the Statutes and the issue of discretionary dismissal of the President could be addressed within the statutes. The Minister suggested that he would be willing to recommend a change in the Law and this would also remove the question mark over the independence of PKA.

The panel concluded that the three dimensions of independence remained as they were in 2018 when the agency was found to be in compliance. Although, the panel were reassured that whilst there are sufficient measures in place to ensure independence on a day to day basis, it could not gauge the extent to which the looming possibility of dismissal without reason may affect the behaviour and performance of the President in ways that cannot be evidenced in this review. To this extent, the introduction of a clear rule, regulation or protocol would remove this and until this is the case the panel judges the agency to be in partial compliance.

The agency should make representations to the Minister of Education and Science advising that the discretionary powers which enable the President of PKA to be removed from office are considered by the European Quality Assurance community to undermine the agency's independence. Introducing clear criteria for the removal from office of the PKA President would address this concern.

### **Panel recommendations**

1. The agency should make representations to the Minister of Education and Science advising that the discretionary powers which enable the President of PKA to be removed from office are considered by the European Quality Assurance community to undermine the agency's independence. Introducing clear criteria for the removal from office of the PKA President would address this concern.

### **Panel conclusion: partially compliant**

## ESG 3.5 RESOURCES

Standard:

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

### 2018 ENQA review recommendation

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

### 2019 EQAR Register Committee decision

- The Register Committee further underlined the review panel's recommendations on the need to increase the agency's capacity to perform thematic analysis.

### Evidence

The panel focussed on evidencing a decrease in staff turnover and an increased capacity to invest time and knowledge in thematic analysis and internal enhancement.

The panel noted that Minister of Education and Science increased the number of members of the Polish Accreditation Committee in April 2021 (9 new members), and in May 2021 (1 new member) resulting in an increase of PKA members to no more than 100 in 2021 due to increased need during the pandemic. Although this was introduced as an emergency measure during the pandemic, the increase in numbers has now been consolidated. The distinction between PKA members and PKA Bureau staff was noted – PKA members work within the Sections and the Appeals Body, which perform statutory tasks of PKA and are not employees of PKA whereas PKA Bureau staff are. The PKA Bureau provides administrative and financial services to the Committee. There are 23 employees currently; some of whom also serve as panel secretaries. Number of Bureau employees increased from 16 to 22 in 2019 and since then remains stable.

The panel heard that insufficient funding had previously had some impact on human resources and that in 2019 PKA received a significant increase in the HR budget to improve the situation. Financial provision for evaluation activities is now seen by senior managers as appropriate. Data was provided that showed an increase in funding of 9,8 mln. PLN to 11,9 mln. PLN between 2019 and 2022, with a special provision of 13,1 mln. PLN in 2021 to cover additional pandemic costs. Financing is agreed upon with the Ministry on a three-year basis.

Experts reported that remuneration for services is not sufficient but the experts take evaluation as their responsibility and treat it as a prestigious task. Raising remuneration is a Ministerial decision. HEIs expressed a reluctance to commit more funds to evaluation and review activities.

With regard to thematic analysis, following the recommendation in 2018, the analytical activity of the Polish Accreditation Committee has found formal confirmation in legal acts and has been reflected in the structure of PKA's Bureau. The Law on Higher Education and Science introduced in 2018 facilitates development of this strand of PKA activities by acknowledging it as a legal PKA obligation. Following those new circumstances, in January 2019 Bureau of the Polish Accreditation Committee introduced a new internal unit for analysis, research, training and public communication. Currently, it is composed of 4.5 full-time employees (FTE). From 2019 to 2022, the analytical activities were

financed without a dedicated financial budget heading. Now, the analytical activity has found formal confirmation in legal acts and has been reflected in the structure of PKA's Bureau finances.

### **Analysis**

The panel heard from Senior Management of PKA and PKA Bureau of the actions which have been taken since 2019, led by the Managing Director appointed at that time. These actions have overhauled the infrastructure of the Bureau and identified new roles for staff with increased responsibilities and opportunities. This was in part possible due to an enhanced budget which improved staff remuneration. This had the intention of not only increasing efficiencies but also creating a learning organisation. One outcome of this approach is that skills training and staff development are more systematic and targeted.

PKA Bureau employees expressed satisfaction with their working conditions, they felt valued in their roles and with their career opportunities. The employees confirmed that internally they felt valued and were now seeking to be recognised as experts by different stakeholders outside the agency. It was clear to the panel that the career satisfaction expressed by this group was not only related to their enhanced remuneration but also to the organisation of working activities, the feedback from surveys, other improvement techniques and the challenge of their role.

The panel discussed working conditions with PKA Senior management and members, PKA members and relevant HEI external stakeholders who were satisfied with working deadlines and did not note any undue delays on the part of PKA staff.

Overall the panel noted an increase in resources, a decrease in staff turnover, an improved focus on analytical and thematic activity with legislative recognition for this activity. Staff, managers and stakeholders were satisfied with the situation. The staff turnover is 1-2 employees per year as reported by the Managing Director of PKA. This is considered to be stable and within a normal range and does not have any significant impact on PKA activities.

Changes in legislation, resources and PKA Bureau organisation enable thematic analysis activities. The previous recommendations have been addressed.

Although not employees of the Bureau, low remuneration rates for experts participating in reviews seem manageable as this is seen as a desirable career-enhancing activity, however the panel considered that to attract international experts, methods of remuneration and funding rates would need to be addressed. The PKA sees the possibility of significantly increasing the participation of international experts in the planned comprehensive assessment, taking the position that expert panels conducting the comprehensive assessment (after its introduction) should obligatorily include the participation of international experts, which will be taken into account when designing detailed solutions for the assessment procedure as part of the comprehensive assessment.

### **Panel suggestions for further improvement**

I. Anticipating a move to involve more international experts, PKA may wish to address issues of funding and remuneration.

### **Panel conclusion: compliant**

## ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

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

### 2018 review recommendation

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

### 2022 EQAR Register Committee decision on Substantive Change Report (2022-11-25) (Also mentioned under ESG 3.3)

- Register Committee noted the reactivation of the Advisory Council. The Committee understood that this body has been established and operational and it will be performing consultative and advisory functions in order to support PKA's development.
- Register Committee considered the reported change on the newly established body, the Quality Council, and expressed concern with the current proposal of an open-ended regulation that would affect the operability and independence of the Quality Council. The Committee could not make a final judgement on whether PKA continues to comply given the lack of clarity concerning the functioning of the new body.
- Considering the upcoming targeted review of PKA, the Register Committee therefore asks the panel to address: how the newly established Quality Council would affect the internal checks and balances within the agency, especially within the different bodies in the agency.

### Evidence

The panel reviewed evidence across three components related to previous recommendations and EQAR Register Committee's considerations:

- The **internal quality assurance** in the areas of strategic management (decision-making process, definition and implementation of the strategic plan, etc.) and the role of the panel Chair,
- Introduction of the **Quality Council** and its effect on internal checks and balances
- Functionality of the **Advisory Council** to support PKA's development

### Internal Quality Assurance

The panel reviewed PKA Statute Art. 7 which defined PKA President's supervision role in the internal quality management system. PKA has also taken steps in strategic management related to internal quality management systems. These include that the PKA President will develop and implement a system for the implementation and monitoring of the implementation of the strategy, taking into account the responsible personnel and monitoring systems, semi-annual monitoring of status of implementation and annual monitoring of the validity under current conditions. The PKA

Quality Manual indicates that the PKA President is responsible for supervision of the internal quality management system (IQMS) and shall appoint a Quality Management System Plenipotentiary.

The 2018 panel had noted the strong position of the chair in the programme evaluation process when the chair is a PKA panel member. It recommended that the IQA system sets some clear regulations reassuring the role of other stakeholders. At that time there was no mechanism in place to guarantee that all panel members were involved in the drafting of the report or informed about requirements to make adjustments. Based on the recommendations of the review panel in 2018, Art. 18(2) of PKA Statute has been amended by the resolutions of the Polish Accreditation Committee of February 18, 2019 No. 1/2019 and of February 16, 2022 No. 1/2022, to highlight the role of the review panel's Chair in program evaluations and indicates that a member of the Committee or, in duly justified cases, an expert referred to in Art. 15(2)(1), can perform the function of the chair of an assessment panel.

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, improving the quality of PKA's work, including the implementation of a new task, which is the periodic evaluation of the work of members of the Committee and its experts.

### **Quality Council**

The panel reviewed PKA Statute Art. 11a(1) which indicates that PKA President may appoint a Quality Council for PKA whose tasks may include;

1. Monitoring the quality of assessment panel reports;
2. Evaluation of the quality of work of the members of the Committee and experts and request dismissal (Art.15);
3. preparation of draft interpretative positions;
4. preparation of draft templates and guidelines (Art.9(3)5-8) or changes adopted by Presidium.

According to Art. 11a(2) the Quality Council members are composed of a secretary and at least six members from among members of the Committee or experts, including at least one student expert and at least one from a group of experts indicated by employers or representing employers' organisations. The PKA President will also appoint a chair to the council. The council will perform its tasks on the basis of the Regulations adopted by the Presidium at the request of the President. The plenary assembly of the PKA in December 2021, after consultations among internal and external stakeholders, decided to amend the PKA's Statute, the possibility of appointing the PKA's Quality Council. In addition, related PKA Quality Management System (QMS) (SAR Appendix No.7) document dated 24 May 2022 refers to QMS Art.I General Conditions (3) for PKA President to be responsible for supervision of the internal QMS and the appointment of a Quality Management System Plenipotentiary.

However, at the time of the panel visit in February 2023, the Quality Council members had not been appointed yet.

### **Advisory Council**

The panel reviewed PKA Statute Art. 8 which indicates that the PKA President can appoint an Advisory Council, which performs opinion-giving and advisory functions for the Committee concerning strategic directions for the development of the Committee. As a result of the formal decision taken by PKA President in September 2021, the Advisory Council was reactivated in a new format of cooperation to include external stakeholders and representatives of employers and

students. The Advisory Council was appointed in 2021 consisting of a council president and 13 members mainly from academia including a student and an employers' representative member. The PKA President determines the scope of its activity and convenes at least once a year. In its first meeting on December 8, 2021, the subject of the considerations of the Advisory Council were the strategic directions of the development of the Committee formulated in the draft PKA Strategy for 2021-2025, as well as the draft PKA Statute.

## **Analysis**

### **Internal Quality Assurance**

PKA introduced a revised Quality Management System in May 2022 describing the scope, procedures and responsibilities of internal quality assurance and the review panel heard that the recommendations of the 2018 panel had been taken into consideration when this was being prepared. In particular the 2018 panel had noted that There are no formalised procedures assessing or ensuring effective internal feedback, as they rely on "opinions formulated by members, experts and employees. The QMS introduced 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. Similarly, student and employer representatives confirmed their involvement in decision making processes through their presence in the PKA Presidium.

The panel for programme evaluation consists of experts, committee members and a person acting as secretary. In meetings with section heads as well as in meetings with people who had been PKA panel members for programme evaluation, it was confirmed that the secretary of the panel drafts the report and coordinates the procedure for programme evaluation. PKA has adopted rules for the division of duties between the members of the evaluation panels, which are binding for all chairmen of the panels. This change was introduced in 2018 and now ensures that all panel members are involved in the drafting of the report or informed about requirements to make adjustments. At the same time, the PKA has evidence from each evaluation which confirms arrangements between all panel members regarding final assessments under each criterion as well as the most important issues that should be highlighted in the site visit report. This was confirmed by members of the reviewers pool as well as panel secretaries. In this regard a clear safeguarding measure has been introduced as part of the IQA and this is in line with the ENQA 2018 panel recommendations and there is a checks and balance system for the strong role of the PKA member serving as president of the review panel.

### **Advisory Council**

After reactivation by the PKA President, the Advisory Council has had just two meetings so far, therefore it needs more time, and perhaps more frequent meetings, before assessing the added value of this Council to PKA.

### **Quality Council**

During the on-site meetings with the upper management of PKA, the panel has observed that the responsibilities to be assigned to the Quality Council are currently not resolved due to the current status quo and ongoing internal discussions on the Quality Council's establishment. The panel is unable to comment on the Quality Council as it is not yet functioning.

### **Panel commendations**

Assessment procedures for the experts are highly appreciated by everyone, and additionally, this contributes to the overall understanding of PKA's procedures and evaluations by the experts and is an example of good-practice in quality enhancement.

**Panel conclusion: compliant**

## **ESG PART 2: EXTERNAL QUALITY ASSURANCE**

### **ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE**

Standard:

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

#### **2018 review recommendation**

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

#### **Evidence**

The 2018 review noted that in the absence of institutional evaluation, PKA is currently focusing on two procedures: conducting obligatory programme evaluations and giving opinions on applications for the authorisation to provide degree programmes submitted by higher education institutions (Statute §4).

The 2018 panel scrutinised the methodologies for PKA's quality assurance activities and confirmed the direct link between internal (ESG Part 1) and external (ESG Part 2) quality assurance as far as the procedure of programme evaluation is concerned. However, with regard to the opinion giving process, the 2018 panel noted that full alignment is not the case. In particular the 2018 review panel noted that ESG standards 1.2 and 1.4 are aligned weaker and 1.7, 1.8 and 1.9 are not represented in the methodology.

A new *Law on Higher Education and Science*, issued on 20 July 2018, redefined the tasks assigned to PKA including the task of expressing opinions on meeting the conditions for conducting studies in a specific field, level and profile, and the relationship of studies with the higher education institution's strategy. To accommodate the changes in the new Law and the ENQA recommendation on opinion-giving procedure, Statutes of the Polish Accreditation Committee had been adjusted to include a new set of quality assurance criteria and standards. PKA's self-assessment report from 2022 summarised these legal changes giving in detail the new set of criteria and standards for IQA of HEIs. The new criteria together with the Statute is published on the website [www.pka.edu.pl](http://www.pka.edu.pl).

Under ESG 2.1, concerning the consideration of internal quality assurance of HEIs, PKA conducts ex-ante and ex-post evaluations in non-public and public HEIs having general academic or practical (study) profile.

A) Ex-ante evaluation limited to **opinion-giving**:

- Takes place prior to the Minister granting permission to establish a degree programme in a specific field, level and profile.
- PKA expresses to the Minister of Education and Science (MES) opinions on meeting the conditions for conducting studies in a specific field of study, level and profile of study and the relationship between studies and the strategy of a higher education institution.



- As indicated in SAR P34 and as referred to in Article 433, depending on the field of study, MES takes into consideration other ministries' conditions to be fulfilled in addition to ESG Part I standards .
- HEIs that do not have the academic category A+, A or B+ in specific discipline to which a field of study is assigned, and hence the right to award the doctoral degree must apply to MES for permission to establish studies in a specific field of study and at a specific level and profile.

B) Ex-post **program evaluation** leading to accreditation:

- Regular evaluations take place after the completion of the first cycle of the educational programme.
- At the special request of MSE, evaluations may also be held at any time.
- Assessments result in positive or negative rating.
- a positive assessment is issued for a period of up to 6 years

The SAR indicates that changes in the Law on Higher Education Act (2018) reflected the ENQA panel recommendation and PKA have developed new criteria for the opinion giving process that are aligned with the requirements of Part I of the ESG 2015.

The SAR provided tables one which mapped the links between PKA programme evaluation standards and ESG 2015. The table is reproduced in Annexe five of this report. The other table, (also in Annexe five) illustrates criteria used by PKA while expressing opinions on meeting the conditions for conducting studies in a specific field of study, level and profile of study and the relationship between studies and the strategy of a higher education institution.

The SAR (annex 9) also includes a mapping table with PKA criteria and ESG standards which illustrates how each standard of the ESG Part I is reflected in the PKA criteria and standards for opinion-giving and programme evaluation. This was accompanied by a description of how the standards were met. Sample templates and completed reports were provided by the agency.

PKA preferred to use criteria and standards, such that the coverage of each PKA evaluation criterion is given in detail by several standards. In fact, each criterion is an overarching summary of standards underneath.

### **Analysis**

Analysis of current PKA methodology and provided detailed mapping in the SAR (annex 9) shows that PKA indeed reviewed their standards and assured full alignment of their standards with ESG part I standards. Only such elements as recognition of qualifications, periods of study and prior learning are not fully covered in opinion giving standards, but are in place in programme evaluation standards.

The mapping grid (below) of PKA criteria and standards versus ESG standards is a summary of the Tables 17 and 18 given in the SAR (included in this report as appendix five). The panel analysed the information provided by PKA and checked the mapping grid which they had produced. The results are below:

### **Compliance of PKA's external quality assurance criteria and standards with the ESG Part I for opinion-giving and program evaluation of HEIs having general academic or practical (study) profile**

The 2018 review panel's decision on partial compliance of ESG 2.1 was due to PKA's criteria and standards defined for the opinion-giving process being not fully aligned with ESG Part I. These missing alignments are well addressed by setting up a one-to-one correspondence in the new PKA statute.

Following ESG Part I Standards are analysed here to clearly correlate each to one or more PKA Standards. An analysis is also added to show how much ESG Part I coverage is provided by the related 10 PKA criteria. With few exceptions where it will be mentioned, the corresponding PKA criteria and standards are all applicable to opinion-giving and program evaluation for the general academic or practical (study) profile.

### 1.1 Policy for quality assurance

PKA educational quality standards associated with each criterion explicitly take the internal quality assurance system into account for both programme evaluation and opinion giving and include, *inter alia*, requirements for regular external assessments of quality which are made public.

The quality of education provided as part of the degree programme in HEIs is subject to regular external assessments of education quality, the results of which are made public (PKA 10.2) The concept of education and learning objectives correspond to the strategy of the HEI (PKA 1.1), Learning outcomes correspond to the concept of education and learning objectives and the discipline(-s) to which the degree programme is assigned (PKA 1.2), relate learning outcomes of certain professions to the specified HE act articles (PKA 1.2a and 2b) .

Regular reviews of the study programme are conducted based on the results of analysis of reliable data and information and with the participation of internal stakeholders, including students, and external stakeholders (PKA 10.1); Cooperation with social and economic stakeholders, including employers, on the development, implementation and improvement of the study programme is ensured (PKA 6.1).

The internationalisation of education provided as part of a degree programme is also related to ESG 1.1 by generalising the policy for quality assurance (PKA 7.1). PKA 6.2 and 7.2 which concern regular reviews with respect to the participation of external stakeholders and international students, require the participation of students. Therefore these standards which are not applied to the opinion-giving processes, can only be applied to program evaluations.

### 1.2 Design and approval of programmes

Institutions should have processes for designing, approving, and modifying the study programme have been formally adopted and applied), (PKA 10.2-The quality of education provided as part of the degree programme is subject to regular external assessments of education quality).

PKA 6.2 and 7.2 which concern regular reviews with respect to the participation of external stakeholders and international students, require the participation of students. Therefore these standards which are not applied to the opinion-giving processes, can only be applied to program evaluations.

PKA standard 1.2 requires evaluating whether learning outcomes correspond to appropriate levels of Polish Qualification Framework. As PQF is referenced to EQF so this element is indirectly reflected in PKA standards.

### 1.3 Student-centred learning, teaching and assessment

ESG 1.3 is covered by standards of PKA criterion 2 and 3 in both procedures

#### 1.4 Student admission, progression, recognition and certification

This ESG standard is covered by PKA criterion 3 and its standards. The only issue which needs more attention is about recognition of periods of study and prior learning which is not covered in opinion giving procedure.

#### 1.5 Teaching staff

This ESG standard is covered by PKA standards of criterion 4.

PKA 4.1a - programmes providing education for professions referred to in Article 68(1) of the HE act comply with the rules and requirements contained in education standards specified in the regulations on Article 68(3) of the HE act),

PKA 4.2-Staffing policy ensures the selection of academic teachers and other teaching staff based on transparent rules and proper teaching capacity; in-service staff training and continuous development taking into account the regular assessment of teachers by students).

#### 1.6 Learning resources and student support

Learning resources and student support are covered by PKA standards of criterion 5, 7 and 8 in both procedures.

#### 1.7 Information management

This standard is reflected in PKA standard 10.1 of criterion 10.

#### 1.8 Public information

Criterion 9 of PKA covers ESG 1.8. The difference here is that standard 9.2 is applied only in programme evaluation and standard 9.1 is applied in both procedures.

#### 1.9 On-going monitoring and periodic review of programmes

#### 1.10 Cyclical external quality assurance

Both processes are covered by standards of PKA criterion 10. They fully reflect ESG standards 1.9 and 1.10. In both cases these standards in opinion giving procedure are utilised as they require HEI to reveal how the programme will be monitored and reviewed.

### **Summary**

PKA was asked to provide a sample of reports which, on checking, verified that all standards are reflected in the procedures of PKA. Analysis of these expert panel reports provided by the PKA on the opinion-giving and programme evaluation revealed that the reviewers have analysed the proposed study well (in terms of applicable PKA criteria and standards) using self-assessment documents provided by HEIs; especially for “negative opinion” conclusions. Other program evaluation reports sampled from PKA’s web site also reflect similar comprehensiveness of the respective panel reports.

The previous review concluded that some standards were not covered substantially and that some were not represented in the opinion-giving process. This has been addressed and all elements of the standard are covered in both procedures (programme evaluation and opinion-giving).

It was also observed that each standard of ESG Part I is included in templates for self-assessment report as well as templates for evaluation reports (programme evaluation and opinion-giving, academic and practical profile).

The panel concluded that the opinion giving procedure is aligned with the requirements of part one of the ESG.

### **Panel suggestions for further improvement**

2. Consider including recognition of periods of study and prior learning elements in opinion giving procedure.

### **Panel conclusion: compliant**

## ESG 2.3 IMPLEMENTING PROCESSES

Standard:

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

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

### **2018 review recommendation**

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

### **2022 Register Committee decision on Substantive Change Report (22-07-12)**

- The Register Committee took note of the addition of specific elements related to on-line and distance learning to PKA's methodology and acknowledged that these were obviously topical in light of current developments in higher education.
- As the additions could not be addressed within the Change Report process in detail, the next external review of PKA should give attention to those additions in further detail.

### **2022 EQAR Register Committee decision on Substantive Change Report (2022-11-25)**

- The Register Committee took note of the changes in the concept of conducting programme evaluations related to Standard 2.3. The committee understood that this change is made to clearly distinguish two categories of positive programme accreditation, one for a full 'for up to six years' accreditation and the second one conditional accreditation 'for up to two years'.
- The Register Committee considered the reported changes and noted that this change should be further addressed in the external review of PKA.
- The activity 'complex evaluation procedure', is not yet carried out, but the activity was addressed in the self-evaluation report and external review report on the basis of available processes and documentation.

## Evidence

### Transparency of opinion giving process

The 2018 panel noted that For the opinion giving process there is also an application by the institutions, the desk-based assessment usually happens by reviewers who are members of PKA, their report is then discussed by the section which forms the baseline for the decision that is then made by the PKA Presidium. The decision is made available to the MoHE and the institutions, however it is not published. Students are only involved in the decision making process at its final stage in the Presidium of PKA. The panel found no indication for inconsistencies in the use of the predefined and reliable implementation. However, understanding that the institution only receives the decision of the PKA Presidium and not the full opinion that was formulated by the reviewers of the section, the panel found no predefined and transparent way how the opinion is then made available to the institution in cases it wants to appeal the decision. The explanations the panel received in the interviews with institutions and the Appeals committee could not produce a consistent picture of the procedures in these cases.

The SAR advised that to address the issue of transparency, after the decision of the Minister of Education and Science issued as a result of the completion of administrative proceedings regarding the HEI's application for permission to establish studies, PKA publishes a resolution on its website, including an opinion on the fulfilment of the conditions for conducting studies in a given field of study, level and profile, and the connection of studies with the HEI strategy. Such a publication is a statutory requirement. They are also uploaded to DEQAR database on a regular basis.

Following the review of the above-mentioned sources, the panel gained an overview of both the programme evaluation and opinion giving processes. The higher education institution submits the self-evaluation report to the Committee following the template and guidelines adopted by the PKA Presidium – within six weeks of receiving the request. The site visit should be carried out within eight weeks of receiving the self-evaluation report. The site visit shall be conducted in accordance with the rules for conducting the visit specified by the Presidium of the PKA and published on the website (SAR Annex No. 10). If the institution fails to provide the self-evaluation report and, at a later stage, a reply to the report, it shall not suspend the course of subsequent activities of the assessment procedure. The Managing Director of the PKA Bureau informs the higher education institution of the date of the site visit and provides a draft schedule for the site visit, two weeks prior to the site visit. The Chair of the evaluation panel is a member of the Committee or, in justified cases, an expert who is a former member of the Committee. In the case of expressing opinions on meeting the conditions for conducting studies in a specific field of study, level and profile of study and the relationship between studies and the strategy of a higher education institution, the panel of reviewers consists of at least two members, each time including a representative of students. The panel shall be appointed by the Secretary-General after consulting the chair of the Section. The Secretary-General may, in particularly justified cases, extend the composition of the evaluation panel.

The evaluation panel should prepare a report within six weeks after reviewing the self-evaluation report and the site visit. Each expert is required to submit a separate report in accordance with the agreed division of responsibilities. The final version of the report is prepared by the entire evaluation panel. Editing and editorial work is undertaken by the secretary of the panel and verification and approval by the Chair of the panel. The evaluation panel's report is sent to the higher education institution, which may respond to it within three weeks of its receipt. The Chairperson of the Section or a person designated by him or her presents the summary of the Section's meeting, including the opinion and the draft of the decision on the evaluation, at the meeting of the Presidium, within six weeks of receiving the response from the higher education institution. All decisions,

including their justification and conclusions, are delivered by the Committee to the rector of the HEI, the minister responsible for higher education and possibly another minister supervising the HEI seven days after they are taken. A party dissatisfied with a decision of the Presidium may request a reconsideration within fourteen days of the date of the delivery of the resolution. Reports, as well as Committee's decisions, and recommendations shall be published on its website.

### **Online and distance learning**

The panel considered the addition of specific elements related to on-line and distance learning to PKA's methodology notified in Substantive Change Report (22-07-12). The SAR described that since October 2020 PKA has been implementing and providing programme evaluation procedures remotely. This measure was introduced as a response to the Covid -19 pandemic. The measure only impacted on the mode of delivery and quality criteria and standards remained unchanged. The introduction of this measure was supported by a series of webinars. In February 2021 PKA highlighted the issues of distance learning and teaching in the indicators of compliance with the quality standards. In September 2022, due to the continuing epidemic emergency, the Presidium of the PKA decided to maintain the conduct of visits remotely and produced guidelines on the circumstances in which this was possible. Indicators of meeting the quality standards of education, highlighting the changes introduced in February 2021 regarding the assessment of education provided with the use of methods and distance learning techniques were available during the site visit.

### **Programme evaluation**

According to the Statute, as part of the programme evaluation, the Presidium of the PKA may issue an evaluation: positive for a period of up to six years, positive for a period of up to two years, and a negative evaluation.

In Article 20 section 4 is replaced by the following: "4. A positive programme assessment is issued for a period of up to six years.

### **Complex Evaluation**

The complex evaluation is PKA's task in accordance with the provisions of the Law on Higher Education and Science, but so far, the basic criteria for the assessment, determining further activities of PKA, i.e. defining the detailed assessment procedure and detailed criteria, have not been issued by the Minister of Education and Science.

### **Analysis**

#### **Transparency of the opinion giving process**

With regard to opinion-giving, the PKA Criteria, standards and procedures aligned with the ESG standards for external quality assurance of general academic or practical (study) programmes in non-public and public HEIs are well designed, legally documented and published. Thereby addressing the recommendations of the previous review. Naturally, opinion-giving being an ex-ante evaluation, ESG 2.3's follow-up requirement does not apply, since opinion-giving is a compliant or non-compliant type decision. The self-assessment stage, external assessment stage being (if needed) on-site or on-line, PKA opinion report preparation stage by the panel set by the most related academic field (PKA Section), submission stage to Ministry of Education and Science by PKA Presidium processes are well defined and implemented consistently. However, publication of opinion reports and decisions (positive or negative) is not systematically applied, as of 2020 due to the claims of delays in Ministerial processes since the Ministry is the final decision-making body. See also ESG 2.6.

## **Online and distance learning**

With regard to the addition of specific elements for online and distance learning the panel noted that PKA quality criteria were supplemented with additional elements to take into account online and distance learning methods in external quality assurance procedure as in covid period this mode of learning became widely used by HEI. PKA can be commended for appropriate reaction to respond to trends in higher education. Additionally components of remote communications with institutions, introduced during the pandemic, were retained in circumstances where this is safe and effective.

## **Complex Evaluation**

According to the SAR and discussion with the President and Secretary-General, with regards to comprehensive evaluation (also referred to as comprehensive evaluation), it will not be applied before 2025. Criteria, standards and procedures are not prepared. A pilot evaluation will take place prior to its implementation.

## **Programme Evaluation**

The reason for introducing a shortened period is the formulation of recommendations of a corrective nature as a result of the programme evaluation. During this shortened period, the HEI is obliged to implement the recommendations and after the expiry of the assessment period, another assessment takes place, in which, in addition to the assessment of the fulfilment of individual criteria, the manner in which the recommendations are implemented and its effectiveness in removing the deficiencies and errors diagnosed earlier is also assessed.

A two year accreditation is applied for programmes that contain recommendations indicating the need for immediate elimination of errors and inconsistencies. This change of accreditation period seems completely reasonable as it allows for the monitoring of the implementation of recommendations and safeguards interests of students. Especially as a clear follow-up procedure is not in place.

HEI's Quality Officers state that PKA does not ask HEIs for follow-up of recommendations in PKA review report. The panel noted that external quality assurance procedures do not include any follow-up processes. On the other hand, the Presidium's decision for a non-compliant with PKA standards results in a negative assessment. The Presidium's decision for a partially-compliant with PKA standards results in a positive assessment for a period of less than 6 years (usually 2 years) and the need for effective implementation of recommendations formulated in a resolution by the Presidium of PKA.

Full compliance to PKA standards results in a six-year accreditation. During this six year period the panel could not find any evidence of a follow up. Although in the case of two year evaluations, PKA applies a follow up procedure to verify if a given HEI has complied with the recommendations of PKA, the SAR advises that in the case of positive ratings for 6 years, recommendations are designed only to improve a good education process, their adoption is examined in the course of the subsequent programme evaluation. The review panel could not see that there is a consistent follow up in place to verify the implementation of any conditions imposed or to monitor progress in quality enhancement.

Furthermore the panel noted that arrangements for a check of factual accuracy is not clearly defined in the procedure. Although site-visit meetings provide assurance that such a procedure is in place, the panel suggests to describe it in a more clear manner so that HEI comments on inaccuracies in the draft report are taken into account within the final report.

With regards to programme evaluation, PKA Criteria, standards and procedures aligned with ESG standards for external quality assurance of general academic and practical (study) programmes in non-public and public HEIs are well designed, legally documented and published except for the follow-up stage. In the self-assessment stage, external assessment stage being on-site or on-line, PKA review report, accreditation decision of PKA Presidium, and publication of review reports and decisions (positive or negative) are consistently implemented.

### **Panel commendations**

1. PKA quickly responded to include methods for distance and online learning within its quality criteria and have reviewed and retained these.

### **Panel recommendations**

2. Clearly define and implement a follow-up in the programme evaluation procedure.

### **Panel suggestions for further improvement**

3. Clarify stage of factual accuracy check in PKA procedures.

### **Panel conclusion: partially compliant**

## **ESG 2.4 PEER-REVIEW EXPERTS**

Standard:

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

### **2018 review recommendation**

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

### **2019 EQAR Register Committee decision**

- The panel's findings show that in the opinion-giving process students are not involved as members of review panels. Opinions are prepared by members of relevant Sections or PKA experts, following which the Presidium prepares a resolution that is forwarded to the Minister and higher education institutions. The panel noted that students are to a certain extent involved as members of the Presidium of PKA.
- The Committee underlined that students are normally expected to be involved as part of the peer-review expert groups and to contribute as equal partners. As the current arrangement of PKA could not yet be reviewed by an external panel the Committee was unable to conclude whether the way students are involved meets the requirements of the standard.

### **Evidence**

PKA is supported by almost 930 experts and panels' secretaries. PKA experts are appointed on the strength of a decision of the President of PKA based on the needs identified by PKA sections. The recruitment procedure for the individual groups of experts is initiated by the PKA Secretary-



General, and the process is open and distributed through various channels (PKA's partners, PKA's website etc.). PKA members and experts undergo intensive internal training in order to ensure effective implementation of external quality assurance processes. In the period 2020 - 2022, approximately 40 such training events were organised.

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 PKA's website. This information is useful later, as the processes relating to the quality of PKA's work are improved, i.e. in experts' training, preparation of the reports etc.. The process of selection and appointment of experts is transparent, multilayered and is not affected by state authorities, HEIs or other stakeholders. Representatives of external stakeholders have been appointed to the Presidium of the Polish Accreditation Committee and as a result have a direct influence on the operations of PKA.

In accordance with the Statutes, professionalism, impartiality and transparency are the overriding principles for the operations of the Polish Accreditation Committee. For this purpose, the Section for Ethics manages these issues and the Code of Ethics has been adopted. In addition, PKA members and experts sign a declaration of no conflict of interest. It covers the procedures for selection, monitoring and evaluation of work of the Committee.

The site-visit panels for programme evaluation consists of at least five and at most seven members, belonging to individual groups of experts: academic teachers, students, international experts (when possible), employer representatives and the panel's secretary. The Section Chairs propose the composition of each panel and the final proposal has to be approved by PKA's Secretary General. Similarly, the Chair of the Appeals Body, proposes a reviewer or reviewers for the request for reconsideration, and the proposal is approved by the PKA's Secretary General. The tasks and deadlines for each individual panel member are determined at the same time when the panel composition is proposed. The panel Chair distributes the workload among the panel members, and all panel members have equal rights within a panel, and are able to formulate and express their opinions and conclusions during the site visit. The panel Secretary helps in preparing the draft report prior to the site-visit, based on the information available to the panel members in the self-assessment report. Bureau of PKA staff members can act as Panel secretaries, and PKA has the access to all the reports on the Sharepoint portal, however changes in the programme evaluations reports are made only by the appropriate evaluation panel until the report is submitted to the HEI. International experts are involved in programme evaluations, but they have to speak Polish, so the current number of these experts is low (32 experts). Students and employers participate in programme evaluations as panel members with equal rights to the other panel members, and they are required to complete a standardised training system involving a two-day workshop, mentorship programme evaluation visit and a detailed evaluation of at least 2 programme evaluation reports under the mentorship of the Committee coordinator.

The site-visit panels for the opinion-giving procedure are composed of members of relevant Sections or experts appointed from the academic teachers expert group and a student. The PKA Secretary-General approves the final composition of the panel in consultation with the Chair of the Section and students. Representatives of students and employers sit in the Presidium and are able and required to present their opinions on the applications and evaluations. The opinion of the students' self-government at the applying HEI is a required part of the programme application. Additionally, the chairman of PSRP and students from PKA students Quality Assurance Pool give their opinion on the programme application.

Students' representatives and employers' representatives are independently nominated to PKA by their respective organisations, and once admitted as PKA members, they undergo training to be able

to participate in the evaluation processes. Furthermore, the PKA student experts, in collaboration with the Students' Parliament of the Republic of Poland (PSRP) issue an additional opinion on the opinion-giving process to assure full inclusion of students on all levels of opinion-giving procedure. Students have a national student Quality Assurance Pool under PSRP and a coordinator of the PKA students Quality Assurance Pool is elected. He/she nominates students for programme evaluations on request-basis and the student experts are nominated based on their QA knowledge, their field of studies and other relevant criteria. Before the student participates in the review for the first time as an expert, they are required to undergo a study visit as observers, and the student engaged as an expert in that particular review mentors them. Employers have a similar mentoring system, in which they have to undergo at least one study visit as observers prior to their engagement as experts. Seeking the opinion of student self-government of the applying HEI is obligatory. There is a student member in PKA Presidium. There are no student members in the composition of Sections. There are no regulations stipulating the level of engagement of employers in the opinion-giving procedure. The Section head can propose a representative of the employers as a panel member, if their expertise is considered relevant, but these cases are rare. During the interviews, it was noted that employers would like to/should be more engaged in opinion-giving procedures.

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 Education and Science. Experts commented that there has been no increase in the remuneration sum for a number of years.

### **Analysis**

There are 32 international experts engaged by PKA and to date, no stakeholders were aware of any plans for PKA to internationalise their procedures and involvement of external experts. HEIs would welcome international experts in their programme and institutional accreditations, as they see it as a benefit for their institutions. Some of the HEIs (especially if they already have an international component of their programmes) already decide to undergo international accreditation, as they see it as a way toward proving their quality. The expert panel agrees that the procedures for the recruitment of experts are suitable and transparent, but that further effort is needed in the recruitment of international experts. Additionally, the nomination procedures are well-defined and fit for purpose. These processes are functional and systemic, allowing for good monitoring of the processes and democratic procedures.

The effort of PKA has been visible in the involvement of employers, and even more so- students, in the programme evaluations and the opinion-giving procedures. The panels for the programme evaluations and the opinion-giving procedures assure versatility and the involvement of different stakeholders. Particular improvement was noticed in the engagement of students in opinion-giving procedure, where the students from the HEI submitting a programme application are able to give their opinion, as well as the students from the PKA students Quality Assurance Pool. In the last ENQA review, the students did not have the chance to participate in the opinion-giving procedure, so their full involvement to the extent it is now, is seen as an important improvement. This has brought the involvement of students to a higher level in which the students are able to follow and reflect on the entire opinion-giving process- from the time of the application until its completion. Even though the Students are not members of Sections, this is not considered as necessary as students expressed that they have a more generic, rather than discipline-specific view of higher education and they expressed satisfaction at the current state of their engagement. The panel finds it important to honour the students' perspective in this regard, and finds their current level of engagement satisfactory.

The new training format, employed since 2020 is much more reflective and informative for the experts in respect to the old training organised by PKA. PKA is conducting assessments for the experts: initially, the procedure was applied only to students, but has since moved to include employers and other experts too. These assessments are seen as a constructive evaluation of the experts' work, the feedback is provided on their work, and recommendations on what part of their work should be improved. Trainings for the experts are available both on the Sharepoint portal, and are organised in-person (on different topics than those already online) and a multi-level mentorship programme is established for both the students and the employers, which, according to the experts, assures a higher standard and competencies of the newly admitted and the existing PKA experts. The expert panel has found the training as such to be well organised and the feedback received from the experts was positive. PKA has paid attention to the potential conflict of interest when it comes to reviews. All PKA members and experts are accountable to the Section for Ethics. They have to declare no competing interest in the tasks they perform, their selection and appointment is subject to evaluation by the PKA Secretary-General, and the information of the composition of the expert panels is sent in advance (14 days prior) to the HEIs, who can respond to the agency's proposal and declare any potential conflict of interest. The expert panel has found these steps contributing to the transparency of the evaluation process and the elimination of any potential conflict of interest.

Digitalisation of PKA needs to be improved in experts' opinion, as their improvements are seen largely through the SharePoint portal, but there is a potential for further digitalisation and improving PKA's procedures (both related to the assessments and in general) on a regular basis.

Remuneration of the experts came up as one of the issues when discussing a high workload of the experts. It was universally agreed that the remuneration rates are low, despite the job being rewarding in itself, as well as highly respected in the academic community. The expert panel acknowledges that PKA does not have a direct influence on changing the rates, as it is the responsibility of the Ministry. However, further efforts are needed to communicate the importance of raising the remuneration sum for the experts' engagement.

### **Panel commendations**

2. Following through with the recommendation from the previous ENQA review and moving toward an exemplary level of student engagement. Special commendation for the mentorship programme for new experts.

### **Panel suggestions for further improvement**

4. Update student database more regularly and continue to reduce reliance on non-digital communications.
5. Accelerate plans for internationalisation and international expert involvement in procedures.
6. Work on increasing the remuneration for experts to be in line with the international norms.

### **Panel conclusion: compliant**

## ESG 2.6 REPORTING

Standard:

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

## 2018 review recommendation

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

## 2019 EQAR Register Committee decision

- In the previous decision of renewal the Register Committee flagged for attention PKA's publication of reports of its ex-ante evaluations.
- As this issue was already flagged in PKA's last application, the Register Committee therefore concurred with the review panel's conclusion that PKA complies only partially with the standard, pending the publication of the remaining reports.

## Evidence

Reports for the opinion-giving procedure, as well as for the programme evaluation, are written according to standardised templates that are public. These templates are accessible through PKA's website<sup>5</sup>. The HEIs have the possibility to comment on the report before the consideration in the relevant PKA Section. There is a procedure to check for factual accuracy of the reports. The check is not clearly described in the procedure, but the HEIs are asked to provide comments to the report which are then published together with the report. In case of the programme evaluation there are two Report parts – published and unpublished. The unpublished one contains confidential information, including personal data, and is sent only to HEIs.

There are publicly-accessible databases with reports on programme evaluation and opinion-giving procedures. The decisions made by the Presidium of the Agency are published together with the opinions/ programme evaluations. However, in the database of opinions<sup>6</sup>, in many cases, the opinion reports contain the resolution of the Presidium made based on the opinion, but the details of the opinion procedure itself are not available. Additionally, in the database of opinion-giving procedures, most recent resolutions were, at the time of this evaluation, from 2020. In 2021-2022 there were approximately 750 opinions but they are not available in the database. The reason for this, as explained by PKA, is that the final decision has to be taken by the Ministry and only when the Minister's decision is received, opinion and resolution can be published on the database. The Ministry explained to the panel that the usual time duration for a decision to be made is 4-5 months.

I. With programme evaluation reports there is no delay in publication and even though generally all components of the procedure are published, the panel found a few cases where the expert report or HEI comments (or both) are missing even though, according to the SAR "such publication is a statutory requirement".

Recommendation of the previous report was to set up a mechanism for the involvement of all experts in report-writing, and this has been implemented and is confirmed by the range of experts under PKA. Particularly, an effort was made to involve the students in report-writing, as well as the external stakeholders, by working with them on several levels:

- mentorship programme was established so that the incoming experts would learn how to perform an evaluation and participate in the report-writing;

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<sup>5</sup> <https://www.pka.edu.pl/en/home-page/>

<sup>6</sup> <https://www.pka.edu.pl/en/database-of-opinions/>

- training is provided to the experts prior to the programme/opinion-giving procedure which involves report-writing explanation;
- experts are invited to ask for help in case they have any questions regarding any part of the evaluation they are performing.
- Panel Secretary is responsible for preparing the report draft, that makes it easier for the experts to understand how the report needs to be written, and to guide the report-writing procedure. This practice also helps in standardising the PKA reports, which makes them easier to read and informs the general academic community, external partners and other interested individuals in a structural way of the outcomes of the evaluations. Post-evaluation, all panel members are given the same workload and responsibilities, and they all equally contribute to report-writing.

## **Analysis**

PKA Bureau holds ongoing reports on its Sharepoint portal and changes in the programme evaluations reports are made only by the appropriate evaluation panel until the report is submitted to the HEI. Content of the review on applications for permission to establish studies is modified only by the authors of the reviews at the stage of their development.

PKA Bureau staff mentioned that because the opinions are already in their database, as soon as they are approved by the Ministry, PKA may publish them immediately, however, the panel was made aware that this can take longer than 14 days, as was the case at the time of the site visit.

The panel were told during the site visit that if the feedback from the institutions under programme evaluation is negative, PKA takes this into consideration and tries to communicate with the HEI to make sure that the situation is resolved. In drafting the report, all panel members contribute equally to content-creation, including students. In 2018, the secretary position was added to the assessment panels, and in consultation with other panel members, the secretary drafts the initial report prior to the site visit, based on the information the institutions provide in their SAR. Based on the findings from the site visit, this report is amended and completed.

The structure of the opinion-giving report contains the following:

- Basic information about the HEI applying for a permit to establish a programme and the field of study which is the subject of the application;
- Indicators concerning the programme of studies in the field of study subject to the application set out in the Regulation of the Minister of Education and Science of 27 September 2018 on studies (Journal of Laws of 2018, item 1861)<sup>7</sup> ;
- Analysis and assessment of the fulfilment of detailed criteria (10 criteria in total) for reviewing applications for permission to establish programmes at a specific level and profile;
- Annex (detailed criteria for reviewing requests for granting permission to provide
- a degree programme at a specific level of study and with a specific degree profile).

The structure of the programme evaluation report contains the following:

- Information about the visit and its course;
- Basic information about the study programme of the field of study under evaluation;

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<sup>7</sup> If the application concerns full-time and part-time studies, the table should be completed separately for each form of study.

- Assessment of the degree of satisfying the programme evaluation criteria;
- Description of the fulfilment of detailed criteria for programme evaluation and education quality standards;
- Annex.

The current structure of the reports is considered useful by the HEIs, as they find that the reports, aside from reporting on standard compliance, also offer advice on improvements. The structure of the reports, both for opinions and programme evaluations, is found to be fit-for-purpose by the expert panel. Detailed description of each of the 10 criteria is deemed important for understanding the many specifics of each individual institution, and it provides an in-depth understanding of the quality of higher education processes. The reports all satisfy the set form, they are well-structured, easy to navigate and understand. However, the reports are only available in Polish language, making them hardly accessible to the wider international audience. If the reports would be offered in (at least) English language, they would be more accessible to the wider public, international community and higher education stakeholders.

Unfortunately, the expert panel did not have insight into opinions issued after 02.07.2020, (publicly available on PKA's website), although some of them were approved by the Ministry, as mentioned by the PKA. PKA also mentioned that the procedure of publishing the reports is simple, as the reports already exist and are uploaded to PKA's Sharepoint Portal. The expert panel believes that this process should be more automatic, and that such long delays (more than 45 days) should not happen. Rather, the reports on the opinions should be published as soon as possible after the Ministry's decision.

Since April 2022, PKA has reengineered a questionnaire so that HEIs can give feedback and this is available on PKA's website. This questionnaire is considered useful as PKA can collect reflections from HEIs, however it may be more useful if HEIs were invited to complete it at the end of each assessment. Reports of the assessments are available only in Polish and so the audience is limited. Having the reports written in English could be useful, especially for international members of Polish higher education, which is in line with some of the feedback gathered from the HEIs on the wish for further internationalisation.

The panel concludes that the recommendation of the previous report to set up a mechanism for involvement of all experts in report writing has been implemented. Expert reports and resolutions of the opinion giving process are published and available on PKA's website.

#### **Panel suggestions for further improvement**

7. Set a clear time by which opinions will be published following notification of the Minister granting permission to establish a degree programme in a specific field, level and profile.
8. To reach a wider audience and prepare for a more internationalised approach, (at least) the summaries of the final assessment reports could be written in English.

#### **Panel conclusion: compliant**

## ESG 2.7 COMPLAINTS AND APPEALS

Standard:

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

## 2018 review recommendation

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

## 2022 EQAR Register Committee decision on Substantive Change Report (2022-11-25)

- The Register Committee took note of change in PKA complaint procedure. Based on the information provided in the Substantive Change Report [16/8/22], and the supporting documentation the Register Committee had no concerns that the ESG are complied with in the case of standard 2.7 and welcomed this change in the complaint procedure.
- The Committee expects that this change will be analysed as part of PKA's next targeted review.

## Evidence

An independent Appeals Section acts according to the Law on Higher Education and Science and operates within the organisational structure of PKA following a legislative change in 2014. The appeal process is defined in the Statutes of PKA and in the quality assurance system published on PKA website. Each resolution of PKA features instructions on how and when to submit an application for reconsideration of the matter. Each HEI can appeal against a resolution (both positive and negative) adopted by the PKA Presidium.

There are two procedures in place:

- I) Appeals Procedure;
- II) Procedure for Considering Complaints and Motions.

In the appeals procedure<sup>8</sup>, the motion can be filed by a party dissatisfied with a decision of the Presidium of the PKA taken in cases concerning several aspects:

- opinions on the registration of a non-public higher education institution;
- opinions on the fulfilment of conditions for the provision of degree programmes in a given field, level, profile and relationship of degree programmes with the strategy of a higher education institution;
- decisions concerning programme evaluation;
- decisions concerning comprehensive assessment.

The opinion on the appeal has to be issued by PKA's Appeals Section within 4 weeks time from the date of the receipt of the request. The opinion is prepared by a member of PKA or an expert appointed by PKA's Secretary-General. The Chair of the appeal team presents a candidate proposed as a reviewer to PKA's Secretary-General, within 3 days from the receipt of the appeal. Appeals are submitted directly to PKA. "The subject of the appeal may be both a decision on the programme and comprehensive evaluation, as well as a decision on the application submitted to the Committee.

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<sup>8</sup> <https://www.pka.edu.pl/en/appeals-procedure/>

Objections may relate to procedural, legal, and substantive aspects of the evaluation and should relate only to these problems and to the extent to which they were the subject of evaluation and the basis for the adopted resolutions.” After receiving the appeal, PKA’s Secretary-General appoints a reviewer/s who need to prepare a review within 14 days, and who did not participate in an evaluation subject to the appeal. Final decision needs to be made by the Presidium no later than 45 days from the date of receiving the appeal. Presidium can decide to change either the opinion or the evaluation (only if the arguments presented are able to prove the absence of concerns upon which the original decision was made). The Chair of the Appeal Section participates (and votes) in the PKA Presidium meetings. The Presidium shall decide to change the opinion or evaluation only in cases where the presented arguments concerning each charge made, remove any doubts which were the reason for the original decision and, at the same time, are within the acceptable limits for providing additional information and documentation. The decisions made by PKA are final and cannot be reviewed by the Administrative Court.

According to the Procedure for Considering Complaints and Motions<sup>9</sup>, HEIs may file a complaint and/or motion with regard to the course of the procedure being implemented as part of the programme evaluation process or opinions-giving on motions. HEIs cannot file a complaint or a motion, if those involve substantive objections to the decisions made, and they cannot constitute a request for the reconsideration of the matter (in terms of a Presidium resolution). Aside from HEIs, complaints and/or motions can be filed by persons as well, in their stead, in others’ stead or in the public interest. The requests need to be submitted in writing via snail mail or through the email during the proceedings of the evaluation/ opinion-giving procedure. The complaints and appeals have to be addressed to PKA’s President who has to immediately forward the request to the Section for Complaints and Motions and/or the Section for Ethics, who has/have to set the meeting within 7 days (normally). The decision of the Section for Complaints and Motions, with the proposal on how to settle said complaint/motion, is sent to PKA’s President who notifies the applicant. If the complaint/ motion is considered unfounded, and no new evidence emerges, the original position is maintained. During the programme evaluation, PKA collects the feedback from HEIs, in which they can also submit their comments, suggestions, criticism or objections.

The number of appeals is comparatively high in the opinion giving process, up to 40% from all applications. In cases where a negative decision is made the percentage is much higher. Cases for the programme evaluation procedure are lower. The overall figures below are taken from the SAR.

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<sup>9</sup> [https://www.pka.edu.pl/wp-content/uploads/2022/12/III.4.Procedure-for-considering-complaints-and-motions\\_final-2.pdf](https://www.pka.edu.pl/wp-content/uploads/2022/12/III.4.Procedure-for-considering-complaints-and-motions_final-2.pdf)



**Table 12.** Appeals considered by the Polish Accreditation Committee

	Programme and institutional evaluation			Opinion-giving process		Total
	Maintained	Considered	Left unconsidered	Maintained	Considered	
IV term	28	31		76	89	<b>224</b>
V term						
2016	11	5		29	33	<b>396</b>
2017	13	5	2	28	38	
<b>2018</b>	10	7		35	31	
<b>2019</b>	24	4		89	39	
VI term	12	3	0	89	51	<b>416</b>
<b>2020</b>						
<b>2021</b>	32	9	0	55	44	
<b>2022</b>	18	5	0	67	31	
<b>Total</b>	<b>148</b>	<b>69</b>	<b>2</b>	<b>461</b>	<b>356</b>	<b>1036</b>

Source: PKA SAR 2022

There have been two complaints in the past three years. PKA also maintains a database of interpretations to identify precedents and more clearly define those parts of law with a large window of interpretation. The definition proposals have to be approved by the Presidium, which assures all stakeholders are involved in the decisions on interpretation.

Students are appointed to the Section for Complaints and motions, based on the nomination from the Students' Parliament of the Republic of Poland (PRSP). Additionally, PSRP's President sits in the Presidium, where final decisions on the appeals, complaints and motions have to be taken.

PKA also has an established Section for Ethics (since 2005), that operates by their own regulations as per PKA's Statute<sup>10</sup>. PKA has also adopted their Code of Ethics<sup>11</sup>. The role of the Section for Ethics is to formulate their decisions on the matters asked from them within 4 months time. They are required to begin investigating the matter within 30 days of the received application. The Section does not only decide on whether potential breaches occurred, but also on whether the applications fall under the scope of the work of the Section for Ethics. No statute of limitations apply to the application submitted to this Section, so, in case of hindrances, the matter can be suspended for a time. However, if this hindrance continues for more than 3 months, the matter shall be forwarded to the Presidium for consideration. The decisions of the Section for Ethics can be appealed within 14 days of receiving the decision, by sending the appeal to the Presidium. Members of the Section for Ethics are appointed by PKA's plenary session. Currently there are five members of the Section for Ethics.

PKA has also modified the procedure for monitoring surveys, complaints and motions submitted by the HEIs in 2021/2022. The current approach looks at the complaints individually, and based on the analysis, PKA looks to implement the improvements.

<sup>10</sup> <https://www.pka.edu.pl/wp-content/uploads/2023/01/Regulations-of-Section-of-Ethics.pdf>

<sup>11</sup> [https://www.pka.edu.pl/wp-content/uploads/2023/01/The-Code-of-ethics-of-the-PKA\\_final.pdf](https://www.pka.edu.pl/wp-content/uploads/2023/01/The-Code-of-ethics-of-the-PKA_final.pdf)

## Analysis

The expert panel has determined that PKA has misunderstood the past ENQA recommendation on the “creative use of the appeals system”, by interpreting the recommendation as PKA’s creative use of the system, instead of HEI’s creative use of the appeals system. Therefore, the distinction had to be made between the two interpretations during the site visit, in which PKA has presented their point of view on the latter interpretation. HEIs use both the complaints and appeals procedures. The high number of appeals may signal that something is amiss with the opinion-giving procedure, for example, it was suggested to the panel that it may occur because institutions start to meet recommendations prior to the issuance of the resolution – and when the resolution is issued there is an appeal to demonstrate that they have met the recommendations. However, despite the panel’s concerns of the high number of appeals, both PKA and the representatives from HEIs confirmed that their practices of using the appeals process to potentially improve their programme evaluation results is expected. In fact, this practice is considered good by the HEIs, as it is seen as another way of communicating their work and dedication to the improvement of quality of their programmes, while PKA sees it as an exercising right of the institutions, and it proves PKA’s respectable standing in higher education, as well as the trust between PKA and HEIs. Even though PKA and HEIs consider the system of appeals to be highly functional and beneficial for both parties, the experts panel still considers that PKA would benefit from having a clearer policy on appeals regarding the opinion-giving procedure, mentioning at which points during the evaluation can appeals be made, and even what constitutes appeals in this particular case. The expert panel has noted the high workload of the experts and very high number of appeals, which pose an additional stress for PKA. PKA should aim to lower the number of appeals by identifying how the current opinion-giving appeals result in high appeal rate. HEIs find the information on the complaints and appeals accessible, transparent and easy to understand. The information can be found on PKA’s website and it is available both in Polish and in English language. Additionally, PKA informs the HEIs of their right to file appeals, complaints and motions prior to conducting a review.

Students are appointed to the Section for Complaints and Motions, based on the nomination agreed with the Chair of PSRP and coordinator of the student experts. Students have equal participation rights to the other members, and they equally contribute in terms of workload. If any support is needed, PKA is ready to provide the students with further explanations on their role in this Section. The expert panel believes that students are a necessary element of the complaints and motions procedures, and PKA involving them in this process contributes to the overall greater transparency of the evaluation procedures.

The Section for Ethics is also composed of PKA members, but students are not members. Any person delegated to the section for Ethics is considered an expert based on their background and previous experience, and PKA does not provide any training for these members. The panel believes that the experts PKA has chosen are professional, but there could be some space for further improvements in terms of their qualifications specifically related to Ethics and not necessarily to their personal and professional backgrounds.

The expert panel has also noted PKA’s systematic analysis of the feedback received by all the parties involved in both the programme evaluation and the opinion-giving procedure. By establishing the Section for Complaints and Motions, PKA has compartmentalised their activities relating to complaints and motions, and it allowed them to systematically analyse, follow and develop the procedures, independently from the programme- evaluation and opinion-giving procedure cycles. This is considered a good improvement, and the panel concluded that PKA should continue with their activities and development of this Section.

**Panel commendations**

1. Forming the Section for Complaints and Motions and making it fully operational, as well as fully involving students in this process.

**Panel suggestions for further improvement**

6. Revise the instructions sent to the institutions on how and when to submit an application for reconsideration of the opinion-giving procedure, in an effort to lower the number of appeals.

7. Evaluate whether the members of the Section for Ethics would benefit from further educational opportunities or training related to their role.

**Panel conclusion: compliant**

# ENHANCEMENT AREAS

## ESG 3.4 THEMATIC ANALYSIS

Recent changes in the Law on Higher Education and Science reflected PKA long-term experience in thematic analysis and addressed the ENQA recommendation directly. Analytical and training activities have now been included in the remit of PKA and set within the Law on Higher Education and Science (2018).

A dedicated unit within the PKA bureau has been established in 2019. Additional financing was allocated for analytical and research activities of PKA. As well as conducting surveys designed to improve internal quality assurance, the unit within the PKA Bureau is responsible for thematic analysis. The analytical and research activities envisaged fall within three categories: cyclical research, process analysis and research, and freestyle analysis.

The newly established Programme Council, which is composed of PKA stakeholders, including PKA members, experts, secretaries of the panels, staff and HEIs, developed the Concept of Analytical and Research activities for the period of 2022-2023 which has been adopted by PKA Presidium.

The Quality Forum serves as one focus for the dissemination channel and provides a feedback loop to identify further topics for research and analysis. The Quality Forum is a platform for cyclical 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.

The overall impact of these activities is designed so that PKA can fulfil its mission to analyse possibilities and desirable directions for improving PKA's methods of operation based on documented research results as well as identification of good practices in education quality assurance and identifying of key trends and significant innovations in education, education quality assurance and accreditation.

The following schedule for analysis and research with identified topics to be analysed in the period of 2022-2023 was provided by PKA.

<b>Cyclical research – reports, studies, analyses of an obligatory nature resulting from the need for ongoing monitoring and improvement of the processes carried out by PKA</b>
Research resulting from the PKA quality management system - feedback mechanism analysis.
Quantitative reports.
Site-visits conducted by PKA remotely.
Research to support the development of the competence of PKA's student experts and employer experts.
Research on quality/satisfaction assessment of participants in training and seminar events organized by PKA.
A study of the relationship between PKA-identified best practices and innovation in the quality of higher education.
Identification of the main challenges for HEIs in the area of quality assurance based on the analysis of evaluation panels reports and resolutions.
Identification of good practices - analysis of evaluation panel's report.
<b>Process analysis and research – analyses embedded in available data collected as a result of PKA's processes</b>
Identification of difficulties/constraints encountered in the process of programme evaluation by PKA members and experts regarding individual quality standards and related indicators of

fulfillment.
Study of the impact of programme evaluations conducted by PKA on the quality assurance of higher education considering the implementation of recommendations by HEIs, based on the results of programme re-evaluations/evaluations after conditional assessment.
Examination of the relationship between PKA-identified best practices and innovation in the quality of higher education. Analysis of certificates of educational excellence – in progress.
PKA's autonomy considering generally applicable laws.
<b><i>Freestyle analysis – analyses resulting from the current and future needs of the agency, reflecting challenges to the development of quality assurance systems</i></b>
The role of students in programme evaluation, with particular attention to the views of students as internal stakeholders involved in quality assurance processes.
What factors contributed to the HEIs smooth transition to remote learning. Examination of evaluation panels reports.
Lesson learnt - comprehensive evaluation from the perspective of institutional evaluation experience, recommendations for the future.

In the session dedicated to this standard the panel and agency representatives discussed the items in detail and learned that the schedule was both realistic and achievable.

The panel engaged in discussion with representatives from PKA during the site visit. The panel noted the change in law to accommodate thematic analysis, the additional resources available for research and analytical activities, the structured approach that had been developed which included stakeholders and feedback loops, as well as the range of topics which were planned. The development of this more structured approach towards thematic analysis would more clearly lead to analyses and research focussed on meeting the needs of the Polish Higher Education system independently from international projects. The panel concurred that this systematic and comprehensive approach would be pivotal in shaping the activities of PKA and also internal and external quality assurance.

The panel were able to share, whilst maintaining confidentiality, their experiences of the interpretation of standard 3.4 and the approaches that had been taken within other agencies. The panel also referred to the EQAR policy briefs which clarify the meaning and purpose of the standard.

The panel suggested that the activities should focus on selecting the priority topics that reflect the interests of external stakeholders and investigating them in depth, rather than examining a wide range of topics superficially. Also activities, related to the analysis of some aspects of external evaluation procedures, are more linked to internal quality processes rather than thematic analysis. The latter is supposed to be oriented towards a broader audience than the PKA itself. It could be seen that the new approach to research and analysis would also further improve the standing and reputation of PKA nationally and internationally, improving perceptions of PKA as a centre of excellence and expertise. Overall the panel believed that the plans and work undertaken to date would meet the expectations of standard 3.4.

# CONCLUSION

## SUMMARY OF COMMENDATIONS

### ESG. 3.6 Internal quality assurance and professional conduct

1. Assessment procedures for the experts are highly appreciated by everyone, and additionally, this contributes to the overall understanding of PKA's procedures and evaluations by the experts and is an example of good-practice in quality enhancement.

### ESG 2.3 Implementing processes

2. PKA quickly responded to include methods for distance and online learning within its quality criteria and have reviewed and retained these.

### ESG. 2.4 Peer-review experts

3. Following through with the requirements from the past ENQA review and moving toward an exemplary level of student engagement. Special commendation for the mentorship programme for new experts.

### ESG 2.7 Complaints and appeals

4. Forming the Section for Complaints and Motions and making it fully operational, as well as fully involving students in this process.

## OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

### ESG 2.1 Consideration of internal quality assurance, compliant

### ESG 2.3 Implementing processes, partially compliant

### ESG. 2.4 Peer-review experts, compliant

### ESG. 2.6 Reporting, compliant

### ESG. 2.7 Complaints and appeals, compliant

### ESG. 3.3 Independence, partially compliant

### ESG. 3.5 Resources, compliant

### ESG. 3.6 Internal quality assurance and professional conduct, compliant

## Summary of Recommendations

### ESG. 3.3 Independence

1. The agency should make representations to the Minister of Education and Science advising that the discretionary powers which enable the President of PKA to be removed from office are considered by the European Quality Assurance community to undermine the agency's independence. Introducing clear criteria for the removal from office of the PKA President would address this concern.

### ESG 2.3 Implementing processes

2. Clearly define and implement a follow-up in the programme evaluation procedure.

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

## **SUGGESTIONS FOR FURTHER IMPROVEMENT**

### ESG. 3.5 Resources

1. Anticipating a move to involve more international experts, PKA may wish to address issues of funding and remuneration.

### ESG 2.1 Consideration of internal quality assurance

2. Consider including recognition of periods of study and prior learning elements in opinion giving procedure.

### ESG 2.3 Implementing processes

3. Clarify stage of factual accuracy check in PKA procedures.

### ESG. 2.4 Peer-review experts

4. Update student database more regularly and continue to reduce reliance on non-digital communications.

5. Accelerate plans for internationalisation and international expert involvement in procedures.

6. Work on increasing the remuneration for experts to be in line with the international norms.

### ESG. 2.6 Reporting

7. Set a clear time by which opinions will be published following notification of the Minister granting permission to establish a degree programme in a specific field, level and profile.

8. To reach a wider audience and prepare for a more internationalised approach, (at least) the summaries of the final assessment reports could be written in English.

### ESG. 2.7 Complaints and appeals

Revise the instructions sent to the institutions on how and when to submit an application for reconsideration of the opinion-giving procedure, in an effort to lower the number of appeals.

Evaluate whether the members of the Section for Ethics would benefit from further educational opportunities or training related to their role.

# ANNEXES

## ANNEX I: PROGRAMME OF THE SITE VISIT

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
[15.02.2023] - Online meeting with the agency's resource person				
1	14.00 - 15.30	Review panel's kick-off meeting and preparations for site visit		
2	15.30 - 17.00	An online clarifications meeting with the agency's resource person to clarify the agency's changes since the last full review against the ESG and to understand the background and motive of the agency's choice of the self-selected ESG standard for enhancement (next to the overall HE and QA context of the agency)	PKA President PKA Secretary-General	
[27.02.2023] – Day 0 (pre-visit)				
3	17.00 -19.00	Review panel's pre-visit meeting and preparations for day 1		
4	17.00 – 18.00	A pre-visit meeting with the agency's resource person to clarify any remaining questions after the online clarifications meeting	PKA President PKA Secretary-General	
[28.02.2023] – Day 1				
	8.30 - 9.00	Review panel's private meeting		
5	9.00 - 9.45	Meeting with PKA President and PKA Secretary-General	PKA President PKA Secretary General	
	9.45 - 10.00	Review panel's private discussion		
6	10.00 -10.45	Meeting with PKA Bureau Managing Director	Bureau Managing Director	
	10.45 - 11.00	Review panel's private discussion		
7	11.00 - 11.45	Meeting with the Presidium including President of Student Parliament	Chair, Section for Humanities and Theological Sciences Chair, Section for Engineering and Technical	



SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Sciences, Chair, Section for Agricultural Sciences Chair, Section for Science and Natural Sciences Chair, Section for Arts employers' representative President of Student Parliament	
		Lunch (panel only)		
8	13.00 - 14.00	Meeting with PKA section secretaries coordinators of programme evaluation and opinion-giving procedures	coordinator BPKA – opinion-giving process, secretary of experts' panel coordinator BPKA – programme evaluation process, secretary of experts' panel secretary of the Section, secretary of experts' panel secretary of the Section, secretary of experts' panel secretary of the Section, secretary of experts' panel secretary of the Section, secretary of experts' panel secretary of the Section, secretary of experts' panel	
	14.15 - 14.30	Review panel's private discussion		
9	14.30 - 15.15	Meeting with Advisory Council	Chairman Member Member Member Member	
	15.15 - 15.30	Review panel's private discussion		
10	15.30 - 16.15	Meeting with Chairs and members from Section for Appeals, Complaints and Ethics	Chair of Section for appeals Chair of Section for complaints and motions member of Section for appeals member of Section form ethics secretary of Section for appeals, Section for complaints and motions and Section for ethics	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
11	60 min	Wrap-up meeting among panel members and preparations for day 2		
		Dinner (panel only)		
[01.03.2023] – Day 2				
	8.30	Meet in Lobby of Ministry (Hoża 20 street, meeting room no.140)		
12	9.00 - 9.45	Meeting with Ministry	Minister of Education and Science Head of Department of Higher Education in Ministry of Education and Science	
	9.45 – 10:00	Return to PKA office		
	10.00 - 10.15	Review panel's private discussion		
13	10.15 - 11.00	Meeting with Heads of some reviewed HEIs/ HEI representatives	vice-Rector, The Aleksander Zelwerowicz National Academy of Dramatic Art in Warsaw Rector's proxy, Stanisław Staszic State University of Applied Sciences in Piła Rector's proxy, University of Science and Technology in Cracov vice-Rector, Medical University in Łódź vice-Rector, Warsaw School of Economics Rector, University of Lower Silesia Rector, Warsaw University	
	11.00 - 11.15	Review panel's private discussion		
14	11.15 - 12.00	Meeting with Quality Assurance Officers of HEIs	Excellence of Didactics Office, Warsaw University of Life Sciences proxy of Rector for QM, Adam Mickiewicz University in Poznań proxy of Rector for QA, Kozminski University in Warsaw vice-Rector for evaluation and development, Academy of Music. K. Lipinski in Wrocław proxy of Rector for QA, WSB University in Dąbrowa Górnicza proxy of Rector for QA, The Mazovian	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Academy in Płock proxy of Rector for QA, Silesian University of Technology in Gliwice vice-Rector for education affairs, University of Warmia and Mazury in Olsztyn	
	60 min	Lunch (panel only)		
15	13.00 - 13.45	Meeting with representatives from the reviewers' pool	PKA expert from employers' pool PKA expert from employers' pool PKA expert PKA expert from students' pool PKA member PKA member PKA member PKA member PKA member PKA expert from students' pool	
	13.45 - 14.00	Review panel's private discussion		
16	14.00 - 14.45	Representatives of Student Parliament	vice-President of Students Parliament, PKA expert coordinator of students' experts' pool in Students Parliament member of Executive Committee of Students Parliament Director of Students Parliament Office, PKA expert member of Students Council of Students Parliament member of Executive Committee of Students Parliament, PKA expert member of Students Council of Students Parliament	
	14.45 - 15.00	Review panel's private discussion		
17	15.00 - 15.45	Meeting with stakeholders, such as employers, local community and alumni	member of Management Board, National Chamber of Commerce President of Conference of Rectors of	

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
			Academic Schools in Poland President of Conference of Rectors of Academic Non-Public Schools in Poland Chairman of Main Council for Science and Higher Education Chairman of Conference of Rectors of Public Vocational Higher Education Institutions Chairman of Conference of Rectors of Vocational Schools in Poland	
		Panel private meeting		
18	16.00 -16.45	Selected Focus area discussion ESG 3.4	Chair of Program Council, Secretary-General Member of Program Council Member of Program Council – students' representative Member of Program Council, Managing Director Member of Program Council – coordinator of employers' experts' pool Member of Program Council secretary of the Program Council coordinator BPKA - analysis, research, training / communication and stakeholders' relations	
	60 min	Wrap-up meeting among panel members: preparation for day 3 and provisional conclusions		
[02.03.2023] – Day 3				
19	60 min	Meeting among panel members to agree on final issues to clarify		
20	9.00 - 10.00	Meeting with to clarify any pending issues (President/Secretary-General General/Managing Director)	PKA President PKA Secretary-General PKA Bureau Managing Director	
21	10.00 - 11.30	Private meeting between panel members to agree on the main findings		

SESSION NO.	TIMING	TOPIC	PERSONS FOR INTERVIEW	LEAD PANEL MEMBER
	60 min	Lunch (panel only)		
22	12.30 - 13.00	Final de-briefing meeting with staff and Board members of the agency to inform about preliminary findings	PKA President PKA Secretary-General PKA Presidium member PKA Bureau Managing Director coordinator BPKA – opinion-giving process coordinator BPKA – programme evaluation process coordinator BPKA - analysis, research, training / communication and stakeholders' relations	

## ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

# Targeted review of Polish Accreditation Committee (PKA) against the ESG

# Annex I: TERMS OF REFERENCE

The present Terms of Reference were agreed between PKA (applicant), ENQA (coordinator) and EQAR.

November 2022

## 1. Background

Polish Accreditation Committee (PKA) has been registered on the European Quality Assurance Register for Higher Education (EQAR) since 2008 and is applying for renewal of EQAR registration based on a targeted external review against *the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* coordinated by The European Association for Quality Assurance in Higher Education (ENQA).

PKA has been a member of ENQA since 2009 and is applying for renewal of ENQA membership.

PKA is carrying out the following activities within the scope of the ESG:

- Initial (ex-ante) programme evaluation (opinion- giving process)
- Programme evaluation (ex-post)

All these activities will be included on the agency's profile on the EQAR website and linked to DEQAR database. NB: The agency may not upload reports from other activities to DEQAR.

While the activity 'complex evaluation procedure', is not yet carried out, the activity should be addressed in the self-evaluation report and external review report on the basis of available processes and documentation.

Should anything change between the time of application and the review i.e. any type of changes that may affect the registered agency's substantial compliance with the ESG such as development of new external QA activities, the agency is expected to inform EQAR at the earliest convenience<sup>12</sup>.

There are no reported activities by the applicant that are outside the scope of the ESG.

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<sup>12</sup> See EQAR's policy on reporting changes <https://www.eqar.eu/register/guide-for-agencies/reporting-and-renewal/>

## 2. Purpose and scope of the targeted review

This review will evaluate the extent to which PKA continues to fulfil the requirements of the ESG. The targeted review aims to place more focus on those parts that require attention and provide sufficient information to support PKA's application to EQAR.

The review will be further used as part of the agency's renewal of membership in ENQA.

### 2.1 Focus areas

- A) Standards with a partial compliance conclusion in the Register Committee's last renewal decision:
  - a. 2.4 Peer-review experts
  - b. 2.6 Reporting
  - c. 3.5 Resources
- B) Standards 2.1 to 2.7 for the following activities:
  - a. not applicable
- C) Standards affected by other types of substantive changes:
  - a. 2.3 Implementing processes i.e. addition of specific elements related to on-line and distance learning to PKA's methodology<sup>13</sup> and the distinguishing between the two categories of positive programme accreditation<sup>14</sup>;
  - b. 2.7 Complaints and appeals<sup>15</sup>
  - c. 3.3 Independence<sup>16 17</sup>;
  - d. 3.6 Internal quality assurance and professional conduct<sup>18</sup>
- D) ESG 2.1 Consideration of internal quality assurance;
- E) Selected enhancement area: ESG 3.4 Thematic analysis

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<sup>13</sup> As requested by EQAR's Register Committee in their Extraordinary Revision of Registration of PKA from 2022-07-12 ([Ref. R34/C68](#))

<sup>14</sup> As requested by EQAR's Register Committee in their Substantive Change Report decision from 2022-11-25 ([Ref. R37/C86](#))

<sup>15</sup> As requested by EQAR's Register Committee in their Substantive Change Report decision from 2022-11-25 ([Ref. R37/C86](#))

<sup>16</sup> As requested by EQAR's Register Committee in their Extraordinary Revision of Registration of PKA from 2022-07-12 ([Ref. R34/C68](#))

<sup>17</sup> As requested by EQAR's Register Committee in their Substantive Change Report decision from 2022-11-25 ([Ref. R37/C86](#))

<sup>18</sup> As requested by EQAR's Register Committee in their Substantive Change Report decision from 2022-11-25 ([Ref. R37/C86](#))

- F) Other matters regarding ESG compliance that come up during the targeted review and that may affect the agency's compliance with the ESG (if any).

These issues should be investigated by the review panel as far as possible, providing an analysis and conclusion on the ESG standard(s) concerned.

### **3. The review process**

The review will be conducted in line with the requirements of *the EQAR Procedures for Applications* and *the Policy on Targeted Reviews*, and following the methodology described in the *Guidelines for ENQA Targeted Reviews*.

The evaluation procedure consists of the following steps:

- Agreement on the Terms of Reference between EQAR, PKA and The European Association for Quality Assurance in Higher Education (ENQA);
- Nomination and appointment of the review panel by The European Association for Quality Assurance in Higher Education (ENQA);
- Self-assessment by PKA including the preparation and publication of a self-assessment report;
- A site visit by the review panel to PKA;
- Preparation and completion of the final review report by the review panel;
- Scrutiny of the final review report by ENQA's Agency Review Committee;
- Analysis of the final review report and decision-making by the EQAR Register Committee;
- Decision on ENQA membership by the ENQA Board;
- Attendance to the online follow-up seminar.

#### **3.1 Independence of the review coordinator**

The European Association for Quality Assurance in Higher Education (ENQA) has not provided remunerated (e.g. consultancy) or unremunerated services to PKA during the past 5 years, and conversely PKA has not provided any remunerated or unremunerated services to The European Association for Quality Assurance in Higher Education (ENQA).

#### **3.2 Nomination and appointment of the review team members**

The review panel consists of 4 members including an academic employed by a higher education institution, a student member and one other expert. At least two of the four members is from another country.

At least one panel member should be a quality assurance professional that is currently employed by a QA agency and has been engaged in quality assurance within the past five years. When requested by the agency under review or when



considered particularly pertinent, other stakeholders (for example, a representative of the labour market) may be included in addition to the four panel members. In this case, an additional fee is charged to cover the reviewer's fee and travel expenses.

One of the members serves as the chair of the review panel, and one as the review secretary. At least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers. If requested, the labour market representative may come from the Business Europe nominees or from ENQA. At least two panel members come from outside the national system of the agency under review (if relevant).

The panel will be supported by the ENQA Review Coordinator (an ENQA staff member) who will monitor the integrity of the process and ensure that ENQA's requirements are met throughout the process. The Review Coordinator will not be the secretary of the review and will not participate in the discussions during the site visit interviews.

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

ENQA will provide the agency with the proposed panel composition and the curricula vitae of the panel members to establish that there are no known conflicts of interest. The reviewers will have to agree to a non-conflict of interest statement that is incorporated in their contract for the review of this agency.

Once appointed, The European Association for Quality Assurance in Higher Education (ENQA) will inform EQAR about the appointed panel members.

### **3.3 Self-assessment by PKA, including the preparation of a self-assessment report**

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

- Self-assessment includes all relevant internal and external stakeholders;

The self-assessment report is expected to contain:

- a description of the self-assessment process and the production of the SAR;
- a description of changes occurred within the agency since the last full review, including any eventual changes in the higher education system and quality assurance system in which the agency predominantly operates, the agency's structure, funding, its list of external quality assurance activities within the scope of the ESG, as well as the changes in the agency's quality assurance activities abroad (where relevant);

- a section that addresses the focus areas of the review, including standards that were considered to be partially compliant with the ESG in the last full review as well as ESG 2.1 and one self-selected ESG standard for enhancement (see **2.1 Focus areas**);
- a SWOT analysis of the agency as a whole;
- for each of the individual standards enlisted above (see section 2) a consideration of how the agency has addressed the recommendations as noted in the previous EQAR Register Committee decision of inclusion/renewal (if applicable).

The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which PKA fulfils its tasks of external quality assurance and continues to meet the ESG and thus the requirements for EQAR registration.

The self-assessment report is submitted to the review coordinator, which has two weeks to carry out a screening. The purpose of a screening is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The coordinator will not judge the content of information itself but rather whether or not the necessary information, as outlined in the *Guidelines for ENQA Targeted Reviews*, is present. If the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the ENQA Secretariat reserves the right to ask for a revised version within two weeks.

The final version of the agency's self-assessment report is then submitted to the review panel a minimum of eight weeks prior to the site visit. The agency publishes the completed SAR on its website and sends the link to ENQA. ENQA will publish this link on its website as well.

### **3.4 A site visit by the review panel**

The review panel will draft a proposal of the site visit schedule considering the aspects included under the focus area (as defined under point 2.1 of the Terms of Reference).

The schedule will include an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit. The approved schedule shall be given to PKA at least one month before the site visit, in order to properly organise the requested interviews.

The site visit should enable the review panel to explore how the agency has addressed the standards where it has been found to be partially compliant (if the case), aspects of substantive change, consideration of internal quality assurance (ESG 2.1) and the self-selected ESG standard(s) for enhancement. The panel will include extra time during the site-visit to address any other arising issues (if the case) that might have an impact on the agency's compliance with the ESG.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on the ESG compliance of the agency.

Prior to the physical site visit, the panel attends a joint briefing call between the panel, The European Association for Quality Assurance in Higher Education (ENQA) and EQAR to clarify the review expectations and address any possible arising matters.

In advance of the site visit (at least two weeks before the site visit), the panel will organise an obligatory online meeting with the agency. This meeting is held to ensure that the panel reaches a sufficient understanding of:

- The specific national/legal context in which the agency operates;
- The specific quality assurance system to which the agency belongs;
- The key characteristics of the agency's external QA activities.

### **3.5 Preparation and completion of the final review report**

The review report will be drafted in consultation with all review panel members and correspond to the purpose and scope of the review as defined under articles 2 and 2.1. In particular, it will provide a clear rationale for its findings concerning each ESG. When preparing the report, the review panel should bear in mind the *EQAR Policy on the Use and Interpretation of the ESG* to ensure that the report will contain sufficient information for the Register Committee for application to EQAR<sup>19</sup>.

The external report will present the facts and analysis reflecting the reality at the time of review. This will form the main basis for the Register Committee's decision making.

A draft will first be submitted to the ENQA Review Coordinator who will check the report for consistency, clarity, and language. After panel has considered coordinator's feedback, the report will go to the agency for comment on factual accuracy. If PKA chooses to provide a position statement in reference to the draft report, it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report.

Thereafter, the review panel will take into account the statement by PKA and submit the document for scrutiny to ENQA's Agency Review Committee and then to EQAR along with the remaining application documents (self-evaluation report, Declaration of Honour, statement to review report-if applicable). The report is to be finalised normally within 2-4 months of the site visit and will normally not exceed 30 pages in length. All panel will sign off on the final version of the external review report. The European Association for Quality Assurance in Higher Education (ENQA) will provide to PKA the [Declaration of Honour](#) together with the final report.

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<sup>19</sup> See here: <https://www.eqar.eu/about/official-documents/#use-and-interpretation-of-the-esg>

## **4. Publication and use of the report**

PKA will receive the expert panel's report and publish it on its website once the ENQA Agency Review Committee has validated the report. Prior to the final validation of the report, the ENQA Agency Review Committee may request additional (documentary) evidence or clarification from the review panel, review coordinator or the agency if needed. The review report will be published on ENQA website regardless of the review outcome. The report will also be published on the EQAR website together with the decision on registration, regardless of the outcome.

ENQA will retain ownership of the report. The intellectual property of all works created by the review panel in connection with the review contract, including specifically any written reports, will be vested in ENQA. In the case of an unsuccessful application to EQAR, the report may also be used by the ENQA Board to reach a conclusion on whether the agency can be admitted/reconfirmed as a member of ENQA.

## **5. Decision-making on EQAR registration and ENQA membership**

The agency will submit the review report via email to EQAR before expiry of the agency's registration on EQAR. The agency will also include its self-assessment report (in a PDF format), the Declaration of Honour and any other relevant documents to the application to EQAR (i.e. annexes, statement to the review report).

EQAR is expected to consider the review report and the agency's application at its Register Committee meeting in Autumn 2023. The Register Committee's final judgement on the agency's compliance with the ESG as a whole can either be substantially compliant (approval of the application) or not substantially compliant (rejection of the application). In case of a positive decision (substantially compliant with the ESG), the registration is renewed for a further five years (from the date of the review report).

The decision on ENQA membership by the ENQA Board will take place after EQAR Register Committee decision.

To apply for ENQA membership, the agency is requested to provide a letter addressed to the ENQA Board outlining its motivation for applying for membership and the ways in which the agency expects to contribute to the work and objectives of ENQA during its membership. This letter will be considered by the Board together with the confirmation of EQAR listing when deciding on the agency's membership. Should the agency not be granted the registration in EQAR or the registration is not renewed, the decision on ENQA membership will be taken based on the final review report, the application letter, and the statement from the Agency Review Committee. The decision on membership will be published on ENQA's website.

## 6. Indicative schedule of the review

Agreement on Terms of Reference	November 2022
Appointment of review panel members	November 2022
Self-assessment report (SAR) completed by PKA	By 20 December 2022
Screening of SAR by ENQA Review Coordinator	December 2022
Preparation of site visit schedule and indicative timetable	January 2023
Briefing of review panel members	January 2023
Review panel site visit	End of February/Early March 2023
Submission of the draft review report to ENQA Review Coordinator	April 2023
Factual check of the review report by the PKA	April 2023
Statement of PKA to review panel (if applicable)	May 2023
Submission of review report to The European Association for Quality Assurance in Higher Education (ENQA)	May 2023
Validation of the review report by the Agency Review Committee	June 2023
EQAR Register Committee meeting and decision on the application by PKA	Autumn 2023
Decision on ENQA membership by the ENQA Board	December 2023/February 2024

## ANNEX 3: GLOSSARY

EHEA	European Higher Education Area
ENQA	European Association for Quality Assurance in Higher Education
EQAR	European Quality Assurance Register for Higher Education
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	higher education
HEI	higher education institution
PKA	Polish Accreditation Committee (Polish: Polska Komisja Akredytacyjna) (PKA)
QA	quality assurance
SAR	self-assessment report

## ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

### DOCUMENTS PROVIDED BY PKA

- A sample of most recent attendance lists of expert trainings and training programme.
- Financial flows of PKA in last 3 years: finances for evaluation activities, Bureau staff, other costs.
- Statistics on PKA Bureau staff changes in last 3 years (each year separately).
- Statistics on complaints and motions received in last 3 years.
- List of thematic analysis in the last 3 years with indicated funding source.
- Schedule for Analytical and Research Activities of PKA Programme Council

### OTHER SOURCES USED BY THE REVIEW PANEL

<https://www.pka.edu.pl/>

PKA external review report, 2018

## ANNEX 5. MAPPING GRID FOR ESG 2.1

General profile	Practical profile	ESG 2015
<b>Criterion 1. Structure of the study programme: concept of education, learning objectives and outcomes</b>		
Quality education standard 1.1 Quality education standard 1.2 Quality education standard 1.2a Quality education standard 1.2b	Quality education standard 1.1 Quality education standard 1.2 Quality education standard 1.2a Quality education standard 1.2b	ESG 1.1 Policy for quality assurance ESG 1.2 Design and approval of programmes
<b>Criterion 2. Implementation of the study programme: programme contents, timetable for the implementation of the study programme, forms and organisation of classes, methods of education, student placements, organisation of the teaching and learning proces</b>		
Quality education standard 2.1 Quality education standard 2.1a Quality education standard 2.2 Quality education standard 2.2a Quality education standard 2.3a Quality education standard 2.4 Quality education standard 2.4a Quality education standard 2.5 Quality education standard 2.5a	Quality education standard 2.1 Quality education standard 2.1a Quality education standard 2.2 Quality education standard 2.2a Quality education standard 2.3a Quality education standard 2.4 Quality education standard 2.4a Quality education standard 2.5 Quality education standard 2.5a	ESG 1.2 Design and approval of programmes ESG 1.3 Student-centred learning, teaching and assessment
<b>Criterion 3. Admission to studies, verification of learning outcomes achievement by students, giving credit for individual semesters and years and awarding diplomas</b>		
Quality education standard 3.1 Quality education standard 3.2 Quality education standard 3.2a Quality education standard 3.3	Quality education standard 3.1 Quality education standard 3.2 Quality education standard 3.2a Quality education standard 3.3	1.4 Student admission, progression, recognition and certification ESG 1.3 Student-centred learning, teaching and assessment
<b>Criterion 4. Competence, experience, qualifications and the number of staff providing education. Staff development and in-service training</b>		
Quality education standard 4.1 Quality education standard 4.1a Quality education standard 4.2	Quality education standard 4.1 Quality education standard 4.1a Quality education standard 4.2	ESG 1.5 Teaching staff
<b>Criterion 5. Education infrastructure and resources used in the implementation of the study programme and their improvement</b>		
Quality education standard 5.1 Quality education standard 5.1a Quality education standard 5.2	Quality education standard 5.1 Quality education standard 5.1a Quality education standard 5.2	ESG 1.6 Learning resources and student support



**Criterion 6. Cooperation with social and economic stakeholders on the development, implementation and improvement of the study programme and its impact on the development of the degree programme**

Quality education standard 6.1 Quality education standard 6.2	Quality education standard 6.1 Quality education standard 6.2	ESG 1.1 Policy for quality assurance ESG 1.2 Design and approval of programmes
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**Criterion 7. Conditions for and methods of improving the internationalisation of education provided as part of the degree programme**

Quality education standard 7.1 Quality education standard 7.2	Quality education standard 7.1 Quality education standard 7.2	ESG 1.1 Policy for quality assurance ESG 1.2 Design and approval of programmes ESG 1.6 Learning resources and student support
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**Criterion 8. Supporting learning, social, academic or professional development of students and their entry on the labour market. Development and improvement of such support**

Quality education standard 8.1 Quality education standard 8.2	Quality education standard 8.1 Quality education standard 8.2	ESG 1.6 Learning resources and student support
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**Criterion 9. Public access to information about the study programme, conditions for its implementation and achieved results**

Quality education standard 9.1 Quality education standard 9.2	Quality education standard 9.1 Quality education standard 9.2	ESG 1.8 Public Information
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**Criterion 10. Quality assurance policy, designing, approving, monitoring, reviewing and improving the study programme**

Quality education standard 10.1 Quality education standard 10.2	Quality education standard 10.1 Quality education standard 10.2	ESG 1.1 Policy for quality assurance ESG 1.2 Design and approval of programmes ESG 1.7 Information management ESG 1.9 On-going monitoring and periodic review of programmes
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Mapping programme evaluation criteria against standards of ESG, Part 1 (from PKA SAR table 17)

General profile	Practical profile	ESG 2015
<b>Criterion 1. Structure of the study programme: concept of education, learning objectives and outcomes</b>		
Quality education standard 1.1 Quality education standard 1.2 Quality education standard 1.2a Quality education standard 1.2b	Quality education standard 1.1 Quality education standard 1.2 Quality education standard 1.2a Quality education standard 1.2b	ESG 1.1 Policy for quality assurance ESG 1.2 Design and approval of programmes
<b>Criterion 2. Implementation of the study programme: programme contents, timetable for the implementation of the study programme, forms and organisation of classes, methods of education, student placements, organisation of the teaching and learning process</b>		
Quality education standard 2.1 Quality education standard 2.1a Quality education standard 2.2 Quality education standard 2.2a Quality education standard 2.3a Quality education standard 2.4 Quality education standard 2.4a Quality education standard 2.5 Quality education standard 2.5a	Quality education standard 2.1 Quality education standard 2.1a Quality education standard 2.2 Quality education standard 2.2a Quality education standard 2.3a Quality education standard 2.4 Quality education standard 2.4a Quality education standard 2.5 Quality education standard 2.5a	ESG 1.2 Design and approval of programmes ESG 1.3 Student-centred learning, teaching and assessment
<b>Criterion 3. Admission to studies, verification of learning outcomes achievement by students, giving credit for individual semesters and years and awarding diplomas</b>		
Quality education standard 3.1 Quality education standard 3.2 Quality education standard 3.2a	Quality education standard 3.1 Quality education standard 3.2 Quality education standard 3.2a	1.4 Student admission, progression, recognition and certification ESG 1.3 Student-centred learning, teaching and assessment
<b>Criterion 4. Competence, experience, qualifications and the number of staff providing education. Staff development and in-service training</b>		
Quality education standard 4.1 Quality education standard 4.1a Quality education standard 4.2	Quality education standard 4.1 Quality education standard 4.1a Quality education standard 4.2	ESG 1.5 Teaching staff
<b>Criterion 5. Education infrastructure and resources used in the implementation of the study programme and their improvement</b>		
Quality education standard 5.1 Quality education standard 5.1a Quality education standard 5.2	Quality education standard 5.1 Quality education standard 5.1a Quality education standard 5.2	ESG 1.6 Learning resources and student support

**Criterion 6. Cooperation with social and economic stakeholders on the development, implementation and improvement of the study programme and its impact on the development of the degree programme**

Quality education standard 6.1	Quality education standard 6.1	ESG 1.1 Policy for quality assurance ESG 1.2 Design and approval of programmes
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**Criterion 7. Conditions for and methods of improving the internationalisation of education provided as part of the degree programme**

Quality education standard 7.1	Quality education standard 7.1	ESG 1.1 Policy for quality assurance ESG 1.2 Design and approval of programmes ESG 1.6 Learning resources and student support
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**Criterion 8. Supporting learning, social, academic or professional development of students and their entry on the labour market. Development and improvement of such support**

Quality education standard 8.1 Quality education standard 8.2	Quality education standard 8.1 Quality education standard 8.2	ESG 1.6 Learning resources and student support
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**Criterion 9. Public access to information about the study programme, conditions for its implementation and achieved results**

Quality education standard 9.1	Quality education standard 9.1	ESG 1.8 Public Information
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**Criterion 10. Quality assurance policy, designing, approving, monitoring, reviewing and improving the study programme**

Quality education standard 10.1 Quality education standard 10.2	Quality education standard 10.1 Quality education standard 10.2	ESG 1.1 Policy for quality assurance ESG 1.2 Design and approval of programmes ESG 1.7 Information management ESG 1.9 On-going monitoring and periodic review of programmes
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Mapping of the criteria used in drawing up opinions on applications against ESG, Part 1 (from PKA SAR table 18)

## ENQA TARGETED REVIEW 2023

THIS REPORT presents findings of the ENQA Targeted Review of the Polish Accreditation Committee (PKA), undertaken in 2023.

**enqa.**

European Association for  
Quality Assurance in Higher Education